Whose urn is it anyway? Discussions on decolonisation & repatriation efforts in the cultural heritage sector in Portugal

Kelsey J.S. Ransick

Mestrado em Estudos Internacionais

Orientador:
Doutor Manuel João Ramos, Professor Associado (com Agregação)
ISCTE-Instituto Universitário de Lisboa

Agosto 2023

Departamento da História

Whose urn is it anyway? Discussions on decolonisation & repatriation efforts in the cultural heritage sector in Portugal

Kelsey J.S. Ransick

Mestrado em Estudos Internacionais

Orientador:
Doutor Manuel João Ramos, Professor Associado (com Agregação)
ISCTE-Instituto Universitário de Lisboa

Agosto, 2023

Dedication

For my dad, Chris Ransick. He may not be here to read this text, but he is here in this work.

Acknowledgements

This thesis is not, ultimately, the work of one person. Many thanks go to my family, particularly to my sister-in-law, Maria, for reading drafts of this work and providing feedback, for being a sounding board for my ideas, and for commiserating with me when I struggled to keep working, and to my partner, Zé, for patiently listening to all my ramblings and providing emotional and practical support with everyday tasks while I battled my executive dysfunction and threw all my spoons into finishing this thesis. Thanks also to Nanda, a true friend whom I never would have met if not for this program, who kept pace with me while juggling work, family, school, and all the normal ups and downs of life. I appreciate the help and patience of my advisor, Professor Ramos, and the International Studies program coordinator, Professor Rodrigues, both of whom helped enormously by answering questions, addressing concerns, and providing feedback on my research, in addition to facilitating my adjustment to Portuguese pedagogical styles. Finally, as we all are, I am greatly indebted to the anticolonial, intersectional, and critical historians, writers, sociologists, and other scholars, such as Dr. Kimberlé Crenshaw, Blair Imani, Monique Melton, bell hooks, Layla F. Saad, Amy Lonetree, James Baldwin, Angela Davis, Frantz Fanon, and so many more, who have made my own efforts possible and may yet guide us to true liberation for all. It took many years for me to understand what they have been saying for decades, and I am grateful for their enduring determination during those years of my ignorance.

Resumo

Iniciativas e relatórios recentes mostram algumas respostas positivas por parte dos países Ocidentais aos crescentes pedidos de repatriação de artefactos de museu, que vêm associados a esforços de descolonização mais abrangentes. Enquanto este movimento cresce, os estados modernos de antigos impérios e *hegemons* atuais, incluindo Portugal, irão enfrentar mais batalhas legais, culturais e ideológicas acerca dos objetos que estão debaixo do seu cuidado. Assim, o estabelecimento de orientações para lidar com pedidos de repatriação representaria um reconhecimento da importância da cultura e aumentaria o *soft power* de Portugal, mostrando a sua capacidade de fazer paz com o passado e de nutrir laços internacionais mais fortes. Esta tese analisa os atores e argumentos envolvidos nos debates e esforços públicos de descolonização e de repatriação dentro do setor português de herança cultural. Uma contextualização dos esforços de descolonização e repatriação nos museus situa Portugal dentro de um movimento maior para incluir vozes anteriormente excluídas. Esta tese analisa especificamente o contexto português, considerando o legado do luso-tropicalismo e as formas como Portugal tem começado a lidar com o seu papel histórico na construção e perpetuação da ideia de raça. Debates públicos, recentes, e polarizantes revelam dois campos proeminentes, com uma ausência notável de vozes intermédias, incluindo de portugueses com menor educação formal e provenientes de zonas rurais. Finalmente, um pedaço partilhado de património cultural, os restos mortais de Dom Pedro I do Brasil, mostra a potencial dificuldade em determinar a pertença e a dominância na relação entre impérios e as antigas colónias.

Palavras chaves: repatriamento, património cultural, museus, descolonização, luso-tropicalismo, racismo

Abstract

Recent initiatives and reports, such as the Savoy–Sarr report in France, show some positive response among Western countries to the increasingly frequent calls for repatriating artefacts from museums, often as part of larger decolonisation efforts, although many of these calls still go unanswered. As this movement gains traction, the modern states of former empires and present-day hegemons, including Portugal, will face more legal, cultural, and ideological battles over the objects in their care. Thus, establishing guidelines for handling repatriation requests would be an acknowledgement of the power and importance of culture and increase Portugal's soft power to make peace with the past and foster stronger international ties. This thesis analyses actors and arguments involved in public decolonisation and repatriation debates and efforts in the Portuguese cultural heritage sector. First, a brief history and contextualisation of decolonisation and repatriation efforts in museums situates Portugal within a larger movement to include previously excluded voices and perspectives. Then, the Portuguese context is specifically examined, considering the legacy of lusotropicalism and the ways Portugal has begun to

reckon with its historical role in constructing and perpetuating the idea of race. Recent public debates reveal two outspoken camps in such polarising debates, with a notable absence of in-between voices, including rural and less formally educated Portuguese. Finally, a shared piece of cultural patrimony, the mortal remains of Dom Pedro I of Brazil (IV of Portugal), shows the potential difficulty in determining ownership and dominance in the relationship between empires and their former colonies.

Keywords: repatriation, cultural patrimony, museums, decolonisation, lusotropicalism, racism

Table of Contents

"Colonial amnesia is a political disease – and one for which we have yet to find a cure."
~*Patrícia Martins Marcos*

1 Introduction

The idea of repatriating museum collections is not new. Since the 1970s, there have been regular calls for objects in museums to be returned to the countries and cultures in which they were created and from which they were removed—often through unequal trade or commercial activities or even through outright pillage. These calls have come both from plundered communities and from among the ranks of employees in Western museums. With the rise of new museology in the 1980s, collaborations between museums and communities have grown out of these calls (Onciul, 2015), but repatriation efforts have been slow to gain support. Additionally, national-level legislation or other formal guidelines for handling cultural patrimony from former colonies and dominated states is often only nascent, ineffectively enforced, or absent altogether. The 2018 Savoy–Sarr report in France and the 2019 Return of Cultural Objects: Principles and Process guidelines from the Nationaal Museum van Wereldculturen in the Netherlands are still new enough that their effectiveness and sufficiency are untested. Indeed, the ability of these initiatives to reunite former colonies with their plundered (sometimes recently illicitly stolen) cultural goods is no foregone conclusion. However, as such reports and initiatives gain traction in the Western world, the modern states of former empires and present-day hegemons such as the United States, France, the Netherlands, Germany, Spain, and Portugal will face increasingly pervasive legal, cultural, and ideological battles over the objects sitting in the dark storage rooms and tidy halls of their museums.

In Portugal, decolonisation has been central in debates about the founding of various "museums of discovery" proposed and/or founded in the past 15 years. Professionals in the cultural heritage sector, professors, and other prominent thinkers have published numerous blogs, opinion articles, and open letters about whether and how these museums should be founded and run. However, public understanding and participation in the debate is still limited, even among museum professionals. As Maria Vlachou, the Executive Director of Acesso Cultura, points out, at a lecture titled "Decolonizing the Museum: Lessons from New York" held in Lisbon on 6 June 2018, most attendees were students or working in other fields; there were only "three or four [museum professionals]—no one who works 'in' museums, but some who work 'for' museums" (Vlachou, 2018b).

This disinterest, or perhaps active disengagement, is by no means unique to Portugal, which is why the Portuguese case needs to be contextualised within wider debates and efforts in the field. At present, there is limited English-language scholarly material on the subject of decolonisation and repatriation in Portugal, which limits the audience (and therefore the ideas and solutions that can be presented to move forward) and restricts the possibilities for comparison, emulation, and growth. Additionally, much of the work on decolonization and repatriation in museums globally is in English, which is, for better or worse, the *lingua franca* for many such discussions. As such, multilingual and English-language research on

this subject can be useful for informing a framework or guidelines for repatriation standards or for case-by-case repatriation efforts. While some might question whether such effort is "inviting trouble", it is important to note that requests for repatriation have already been submitted and seem unlikely to disappear soon. Surely, then, it is best to be prepared for handling such requests rather than scrambling to address them after the fact. Moreover, having established guidelines or frameworks for handling repatriation requests would speak to Portugal's acknowledgement of the power and importance of culture and increase its ability to wield soft power and diplomacy to make peace with the past and foster strong international ties going forward.

A review of the literature reveals significant opportunities for expanding the knowledge and analysis of repatriation efforts across the Western world and in Portugal specifically. This research seeks to help fill gaps in the literature and contextualise the current state of decolonisation in Portuguese museums, thus supporting future scholarship on the subject, by asking questions such as: 1) In what ways have calls for decolonising museums across the Western world affected the founding and management of various museums in Portugal over the last few decades? 2) What are some of the factors in Portuguese society that influence the current state of decolonisation and artefact repatriation efforts in Portugal? 3) How do scholars, politicians, and the general public view repatriation and decolonisation efforts in the cultural heritage sector in Portugal? The current research thus provides an English-language analysis of some of the actors and arguments currently involved in public decolonisation and repatriation debates and efforts in the Portuguese cultural heritage sector in order to widen the possibilities for future comparative and practical research on the subject.

This thesis is structured as follows: To begin, a summary of the history and global context of decolonisation and repatriation efforts in museums is given. This situates Portugal within a larger movement to change the purpose and focus of museums by including previously excluded voices and perspectives. Then, the specific situation in Portugal is examined, specifically by considering the legacy of lusotropicalism and the ways Portugal has begun to reckon with its historical role in constructing and perpetuating the idea of race. Recent examples of museums and monuments featured in public debates about the merits and drawbacks of cultural heritage decolonisation reveal two outspoken camps in such polarising debates: those who are firmly in favour of changing the status quo to make Portuguese society more equitable, multicultural, and responsible for its past, and those who see such a turn as acquiescing to cultural tyrants determined to move the country backwards, not forwards. Notably, in-between voices and those of rural and less formally educated Portuguese are generally absent from these debates. Next, the waters are muddied by the example of shared cultural patrimony between Portugal and Brazil: the mortal remains of Dom Pedro I of Brazil (IV of Portugal). This example shows just how difficult it can be to determine ownership of cultural patrimony and what truly constitutes dominance in the relationship between empires and their former colonies. Finally, the arguments of this thesis are summarised in the answers to the research questions, and the limitations of this research are briefly discussed.

2 The Context of Decolonisation

2.1 Definitions and Notes About Terminology

For the sake of simplicity, the term "museums" is used throughout the thesis with the understanding that it can encompass a wide range of publicly accessible institutions, including archaeological and historic sites, cultural centres, galleries, archives, and the entire range of acknowledged museums from children's museums and science museums to art museums and natural history museums.

Notably, many definitions of repatriation and decolonization exist, but the following are most apt for this thesis: *repatriation* is the return of an original object or actual remains to the original owners or their descendants (often the modern government of the country of origin). *Decolonisation*, which began as an offshoot of postcolonial theories in the 1990s (Queiroz, 2020), is the mindset, value, and process of challenging white supremacy, decentering Eurocentric/Western views, and valuing "othered" narratives. While these terms have distinct meanings, they are closely related in the minds of many museum professionals and visitors. This is because the arguments in favour of repatriation are a significant part[1] of a larger effort to "decolonise"[2] museums—that is, to take a critical, intersectional view of the value, assessment, and narrative of knowledge systems in the West that have been used to dictate what is collected, studied, and displayed in museums and how it is collected, studied, and displayed. As Elisa Shoenberger of MuseumNext notes, decolonising museums is about more than just

> inviting indigenous and other marginalized people into the museum to help the institution improve its exhibitions; it's [about] overhauling the entire system. Otherwise, museums are merely replicating systems of colonialism, exploiting people of color for their emotional and intellectual labor within their institutions without a corollary in respect and power (Shoenberger, 2019).

While repatriation is a key component of decolonisation, as Amy Lonetree notes, the most important action of decolonisation is, ultimately, truth-telling (Lonetree, 2012). Being clear, honest, and straightforward in presenting and discussing the past, in all its horror and splendour, "assists in healing and promotes community well-being, empowerment, and nation building" (Lonetree, 2012, p. 5). In short, the repatriation of artefacts and the larger goal of decolonising museums are a type of restorative justice. Notably, "cultural heritage decolonisation" is used here specifically to indicate the decolonisation of the sphere of cultural heritage—museums, monuments, and other cultural and historical institutions—rather than the more general idea of decolonising a society and its culture.

In an effort to adopt a decolonised mindset, this thesis uses certain terms that past literature has shied away from but are becoming increasingly common in scholarly and popular literature and on social media as part of the purposeful reframing of certain narratives. This reframing stems from the recognition

---

[1] Alongside concerns about cultural appropriation.

[2] The *Washington Post*'s more general definition of "decolonisation" is "a process that institutions undergo to expand the perspectives they portray beyond those of the dominant cultural group, particularly white colonizers" (Hatzipanagos, 2018).

that words have power, not just in affecting human emotions, but in framing perspectives and reinforcing bias. As Miller notes, "historians often take shelter in passive voice, which permits one to say that 'a wrong was done' without naming the culprit" (Miller, quoted in Lonetree, 2012, p. 8). Thus, this work seeks to call out and avoid the anti-Black and anti-indigenous language and concepts "embedded in existing literature", as this is an important way to "assist communities in understanding colonization as the origin of historical and ongoing harms" (Lonetree, 2012, p. 8).

As a specific example, the terms "enslaved person" and "coloniser" are used here instead of "slave" and "colonist", as the former set affirm the humanity of the individual and more accurately convey the true purpose of the person's actions, respectively. For too long, the latter set have been used to dehumanise those who were enslaved and obscure the devastating effects of the actions of those who enslaved them. Many will be uncomfortable or will not agree with the use of these terms, but using these appropriate and descriptive terms is imperative to practising decolonised, humanistic, and justice-restoring scholarship. As Brave Heart and DeBruyn so aptly state, "understanding the interrelationship with our past and how it shapes our present world will also give us the courage to initiate healing" (Brave Heart and DeBruyn, quoted in Lonetree, 2012, p. 6).

2.2 Elephant in the Room: Close Links among Colonisation, Racism, and Museums

In some circles, it is increasingly taken for granted that colonisation and racism (and therefore decolonisation and anti-racism) go hand-in-hand and that there is no need to explicitly outline why. However, many people—including politicians and academics—refuse to acknowledge this link that appears so obvious to others. Thus, some points must be clarified and addressed directly before progress can be made. A comprehensive review of the link between colonisation and racism is beyond the scope of any single paper, let alone this one, so the analysis here is focused on how these linked concepts have shaped the history of museums and how they manifest in modern museology. To that end, a discussion of the connections among these concepts and a brief clarification of the terminology used herein are warranted. Ultimately, the intimate link between racism and colonisation and between colonisation and museums indicates that all of these concepts are inextricably related.

2.2.1 Colonisation and Racism

Today, it is irresponsible to deny the link between colonisation and racism[3]. As many scholars, educators, politicians, and members of the public have pointed out, the concept of race was developed specifically

---

[3] "Why Is Mainstream International Relations Blind to Racism?" provides an excellent and thought-provoking discussion of how mainstream IR research and theory fail to acknowledge that colonialism and decolonisation have shaped the contemporary international order. It includes reflections by nine prominent IR thinkers on how this failure has led to an inaccurate understanding of the modern state system (Bhambra et al., 2020).

to differentiate European colonisers from those they were conquering and controlling.[4] In Latin America, this manifested, for example, in the creation of the concept of "Indian", an identity that did not exist before European colonisation began (Burkholder & Johnson, 2008, p. 213). Originally, the term was meant to be purely a racial description, but it quickly became both a cultural term and a fiscal category that implied certain obligations toward the Spanish Crown (Burkholder & Johnson, 2008, p. 213). Thus, the diverse indigenous populations were compressed into a narrow identity that was imbued with "political and economic meaning", that they did not choose for themselves, and that was meant to indicate their difference from Europeans (Burkholder & Johnson, 2008, p. 213).

Likewise, once enslaved people from Africa began arriving in the Americas, "blacks were allocated an inferior position in society that was imposed both by law and by informal mechanisms of discrimination", although their lowly position had been established in Spain and Portugal even before Columbus's voyage (Burkholder & Johnson, 2008, p. 218). As the trade in enslaved Africans grew, "the cultural distinctiveness of an increasingly African slave population and the social effects of harsh labor and brutal discipline promoted negative racial stereotypes and reinforced the effects of discriminatory legislation and racial prejudice brought from Portugal and Spain" (Burkholder & Johnson, 2008, p. 221). The distinction between "conquered and conqueror…[has] proved to be remarkably durable" (Burkholder & Johnson, 2008, p. 222). While these boundaries have been blurred and there are other factors of discrimination, particularly in the Americas, race and class distinctions are mutually reinforcing: prejudice and discrimination based on race were originally "mechanisms for distributing wealth and organizing labor" (Burkholder & Johnson, 2008, p. 223), and this role continues today even if in other, more dynamic manifestations (Burkholder & Johnson, 2008, p. 406).

2.2.2 Colonisation and Museums

The birth of the modern museum is detailed well, if from a rather one-sided perspective,[5] in Keeping Their Marbles: How the Treasures of the Past Ended Up in Museums…and Why They Should Stay There, by Tiffany Jenkins (2016), a writer, author, and broadcaster with a background in art history and sociology. As European colonisation began and colonisers encountered people in distant lands, they began to bring back natural and human-made objects that they found beautiful, curious, strange, and exotic. These objects were often traded or bartered for, but there is also plenty of evidence that they were sometimes outright stolen or taken without true consent, as their owners were clearly under duress and engaged in an imbalanced power relationship. Upon their arrival in Europe, these objects were sold or gifted and then locked away in private collections.

---

[4] Just a few examples include Allen (2012a, 2012b), Allan (2018), Fanon (1961), and the hashtag #COLONIALISM on Twitter for ongoing discussions.

[5] Jenkins writes that colonisers were merely "travellers [who] were central protagonists in the Age of Exploration…[and] set sail to explore the unknown world" (Jenkins, 2016, p. 16), failing to note that regardless of individual curiosity, these people were sent to find land and resources for their rulers to control and exploit in places that were by no means "unknown"—those who lived there certainly knew they existed.

The iconic cabinet of curiosities, filled with "all of reality in miniature", was born in this era (Jenkins, 2016, p. 40). These collections were sparked by genuine curiosity and a desire for knowledge—after all, this was the age of the Enlightenment—but rarely showed regard for the humanity and autonomy of the people sourcing the objects. Soon, these cabinets grew into rooms, galleries, and entire buildings meant to showcase "the diversity and unity of the world" (Jenkins, 2016, p. 41). They became "repositories for war trophers, whether acquired from internal wars of aggression against indigenous people or other marginalized religious and ethnic communities, or from external conflicts and colonial conquest" (Lord & Blankenberg, 2015, p. 10). Eventually, these collections opened to the public, and entire institutions were founded to collect, categorise, and display an encyclopaedic range of objects representing the diverse knowledge and production of humankind.

European states, particularly the British Empire, soon realised that these collections could serve as "a monument of these national exertions of British munificence and industry" (Jenkins, 2016, p. 22). In fact, museums in Britain were the first public institutions in the country to bear the title "British" and were thus "probably intended to embody the values of the new state" (Jenkins, 2016, p. 51). The term indicated that their contents belonged not to the Church nor to the king but to the people; in short, "a nation was in the process of being imagined…[and] museums were institutions that came to give a visual form to the ideals of different nation states" (Jenkins, 2016, p. 51). This was happening elsewhere too, as seen by the National Museum in Budapest, the National Museum of Prague, the Louvre, and the government-run Museum of Copenhagen, which were all formative in crafting various nation-based identities and extending imperial power (Jenkins, 2016). As more such institutions emerged, both private and "public" demand for objects (and, quite literally, people) from "exotic" locations increased, and colonisers sent more and more objects back to fill up these waiting halls. The objects displayed in this context were meant to "communicate ideas about power and the hierarchy of 'civilizations', so that there would be no doubt about the justice of 'our empire' or the superiority of 'our civilization'" (Lord & Blankenberg, 2015, p. 10). Hence, while museum-building may not have been the original purpose of colonisation, it eventually became an integral part of empire-building.

Of course, conquering parties' taste for the riches and resources of the defeated was hardly a new phenomenon in the eighteenth century. In a recent book from Sotheby's Institute of Art, Alexander Herman plainly writes that "wartime plunder has a long history" and that "for every post-war decision to return, there are dozens—perhaps hundreds—where the victors retained the prize, either to be displayed as a trophy or sold off as valuable booty" (Herman, 2021, p. 45). In many cases, these prizes, "often taken by violence and brought to places far removed from their territory of origin", were given to or purchased by museums, where they remain today (Herman, 2021, p. 45). However, it is at best naive to assume that museums have been innocent in such actions. Until codes of ethics for museums, which, notably, are *not legally binding*, began to be developed in the second quarter of the twentieth century[6],

---

[6] The first being the American Alliance of Museum's professional code in 1925 (Bounia, 2014).

provenance (the history of an object's ownership and possession, including the circumstances under which it changed hands) was traced only as a matter of interest, not ethical obligation. Furthermore, when controversial acquisition stories were discovered, they were "kept quiet, or at least downplayed, by museums", with the result that if such stories were shared with the public, this was "often done using innuendo and euphemism" (Herman, 2021, p. 45). Clearly, museums were aware of the ethically dubious nature of certain areas of their activity.

This awareness continues today, with varying degrees of willingness to acknowledge it. Some scholars and members of the public point to the lack of "official" empires as evidence that colonial legacies are ended and that the past is in the past—it is time to move on with a blank slate. For example, in Keeping Their Marbles, Jenkins makes several arguments about why the past, even if regrettable, should not hold sway on our actions today. First, she asserts that "people living today, most of whom were born way after the event in question, are held culpable for the past—not because of their own actions, but because of the particular national, religious, ethnic, or racial group to which they belong" (Jenkins, 2016, p. 285). She attributes this to a type of "reverse racism" that "has uncomfortable echoes with old racializing discourse, which promoted notions about the biological inheritance of moral traits" (Jenkins, 2016, p. 285). Three points are important to note here: 1) it is bizarre to assert that because no one is alive today who committed the original harm, those who are still suffering because of that harm are owed no acknowledgement of the harm, let alone an apology; 2) in many cases, there are people alive today who were not only alive but also part of perpetuating the harm that museums have caused both directly and indirectly[7]; and 3) the idea of "reverse racism", or the belief that marginalised populations can systemically discriminate against populations that hold political, social, financial, and cultural power, has been soundly refuted.[8] Simply put, racism is not merely discrimination based on the perception of someone's race: racism is "a cultural and historical fact that structures the norms and values of societies and it is evident in the policies and practices of institutions….It is structural and institutional", and "a key component of racism is power—structural and institutional power" (James, 2007, p. 357). Marginalised groups, by definition, lack this power.

Second, Jenkins's camp argues that no individual or group can "own" a culture, so no individual or group has exclusive rights to any given artefacts. Indeed, there is merit to the idea that ownership of culture is linked with other dangerous ideas, such as the many nationalist movements springing up across the globe. However, it needs hardly be pointed out that claiming current possession as a reason to refuse to share cultural artefacts with other communities is an attempt to do just that—own a piece of culture and restrict who has access to it. Ultimately, as one reviewer noted, Jenkins "over-simplifies, mocks, and dismisses the arguments in favor of artifact repatriation that detail the more abstract, lasting damage their

---

[7] For example, South African museums "created during the apartheid era were racist and existed to justify a system that made the minority feel proud at the expense of the majority" (Lord & Blankenberg, 2015, p. 20).

[8] For just two of many examples, see Roussel, Henne, Glover, and Willits (2017) and James (2007).

(oftentimes violent) seizure caused" (Hanink, 2016).[9]

Clearly, the history of museums is "interwoven with [that] of colonialism, invasion and oppression" (Onciul, 2015, p. 3). As Amy Lonetree, a professor at UC Santa Cruz and enrolled citizen of the Ho-Chunk Nation, notes, "museums can be very painful sites for Native peoples, as they are intimately tied to the colonization process" (Lonetree, 2012, p. 1). While Lonetree's experience occurs specifically in the US context, her words ring true for many citizens of former colonies. Museums have "played a major role in dispossessing and misrepresenting Native Americans, and this has been a critical part of the identity of Euro-American museums" (Lonetree, 2012, p. 9). Nevertheless, today, museums have the "potential to support efforts of decolonisation, Indigeneity, and survivance" (Onciul, 2015, p. 3). Changes over the past several decades have begun to reshape the relationship between indigenous peoples and museums into one of "shared authority", allowing Native communities to control the representation of their cultures (Lonetree, 2012, p. 1). These changes are "linked to larger movements of self-determination and cultural sovereignty" (Lonetree, 2012, p. 1).

Of course, race and racism are extremely complex issues, and the topics explored herein are not as simple as museum = racism, despite some claims to the contrary. This is quite clear in the example of Russia and Russophobia. First defined in the 1830s (Merriam-Webster, n.d.), Russophobia is a fear or dislike of Russia, a country that many in the West (and within Russia itself)[10] forget is ethnically, linguistically, and culturally diverse (Miliyollie & Fedorova, 2019). For those who prefer neat categories, Russia muddies the waters—is Russia part of the West? Are Russians white? Does "white" mean the same thing in Russia and, for example, in France? Interestingly, Russia has called for the return of artefacts taken from its territories by other Europeans. For instance, the Salzburg Museum recently agreed to return three amphorae and five grave reliefs that were taken by an Austrian army officer as trophies during the Second World War (Hickley, 2019b). This theft was hardly racially motivated but was nevertheless intimately connected with the spoils of war and unethical collection methods, which Martin Hochleitner, the Salzburg Museum's director, acknowledges. In fact, despite "restitutions to Russia from western European museums [being] a one-way street",[11] he insists that "we are not giving back in order to have things given back to us. We want to right a past wrong" (Hickley, 2019b). More recently, Russia's recent aggression against Ukraine has led many to wonder whether it is acceptable to confiscate art or prevent items on loan from Russian institutions from being returned until the war in Ukraine ends (Dalley, 2022; Grim & Cohen, 2020; Herman, 2022; Mosbacher, 2022; Simpson, 2022).

---

[9] Jenkins's book fails to provide a genuine or convincing argument. It is more provocative than well-researched, including citation-less assertions that the Parthenon Marbles were taken "with permission from the then rulers", despite the extensive debate about the credibility of this claim (Jenkins, 2016, p. 2). See Rudenstine (2002), which centres around whether a genuine and legitimate firman (royal decree) was ever actually issued giving Lord Elgin permission to remove the marbles or this was a story told later to justify their removal. Even if the existence of the firman can be proven, the legitimacy of the ruling is still questionable, as the Ottomans, who controlled Athens at the time, were also an invading force, albeit one that had ruled there for 400 years.

[10] Even here, should the sentence read "*and* within Russia itself" or "*even* within Russia itself"?

[11] In 1996, the Russian parliament voted to nationalise all property obtained from Germany at the end of the Second World War, considering such property reparations for Russia's own lost heritage (Hickley, 2019b).

As this case shows, it is impossible for any single work to comprehensively capture all the manifestations of race, racial tensions, racism, xenophobia, and cultural othering and to therefore provide statements regarding museums, racism, and colonisation that are true in all cases. Therefore, while acknowledging that this limits the explanatory power and generalisability of its arguments, this thesis primarily focuses on the context of Western European colonisation of the Americas and Africa.

2.3 Museums and Soft Power

One might ask why it matters so much that museums are involved in the work of decolonisation. Surely, they should be "neutral" third-parties, witnesses to a past that cannot and should not be changed by our modern ideals of what is "right". The answer is that museums have, from the beginning, been tools of soft power. Soft power is built and influenced by three main resources: culture, diplomacy, and political values (Joseph, 2015). Museums variously affect all three of these interrelated resources. The connection between museums and culture is fairly self-evident, but as a concrete example, changing values and attitudes in Brazil are prompting museums to not only reflect but also influence culture: Museums are helping combat "Brazilians' ingrained belief that 'all things foreign' are best" by "boost[ing] enjoyment of Brazilian and local culture and self-esteem" (Joseph, 2015, pp. 77, 79). Specifically, look to the case of the Inhotim Institute, an open-air museological complex with a significant collection of contemporary and Brazilian art. The institute's seven art pavilions highlight the "spatial relationship between nature and art", and the whole complex is a centre of reference for sustainability practices and botanical studies (Joseph, 2015). Staffed primarily by local residents, the institute ranked second on the Instituto Brasileiro de Museus's 2011 list of museums and cultural centres to visit and draws nearly 80% of its visitors from Belo Horizonte, a major city about an hour away (Joseph, 2015). Though this impact may be difficult to quantify, one major reason many museums struggle to "prove" their usefulness when fighting for funding, the Inhotim Institute has been acknowledged as "a success story with a real impact on the regional society's thinking and practice, strengthening its cohesion and identity" (Joseph, 2015, p. 78).

As for the link between museums and diplomacy, the form of this connection's influence and manifestation is changing. Detailing an extensive collaborative effort between the Museum of New Zealand Te Papa Tongarewa in Aotearoa New Zealand[12] and the Instituto Nacional de Antropología e Historia in Mexico, *Cosmopolitan Ambassadors: International Exhibitions, Cultural Diplomacy and the Polycentral Museum* shows how the museums' collaborative efforts and the exhibitions they produced both affected and were affected by the foreign policy context of the two countries (Davidson & Pérez-Castellanos, 2019). The work of museums and the meanings they produce relate to the interests of museums themselves, of course, but also to state interests. They can contribute in no small way to "national and international diplomatic agendas" by fostering intercultural skills and understanding and

---

[12] As the authors explain, the name "Aotearoa New Zealand" combines the Māori and European names for the country, thus recognizing its fundamentally bilingual and bicultural nature.

"a cosmopolitan imagination or visitation…deemed by many as essential for navigating the accelerating processes of globalisation within which we find ourselves in the twenty-first century" (Davidson & Pérez-Castellanos, 2019, p. 2). Thus, much like the World Fairs of the nineteenth and twentieth centuries, international collaborations among museums, and international exhibitions in particular, can play an integral role in presenting and advancing political agendas, acting as "cosmopolitan ambassadors" (Davidson & Pérez-Castellanos, 2019, p. xii).

In some cases, this potential is still unrealised. In a fascinating piece about museums in the member states of the Gulf Cooperation Council, Hayfa Matar explains how at first, these institutions were a way for these countries to "announce their arrival as nations" in the 1970s (Matar, 2015, p. 88). Fifty years later, many of these museums are still "reluctan[t] to tackle controversial subjects and offer alternatives to the narrow, state-approved narratives", which has prompted both nationals and migrants to seek alternative channels to accessing their country's culture and heritage (Matar, 2015, pp. 90, 91). Extremely relevant issues, such as the environmental impact of development, the colonial/protectorate period, and the roles of women and other religious and ethnic groups within communities, are rarely, if ever, addressed, and this alienates potential visitors (Matar, 2015). Matar highlights the danger of not addressing this gap between what potential visitors seek and what they find in museums, as "extremist ideology [is] on the rise, [and] a key challenge for governments and for communities is to engage with and address the concerns of young people" (Matar, 2015, p. 91). Thus, Matar sees great potential for museums to proactively and enthusiastically promote the value and principles of pluralism and coexistence, specifically by examining and confronting these at times painful narratives. Doing so can "foster a dialogue with both residents and visitors alike, using the museum as a platform to promote the country's past and to broaden and deepen its pluralistic identity [which] may seem counter-intuitive to some, but the more open a country is about its past, the stronger the sense of identity its residents will feel" (Matar, 2015, p. 91). The soft power that museums wield is a type of cultural diplomacy and a potent way to dispel myths and build bridges among people and countries. In the Gulf states and other countries, it can be used to combat the dangers of extremism. Ultimately, Matar argues that "an ideological response to these kinds of challenges through art, culture, and education is as important as the military and financial response" (Matar, 2015, p. 93).

Finally, the connection between museums and political values established above is briefly summarised here. Museums have always been "powerful public spaces where the leading ideas of the time were presented", even if those ideas were objectively bad, like eugenics (Lord & Blankenberg, 2015, p. 11).[13] Once an explicit tool of the government, museums, even independent ones, are now part of the most effective generator of soft power—civil society (Lord & Blankenberg, 2015). They may find themselves with "new roles, responsibilities, and expectations" due to a shift in their patronage away from the governmental and corporate sectors to the nonprofit sector, but museums remain central to the

---

[13] Museums' legacy as "instruments of oppression" is particularly controversial in the case of science, ethnography, and history museums (Blankenberg, 2015, p. 111)

generation and maintenance of soft power because of their influence over the three main soft power resources: culture, diplomacy, and political values (Lord & Blankenberg, 2015, p. 11). Therefore, increasingly influenced by broader human rights issues, museums have a unique opportunity to assist groups in community or "nation building, empowerment, and healing" (Lonetree, 2012, p. 4). In turn, this means that repatriation is often less about the cultural objects themselves (at least for those doing the returning) and is more clearly connected to public relations and economic and political interests.

Some see this change in the role of museums as negative; for example, Jenkins considers museums that have agreed to repatriation as bowing to outside pressure in the midst of an internal identity crisis: "this issue is a response to a crisis of cultural authority, which has come about after decades of unremitting questioning of the purpose of the museum. Professionals' response…is an attempt to secure new legitimacy by distancing themselves from a discredited foundational remit" (Jenkins, 2011, p. 6). Indeed, predicting doom for the field of museum management, Jenkins sees this as an ending rather than a beginning. She focuses on "the implications for the museum of a profession that continues to challenge its own authority" as a negative, self-imposed duty voluntarily taken on out of guilt (Jenkins, 2011, p. 11) rather than as a chance to expand learning and debate and extend basic human dignity to living cultures. Espousing that the remit of museums will become "highly unstable" should these calls continue to be heeded (Jenkins, 2011, p. 146), opponents of decolonisation and repatriation efforts in museums seem to be more afraid of than curious about this intentional instability.

However, despite this scare-mongering, many scholars and museum professionals see these changes as part of a healthy and necessary "transition of [the museum] from a 'temple' to a 'forum'" (Lonetree, 2012, p. 4). Rather than a threat, this transition is seen as offering new opportunities for museums, communities, and even states to meet basic needs and become sustainable and integral parts of the social fabric of their context. In fact, the very remit of museums that some fear to be under threat is thriving; it has merely taken on a new form. Museums "are particularly strategic for international relations, whether as symbolic meeting places or as part of a network of relationships with other museums" (Lord & Blankenberg, 2015, pp. 22–23). This was acknowledged in a 2014 report from the House of Lords that specifically highlighted the British Library and British Museum as "a wellspring of the nation's soft power" (Card, 2015, p. 64). They can "maintain good relationships when more formal channels of communication prove challenging" (Olivares, 2015, p. 50).[14] For example, research centres in areas experiencing political and social upheaval can provide knowledge, resources, and facilities to overseas researchers seeking to study and preserve archaeological sites and artefacts *in situ*, as shown in *US Cultural Diplomacy and Archaeology: Soft Power, Hard Heritage* (Luke & Kersel, 2013). After the

---

[14] Conversely, there is heated debate about whether artefacts currently on loan from Russian institutions should be returned given Russia's invasion of Ukraine. Were these not cultural objects, the sanctions on Russia would clearly dictate that they be withheld. This debate centres on the Victoria and Albert Museum's special exhibition of Fabergé eggs, as Putin has been particularly determined to repatriate the eggs the Bolsheviks sold to Western collectors. The eggs were originally loaned out *because* they are part of Putin's view of Russian identity and are therefore key objects for cultural diplomacy and image-making (Mosbacher, 2022).

looting and destruction of cultural heritage from the Iraq Museum in Baghdad in 2003 and insensitive and embarrassing responses from many U.S. politicians and pundits, the U.S. government relied on archaeologists, museum specialists, and other cultural heritage practitioners to act as ambassadors and repair relationships (Luke & Kersel, 2013). This arrangement was certainly not new, as archaeologists have long acted as consuls on behalf of colonising and hegemonic governments (Luke & Kersel, 2013).

In summary, soft power relates to the way someone can "frame the agenda", which is exactly what museums do based on the ideas they include and exclude (Blankenberg & Lord, 2015). This means that when museums have extensive gaps in their collections in relation to whole groups of people, such as women, colonised peoples, and people of colour, or when the materials they do have related to such groups are insufficiently researched, this frames the cultural agenda of those funding the museums, those depicted as mainstream in the museums, and those uncritically experiencing the museums (Blankenberg & Lord, 2015). Paradoxically, given the problematic collection practices of museums in the past, these cultural institutions must learn to represent and give voice to such groups without exploiting their narratives. Therein lies the challenge shaping the debate on the decolonisation of museums.

2.4 History of Decolonisation and Repatriation in Museums

Calls for repatriation are certainly not new. An early documented case of a demand for repatriation was issued by the Pope following the Battle of Waterloo (Miles, 2017). The Pope demanded the return of paintings and sculptures, including the Laocoön, looted from the Papal collections by Napoleon and his troops (Miles, 2017). Ultimately, it was decided to return as many plundered objects as possible, purportedly on the basis of a number of principles that were almost immediately contradicted by the British elsewhere in the Empire: Conquest does not give the right of possession of new plunder; unequal treaties signed under duress (such as wartime) are illegitimate; cultural property belongs to a special, protected category of resources that should be treated differently than possessions such as long or raw materials; and art, in particular, rightfully belongs in its "ancient seat" (Miles, 2017).

The principles that directed the return of these artefacts were quickly eclipsed by the rabid desire in Western Europe to construct "universal museums", justified by nationalist pride and claims of the educational value of such institutions (Miles, 2017). Thus, the plundering of, for example, Egypt and Italy in the preceding decades became merely a precursor to the sustained and intensive acquisition— through purchase, plunder or coerced division—of cultural goods in colonised and conquered areas across the world (Miles, 2017). Museums and collectors had a vested interest in the wartime plundering and acquisition of cultural property from the late eighteenth century onwards (Miles, 2017), and the acknowledgement of this inextricable link between museums colonisation is inherent in many discussions in museum theory today (Lonetree, 2012). In the race to acquire objects to fill their halls, these actors dismissed the interests and needs of the sourcing communities (Miles, 2017). Many such stolen objects remain in those halls today: The British government still refuses to return the Parthenon

Marbles[15] to Greece despite mounting pressure from the EU, the Greek government, and the British public, which became even more intense after Brexit (Reiner-Roth, 2020).

Modern cultural heritage decolonization efforts vary greatly, and most academic literature on repatriation has focused on the US, Australia, New Zealand, and Canada (Jenkins, 2011). There are three main situations in which claims for repatriation arise: first, stolen and/or illegally trafficked cultural heritage; second, artefacts looted in the context of war or occupation; and third, objects removed in a colonial context (Queiroz, 2020). The last category tends to be the most contentious, as numerous conventions and laws dictate how to handle items in the first category, although these regulatory frameworks are not retroactive (Queiroz, 2020), and the second and third categories frequently blend together. Many modern repatriation claims involve "items that can help to bring spiritual closure", including mortal remains, which are often found in natural science and archaeology museums, even if they are no longer commonly displayed to the public (Queiroz, 2020). Some countries have passed laws requiring the return of certain objects. For example, the Native American Graves Protection and Repatriation Act (NAGPRA), passed in the US in 1990, mandates the return of cultural items and human remains to Native American, Alaska Native, and Native Hawai'ian tribes or groups when those items are held by an institution that receives federal funding (Duggan, 2015). Grants are available to help with the repatriation process, but this has not guaranteed success. For example, the mandate does not apply to privately funded organisations or to cultural items from non-indigenous North American peoples, and failure to comply, which theoretically incurs a fine, is only intermittently punished (Ufheil, 2020).

Other countries, such as Australia, the Netherlands, and France, lack country-wide rules for repatriation but have shown significant interest in increasing their efforts to return cultural objects to formerly colonised peoples. In Australia, several states have passed legislation regarding the return of indigenous human remains, and there are multiple national government programs, such as the Return of Indigenous Cultural Property Program, the Repatriation Unit at the National Museum of Australia, and the International Repatriation Program from the Department of Families, Housing, Community Services and Indigenous Affairs,[16] that aim to encourage such efforts (Feikert, 2009).

The Nationaal Museum van Wereldculturen (National Museum of World Cultures) in the Netherlands boasts being "one of the first museums in Europe to develop mechanisms for repatriating artefacts looted from former colonies" (Hickley, 2020). Before 2017, when the museum began developing guidelines for handling repatriation requests, such claims were handled in an ad hoc manner; the guidelines are intended to make the process more "systematic and equitable" (Hickley, 2020). The museum's director noted that the decision to create the guidelines came from mounting international pressure to return artefacts to former colonies and from an acknowledgement that

it is certain that [the museum] manage[s] objects that the original owner did not relinquish of his

---

[15] Commonly known as the Elgin Marbles, after Lord Elgin, who removed them from the Greek Acropolis in the nineteenth century under dubious circumstances.

[16] Which helps indigenous Australian groups reclaim cultural patrimony and human remains (Feikert, 2009).

own accord. In these cases, claims are justified in our eyes. If today we say that on the basis of international treaties, objects stolen from Syria do not belong in our collection, then why should that principle not apply to objects stolen 100 years ago? (Hickley, 2019a)

The guidelines are only the first step in righting wrongs done in the name of learning, and the museum hopes they become "a working method that can apply to the entire museum sector" (Hickley, 2019a).

One well-known effort is the commissioning of "The Restitution of African Cultural Heritage: Toward a New Relational Ethics" in France following French President Emmanuel Macron's promise in 2017 to a crowd in Burkina Faso that items of African patrimony would be permanently repatriated (Hickley, 2020). The report urged the return of sub-Saharan African artefacts currently kept in or "owned" by French museums (Hickley, 2020). The first act of repatriation after this involved the return of 26 artefacts to Benin and one artefact to Senegal in 2020 (Hickley, 2020). Clearly, many countries with a history of colonisation are responding to both internal and external pressures to consider the role that museums have had and continue to play in stripping indigenous peoples of their material culture. The true impact of these reports, programs, and declarations is of ongoing interest to the people and institutions in former colonising and colonised countries alike. Notably, no state-wide framework for handling repatriation requests yet exists in Portugal.

2.5 Practical and Moral Concerns in the Debate on Repatriation

The debate over the merits and practicality of repatriation is by no means resolved. The issue of context, just one of many relevant aspects for museums, illustrates the complexity involved in the debate. Specifically, it is important to consider how context impacts an object's meaning, as well as our interpretation and understanding of it. Museums seek to provide context for the collections they hold by grouping objects according to their region of origin or their purpose, for example[17]. Occasionally, museums have displayed objects in a fabricated "realistic" setting, using dioramas and even real people as props. Today, many formerly sterile and unchanging exhibits are being replaced by experiential settings with object replicas and interpreters who teach visitors how to use the objects. The "real" objects that are kept behind walls of plexiglass and cannot be touched may thus feel "more real", as visitors can better understand what it would be like to use such objects. However, the fact remains that none of these is the original setting of the objects. That is because museum objects

are living entities. They embody layers of meaning, and they are deeply connected to the past, present, and future of Indigenous communities.…We are not just looking at interesting pieces. In the presence of objects from the past, we are privileged to stand as witnesses to living entities that remain intimately and inextricably tied to their descendant communities (Lonetree, 2012, p. xv).

Further complicating matters is the fact that even a repatriated object is not returning to its "true" context—afterall, an object that has been gone for hundreds of years can never return to the same person

---

[17] For a particularly interesting example of this, see the Mercer Museum in Doylestown, Pennsylvania, USA.

who made or first owned it, and it is not guaranteed that that person's descendants will be the ones receiving the repatriated object. Thus, a number of questions must be asked: Once removed, can an artefact ever be truly repatriated? Can a museum replica be equally useful for learning and teaching about distant cultures? What happens when there is no clear "patria" for the artefact? Does the object acquire new context when it changes ownership or the longer it is in a new place?

This section presents some of the most frequent arguments raised in answering these questions. First, popular arguments against repatriation, including the challenges involved in such actions are described. Then, some of the most common arguments for returning cultural objects are summarised, with an acknowledgement that not all aspects can be covered here in full, as the complexity and ongoing nature of the issue prohibit such comprehensiveness in one work.

2.5.1 Arguments Against Repatriation

To begin, the arguments against the return of objects of cultural patrimony fall into two basic categories: practical concerns and moral concerns. The former include issues such as the financial cost of handling repatriation claims, questions about responsibility and liability (e.g., who bears the burden for ensuring that objects are returned safely), and identifying the "true" owner. In today's capitalist, globalised society, it is natural that arguments about "the money" feature prominently. Rowley and Hausler note that many communities have "neither the research capacity nor the funding" to locate and make claims for their lost cultural property (Rowley & Hausler, 2008, p. 202). Ergo, the burden—financial or otherwise—often falls on museums, many of which are themselves underfunded. Although most museums ascribe to professional codes of conduct and best practices[18] that prohibit the *acquisition* of objects with unknown or dubious provenance, for practical reasons, such codes frequently do not extend this requirement to objects already in a museum's possession.

Indeed, it is no small thing to investigate an object's provenance, often requiring years of research because records are lost or incomplete or never existed in the first place. Furthermore, repatriation, so the argument goes, is a slippery slope, as once such claims are entertained, "everything that took place under the conditions of colonialism is eligible for restitution" (Nayeri, 2018). Indeed, if victimisation is used "as the moral basis for the ownership of artefacts, there could be no end to competitive claim-making" (Jenkins, 2018). Requiring every Western museum to investigate the full history of every object in its collections—often numbering in the millions[19]—would be a Herculean task. That is not to say that these museums would all be reluctant to do so; many of them are already undertaking the task. However, funding and labour limitations force museums to prioritise certain items, and it will be a long time before most museums have sufficiently researched their collections—if it ever happens. As a curator at the Baltimore Museum of Art noted, "barring a massive change in the way that art institutions are financed,

---

[18] Such as the ICOM Code of Ethics for Museums.
[19] The British Museum has over 8 million artefacts, only about 1% of which are on display (British Museum, n.d.a). While the BM's collection is exceptionally large, this proportion of objects on display is common.

it really is not feasible for institutions with significant collections of African art to conduct this sort of research on a collection-wide scale" (Scher & Scher, 2019).

Thus, there is the question of who should be responsible for bearing the costs (as well as liability) of identifying objects for repatriation, negotiating their return, and actually sending them back. Even after an object's return has been agreed upon, there are further significant costs to consider. Shipping a delicate object can cost thousands of euros between packing, insuring, and courier costs, and some countries are even charging customs and duty fees on their returned art. For example, in 2014, the Denver Museum of Nature & Science (DMNS) finally agreed to return a set of vigango (wooden carvings originally erected around Mijikenda homesteads) to Kenya, and the Kenyan Revenue Authority sent a bill for $40,000 in import tariffs (Ufheil, 2020). Eventually, a law was passed stipulating that such objects would not be taxed, and the DMNS was able to return the vigango in 2019 (Ufheil, 2020), but this incident still highlights a major barrier in repatriation work.

Of course, successful repatriation efforts require determining something that is often not so clear: Who is the rightful owner of such objects? Like the larger repatriation debate, this issue has both practical and moral components. It can be difficult to trace an object's provenance. Even supposing it can be traced, new questions arise: Does it belong to an individual? A museum? A national government? UNESCO itself has declared that "no culture is a hermetically sealed entity" (UNESCO quoted in Cuno, 2014, p. 119). Determining ownership is rarely as simple as identifying the descendants of the individual who made or first owned the artefact. Modern national borders have not always existed as they do under the Westphalian political order. Thus, lacking very specific documentation, objects taken from the Belgian colony of Ruanda–Urundi could belong to groups living in either modern-day Rwanda or Burundi. Just such a case arose in 2000, when a feather cape originally belonging to the Tupinamba people (in modern-day Brazil) was loaned to a Brazilian institution by the National Museum of Denmark (Queiroz, 2020). A group of Tupinamba descendants living in Ilhéus objected to the cape's return to Denmark, arguing that it should remain in Brazil (Queiroz, 2020). However, the Tupinamba spread out along Brazil's coast during the eighteenth century, so several groups could rightly lay claim to the cape; if the cape was repatriated to Ilhéus, additional disputes would likely have surfaced (Queiroz, 2020). One solution suggested by a Brazilian history professor was that the Brazilian government could make a repatriation claim and maintain the cape in a state museum (Queiroz, 2020). Ultimately, culture is complex and ever-changing, so "repatriation claims based strictly on national origin are more than just denials of cultural exchange: they are also arguments against the promise of encyclopedic museums", which "encourage curiosity about the world and its many peoples…[and] promote a cosmopolitan worldview, as opposed to a nationalist concept of cultural identity" (Cuno, 2014, p. 120).[20]

This last point bridges the practical and moral domains, revealing some of the complexity involved in any repatriation effort. Additional moral concerns include the issues of objects that are held in the

---

[20] That is, these museums provide such experiences *for those with access to them*. Many Africans cannot get visas to come to the US or the UK to see their cultural artefacts in these encyclopaedic museums.

"public trust", whether and how returned objects will be cared for, how to handle changes in borders and regimes (both in the past and in the future), how objects might be used to stoke nationalism or sectarianism, and whether the return of objects will effectively empty out Western museums, leaving them with nothing to show their visitors and nothing to study. These issues are examined below.

Museums are said to hold their objects in the "public trust", meaning that they are tasked with preserving objects for the public so that present and future generations can continue to learn about the past and the world around them (Tam, 2012). Encyclopaedic museums illustrate this point well. Such museums intend to "offer their visitors the world in all its rich diversity. And in doing so...protect and advance the idea of openness and integration in a changing world" (Cuno, 2014, p. 122). Traditionally, this has been interpreted to mean that museums must ensure the longest, most secure life possible for their artefacts, hence why deaccessioning objects is so frowned upon among museums (Fincham, 2011). Deaccessioning an object, shipping it across the world, and relinquishing further claims to it appears to go against this most basic tenet of museums' code of ethics. Museums frequently refuse to consider repatriation claims because the "terms on which they hold the[ir] collection in trust forb[id] them to accede positively to the demands of indigenous peoples" (Flessas, 2007, p. 1). After all, once in the hands of an entity with less funding or a smaller audience, the object could fall into disrepair or never be seen by the public again, thus failing in the duty to hold the object in the "public trust".

Even worse, the argument goes, an object could be purposefully destroyed. Repatriated human remains are often reburied or cremated, representing "a loss for scientists and a loss for future generations" (Stringer quoted in Jenkins, 2011, p. 39).[21] Ultimately, entertaining calls for repatriation might be merely part of "a crisis of authority" among museums that are now "attempting to secure new legitimacy by distancing themselves from a discredited foundational remit" (Jenkins, 2011, p. 54). Even if objects are not returned, some see a threat from their continued exhibition. For example, Cuno, among others (i.e., Barrett, 2015), notes that they can be used to shore up national identities, enact "cultural purification", and form an exclusionary civilization, with the ultimate result being that they perpetuate "violent xenophobia" (Cuno, 2014, p. 122). Certainly, cultural patrimony has been used as a rallying cry for stimulating nationalist and racist sentiments in the guise of pride—one needs only look at the uses the Confederate flag has been put to in the United States (Blakemore, 2021)—and museums themselves have been described as "a tool of citizenship and behaviour management" (Jenkins, 2016, p. 182).

Finally, one of the most fervent objections raised against the return of cultural objects is that museums that take such action will be emptied, leaving nothing to see or study. It is no secret that Western museums' collections comprise an incredible number of objects with foreign and/or indigenous origins. A quick stroll through the British Museum or its website reveals that a significant portion of its

---

[21] Nicholas Thomas from the Cambridge Museum of Archaeology and Anthropology asserts that the Savoy-Sarr report appears "indifferent as to what happens once material returns. There are some strong and dynamic museums in Africa, but many…have suffered…from underinvestment and the indifference of governments. The collections they already hold, and those that might be returned, cannot be made accessible, and cannot be of public benefit, unless there are sustained efforts to develop capacity and improve facilities" (Hunt et al., 2018).

collection comes from overseas. Further, it is estimated that major museums hold 90 to 95% of the cultural heritage of sub-Saharan Africa (Nayeri, 2018). Jean-Jacques Aillagon, a former French Minister of Culture, expressed concern that the implementation of the recommendations in the Savoy–Sarr report would "would empty the museums, and especially the Musée du quai Branly-Jacques Chirac, where the works would be replaced by copies" (Hunt et al., 2018). The inherent value of the research produced by studying these collections is assumed in most arguments against repatriation. Springer (2006, pp. 11–12), for example, asserts that "it is certainly legitimate, and important, to generalize about [humans of the past], but it is just as important to quantify these generalizations….For this purpose, it is essential to have skeletal populations of substantial...size, drawn from numerous archaeological sites, with...associated grave goods". Moreover, returning these objects would be paramount to admitting that such research "is merely a mask for oppression and imperialism" and from there, drawing the "Marxist conclusion that the study of [for example] American Indian remains is simply an aspect of the commodity fetishism that is a defining characteristic of capitalism" (Springer, 2006, pp. 12–13).

2.5.2 Arguments in Favour of Repatriation

Like the arguments made against repatriation, those advocating for the return of cultural objects can be categorised as practical and/or moral, generally mirroring the points raised above. Some responses to the points raised above are straightforward. For example, regarding the issue of funding for repatriation efforts, proponents simply state that more funding must be made available for such projects. Increased funding shows commitment on the part of governments and institutions to the work of cultural heritage decolonisation. Recognition of this is seen in the grant programs established in the United States and Australia to help with repatriation claims (Chari, 2010). Additionally, internal reprioritization can lead to numerous benefits for both museums and communities making repatriation claims. Museums that foster collaboration and goodwill with "source communities" (Curtis, 2006) are able to increase their working knowledge of certain objects and open the doors for many new research opportunities. Two illustrative cases are highlighted here: First, in the late 1990s, a "ghost dance shirt" was returned to a group of Lakota Sioux Native Americans from a Glasgow museum. Although the museum originally denied the repatriation request, negotiations eventually began, prompting additional research into the shirt and other objects in the museum's collection (Maddra, 1996). Ultimately, the return of the shirt not only brought a sense of closure to the descendants of those who died at the Battle of Wounded Knee, where the shirt was originally obtained, but it also "created a strong bond between Glasgow residents and the Lakota" (McLean, 1999). Second, in an innovative dissertation exploring cultural heritage, Tarisi Sorovi Vunidilo used research methodologies from the actual communities that are making repatriation claims. For example, Vunidilo engaged in talanoa, or Fijian storytelling, and adopted the Tongan Kakala framework to help inform the dissertation—something that would not have been possible without a certain level of trust and collaboration as well as respect for "indigenous knowledge protocols, including languages, philosophies and principles" (Vunidilo, 2015, p. 138).

Those defending Western museums' claims of ownership over artefacts that were obtained under questionable conditions assert that "if we are to understand [the] cultures [that created them] and how [those people] lived, then their material culture—their objects of everyday use, ritual objects, weapons, and items of adornment—is important research material" (Jenkins, 2016, p. 35). What these arguments ignore is that there are often still living people who know how such objects were used or who are still making and using them today. There are numerous examples of museums collaborating with indigenous groups and thereby learning about their own collections and producing more knowledge through the mutually beneficial meeting of modern science and traditional and cultural knowledge. For example, radiocarbon dating can tell us how old a mask is, but living tribal members can tell us whether the mask is a genuine artefact created for use by the tribe or simply "Paraguay", a term used by the Xinguanos of Brazil to describe objects (or actions) created specifically as a commodity to be sold to outsiders but with no true spiritual or ritual value (Neto, 2004).

Ultimately, contested collections may certainly hold research value, but the real question is not *whether* they have value but rather *whether that value eclipses the value they hold with their cultures of origin*. Moreover, artefacts so far removed from their context may hold little value for foreign researchers. As one example, a collection of Senegalese fish nets held by French museums has held little interest among French researchers; however, the knots in the nets are actually ancient mathematical codes that Malick Ndiaye, director of the Museum IFAN in Dakar, describes as "a very valuable part of our technological heritage" (Chiwanza, 2018). Thus, the time has come for "researchers to examine long held tenets on their rights to knowledge and their relationships with and obligations to descendant communities" (Rowley & Hausler, 2008, p. 203).

These tenets inform the assertion that museums are nobly seeking to keep these objects accessible to the public. But what are the implications of this for the way repatriation claims are handled, especially when it is pointed out that "the public" does not, in fact, include everyone? As one legal scholar points out, "designating an object as located within 'the commons' is another way of justifying the appropriation of contested cultural property" (Flessas, 2007, p. 1). After all, it must be asked: How does a source community benefit from its cultural relics being housed behind plexiglass and unavailable to them for study, worship, or use? Does their right to self-determination and their own heritage not trump the ambitious desire of Western academia to catalogue the entire world? In answering these questions, the Australian Museum described its repatriation work thusly:

> The philosophy of [our museum] is that cultural property has ongoing significance, both to the people who created it and to their descendants. Thus…repatriation reflects respect for living cultures and a way of supporting Indigenous people in the control of their own cultural outcomes. As a result of returning artefacts and human skeletal remains…[the museum] has become an agent of social change by promoting reconciliation (Pickering & Gordon, 2011).

In short, repatriation is an act of restorative justice.

Restorative justice was originally a concept applied in criminology to describe "an approach to

justice that seeks to repair harm by providing an opportunity for those harmed and those who take responsibility for the harm to communicate about and address their needs in the aftermath of a crime" (Federal-Provincial-Territorial Meeting of Ministers Responsible for Justice and Public Safety, 2018). Even if the crime occurred long ago, as in the case of museum artefacts stolen or unlawfully obtained from colonised peoples, the principles of restorative justice are still applicable, as they seek to benefit all parties by allowing them to take responsibility for the present situation and work towards a resolution that recognises the humanity, values, and needs of all involved. A report from the Canadian government outlines a number of basic aspects of restorative justice that are relevant to cultural heritage decolonisation efforts (Government of Canada, 2000). For example, restorative justice:

- "Provides opportunities for victims, offenders, and communities affected by a crime to communicate (directly or indirectly) about the causes, circumstances, and impact of that crime, and to address their related needs.
- Is based on an understanding that crime is a violation of people and relationships and is based on principles of respect, compassion and inclusivity.
- Encourages meaningful engagement and accountability and provides an opportunity for healing, reparation and reintegration.
- Uses processes such as conferences, dialogues and circles and is guided by skilled facilitators.
- Is a flexible process and can take different forms depending on the community, program, case, participants, or circumstances" (Government of Canada, 2000).

While "one person's intensely felt hurt may be another's distant memory", every repatriation request "ultimately seeks redress for a wrong that was committed" (Herman, 2021, p. 9). Therefore, in the context of museums, restorative justice means helping communities address "legacies of historical unresolved grief…cut through the veil of silence around colonialism and its consequences for [indigenous] families and communities…[and] educate the general public on the many silences that exist regarding the Indigenous experience" (Lonetree, 2012, p. 5).

Clearly, successful repatriation requests do not consist of a museum receiving and automatically approving the request and immediately boxing the artefact up and dropping it at the nearest post office. Frequently, repatriation requests lead to increased learning and understanding about the object and its original context. For instance, at an initial meeting for a collaboration between a Dakotan family and the Minnesota Historical Society in 1995, museum staff were extremely grateful when the family members brought numerous other objects they had made and were currently using and explained "all the information that museum curators hope for when documenting objects": who made them, when they made them, and what materials were used (Lonetree, 2012, pp. xiii–xiv). Beyond conveying the basic information that curators dream of securing for all their objects, this meeting allowed museum staff to capture stories behind the objects. After all, provenance alone "does not begin to convey the true significance of the objects"—the stories are what clarify for audiences that these objects "are important because they belong to living Native peoples who maintain deep and ongoing connections to the pieces"

(Lonetree, 2012, p. xiv). Ultimately, this collaboration gave the museum an "opportunity to honor [the Dakota family] and their ancestors with an exhibit that celebrated the most important tribal value of all: kinship…[and to] present Native American life through a representation that was framed and told by those who were intimately part of the story (Lonetree, 2012, pp. xiv–xv).

Long-term projects and collaborations are also often born through such requests. For instance, in the case of the ghost dance shirt mentioned above, the repatriation prompted the Glasgow City Council to draw up a report on the repatriation process and then establish a Repatriation of Artefacts Working Group to handle future such requests (Returning Heritage, 2019). Similarly, in 2019, a six-terabyte hard drive containing over 100 digitised images of the Maqdala manuscripts, which are more practical for study than the fragile originals, was delivered to Ethiopia's National Library (Herman, 2021). The transfer came about after the British Library signed a memorandum of understanding with the Ethiopian Ministry of Culture and Tourism that included an agreement to digitise the manuscripts, which are still held in Britain. The project costs were covered by the British "Heritage Made Digital" grant, but of course, sharing images is not the same as repatriation, and "without a permanent solution, it is felt, a frayed history can never be fully repaired" (Herman, 2021, p. 55). Nevertheless, as a result of the project, relationships between Britain and Ethiopia have improved (Herman, 2021).

As another example, the Kwakwaka'wakw people of Vancouver Island issued a series of repatriation requests for items held in various government-run institutions, including the British Museum (Herman, 2021). The particular objects the group sought to reclaim had been taken under duress: after contriving to accuse a number of Kwakwaka'wakw community members of holding an illegal gathering, a potlatch, the local Royal Canadian Mounted Police agent threatened them with imprisonment if they did not surrender over 500 items, such as traditional masks, costumes, and goods, associated with the potlatch. The confiscated items were displayed in parish halls and other venues where non-indigenous visitors could pay a fee to look at and photograph them. When calls for repatriating these stolen items began, the group was told that their ability to properly care for the items was in doubt. In response, the community spent six years constructing the U'mista Cultural Centre at Alert Bay, which is a state-of-the-art display space, research centre, conservation facility, community hall, and cultural embassy that now holds items reclaimed from the Royal Ontario Museum in Toronto, the National Museum of the American Indian, and the British Museum. Throughout the 1990s, the Kwakwaka'wakws' request for the return of the "transformation mask of K'umugwe'" was repeatedly rejected, with the museum citing the British Museum Act of 1963, which they believed made it legally impermissible for them to deaccession the item. In 2003, a representative of the Kwakwaka'wakw, Andrea Sanborn, was able to secure a meeting with the newly appointed Keeper of Africa, Oceania, and the Americas, Jonathan King. The two reached an agreement, albeit an imperfect one, that would permit the mask to be returned to the Kwakwaka'wakw on long-term loan. The mask was physically transferred to the U'mista Cultural Centre at Alert Bay in 2005, and although it was briefly recalled for an exhibition in 2017, the loan was renewed again in 2020. Of course, such an arrangement amounts to turning "looters into owners and owners into borrowers"

(Opoku, 2018). Today, the two institutions work together to display and share knowledge about the mask. This is an unsatisfactory arrangement to some, and it is certainly not the desired outcome of all such repatriation claims. After all, the requirement that the Kwakwaka'wakw prove their ability to care for their own cultural objects "smacks of paternalism" (Herman, 2021, p. 42). Nevertheless, it is one solution to a very complex problem. At the very least, when repatriation claims are heard, new dialogues can happen between museums and the cultures whom their collections are meant to represent. There are still many who resist repatriation efforts, but museums and initiatives that frame such work as promoting positive social change rightly point out the inherent learning opportunities that such efforts provide.

2.6 Brief Review of Decolonisation and Repatriation in the Museums of Other Former and Current Empires

The increased calls to repatriate artefacts and to decolonise museums more generally arise not merely from a spasm of conscience among Western museums; they come from members of previously and currently exploited communities. In a 2015 book titled *Cities, Museums, and Soft Power*, the editors note that internet access has helped distribute massive amounts of information worldwide, enabling "more people [to] participate in international conversations that were once the exclusive domain of states and corporations that had the economic and military power to exercise control" (Lord & Blankenberg, 2015, p. 9). Additionally, this means that information can be shared and acted upon "more quickly, less expensively, and among more people and organizations than ever before in the history of humankind" (Lord & Blankenberg, 2015, p. 9). Cultural contact is no longer "elite-to-elite" or even "elite-to-many"; it is now "people-to-people" (Lord & Blankenberg, 2015). Thus, any discussion of decolonisation and international cooperation among museums must take an international perspective. What happens in one country often affects what happens elsewhere, particularly when those leading the charge are seeking change within modern hegemons such as the US, France, and the UK. In the following subsections, this point is illustrated with occasional references to a separate but clearly related issue—the restitution of art stolen by the Nazis during the Second World War.

It would be both impossible and beyond the scope of this thesis to provide a comprehensive examination of the status of cultural heritage decolonisation in museums in these countries, so certain examples and events that are particularly recent, relevant, impactful, or interesting are discussed. The information on recent decolonisation and repatriation efforts in these countries is provided here not to suggest that Portugal has exactly the same history as these countries and should therefore have exactly the same responsibilities and practices as them. Such a simplified assumption would be both illogical and unhelpful. Rather, these cases are described to show how this global debate encompasses and impacts almost all nations and how the contextual complexity at every level of this issue warrants flexibility, nuance, and a careful consideration of both the broad principles and individual circumstances governing any cultural heritage decolonisation effort.

2.6.1 The United States

In the US, the movement to decolonise museums has manifested in a number of significant changes over the past 50 years. First, the most obvious is perhaps the passing of NAGPRA in 1990. As the first and currently most all-encompassing national legislation to directly address repatriation (Herman, 2021), NAGPRA was passed in response to the increasing calls of Indigenous American groups for the return of the bodies and biological remains of their ancestors. Under the act, institutions receiving federal funding are required to return any remains and associated grave goods within their possession to descendants or culturally affiliated groups as expeditiously as possible. These institutions had five years from the passage of the act to identify and inventory all such material in their collections and to share those inventories with the appropriate tribal authorities. Of course, the gap between the ideal and the reality has been challenging. Some inventories still remain incomplete or completed but lacking actionable information (Herman, 2021). Thus, while many artefacts are still held by federally funded museums and agencies, the remains of over 80,000 individuals have been returned to communities of origin since the act passed (Herman, 2021). The Smithsonian Institution alone has returned the remains of 6,000 individuals, 250,000 funerary objects, and 1,400 other sacred or cultural objects; allaying the fears of those who decry that such efforts will empty out museum halls, the collections from which these objects were returned are "far from empty" (Herman, 2021, p. 34).

Relatedly, since the 1970s, the number of collaborative partnerships between prominent museums and Native Americans have increased significantly, and the nature of these collaborations have changed as well (Lonetree, 2012). The number of tribal museums in general and exclusively tribal-owned museums has also increased notably. As Lonetree notes, this has had a "significant impact both on their communities and on museum practices" (Lonetree, 2012, p. 4). Thus, these changes have not emptied any halls but have served as catalysts and foundations for the construction of new halls that share more diverse voices and stories than ever before.

Another major manifestation of decolonisation efforts in the US is the movement to tear down, relocate, and reinterpret various monuments, particularly since the mid-2010s. International and domestic discourse on human rights has both fueled and provided a foundation for arguments that monuments to Confederate generals and soldiers, in particular, no longer have a place in society (Alam, 2019). Accordingly, various parties have petitioned governments to take action or, when action seemed unlikely or incredibly slow, have taken matters into their own hands. For example, in 2017, the *Confederate Soldiers Monument* in Durham, North Carolina was toppled by a dissatisfied and motivated crowd (Alam, 2019). The monuments being defaced, toppled, and protested soon grew to include memorials such as statues of Christopher Columbus and Thomas Jefferson that represented or even celebrated other forms of systemic racism.[22] Not all problematic statues in the US concern well-known

---

[22] For a comprehensive, if informal, list of statues and other monuments removed around 2020, see (wikipedia.org/wiki/List_of_monuments_and_memorials_removed_during_the_George_Floyd_protests).

figures, of course. As Cynthia Prescott, an associate professor of history at the University of North Dakota, points out, there are dozens of statues erected from the 1880s to the 1930s honouring pioneer women, particularly in areas where such celebrations of white settler colonialism "aligned with national agrarian myths" (Prescott, 2019, p. 50). Even when these monuments do not explicitly depict racial hierarchies, they still "indirectly commemorate [indigenous] removal" (Prescott, 2019, p. 51). While many have lauded the removal, reinterpretation, and relocation of such works, others have decried the movement as an erasure of "our history", apparently having forgotten that history is taught in many places, including museums and classrooms. Nevertheless, there are some legitimate questions that arise, which the museum field has already been asking and prompting the public to discuss, though now with renewed fervour and tension. These questions include:

- Where do we draw the line between remembrance and commemoration?
- How can we acknowledge the past without occluding the atrocities it contains?
- Should an historical figure's wrongdoing discount or negate any actual good that they did?
- How do we deconstruct a national identity built on false narratives and rebuild it into one that is complex, multifaceted, and more, ultimately, honest?

The US is clearly still contending with these questions and many more. As seen with the monument removal movement, frustrated citizens are pursuing avenues of direct action instead of waiting for governments and institutions to cut through the very thick layers of red tape. Time will tell whether US museums and governments, and those of other countries where similar movements have taken place, can read the writing on the wall and take these demands seriously.

In a separate but clearly related issue, the US spearheaded the effort to restitute art stolen from Jewish families and collectors by the Nazis during World War II. The 1998 Washington Conference, aiming for "corrective justice" (Network of European Restitution Committees, 2019, p. 9), produced a set of 11 principles for handling Nazi-looted art. While all 44 states with representatives at the conference endorsed the non-binding principles, they have applied (or not applied) them differently (Herman, 2021; Network of European Restitution Committees, 2019). For example, the Netherlands and the UK developed panels to provide detailed and clear recommendations on restitution claims, a subsequent French commission focused more on monetary compensation than restitution, and Poland essentially ignored the principles and eventually made it clear that "as a victim" itself, the country "owes no obligation of return to Jewish claimants, under international law or otherwise" (Herman, 2021, p. 61). Interestingly, the US provides favourable conditions for claimants for a number of reasons, which also affects repatriation claims more broadly (Herman, 2021):

1) In the US, such claims are often brought to court rather than before commissions.
2) The US court system has generally been receptive to hearing suits against foreign entities, even in relation to events that occurred on foreign soil.
3) Statute of limitation laws vary among US states, but they are generally invoked not from the time of the theft but from more recent events, such as the plaintiff's discovery of the identity or

location of the artefact or when the plaintiff's request for the artefact's return was first rejected. These courts' favouring the plaintiff and their broad jurisdiction could mean that an increasing number of "foreign" matters will be litigated in the US, with numerous national and international implications. A discussion of such implications is beyond the scope here, but two points should be noted: First, the US has long set precedent in various matters, including cultural ones. Trends in the US will no doubt affect trends elsewhere, be it directly or indirectly and with similar or different results. Second, if other countries, like Poland, show continued reluctance to resolve repatriation requests, claimants may turn to the US court system in the hope that the abovementioned factors tip the scales in their favour.

2.6.2 France

One recent well-publicised event in the field of cultural heritage decolonisation was the publication of the 2018 report titled "The Restitution of African Cultural Heritage: Toward a New Relational Ethics" (the "Savoy–Sarr report"), produced by French art historian Bénédicte Savoy and Senegalese scholar Felwine Sarr. Premised on "a new relational ethics" between France and African countries, the report proposes a new system for returning artefacts to Sub-Saharan African countries (Savoy & Sarr, 2018). Estimating that over 90% of the material culture legacy of Sub-Saharan Africa is currently held outside of Africa, the report is mostly targeted towards the 90,000+ items held in French museums that were removed during the French colonial period (c. 1885–1960). Of particular concern are artefacts related to "punitive expeditions", through which European colonisers "punish[ed] uncooperative rulers", often leading to the "incorporation of the relevant region into the empire" (Herman, 2021, p. 47). The imperial government often "justified" such actions by citing, for example, the imprisonment of a European national, and the subsequent raids mostly targeted local sites of political or symbolic power (Herman, 2021). Before destroying a site, soldiers would divvy up anything of value found there. Naturally, many of these items then wound up in museums, as happened with the Benin Bronzes, which were divided among at least 16 different museums (Gundu, 2020), mostly in Europe and North America.[23]

The Savoy–Sarr report is an acknowledgement that museums have a "moral compulsion" to directly communicate with extant communities whose cultural patrimony has been stripped away and stored within the former's collections (Herman, 2021, p. 50). Furthermore, any restitution that does occur should not be framed in a way that perpetuates the colonial relationship, that is, as France benevolently returning artefacts to the passive recipients in Africa (Saxby, 2019). While many of the report's suggestions were not accepted, Savoy and Sarr's efforts were not entirely unsuccessful: they resulted in the promise of the permanent return of 27 specific items to the Republic of Benin and Senegal, and the

---

[23] The British Museum's website gives a fairly unflinching account of its acquisition of these bronzes, but information on how questionable acquisitions are being addressed is glaringly absent. See www.britishmuseum.org/about-us/british-museum-story/contested-objects-collection/benin-bronzes. Of course, not everyone at the time believed that such actions were acceptable—deeply upset about the looting and burning of the Summer Palace in China, novelist Victor Hugo wrote that he hoped "a day [would] come when France, delivered and cleansed, will return this booty to despoiled China" (Hugo, cited in Herman, 2021, p. 49).

French National Assembly passed a law in December 2020 to formally remove those pieces from their museum collections, a move made necessary by the rules regarding the inalienability of public collections in France (Herman, 2021). Despite the firm rejection of the report by many museum professionals in France and other Western countries, many consider it a successful first step and recognise its potential. For example, Ahmadu Bellow University professor of archaeology and newly appointed Nigerian Vice-Chancellor Zacharys Gundu has argued that "Africa must see the report as a window for pressing home demands for the return of the continent's heritage property from not only France but the rest of Europe and North America" (2020, p. 59).

Indeed, many are optimistic that even if the report's recommendations are not followed wholesale, its ideas are still catching fire in the minds of museum professionals and visitors alike, and it provides actionable steps toward restitution despite the "legal and ethical minefield" (Chazan, 2018) such endeavours must navigate. On the whole, the report essentially "demands that the logic of France's relationship to Africa be renegotiated" (Farago, 2019). If the law forbids restitution, the law must change. Official inventories must be completed and examined to determine "what is in French national museums that rightfully belongs to Africa" (Chiwanza, 2018). While not all such artefacts were the result of looting, it is important to trace in as much detail as possible how objects were acquired in and removed from Africa and how they travelled to France. Moreover, as Nigerian-American artist Toyin Ojih Odutola notes, "it's not so much that [they're] returning them *back* to their original home….We know [that] what they're returning to is not where they came from. The context is completely altered" (Farago, 2019). These artefacts are part of a diaspora of both people and objects, and they must therefore be re-contextualised (Chiwanza, 2018). Their time in French institutions has changed their story, so Odutola asserts that since these artefacts have a hybrid history, they should be circulated *from and within Africa* with an understanding of that hybridity (Farago, 2019).

Finally, the report led to the establishment of a commission focused on facilitating the return of stolen artefacts. The commission comprises numerous African and European activists, artists, and collectors, as well as the report's authors. As with many other promises of repatriation, France's recent actions in this direction have been criticised as carrying overly stringent conditions on the return of artefacts. Arguments that African museums lack the security and resources to care for returned artefacts fall flat when one looks at cases like Algeria and Nigeria, which have well-established museums and rich museology disciplines (Chiwanza, 2018; Eboreime, 1995). Ultimately, there is still a long road ahead to large-scale repatriation, but "France's departure from the hardline stance of refusing to return stolen artefacts from the colonial era is a welcome one" (Chiwanza, 2018).

2.6.3 Germany and the Netherlands

Germany and the Netherlands both formed advisory commissions to handle restitution claims after the Washington Conference. The German commission faced criticism for its slow pace and low number of cases, but over 5000 works of art have since been returned by German institutions (Herman, 2021). A

very controversial case heard by the Dutch Restitutions Commission involving Wassily Kandinsky's *Painting with Houses* affected the direction of other commissions. The claim was considered dubious due to a lack of clear evidence, and the committee ended up rejecting the claim in 2018. This decision was criticised, however, because the committee weighed the interests of both the claimants and the museum, ultimately finding that the piece was more important to the museum than to the claimants. This weighing of interests was seen as highly unethical, with the argument being that it was hardly acceptable "to give weight to the interests of a museum holding looted art" (Herman, 2021, p. 65). In 2021, the Kohnstamm Committee of the Council for Culture reevaluated the framework for assessing restitution applications (ArtDependence, 2021). The resulting changes to Dutch restitution policy prompted the municipality of Amsterdam to begin discussions with the former claimants and reach an agreement "on the basis of mutual respect" to return the painting to them (Stedelijk Museum, 2022). Regarding this change in course, Deputy Major Touria Meliana stated:

> As a city, we bear a great responsibility for dealing with the indescribable suffering and injustice inflicted on the Jewish population in the Second World War. To the extent that anything can be restored, we as a society have a moral duty to act accordingly. This certainly applies to the many works of art that were in the possession of Jewish citizens and were looted by Nazis or were otherwise lost to the owners (Stedelijk Museum, 2022).

The museum expressed "melancholy" at the loss of the work from its collections but abided by the decision, calling it "an important moment in Dutch restitution policy" (Stedelijk Museum, 2022).

The German Advisory Commission, heeding both the criticism levelled against the Dutch commission's original decision and the criticism that the German commission itself had faced, began to make detailed reports about its conclusions and recommendations available to the public. In 2019, it adopted a creative solution for a similarly dubious case: Hans von Marées's *Uhlans on the March* was returned to the foundation representing a former Düsseldorf art dealer, although it was not clear whether the dealer's gallery had actually owned the piece or only received it on consignment; therefore, the commission returned the work with the condition that the foundation could not sell the painting for ten years in case someone else with a stronger claim came forward (Herman, 2021).

While these examples deal specifically with the restitution of Nazi-looted art, there are other cultural heritage decolonisation efforts in both countries. In 2019, Germany's Federal Government Commissioner for Culture and the Media, Federal Foreign Office Minister of State for International Cultural Policy, and various cultural affairs ministers and municipal umbrella organisations issued a set of Framework Principles for Dealing with Collections from Colonial Contexts. The framework begins with an acknowledgement of "the historical responsibility resulting from German colonialism and the responsibility deriving from actions marked by colonial attitudes" (Federal Government Commissioner for Culture and the Media et al., 2019, p. 1). There is note of the major ethical and political challenges involved in efforts to address repatriation claims, which thus require a "sincere, credible and sensitive approach" (Federal Government Commissioner for Culture and the Media et al., 2019, p. 1). Importantly,

the document explicitly states that "all people should have the possibility to encounter their rich material cultural heritage in their countries and societies of origin", cultural objects are very important for cultural identity, and appropriately handling collections from colonial contexts requires "close coordination with the respective countries and societies of origin" (Federal Government Commissioner for Culture and the Media et al., 2019, p. 2). Additionally, acknowledging that the state lacks certain jurisdiction over private ownership, the authors call on "non-public museums, collectors and art dealers, to play an active role in addressing the history of collections from colonial contexts and to take the necessary steps to this end in keeping with the spirit of these Framework Principles (Federal Government Commissioner for Culture and the Media et al., 2019, pp. 3–4).

Despite this espoused dedication to returning artefacts that were "violent[ly] appropriat[ed]" (Federal Government Commissioner for Culture and the Media et al., 2019, p. 2), not all implicated institutions are abiding by these principles, which are, after all, non-binding. For example, since the early twenty-first century, Turkey has made numerous calls for the return of culturally important artefacts, and those for numerous objects held by the state-run Pergamon Museum have not been heeded (Daily Sabah With AA, 2020). The museum is named after the Pergamon Altar, which was one of many artefacts, including the mihrab of the Beyhekim Mosque, a statue from the city of Aphrodisias, and a wooden sarcophagus from the tomb of a Muslim mystic in Konya, smuggled from Turkey during Ottoman rule (Daily Sabah With AA, 2020). The joint Turkish–German cultural committee tasked with assessing the case for repatriating these artefacts to Turkey has yet to find in Turkey's favour, citing the grounds that the items in question were legally acquired, despite the lack of documents produced attesting to this (Daily Sabah With AA, 2020). As seen in other cases, regardless of the "legality" of the acquisition, the greater issue is its ethicality: During the last decades of Ottoman rule, European archaeologists were often permitted to take the spoils of their excavations with them when they left or were otherwise able to avoid detection by authorities due to the turbulent state of the empire at the time (Daily Sabah With AA, 2020). It may not have been strictly *illegal* for them to remove these artefacts, but whether it is ethical today for the Pergamon Museum to steadfastly refuse to return them is even less clear.

In the Netherlands, two recent publications have been particularly important: the *Return of Cultural Objects: Principles and Process* from the National Museum of World Cultures (NMWC) in 2019 and *Guidance on the Way Forward for Colonial Collections: A Recognition of Injustice* by the Council for Culture in 2020. The first report is strictly applicable to objects in the NMWC collections and does not apply to objects obtained during the Second World War, which fall under the purview of the Dutch Restitutions Commission. Furthermore, the report is part of the NMWC's commitment to

> researching and making publicly accessible its collection, addressing provenance issues arising from colonial appropriations, developing new ethical possibilities for collections, putting contemporary communities on an equal footing as national collections and engaging in dialogue with communities and nations of source, nationally and internationally, who have particular attachment to the collections (Nationaal Museum van Wereldculturen, 2019, p. 2).

Espousing a dedication to transparency and collaboration, the NMWC does "not view this process as adversarial", and claimants will be involved in the processes of gathering documentation, information and evidence so that "just and fair solutions can be reached" and ongoing and new relationships can be fostered between the museum and claimants (Nationaal Museum van Wereldculturen, 2019, p. 2).

The report from the Council for Culture engaged "discussion partners" from many former Dutch colonies, summarising the takeaways from their discussion thusly:

[The partners] in former colonized countries…consider it important that their museums can tell the colonial story, including by means of objects that are currently in the Netherlands. [Those] in Suriname and the Caribbean consider that the museum infrastructure must be brought up to standard before objects are returned to them. [They] would like regular museum-level cooperation with the Netherlands in the field of capacity development. [Those in Indonesia emphasize the importance of joint academic provenance research. [They] state that the return of cultural heritage objects is a matter to be agreed between states, but that communities to whose culture these objects belong must also benefit (Advisory Committee on the National Policy Framework, 2020, p. 5).

The report notes three key considerations when handling repatriation requests: first, the manner in which the object was acquired by the Dutch matters. A looted object warrants a different approach than an object "acquired legitimately by way of gift or purchase" (Advisory Committee on the National Policy Framework, 2020, p. 5). Second, the importance of the object to both the claimant country and the Netherlands must be weighed in addition to "the storage conditions and accessibility of the cultural heritage object…as well as the availability of alternatives to a return" (Advisory Committee on the National Policy Framework, 2020, p. 5). This consideration, of course, reeks of the same arguments that garnered criticism in the Kandinsky case. Finally, the "true" owner must be identified, be that a private individual or a central, municipal, or other level of government.

As both of these documents are relatively new and their effects are still being determined, they represent a new era in cultural heritage decolonisation efforts in these two countries. These documents make it clear that while the law is not unimportant or inapplicable to such initiatives, the issue of repatriation is an ethical one. The issuance of any relevant framework, however faulty, is an acknowledgement that "the most successful outcomes tend to be those that result from a process that is transparent, where communication between the parties is open and fluid, and where both sides are committed to building a relationship around the [object] in question" (Herman, 2021, pp. 65–66).

2.6.4 The United Kingdom

By far the most well-known repatriation claim in Britain is that of the Parthenon Marbles. The marbles, questionably acquired by Lord Elgin (hence the marbles' other moniker, the Elgin Marbles; see note 11 above) are currently a major feature in the British Museum,[24] despite the fact that the Acropolis Museum,

---

[24] They are also found in a number of other institutions, including the Louvre and the Vatican.

which lies within sight of the original location of the marbles, has an entire gallery built in anticipation of the marbles' return and must make do with plaster copies of the originals. The trustees of the British Museum have issued a rather churlish explanation of their refusal to return the marbles, arguing that the Greek government's rejection of anything less than a full transfer of ownership of the marbles means that "any meaningful discussion on the issue virtually impossible" (Trustees of the British Museum, n.d.). The two sides' "positional bargaining" has entrenched them both only further, making a widely acceptable solution ever more unlikely (Herman, 2021, p. 25).

There are two interesting explanations for the lack of progress on this point, one practical, the other cultural and affective. First, cultural policy in Greece has been closely tied to the cause of seeing the marbles returned ever since the first official request in the 1980s (Herman, 2021). A single ministry, the Ministry of Culture and Sports, sets the policy for both the government and the country's national museums. In Britain, however, cultural policy is dictated by multiple ministries, which are purposefully separate from museum governing boards. This means that what Greece sees as a state-to-state matter, Britain sees as a museum-to-museum affair (Herman, 2021). Negotiations are difficult to initiate if the parties cannot even agree on who is fit to conduct them. Second, this issue goes beyond strict legality versus illegality, particularly for the Greeks, for whom "the Parthenon has long symbolised the freedom of the people and a resistance to tyranny in all its forms" (Herman, 2021, p. 25). Thus, while the marbles remain in non-Greek hands, "the Liberation remains incomplete" (Herman, 2021, p. 25). The English, of course, have no such "visceral memory…of being ruled by foreigners" (Herman, 2021, p. 25). Thus, the Greeks may feel a particular "vulnerability" towards coercion from foreign states, and it may be "difficult for other historically dominant nations to understand this quintessentially Greek predicament" (Herman, 2021, p. 26). The resulting cultural disconnect presents yet another barrier to resolution.

The Parthenon Marbles are far from the only contentious objects in British museums. Following the US' lead, the UK has focused on repatriating human remains (Herman, 2021). In 2000, British PM Tony Blair and Australian PM John Howard discussed a proactive plan to assess the treatment of Australian Aboriginal remains in British collections, leading to the passage of legislation allowing national institutions to return human remains in their collections that they might not otherwise have the legal ability to dispose of (Herman, 2021). Soon after, the UK provided policy guidance and practical support for museums to respond to additional repatriation claims. Numerous UK institutions have since heeded calls for repatriation, though much work remains to be done, and the legislation ultimately seems to have been "permissive rather than compulsory" (Herman, 2021, p. 36).

In the past few decades, the British Museum has faced many requests for repatriation, including a basalt statue from Easter Island known as Hoa Hakananai'a and a marble relief from Italy depicting two freedmen; most of these requests have been rejected under the limitations of the British Museum Act of 1963, which forbids the deaccessioning or removal of collection items in most circumstances (Wilding, 2019). However, numerous other museums in the UK have received requests as well: the Victoria and Albert Museum recently rejected a request from a Welsh MP to return two andirons taken from Gwydir

Castle, offering instead to provide reproductions or loan the andirons to the castle (Wilding, 2019). In April 2022, it was announced that various museums in Glasgow would be repatriating a number of artefacts from their collections after a vote by the Glasgow City Council (Atkinson, 2022). As the largest-ever repatriation agreement from a Scottish museum, this decision covers the return of one illegally purchased item and six other items stolen from Hindu temples during the nineteenth century, seventeen bronze artefacts taken from Benin in 1897, and twenty-five Lakota cultural items variously acquired in the late 1800s, including items taken from the Wounded Knee Massacre site (Atkinson, 2022). In some cases, the recipient states are covering the cost of the return; in other cases, the costs and logistics are still being negotiated (Atkinson, 2022). The decision grew out of a recommendation by the city council's Working Group for Repatriation and Spoliation and is intended to "in a small way, help these descendant communities to heal some of the wounds represented by the wrongful removal of their cultural artefacts, and lead to the development of positive and constructive relationships between Glasgow and communities around the world" (Atkinson, 2022).

In August 2022, the Arts Council of England released *Restitution and Repatriation: A Practical Guide for Museums in England*, which provides information on existing policies and legislation that inform a practical framework for responding to requests for artefact repatriation "in a spirit of transparency, collaboration, and fairness" (Arts Council of England, 2022, p. 2). Acknowledging the complex and time-consuming nature of addressing repatriation requests, the guide argues that such requests provide "rich opportunities" for enhancing understanding, developing knowledge and research, building relationships, and sparking dialogue around cultural heritage (Arts Council of England, 2022, p. 2). The guide stresses that it is helpful to "think about issues on a human level", to be mindful of "the deep sense of hurt an alienation" some claimants feel, and to understand how financially and emotionally costly bringing such a claim forward can be (Arts Council of England, 2022, p. 2). The guide is specifically aimed at English museums and replaces earlier guidelines from the now-defunct Museums and Galleries Commission, with the exception of specific cases like those involving human remains and Nazi-looted works (Arts Council of England, 2022). It remains to be seen how this guidance is heeded and whether its principles will be applied to other UK museums.

2.6.5 Multilateral and Non-Western Initiatives and Voices

Of course, many other countries and institutions are working towards cultural heritage decolonisation, with one notable advancement being the adoption of the Declaration on the Rights of Indigenous Peoples by the United Nations General Assembly in 2007 (Herman, 2021). Though not legally binding, this document has influenced the practices of both governments, museums, and indigenous groups, regarding repatriation requests. Acknowledging the rights of indigenous groups to "survival, dignity, and well-being" (United Nations Department of Economic and Social Affairs, 2007, p. 28), the declaration urges states to facilitate the repatriation of human remains through "fair, transparent and effective mechanisms developed in conjunction with indigenous peoples concerned" (United Nations Department of Economic

and Social Affairs, 2007, p. 12) or at least provide access to those remains—admittedly a weaker statement. Overall, it is clear that "latter-day legal rules cannot be retroactively applied to situations that preceded their enactment", leaving repatriation claims in a difficult position, as less-than-legal arguments with obvious moral implications. Just because something is not illegal, does not make it morally permissible. One might argue that some objects were purchased, not stolen, and in response, Senegalese philosopher and professor Souleymane Bachir Diagne asks, "To what degree can you have consent within a colonial context?" (Farago, 2019). Diagne cites a 1934 book that describes how two ethnologists coerced their subjects into handing over a number of sacred objects and then, feeling guilty, gave them a few francs in exchange; the ethnologists technically "bought" the objects, but in any other circumstance, this "sale" would be understood as inherently lopsided (Farago, 2019). Whether museum artefacts were acquired legally or illegally in the past may no longer be the most important question. Today, the question is: "Does it make sense *now* for museums to hold onto those parts of their collections obtained through violence and depredation inflicted upon defeated people?" (Herman, 2021, p. 48).

Importantly, practical solutions to repatriation claims are not coming solely from European and North American institutions and thinkers—nor should they. Impassioned and informed arguments and suggestions have been made by numerous African and American scholars and activists. Gundu, among others,[25] highlights that the issue of repatriation is deeply related to diplomacy and bilateral relations, but that not much "has [been] achieved much using this route" (Gundu, 2020, p. 56). In fact, the lack of success achieved through established diplomatic channels has merely exacerbated problems, particularly related to the continued illicit trade in Nigerian antiquities (Gundu, 2020). For example, after the French government illegally purchased two Nok statues in 1998, Nigerian President Olusegun Obasanjo and French President Jacques Chirac signed a renewable 25-year "loan" for the pieces in return for (unfulfilled) promises to help the Nigerian museum community (Gundu, 2020). Moreover, the deal sent the wrong message to looters and smugglers. After all, if one can illegally sell an artefact that then becomes the centre of a state-sanctioned diplomatic agreement and face no legal action, what will stop more people from doing the same?

Thus, Gundu argues that following the Savoy–Sarr report, African countries must work together to demand the return of their cultural patrimony. It is imperative that "more voices come from Africa in support of the report" (Gundu, 2020, p. 60). Moreover, African governments must stop backpedalling and even working against the repatriation claims their museums are staking. The various international conventions and initiatives addressing the issue are "significantly skewed against countries seeking returns" because they are "based on western notions of property ownership and are protective of the principle of inalienability" (Gundu, 2020, p. 60). African countries must then "step up both moral and power pressure" on states and institutions that still hold their cultural heritage (Gundu, 2020, p. 60).

Citing successes such as Peru's demand for the return of artefacts looted from Machu Picchu and

---

[25] See also Ogbechie (2016), Opoku (2015), and Cisneros et al. (2022).

sustained determination such as Greece's standing request for the return of the Parthenon Marbles, Gundu sees moral pressure and strategic government intervention as means of rejecting the legitimacy of Western museums in continuing to display cultural property that is not theirs and making headway in demanding its return (Gundu, 2020). Thus, the public must be mobilised to apply pressure on their respective governments through public demonstrations, lectures, and discussions (Gundu, 2020). Scholars must be cut off from using Africa "as a giant research laboratory" through both pressure from the public and regulatory tools so that these scholars then lobby their own governments and museums to appropriately address repatriation claims (Gundu, 2020, p. 61). Increasing public awareness and engagement in both Africa and the West can exert pressure on museums and governments to seriously and promptly address repatriation claims. Regional bodies and international organisations such as the African Union as well as coalitions of NGOs "must begin engagement with each other to stand with one voice and create synergy on the issue of reparations" (Gundu, 2020, p. 61). African governments must recognise and use the means at their disposal, that is, the mechanisms specifically meant for states to dictate access, assert claims, and submit complaints, such as attempting alternative dispute resolution through the UN Intergovernmental Committee and denying excavation permits to applicants from countries with looted or otherwise illicitly held African artefacts (Gundu, 2020). African countries can collaborate to avoid contradictory messages in ratifying major conventions on culture, commissioning reports on stolen artefacts, making demands and taking legal action on the matter (Gundu, 2020).

In contrast, China has used its position as a global superpower to advocate for the return of artefacts lost between 1850 and 1950, a period sometimes described as China's "century of shame" (Herman, 2021, p. 51). In some cases, such as that of the Zodiac heads looted from the Summer Palace in 1860, China stated its desire to see the heads returned from both domestic and international repositories. The announcement prompted wealthy businesspeople to acquire the heads and then donate them to the state to obtain a favourable position with the regime, with the result that seven of the twelve heads have now been returned to the state's possession (Herman, 2021). This incredible display of soft power highlights China's unique position: Once subjected to European aggression, the country now has the world's second largest economy and a permanent seat on the UN Security Council, revealing both its financial and its political power (Herman, 2021).

Notably, China's advocacy does not stop at its own national borders. In 2019, President Xi Jinping voiced his support for the return to Greece of the Parthenon Marbles, which he tied to China's own efforts, stating that "we should work together. Because we have a lot of our own relics abroad, and we are trying as much as we can to bring these back home as soon as possible" (Xi, quoted in Herman, 2021, p. 53). Additionally, China financed the Museum of Black Civilization, a €35 million museum in Dakar, Senegal, that is now home to a number of the Benin Bronzes (Herman, 2021). The museum would not have been possible without China's financial contribution, though the motivation was of course clearly tied to China's quest to see its own artefacts returned from abroad (Herman, 2021).

Finally, it is important to note that compared to repatriation requests from non-Western groups,

museums have been much more willing to entertain restitution requests for objects looted and stolen from churches, museums, and Jewish families by the Nazis during the Holocaust (Herman, 2021). Efforts to return these items have been fairly successful, though not without many failures due to the fact that whole families were decimated by the Nazis, records are often missing or inconclusive, and early efforts, such as those of the "Monuments Men", returned art to the formerly occupied states in which they were taken rather than to individuals or families, leaving it to the states to see those pieces home. As a result, many owners could not be located, and even when they could, states often made it difficult for them to reclaim the items. These restitution efforts continue to this day, facilitated by digitisation and the internet as well as the creation of new processes and administrative bodies tasked with such work. Nevertheless, the process is fraught with legal and practical complications. The cases with clear-cut solutions have generally all been resolved, and what remains are "those in which the right outcome appears less obvious at first glance" (Herman, 2021, p. 59). This is a prime example of how difficult the return of artefacts can be, even when public and institutional support is behind such efforts. Even more telling, however, is that while there is consensus that the items plundered by the Nazis should of course be returned when possible, the distinction made between such items and items stolen under colonial rule is telling.

ÌMỌ̀ DÁRA, an organisation that provides resources on African art for collectors and institutions, provides a useful tool[26] for tracing events and arguments relevant to the repatriation debate. The tool, essentially a timeline, allows users to filter by year and/or by country to find summaries of and links to articles relevant to repatriation claims and quick indicators of the results of such requests . In looking at the broad range of restitution requests and initiatives, it seems that artefacts taken as wartime booty are the most likely to be repatriated (Herman, 2021). The immorality of the removal of such artefacts seems fairly widely acknowledged (though not without other concerns and barriers, real or purported), but artefacts obtained through excavation, trade, or gifting are more contested. Such cases generally involve "at least some form of purported consent", which Western institutions on the whole are clinging to in order to legitimise their hesitation (Herman, 2021, p. 56). Either way, the "tearing out of sacred or cultural material from places of origin has left fissures in many of these societies", which are now protesting this treatment and "reliving an unpleasant part of their own history, not because it is in any way gratifying, but because it still calls out for flutter reconciliation" (Herman, 2021, p. 56).

3 Cultural Heritage Decolonisation in Portuguese Museums

3.1 Data Collection Methods

Given the nature of the subject studied here, popular and scholarly debates in Western institutions, this research primarily engages in textual analysis. Newspaper articles, blogs, scholarly articles and books, and secondary statistical data form the basis of the research. Much of the discussion on cultural heritage

---

[26] The tool can be found at https://www.imodara.com/magazine/send-it-back.

decolonisation in Portugal takes place through media with faster cycles (e.g., newspapers, blogs, and social media). Thus, examining this material for the most up-to-date sentiments is logical.

One unique aspect of this research is that it purposefully does not pursue perspectives gained through surveys and interviews. Semi-structured interviews with museum staff and other actors involved in the cultural heritage field were originally planned to complement the textual analysis, but only one museum professional responded to a request for an interview out of 11 requests sent. Hence, as a result of the COVID-19 pandemic and other factors, interviews proved unfeasible. While originally seen as a shortcoming of the research, this circumstance provides the chance to consider the issue through a specific lens that is actually very fitting for the times. Specifically, living in a globalised world that has round-the-clock connections to people from all corners of the earth, in 2020, we found ourselves suddenly unable to connect in person even with our neighbours: We could access the outside only through online media. This research therefore recreates this recent and ongoing reality by presenting a view of cultural heritage decolonisation efforts in Portugal based on the information that someone who does not live or work there has access to. This could include, for example, someone living in São Paulo who visits the *Rediscovery: 500 Years or More* exhibit, which features a red feather cape on loan from the National Museum of Denmark that originally belonged to the Tupinamba[27]. This person, intrigued to learn that the artefact is "owned" by a very distant museum that seemingly has nothing to do with Brazil or the Tupinamba, begins to research other objects that have been separated from their homeland. While they may not be able to visit Denmark or Portugal themselves, they can learn about how museums in these countries are handling repatriation claims by reading newspaper articles and blogs and watching videos or news segments. Thus, this research focuses on sentiments from various actors expressed primarily through formal online publications accessible to interested parties with no personal connections to museum professionals in Portugal. Future research should adopt different methods, such as interviews and surveys, to explore this topic from other perspectives.

3.1.1 Newspapers, blogs, and social media

The articles used in this research include mostly features and op-eds. These were identified by searching on Google and Google Scholar using various keywords, including "decolonisation", "museum of discovery", "Portugal", "repatriation", "return", and "artefacts". Notes and links included in these articles were followed to identify additional sources. Most of the articles were published by international or national media outlets, rather than local or regional media, and were written in English or Portuguese. To facilitate understanding, the articles were translated into English via Google Translate, and then a bilingual (Portuguese + English) coworker reviewed the translations. The original text of all quoted material from non-English sources is available upon request.

A similar process was used to identify relevant blogs. Using keyword searches, relevant blogs and

---

[27] See https://revistapesquisa.fapesp.br/en/revisiting-and-reclaiming-the-past.

blog posts were identified and examined for suitability and links to additional relevant material. As with newspaper articles, non-English sources were translated via Google Translate and then reviewed by a bilingual coworker. In the current paper, most social media content was identified via links in the previous two types of sources. This was intentional, as the relevant videos and pages come from one-time events sponsored by formal institutions rather than personal pages or special-interest pages. As these sources show, a new form of civic participation has emerged wherein "social media do not replace public institutions but rather change the ways in which people relate to them" (Blankenberg, 2015, p. 104). Debates, roundtables, and even entire conferences now occur entirely online through mediums such as Facebook Live. This widens the audience for these events that were once accessible only to those who were geographically or institutionally close to the organisers. Thus, while the social media content examined here is still associated with and/or generated by formal sources, it is meant for a popular audience. The majority of these sources were available in English, although some included other languages, such as French. When necessary non-English sources were translated via Google Translate to confirm the researcher's understanding. The examination of posts, tweets, and videos from individual social media users is left to future research.

3.1.2 Public Opinions on Race and the Relevance of Racism

Importantly, it must be acknowledged that the content and opinions published in formal sources, such as government reports, newspapers, and journals, rarely reflect the whole range of opinions or ideas on a given topic. Indeed, these forums are often dominated by urban elites. Referencing Saskia Sassen, Lord and Blankenberg point out that global cities, such as Lisbon (and, increasingly, Porto, Coimbra, and other cities that are home to higher education institutions) are characterised by three structural facts: "they concentrate wealth among owners, partners, and professionals associated with global firms; they are increasingly disconnected from their region and country; [and] they are also home to a large marginalized population that does not benefit from the financial activities of the big firms" (Lord & Blankenberg, 2015, p. 16). In Lisbon, for example, this is clearly seen by the housing crisis that many economists, politicians, and scholars attribute to governmental programmes meant to "attract foreign investment, new real estate developments, renovation projects and tourist accommodation" (Gomez, 2022). These programmes have, directly and indirectly, led to "rampant speculation [and] unregulated rents and [are exacerbated by] political inaction" (Gomez, 2022), to the detriment of long-term Portuguese residents.[28] The economic and social gaps both *within* Lisbon and *between* Lisbon and more rural areas of the country appear to be widening.

The representation of any issue in more formal sources such as journals and newspapers must thus

---

[28] Projects and organisations such as Stop Despejos (stopdespejos.wordpress.com) and Habita! (habita.info) are working to demand that the rights of the many who live here are respected over the profits of the few that make speculative investments and provide excessive tourist accommodations.

be considered critically, and the topic of cultural heritage decolonisation work in Portuguese museums is no exception. In fact, such complex debates often have a greater effect on those who lack visibility than "those who comfortably sit in the studio to comment on what they have not lived or experienced" (Vicente, 2021). Therefore, importantly, *this thesis therefore does not attempt to argue that the information discussed here is comprehensive or representative of Portuguese society as a whole*. It is quite clearly a look at the opinions and experiences of people who tend to be relatively wealthy, well-educated, and in close contact with tourists, migrants, and other external cultural groups; they are people who have access to the connections, education and publication opportunities that give them platforms in newspapers, journals, art blogs, and the like. As noted above, a comprehensive survey of all opinions on this subject is beyond the scope of this work, which specifically focuses on how these debates are presented in these more formal sources accessible via the internet. More quantitative and broadly representative research is left for future work.

3.2 Focal Issues: Reckoning with Race, Founding Museums and Monuments, and Considering the Brazil–Portugal Dynamic

No two countries fielding calls for repatriation and the decolonisation of museums face the same circumstances. Thus, a number of complex and subtle factors appear to complicate the narrative and efforts in Portugal. For one thing, the "Age of Discoveries" in Portugal is a source of immense national pride for many, and there is strong feeling that cultural heritage decolonisation efforts would require completely denouncing that pride. As essayist Eduardo Lourenço said in an interview with Diário de Notícias, he "does not understand this movement, when, regardless of the negative consequences, such as slavery, the discoveries had a 'commendable' motivation in their genesis and when so many other countries in Europe committed much greater 'cruelties'" (Diário de Notícias, 2018).

Furthermore, Portugal is no stranger to being plundered and marginalised itself, and this may be a raw point among many Portuguese. Indeed, the Portuguese can see many of their own cultural artefacts in the halls of the British Museum and museums in other former empires.[29] Another more commonly discussed manifestation of this issue is the derogatory term "PI(I)GS", which has been widely used to refer to Portugal, Italy, Ireland, Greece and Spain—countries that struggled to recover from the global financial crisis that began in 2008 (Peralta & Jensen, 2017). This acronym represents "a re-materialization of domestic European orientalism…[that] produces Europe's South as occupying a liminal space in relation to northern-centred European rational (economic) self and has been fed by a long history of travellers, intellectuals and, more generally, public discourse in Europe's North" (Peralta & Jensen, 2017, p. 74). It is not difficult to understand that a people with a recent collective memory of

---

[29] The British Museum has approximately 1,600 catalogued objects associated with Portugal, including a Bronze Age palstave "believed to have been excavated N. of Oporto" (object number 1959,0711.2). The only provenance noted is that it was obtained from a Mrs. E. Danvers, likely in 1959 (British Museum, n.d.b).

mistreatment would object to being accused of much the same actions and attitudes towards others in the past; it also makes sense that calls for repatriation might feel like being required to "pretend" that Portugal still retains its global dominance and thus owes reparations. Lourenço put this feeling succinctly: "We can no longer repair anything…these things cannot be repaired, but [this movement] could be a gesture justified by a kind of particular and unique evil that would distance us from the consideration of a civilized country, of a civilized continent called Europe" (Diário de Notícias, 2018).

These two issues are related to a third potential complicating factor: it is still rather taboo to discuss racism in Portugal, and many there believe that they live in a post-racial society. A clear example of this is that for better or for worse, in an effort to prevent stereotyping and race-based discrimination, the government of Portugal is forbidden by law from collecting data on ethnicity or phenotypes (Cunha, 2010). However well-intentioned such legislated omission is, it has not prevented racism. The recent trial of Evaristo Marinho, who is accused of shooting and killing Bruno Candé, a Portuguese actor of Guinean origin, in Lisbon in 2020, shows just how fraught discussions of race are in Portugal. Although Marinho shouted racial slurs at Candé in the days preceding the shooting, he denies having racist motives (de Sousa, 2020). Marinho hoped that this denial would aid in his defence because, as Black rights campaigner and sociologist Cristina Roldao argues, "in practice, Portugal's capacity to process cases as racism or hate crimes is practically zero" (de Sousa, 2020).[30]

The state of artefact repatriation and the decolonisation of museums in Portugal is thus explored through three focal issues or themes related to these complicating factors. While many other important factors could be explored, these three are chosen because they progressively show how history both informs and complicates the present. First, the issue of race in Portugal is examined using information from both domestic and international sources. The picture that forms is of a country struggling to accept the fact that both positive and negative aspects of its history, however distant that history feels, are still very much impacting the present. Then, the discussion continues with an exploration of how this struggle manifests in the Portuguese cultural sector, specifically in terms of a number of contentious monuments and museums that have operated or been proposed in recent years. The debate surrounding them reinforces what the first theme suggests: that while some in Portugal are ready for difficult conversations about the reality of the country's colonial legacy, others staunchly deny that these issues are either prevalent or relevant to their lives. Finally, these two issues meet in a brief exploration of the unique relationship between Portugal and its former colony of Brazil. The two countries have been intimately tied together for almost half a millennium, forming extensive financial, political, and cultural ties. Given these countries' complex and intertwining relationship, these shared cultural components muddy the waters when it comes to questions of ownership and repatriation.

---

[30] Less than 3% of crimes of discrimination or inciting hate and violence in 2014-2018 resulted in a conviction (Alberti, 2020). Nevertheless, Marinho was convicted of racially motivated murder in June 2021 (Lusa, 2021).

3.3 Lusotropicalism: Reckoning with Race in Portugal

Race is a complex issue. For many, it is a sensitive but important topic to discuss; for others, it is almost entirely taboo. This section examines a number of journal articles reporting formal research, government reports, and op-eds and other articles from online newspapers to offer a snapshot of how the modern concept of race is affected by Portugal's colonial past. In turn, the way race is understood, acknowledged (or not), and acted upon deeply affects attitudes toward decolonisation in all areas of life in Portugal, including museums.

Journalist Joana Gorjão Henriques wrote a striking opinion article in the Guardian that neatly summarises a prevailing attitude in Portugal regarding race and racism:

For years, modern Portugal has been struggling to find a way of talking about national identity and race. Even though Portugal has racial profiling, race crime and the daily subordination of black people by whites, most Portuguese would deny that their country has significant "racial problems"— that's what they have in America, France or the UK. Such attitudes are a hangover from the dictatorship years and the "luso-tropicalism" ideology...which spread the idea that the Portuguese were better colonisers—and that ongoing British or French soul-searching over race was a result of "bad colonising" (J. G. Henriques, 2011).

Lusotropicalism is the idea that the Portuguese had uniquely civil relationships with the people they colonised because they had particularly strong empathy and a natural capacity to interact with people from other cultures (Vala et al., 2008). The concept arose in Brazil in the 1930s and was selectively appropriated by Salazar's regime to romanticise and legitimise Portugal's colonial endeavours, particularly since the second half of the nineteenth century, but has since been fully incorporated into the Portuguese national identity (Vala et al., 2008). In fact, throughout the nineteenth century, as the Portuguese empire lost Brazil and compensated by joining the scramble for Africa and extending and deepening its control over areas along the Indian Ocean and into Asia, "a host of national symbols were created on the basis of an imperialist self-definition of the country's national identity" (Peralta, 2015, p. 306). As Portuguese colonial rule became increasingly challenged as illegitimate, the Estado Novo dictatorship carefully built an "imperial mystical discourse" that was subsequently entrenched in the educational curriculum; this discourse "emphasized the cult of national heroes and the idea of the historical mission of the Portuguese nation" (Peralta, 2015, p. 306).

Of course, it should be noted that Portuguese colonisation was hardly harmless: Bartolomé de las Casas, whose accounts of the atrocities committed by the Spanish are considered fairly accurate, also documented heinous acts by the Portuguese. Upwards of 5 million indigenous people died in Brazil while it was under Portuguese control, and the Portuguese initiated the trans-Atlantic trade of enslaved Africans, forcibly bringing at least 3 million Africans to Brazil alone (Vala et al., 2008). Portuguese colonisers also enslaved Chinese from their colony in Macau (Badcock, 2018). Even after trade in human bodies officially ended, Portuguese colonial projects persisted for another 200 years, with the result that Portuguese is currently the fifth most spoken language in the world (Braga, 2020). Moreover, Patrícia

Martins Marcos, a professor at the University of California, San Diego, argues that the concept of race was *exported* from Portugal, not *imported*. In an article on BUALA,[31] Marcos describes the historical evidence for the long history of the use of race as a marker of difference. For instance, religious iconography and many historical paintings and documents attest to Lisbon being the "Black capital of Europe". However, these sources have been used to paint a picture of Lisbon as raceless and colorblind, which it decidedly was not during the early modern period nor is today.

As evidence, Marcos presents a quote from the 1640 statutes of the Portuguese Inquisition: "only those with 'clean blood, without the race [raça] of Moor, Jew, or peoples newly converted to our Faith' had any place in the Inquisition, and 'neither should they be the descendants of people who had any of the aforementioned defects'" (Marcos, 2021). Here, it is clear that not only was race a marker of (unfavourable) difference, but it could be derived from religious identity as much as from skin colour. As another important example, Marcos describes a 1746 incident in which a royal physician, João Machado de Brito, was accused of "possessing the detestable stain [mácula] of the other" because his father was a New Christian (i.e., of Jewish ancestry); he was subsequently found free of this "defect" because it was revealed that his *biological* father was Christian (Marcos, 2021). Thus, had his "purity" not been proven, "the marking of race…would have not only been applied to him personally but to all his children and all future family generations" (Marcos, 2021). Clearly, in early modern Portugal, race

> constituted a registered mark of explicit hierarchy between humankinds that was not only assumed and acted upon daily but also put on record, thereby producing a biopolitical register of beings with more or less "quality," or degrees of "defect." Once such physical, phenotypical, and moral qualities are put on record…they could not be easily overcome (Marcos, 2021).

As a result, the slavery that grew out of Portuguese colonialism "constituted not only a means of disciplining and molding inferior kinds of humanity but a method of saving their immortal souls while expending the mortal, corruptible, physical body through redemptive suffering" (Marcos, 2021).

3.3.1 Race and Ethnicity Today

It is evident from the historical records that belief in lusotropicalism is misplaced. However, the concept still holds sway with modern audiences. Ascenso Simões, a deputy from the Partido Socialista (the Socialist Party in Portugal), argued that Portugal's recent agreement to help train Mozambican special forces is evidence that the country has never fully accepted the formal decolonisation of Mozambique (Simões, 2021). Indeed, he asserts that "there is a very significant fringe of Portuguese people who continue to think that Africans would prefer the Portuguese whip to the hunger of today" (Simões, 2021).

---

[31] An open-access website launched in 2010 by publisher, academic writer and activist Marta Lança and sponsored by the Câmara Municipal de Lisboa that acts as "a digital home for multiple voices from Africa, Brazil, Europe, and beyond" (BUALA, n.d.). The site archives over 4,000 essays, interviews, exhibitions, and other texts, mostly in Portuguese, with the goal of "democratiz[ing] the production and access to knowledge" and is "often used in research and educational activities, particularly, in locations where there is scarcity of bibliographical resources, or a lack of spaces for publishing critical and independent views" (BUALA, n.d.).

These particular words come from an opinion article in PÚBLICO with no specific sources, but more formal, quantitative evidence of this issue has also been found.

For example, in an article examining the link between the belief in lusotropicalism and various expressions of anti-immigrant prejudice, Vala, Lopes, and Lima identify two dimensions of this relationship: first, the belief may explain the aspect of Portuguese national identity that denounces the overt expression of prejudice; and second, lusotropicalism affects how white Portuguese negatively evaluate cultural differences between themselves and Black immigrants (Vala et al., 2008). The article's two major findings are that Portuguese colonialism is seen as more humane than Spanish and English colonialism and that today, lusotropicalist beliefs may inhibit the overt expression of prejudice but do not protect against its covert expression (Vala et al., 2008).

Today, there may be more positive attitudes towards immigrants, particularly Black immigrants, in Portugal than in other European countries due to the Portuguese national identity that is in no small part constituted by a firmly anti-prejudice norm (Vala et al., 2008). This is sometimes revealed by omission, as seen in the case of the extraordinary welcome extended to Ukrainian refugees following the Russian invasion. As of March 2023, Portugal had granted temporary visas to over 58,000 Ukranians (Schengen Visa News, 2023)—an appropriate move, given the circumstances. However, André Costa Jorge, the coordinator of the Plataforma de Apoio aos Refugiados (PAR) highlighted the case of about 60 youths who had been studying in Ukraine and arrived in Portugal alongside other refugees but were still awaiting accommodation months later (Agência Lusa, 2022a). The difference between these youths and the 2,339 other Ukrainian refugees assisted during this period? They were not white. As Jorge noted, "these people in particular are at the end of the queue [and] often are even excluded or rejected…due to factors such as prejudice and racism" (Agência Lusa, 2022a).

Interestingly, overt prejudice is found to increase when the target of the prejudice is specifically people from former Portuguese colonies in Africa (rather than just "Black people") (Vala et al., 2008). Studies have shown that unlike in many other European countries where there is a positive association between prejudice and national identity, in Portugal, national and racial identity do not necessarily result in the same level of overt prejudice; that is, in Portugal, identifying as white leads to higher overt prejudice than identifying as Portuguese (Pettigrew & Meertens, 1995; Vala et al., 2015). From this seemingly paradoxical finding, the study by Vala, Lopes, and Lima argues that "the relations between receiving societies and immigrants is influenced by the representations that receiving societies build regarding their own history, namely their colonial past" (Vala et al., 2008, p. 298).

What is relevant here is that the Portuguese largely consider themselves to not be racist because they view their colonial past in a relatively favourable light, which affects how they think and act today. Of course, that does not mean that they are free of prejudice, nor even of overt racism. The overt and public expression of racism may be frowned upon, but it does still happen, along with other, more insidious expressions of prejudice and racism. In a 2020 article from openDemocracy, an independent international media platform, Rui Braga (2020) provides a frank assessment of the growth of the anti-

racism movement in Portugal, describing how it challenges the national narrative and highlights the harsh truth of structural racism in Portugal. First, Braga, a researcher at the Tamera Peace Research & Education Center in Relíquias, Portugal, dismantles the idea that Portuguese colonisation was in any way benevolent or relatively peaceful. He discusses the rise of lusotropicalism and the Salazar regime's seizure and exploitation of certain components of it to bolster support for its continued colonial activities. Then, he urges readers to expand their understanding of racism.

Echoing arguments in places like the US, Braga notes that there are two different "definitions" of racism: the first gives us the stereotype of the individual racist who, driven by race-based hatred, purposefully acts cruelly or violently toward another person; the second, however, acknowledges that there is a complex system that involves cultural, social, economic, and political beliefs, structures, and actions that formalise and reinforce the unequal distribution of resources, power, and privileges between people of colour and white people. The former conception allows individuals to deny their participation in and benefits derived from the latter.

Upon hearing about this distinction, what many miss is that despite the difficulty that the latter definition presents in terms of dismantling prejudice, racism, and inequality, it also allows people to acknowledge that they were socialised into this system. This is not meant to give people permission to deny individual responsibility but rather to stop associating racism purely with individual decisions, beliefs, and actions. Without an understanding of the latter definition, people "will assume that what is being criticized is [their] skin color and [their] individual goodness, rather than [their] complicit[y] in a system of oppression that is designed to benefit [them] at the expense of BIPOC in ways that [they] are not even aware of" (Saad, 2020, p. 42). The roots of this system go back almost a millennium; after all, the Christian rulers of the Iberian Peninsula fought hard to reconquer Moorish territory, and a key part of their endeavours was defining their own identity in opposition to that of the Moors (Braga, 2020).

The result is that today, most Afro-Portuguese citizens are descendants of immigrants from former Portuguese colonies or are such immigrants themselves, and they often live in areas that lack funding in public infrastructure and services like healthcare and education (Braga, 2020). While race is not the only contributing factor, these areas are inhabited by numerous historically disadvantaged ethnic groups, such as the Roma people and African immigrants whose home countries could not provide them the necessary stability and dignity—in no small part because of Portugal's role in destabilising the economies and societies in their former colonies (Braga, 2020). These populations are considered minorities "not necessarily [because they are] fewest in number, but rather [because they are] communities that are far from places of speech and decision-making because of their common characteristics" (Vicente, 2021). Furthermore, Black Portuguese youth are half as likely to go to university as their white peers, and the incarceration rate for people of African origin in Portugal is 15 times higher than that of the general population (Badcock, 2018)—clear evidence that even if individuals treat each other equitably, there are undeniable systemic disadvantages and discrimination affecting certain portions of the population.

So what does Braga suggest to remedy this issue? He points out that Portugal's historical legacy is,

of course, neither all good nor all bad: "Just as the present system still upholds the ideological and psychosocial conditions that produced and sustained the colonial reality, we might also find in us that which allowed this land to embrace diversity and enable the coexistence of different cultures and religions" (Braga, 2020). This requires moving from denial to recognition so that Portugal can ideologically, institutionally, and psychosocially remedy the systemic forms that perpetuate inequality and racism. As the head of the UN Working Group of Experts on People of African Descent noted, the "Portuguese identity continues to be defined by its colonial past, as well as enslavement and the trade and trafficking of Africans, and racial equality efforts have not confronted the importance of a broad-based renegotiation of Portuguese identity" (United Nations, 2021).

Indeed, after a visit to Portugal in the wake of the 2020 anti-racism protests, the working group reported that the increasing discourse on systemic racism in Portugal has motivated the current government to "engage[e] with civil society…in defining its anti-racism agenda", although there is still an unacceptable level of "systemic racism and racially motivated violence and ill-treatment, racial profiling, abuse of authority, frequent police brutality towards people of African descent" (United Nations, 2021). The group's report expressed hope that the National Plan to Combat Racism and Discrimination 2021-2025 – Portugal Against Racism (PNCRD) would be a step in the right direction and encouraged the government to "import the welcoming narrative it has built in the migration space in order to demonstrate that excellence and innovation rely on embracing diversity and anti-racism" (United Nations, 2021). The PNCRD, the first national plan on discrimination and racism in Portugal, follows four main principles: 1) the deconstruction of stereotypes, 2) coordination, integrated governance, and territorialisation, 3) integrated intervention in the fight against inequalities, and 4) intersectionality (Esteves, 2021). Recognising that "there are still elements of racism and discrimination enshrined in the Constitution of the Portuguese Republic, which reflect the historical processes that gave rise to them— such as slavery and colonialism—and that perpetuate models of structural discrimination", the plan includes ten areas of intervention: 1) governance, information and knowledge for a non-discriminatory society; 2) education and culture; 3) higher education; 4) work and employment; 5) housing; 6) health and social action; 7) justice, security and rights; 8) participation and representation; 9) sport; and 10) media and digital communications (Esteves, 2021).

While the development of various anti-discrimination measures and legislation in line with this plan is a positive sign, the pace of such development may be insufficient to combat the problems it is meant to address. For example, a recent study by researchers associated with the Instituto Universitário de Lisboa (ISCTE) found that racist and xenophobic phenomena in Portugal has recently increased, particularly since the the start of the COVID-19 pandemic (Casquilho-Martins et al., 2022). Reports from official bodies and data on online news comments show an increase in discriminatory behaviour, online hate speech, and the political presence of extreme right-wing movements (Casquilho-Martins et al., 2022). Notably, new forms of racism have emerged to circumvent the taboo of targeting people based on physical differences (Casquilho-Martins et al., 2022) and are associated with economic arguments

and discussions of lifestyle, the target groups of which conveniently align with—but are not explicitly described in terms of—certain racial and ethnic minority groups (Casquilho-Martins et al., 2022). Ultimately, the three groups in Portugal most negatively affected by racism and xenophobia are the Roma, Afro-descendant, and Brazilian communities (Casquilho-Martins et al., 2022).

Importantly, the study found that the reactions in online news comments to official reports on such issues confirm the continued denial of these problems among many Portuguese. For example, of the 202 comments on a 2021 article about the rapid demolition of numerous cafés and bars in the Jamaica neighbourhood, only one was clearly anti-racist; far more comments questioned the validity of studies that confirm the perpetuation of racism, disagreed with their findings, or violated the platform's guidelines, presumably because they contained offensive or derogatory speech (Casquilho-Martins et al., 2022). Similar trends were found in the comment sections of numerous other articles about studies of race and racism from the UN and the Council of Europe. Interestingly, in comparing the comments on articles about two different homicide cases (the murder of Ukrainian Ihor Homeniuk by SEF officers and the murder of Bruno Candé by 76-year-old Evaristo Marinho), the study found that the former was more frequently denounced, and the racial motivation identified in the latter was more frequently called into question (Casquilho-Martins et al., 2022). It was beyond the scope of the study to assess in detail the degree to which the differing circumstances of the two cases and the ethnicities of the two victims affected the different reactions, but overall, the study found a significant jump in online hate speech in the last few years (see Figures 1 and 2 in Annex A).

Thus, while Portugal, ranked third and then fourth safest country in the world in 2020 and 2021, respectively, is not "culturally…a territory characterized by violent crime", the authors of the study question whether "this safety is truly manifested in the daily lives of people, especially those belonging to more unprotected groups" (Casquilho-Martins et al., 2022, p. 13). Online and offline hate speech and violence, including police violence, has recently proliferated, with numerous reports noting the far-right's infiltration of the Portuguese security forces and military (Fernandes & Teles, 2021).

Despite signs of increasing awareness of discrimination and racism, numerous newspaper articles reporting on the increase in violence against certain groups such as immigrants and Afro-Portuguese individuals and on the activities and speeches of Chega president André Ventura attest to the persistence of "race blindness" in Portugal. Ventura frequently argues that racism is only an issue in Portugal if "we…make racism an issue" (Agência Lusa, 2022b). Blind to his party's own hypocrisy, Ventura proposed a special confinement plan specifically for Roma communities during the first COVID-19 lockdown in 2020 (Casquilho-Martins et al., 2022). Nevertheless, citing the country's numerous immigrant communities, including Angolans and Ukrainians, he argues that Portugal must firmly insist that it is "a society of equals in which everyone must have rights, but everyone must also have duties, whether they are Brazilians, Portuguese of origin, Gypsies, Afro-descendants" (Ventura quoted in Agência Lusa, 2022b). Ventura has promised that for every demonstration against racism in Portugal, Chega will perform a demonstration of its own. Indeed, Chega held a demonstration attended by a few

hundred people in Lisbon in August 2020 following the murder of actor Bruno Candé. The march featured a large banner reading "Portugal não é racista [Portugal is not racist]" in an attempt "to ward off 'this ghost' that plagues the country whenever something tragic happens" (Agência Lusa, 2022b).

Just as Braga warned, Ventura has attempted to pass off incidents of violence against immigrants and Black people as just the actions of a few bad actors, because "Portugal is not a racist country…[but] there are sectors of society more prone to racism" (Agência Lusa, 2022b). Ventura's statements clearly echo the arguments and tactics used for decades, if not centuries, in Portugal and across the world—namely, that racism is perpetuated by individuals and that the state will only exacerbate problems if it officially recognises, analyses, discusses, or makes decisions based on race.

3.3.2 Official Data (or Lack Thereof)

In many countries, policymakers tasked with combating racial tensions use official data sources like censuses to understand the state of the nation from a quantitative, analytical point of view. In Portugal, the most recent censuses indicate that the reduction in the Portuguese population over the last ten years is due to "negative natural and migration balances", including "double demographic ageing" caused by a combination of low birth rates and higher average life expectancy (Duarte & Pinheiro, 2019). Recently, however, the migration balance has helped mitigate this decline, as Portuguese people return and foreign immigrants increase (Duarte & Pinheiro, 2019). Policymakers can also see that the proportion of the total population that are of working age is dropping, from 66% in 1990s to 64% in 2018, with a predicted drop to 52.6% by 2070 (Duarte & Pinheiro, 2019). This is all useful information for forming policies about labour, healthcare, and immigration, to be sure, but it forms an incomplete picture.

What policymakers cannot see is information on the ethnic makeup of the Portuguese population. Echoing the beliefs of 78% of the Portuguese population,[32] a 2019 government working group argued that the upcoming census (for 2021) should collect ethnic/racial data (Viegas, 2019). The group, which included academics and activists, recommended an optional question that prompts respondents to select from among four options: White/Portuguese white/of European origin, Black/Black Portuguese/Afro-descendant/of African origin, Asian/Portuguese of Asian origin/of Asian origin, and Cigano/Portuguese Cigano/Roma[33]. This recommendation stemmed from the hope that having access to such data would help assess and then address ethnic inequalities in Portugal because, as noted above, the Portuguese constitution and the Law on the Protection of Personal Data do not currently permit the collection of data

---

[32] According to a survey by the Centre for Studies and Surveys of Opinion of the Catholic University, which also found that 90% believe there is discrimination in Portugal today (Esteves, 2019). Another survey by the European Commission confirmed this awareness of racial and ethnic prejudice in Portugal, as 67%, 61%, and 62% of respondents agreed that discrimination based on ethnic origin, skin colour, and Roma origin, respectively, is common in Portugal (Casquilho-Martins et al., 2022).

[33] "Branco/Português branco/De origem europeia", "Negro/Português negro/Afro-descendente/De origem africana", "Asiático/Português de origem asiática/De origem asiática", and "Cigano/Português cigano/Roma", respectively (Viegas, 2019). Note that "Cigano" is often translated into English as "Gypsy", which is now widely recognised as a racial slur and thus avoided in this research.

on ethnicity or race.[34] Thus, data obtained through such a question would be more precise and accurate than questions about nationality or parents' nationalities, which are essentially just questions about immigration (Viegas, 2019).

Nevertheless, there was division among the working group, with some members expressing concern that the question would "increas[e] the risks of [the] discriminatory appropriation of information" and misinterpretation and even solidify or legitimise social segregation according to the categories (Viegas, 2019). To mitigate such concerns, the group also recommended that an oversight committee on racism and xenophobia (Observatório do Racismo e da Xenofobia) be founded (Viegas, 2019). In the end, this question was not included in the 2021 census. Officials stated that "the issue is complex and requires further research", that "race and ethnicity are subjective", and that certain groups, such as the Roma community, objected to the question being included (The Portugal News, 2019). Instead, the National Institute of Statistics (INE) said that it will conduct a survey on the subject. The president of the INE noted that the census is not a tool for classifying the population and that it is important to track ethnic/racial data over time, something the census is not equipped to do (DN/Lusa, 2019). Furthermore, few other European countries collect this type of information in their census, so the Portuguese census is not alone in this regard (DN/Lusa, 2019).

3.4 Debates, Protests, and Criticism Regarding Monuments and Museums Dedicated to the Discoveries

We now turn to the second focal issue, that of specific museums and monuments honouring Portugal's age of exploration, often called the Age of Discoveries (Era dos Descobrimentos), or "the Discoveries". This era is still a source of much national pride; it is a vital part of the country's history and, on some level, inextricable from its sense of identity. It is natural that many would support the founding of museums and monuments to honour this fascinating and important period in the nation's history. However, as discussed above, belief in lusotropicalism, even if not as explicit as during Salazar's regime, also plays a role in the desire to found museums about the Age of Discoveries. The 1930s slogan "Portugal is not a small country" aptly encapsulates the dictatorship's purposeful cultivation of pride in the country's colonial empire. As decolonisation picked up steam in the 1950s, the idea of lusotropicalism was pushed in state narratives and propaganda (Braga, 2020). Thus, Portugal's colonial past has long been romanticised, and the construction of race, explicitly driven by the need to justify the colonisation of "inferior" peoples, has been occluded by these glorious achievements in Portugal's past—to admit guilt and denounce one is to also denounce the other. When voices are raised against the founding of memorials or museums glorifying the Age of Discoveries, other voices appear denouncing them as being unpatriotic and ashamed of the past and as seeing racism where there "clearly" is none.

---

[34] It is, of course, possible that the National Data Protection Commission could grant an exception for the census if the anonymity of the data can be properly ensured (Viegas, 2019).

Directly contradicting these claims is the example of the proposal in 2020 by Joacine Katar Moreira, then representing the Livre party in Parliament, to form a working group to identify and repatriate a number of artefacts from former colonies that are currently in Portuguese state museums; all parties except the Bloc de Esquerda and Pessoas–Animais–Natureza (and the Partido Communista Portuguese, which abstained) voted against it (Opoku, 2020). In response, Ventura posted on social media that Moreira, who was born in Guinea-Bissau, should be deported and returned to her country of origin—thus, a request to move toward decolonisation was promptly met with direct racism (Opoku, 2020).

The three particular cases examined here are a pair of existing museums, the World of Discoveries and Museu dos Descobrimentos; the Padrão dos Descobrimentos monument in the neighbourhood of Belém in Lisbon; and the Museu das Descobertas proposed by Lisbon Mayor Fernando Medina in 2017. The first case involves two already constructed institutions, one a "interactive digital exhibition" founded in Porto in 2014 (the World of Discoveries) and the other a more traditional museum founded in 2009 in central Portugal (the Museu dos Descobrimentos). Beyond general information of interest to tourists, not much information about these sites is available online. However, there are some glimpses offered that paint the Porto site as essentially a theme park celebrating sea exploration, navigation, cartography, and international trade and the Belmonte site as a traditional museum that nods to both the glory of the era and the darker side of its activity. The second case is an older monument built during the dictatorship that has come under increasing scrutiny over the decades, recently having been defaced by a foreign citizen in an act of "vandalism against the collective heritage of the city" (DN/Lusa, 2021). Finally, the third case is an impassioned debate about the proposed founding of a museum celebrating the Age of Discoveries. The debate, which was at its height in 2017 and 2018 but is still occasionally reignited, has taken place primarily in the form of opinion articles in newspapers like *Observador* and *PÚBLICO*. Together, these three cases reveal a great deal about the various levels of engagement, awareness, and concern regarding this topic in Portugal, including how these levels may differ among those of different socioeconomic status and educational background. The result is an attempted "discursive displacement…to dissociate [the] Discoveries and colonization" (Gomes, 2019).

3.4.1 World of Discoveries and Museu dos Descobrimentos

The World of Discoveries advertises itself as "a space that re-enacts the fantastic odyssey of the Portuguese navigators, crossing oceans to discover a previously unknown world" (MASHME.EU, n.d.), complete with temperature and climate simulations, wax characters, and live animals. Celebrating Portugal's role in "propell[ing] mankind into the era of globalisation and definitively chang[ing] our relationship with the planet", the site innocuously refers to the enslavement of African peoples as merely "circulating people, animals, and plants all around the world", and its only reference to colonisation is its description of an "incredible meeting of cultures and the ambition, ideas, endeavour[s] and innovation that made it possible" (MASHME.EU, n.d.). Its multilingual content is all available in six languages, neatly aligning with the main languages of six former empires: Portugal, Spain, England, France,

Germany, and Italy (MASHME.EU, n.d.).[35]

Initially, it would be easy to dismiss these issues as "not the point" of the space, which is, after all, aimed at families with young children and is intended to spark curiosity and interest in a decidedly fascinating period of Portuguese history. However, this can also showcase that indoctrination into traditional narratives of history that continue to benefit those in power starts early. The site perpetuates the belief that the Discoveries and colonisation are separate historical facts—many see the Discoveries as the initial event and a source of pride, whereas colonisation came later and can thus be conveniently dismissed by museum educators at the World of Discoveries in Porto as "not the theme of the museum" (Gomes, 2019). In this way, museums inform and sustain cultural memory, but they are also intimately linked with the patriarchal and racist power relations whence they were born. The narratives they present are conveyed as truths about the past, but the past is marked by unequal power relations between the voices we have access to and those we do not—or those we have refused a platform to (Gomes, 2019).

While the Museu dos Descobrimentos reveals a more direct handling of the difficult issues of colonisation and enslavement than the World of Discoveries, it falls short of genuinely engaging with and questioning the narrative behind these topics. Founded by the municipality of Belmonte in the hopes of attracting tourists and their money, the museum focuses on Pedro Álvares Cabral, an explorer and military commander from Belmonte, and his "discovery" of Brazil in 1500. It aims to reach audiences by "disturbing them, stimulating them and giving them the possibility to participate, know, and interpret our history" ("Museu Dos Descobrimentos," n.d.). According to an article written by Mariana Selister Gomes, a Brazilian visitor and researcher, the museum has sparse material collections, and its main medium is thus various technology-enhanced scenarios (Gomes, 2019). A variety of interactive elements are provided, including a simulated "day at sea" where visitors can try their hand at navigation calculations, browse the food that was eaten by voyagers during the Atlantic crossing, and be reminded that having women on board was seen as bad luck (e-cultura, 2018).

While colonisation and race relations are discussed, numerous features reveal the lack of commitment to treating the themes of colonisation and racism with sufficient scepticism and consideration. For example, sa Gomes's article notes, the panel describing the indigenous inhabitants notes that "although [they were] in primitive stages of development, the Indians [can] teach the developed world a lesson in the preservation of ecosystems" (Gomes, 2019)—a rather backhanded way of acknowledging that indigenous peoples have knowledge that is valuable even for their more "advanced" oppressors. Moreover, throughout the museum, the bodies of indigenous and Black people are exoticised and objectified just as they were 500 years ago: "the hegemonic vision is evident, reinforcing the association of indigenous people with nudity, of blacks with the body through capoeira, of whites with intellectuality. That is, the animalization of indigenous and black people is emphasized, in a reconstruction of the colonial body" (Gomes, 2019). Finally, the trite and heavily criticised

---

[35] This list shows the anticipated demographics of the site's main visitors, but it is no coincidence that by offering content in these six tongues, the museum can reach a significant proportion of the world population.

arguments that slavery existed on both sides of the Atlantic before the Portuguese Discoveries and that Africans were the ones enslaving other Africans are prominent in the stories conveyed by panels throughout the museum (Gomes, 2019).

Indeed, the panels attempt to naturalise the enslavement of Africans, despite the fact that slavery had never previously been based on skin color—certainly not on the same scale as the trans-Atlantic slave trade. For most of human history, people became enslaved due to indebtedness or after losing a war. On a panel entitled "Reasons for Slavery", the museum cites sugar as the main impetus for the enslavement of Africans, conveniently sidestepping questions of *why* colonisation was deemed necessary and why no other alternatives were sought. Ultimately, this lack of explicit interrogation and criticism "ends up reproducing the hegemonic colonial discourse" for visitors (Gomes, 2019).

To round out the tour, visitors are directed to the top floor of the museum, described as a "realisation of the identity and union of the two peoples" (e-cultura, 2018). The floor primarily focuses on modern Brazil and presents "naked women's bodies as syntheses of Brazil" through images of young Black women with old white men, a naked woman at a Carnival celebration in Rio de Janeiro, and women wearing thongs on the beach (Gomes, 2019). Ultimately, the story of this floor seems to be that even if the two countries' "truth is a mixture", this truth is still expressed through the same mainstream, Eurocentric narrative in which the continuity among the Discoveries, colonisation, and the present is evident but unspoken (Gomes, 2019).

3.4.2 Padrão dos Descobrimentos Monument

The Padrão dos Descobrimentos monument has received more public criticism than the abovementioned museums, perhaps because of its longer history or its location in the country's capital. The monument, featuring Dom Henrique, Vasco da Gama, Pedro Álvares Cabral, and about 30 other well-known figures from the Age of Discoveries, was originally built as a temporary installation in 1940 for the Exposição do Mundo Português (Portuguese World Exhibition). It became a permanent fixture of the Belém neighbourhood in 1960, heralded by an inauguration ceremony attended by the heads of state of Brazil and Portugal as well as foreign ministers and ambassadors (Martins, 2021). The monument now houses the Centro Cultural das Descobertas (Discoveries Cultural Center) and is one of the most visited[36] monuments in Lisbon (Martins, 2021).

While its original iteration was widely praised by the art world and politicians, the reconstructed monument has been publicly criticised on multiple occasions. In August 2021, the monument was graffitied with the message, "Sailing blindly for money, humanity sinks in a scarlet sea". While the vandal is believed to have been a French art student who was merely visiting Portugal, the discovery of the graffiti awakened many local voices, some angry and some supportive of the message. That the

---

[36] In 2019, the monument received 309,159 visitors (in addition to those who viewed it from the outside), 90% of whom were foreign tourists (Martins, 2021).

French student targeted the Padrão dos Descobrimentos is not surprising. The monument features prominently on many postcards, guidebooks, documentaries, and tourism materials about Portugal. It is one of the faces of the country, and foreigners flock to Belém in large numbers to take its picture. Thus, Franco (2021) smartly notes a potentially surprising truth illustrated by this episode: Thanks to cultural globalisation, cities belong not just to those who reside there but also to the world.

The monument clearly has a meaning beyond that in the minds of Lisboans, and the question must be asked: What does the Padrão dos Descobrimentos convey to those watching from both Portugal and abroad? For example, in 2021, Ascenso Simões wrote that "in a respectable country, [the monument] should have been destroyed" because it does "not fit into the construction of a city that wants to be innovative and open to all societies and origins" (Simões, 2021). Referencing another highly criticised project to found museum about the Estado Novo and Salazar, the Centro Interpretativo do Estado Novo, Simões notes that it is clear that "Salazarism was very effective in this construction, guaranteeing, until today, the perenniality of the myths of the Portuguese plan, of the discoveries, or of the empire" (Simões, 2021). Moreover, such institutions will "always be a temple of pilgrimage, nostalgia, [and] permanent praise" for the political and cultural figures they focus on (Simões, 2021). Simões's article sparked outrage, particularly among the Chega party, which openly questioned in a letter to Prime Minister António Costa, a fellow PS party member, whether Costa still had faith in Simões after the article ran (Lopes, 2021). Afonso's letter accuses Simões of wanting to "rewrite history" because the latter believes that the Discoveries "are synonymous only and exclusively with slavery and never with progress, with courage, of opening the world up" (Afonso, quoted in Lopes, 2021). Finally, the letter challenges Costa to denounce any leader "who shows contempt for the history of Portugal, for the men and women who built the nation we have today, which, while not being perfect—no nation is—it is the result of our evolution as a people" (Afonso, quoted in Lopes, 2021).

This criticism was described by the president of the conservative and Christian Democratic Party as an "insult…to our history" and as both an "absurd [and] serious" attempt to rewrite history. However, the argument that removing statues from public spaces erases history is preposterous. First, most criticisms of the monument ask for its contextualisation, reinterpretation, removal, or destruction. While the last is the "loudest" suggestion, there are many ways in which to align the monument more closely with the democratic ideal of "protecting the rights of minorities to uphold cultural identity, social practices, individual consciences, and religious activities" (*Majority Rule, Minority Rights*, n.d.). After all, issues related to identity and belonging cannot be sufficiently addressed if affect, that is, the emotions that an object or its framing evoke, is not taken into account (Peralta, 2015).

Second, such an argument wilfully ignores the fact that we have books, museums, history classes, eyewitness accounts, and dozens of other ways to learn about history. Portugal is hardly likely to forget about the Age of Discoveries if the monument is dismantled. Second, it is generally agreed that barring an apocalypse after which everyone forgets how to read, "a statue in the public space is never dissociated from the person to whom it is erected and also from the person who erected it" (Vicente, 2021).

Logically, then, leaving the Padrão dos Descobrimentos in place continues to honour both the Discoveries and the Estado Novo dictatorship. Its removal (or even reinterpretation), on the other hand, would neither necessitate the destruction of the memory of the monument (it could be documented with photos and videos that are then added to museum or university research collections) nor erase the story it tells: it would merely remove the "imagery that supports it from the public space" and place of honour (Vicente, 2021). We have long known this; it is why, for example, the names and visages of former Roman emperors were scratched out when a new one came to power and sought to assert his own dominance. Journalist Luís Alves Vicente cogently illustrates how this applies in a more modern context:

1. Regardless of its aesthetic value, a statue of Hitler would always be a statue of a dictator.
2. If a neighbour put up a statue of Hitler in their own house, a public discussion would hardly be appropriate, as no one else would have to look at or engage with it.
3. However, the same statue in a public space would absolutely require discussion because the representation of Hitler would be part of the public landscape.

This is because "people who have committed atrocities don't [have] statues of them erected in public spaces—it's simply not consonant with democracy" (Vicente, 2021). Refusing to grant them a place of honour does not wash away their stories or their impact—would that it could.

As states continue to become more diverse, it is vital to remember that monuments like the Padrão dos Descobrimentos do not allude to collective memory but rather appeal to the identity of only part of the population. Some Portuguese may look on the monument with affection, awe, or indifference, but others have valid reasons for rejecting such symbolism in a public space. Their ancestors or perhaps they themselves "have suffered from practices related to the imagery that sustains the symbol" (Vicente, 2021). The former group may look at the monument and see the glory of maritime expansion, new sources of wealth and learning, and nostalgia for prior prosperity, but these images are also inseparable from slavery and the horrific ensuing consequences of that practice. To deny this is to be ignorant of the very history that some argue would be erased by the removal or alteration of the monument. Those who want monuments that exhibit the pride of Portugal would do well to heed Vicente: "The symbols of pride that we want for Portugal must be unequivocally worthy. And not heroes on Saturdays and Sundays and war criminals on Mondays and Tuesdays" (Vicente, 2021).

3.4.3 Proposed Museu das Descobertas

Given the way that existing museums and monuments dedicated to the Discoveries function, the concern that any new initiative in this arena would merely perpetuate more of the same is reasonable. This is certainly evident in the third case we examine, that is, of the proposal to establish a Museu das Descobertas in Lisbon. During his 2017 mayoral campaign, socialist Fernando Medina shared a list of 25 goals for the city of Lisbon if he were re-elected; among these goals was the founding of a so-called Museum of the Discoveries, though no specifics such as a site, budget, or collections scope were indicated (Barchfield, 2018). While Medina's list described the museum as covering the "most and least

positive aspects" of the Age of the Discoveries and noted that it would "include an area dedicated to the topic of slavery", these points were not enough to dissuade fervent criticism of the idea of such as museum as an "obsolete, incorrect expression, filled with wrong-headed meanings" (Barchfield, 2018). An open letter written by over 100 Portuguese and international academics criticising the idea then set off an avalanche of opinion pieces and roundtable debates (Barchfield, 2018).

Among those in favour of such a museum, columnist João André Costa argued that *not* founding the museum would send the message that "being born Portuguese is today politically incorrect" (Costa, 2018). Costa further claims that those denouncing the founding of such a museum—or founding the museum but seeking to "neither deny nor glorify slavery but ensure that the worst of history will not be repeated" in itself erases history: "It's not possible to erase history.…It happened. It existed. We can't go back in time…and we don't have anything to beat ourselves up about, kneeling for 100 years, with downcast eyes and hearts" (Costa, 2018). Similarly, Manuel Carvalho decries what he sees as "an amputation of the past" (Carvalho, 2018). He suggests that those opposing the museum "want…to go from uncritical glorification to prejudiced annulment of a crucial period for the definition of who we are" in "a clear attempt to subvert a harmful hegemony with another harmful hegemony" (Carvalho, 2018). Furthermore, he argues, "to understand everything, one cannot omit the existence of slavery in Africa before the Portuguese arrived there", nor can we ignore the "intrepidity, courage, vision, curiosity and energy [of the explorers] who helped to shape modern Europe—and the contemporary world" (Carvalho, 2018). He advocates "cleaning up the edges" of Portuguese history and "purging it of lies, musty nationalism, and racial and colonial ideology" but not swinging to another extreme of "looking at this fantastic period of our past as an exclusive recital of horrors" (Carvalho, 2018).

In contrast, two of the main arguments against the museum were that it would be redundant, given the dozens of other museums, statues, and monuments honouring the era, and that "it would only reinforce Portuguese colonial ideology, which portrays that period as heroic and simply glosses over the glaring issues of slavery, mass killings and other abuses" (Joacine Katar-Moreira, quoted in Barchfield, 2018). After all, the very name "Discoveries" implies that the thing being "discovered" was previously unknown, thus revealing the "arrogance…of a Europe that considers itself the centre of the world…and that tends to exclude from the narrative some of the consequences experienced in the centuries that followed the discovery and up to the present day" (Vlachou, 2018a).

Moreover, echoing the inability of the Padrão dos Descobrimentos to speak to all those whom it claims to represent, the museum would either need to make itself relevant to the present or risk being a "dying museum…incapable of becoming relevant for the communities in which it operates and for its visitors…[and] incapable of presenting a political thought and assuming its social role" because "a museum that limits itself to describing the objects on display and putting academic essays on the walls— being in theory a place 'for everyone', but, in practice, remaining an exclusive space, for some" (Vlachou, 2018a). As Vlachou points out, there is already an abundance of "dying museums" in Portugal,

with many institutions facing a severe lack of funding and human resources[37]—with these already stretched so thin, how would founding yet another museum actually help preserve history? Attributing the desire to found another museum to the recent boom in tourism to Portugal, particularly Lisbon, Vlachou surmises that the narrative of the museum would be a "glorifying" one rather than one that would "touch on sensitive, painful, complex, topical subjects" that would spoil tourists' holidays (Vlachou, 2018a). Ultimately, Vlachou argues that "dignifying and reinforcing what we already have, building a realistic and lasting policy for museums, with respect for the collections they preserve and the professionals who work in them, would be a better option in our political-social-financial context than thinking about new equipment" (Vlachou, 2018a).

Additionally, the fervour with which proponents argue that a Museum of the Discoveries should be founded reduces the country's long history to one single, all-important historical period (Raposo, 2018). In so doing, it ignores the other fascinating periods and events that are arguably just as important in forming the nation we see today—for example, what would Portugal's standing in Europe be today had the Carnation Revolution never happened? If the Moors had never reached westernmost Andalusia, how vastly different might the cuisine, art, and architecture of Portugal look today? Obviously, a museum must have a focus. However, that focus is just that—it is one idea or theme linking many other aspects and dimensions. As Raposo notes, no matter how much effort goes into building such a museum in Lisbon, the narrative will only ever be "a partial view, because it is centred in our gaze" (Raposo, 2018). It would focus on the discovery, not the fact that the land had already been "discovered". It would tell the story of those who travelled there, but not of those who were already there. To be sure, it would tell about the indigenous populations, but it would not, could not, fully honour their experiences because that is exactly what the emphasis on the "discovery" requires.

What those arguing in defence of such museums do not acknowledge is that those criticising the construction of new tributes to the Era of Discoveries neither deny the importance of the era nor ask for audiences to shy away from its implications. In fact, they very clearly want the public to reckon with all aspects and consequences of the era, without tying all of Portuguese identity to any one facet. Acknowledging the need for nuance, open-minded thinking, and humility, Raposo asserts that "I do not think this is the best way to celebrate Portugal" (Raposo, 2018).

With this in mind, he proposes a number of alternative titles for such an endeavour. These titles would allow for an understanding of the good, the bad, the grey areas, and everything society is still trying to figure out. It would permit the stories of all involved to be shared and explored. Among the titles he suggests are the "Museu da Interculturalidade " (Museum of Interculturality), the "Museu da Língua" (Museum of Language), and the euphemistic "Museu da Emigração" (Museum of Emigration) and "Museu da Viagem" (Museum of Travel) (Raposo, 2018). Similarly, Matilde de Sousa Franco, a

---

[37] A 2021 survey by ICOM Portugal seeking to identify the presence of cultural heritage from non-European territories had a response rate of only 30%, which was attributed to the lack of staff trained and available to carry out the necessary provenance research (Temudo, 2021).

professor of art history, proposed a "Museum of Interculturality of Portuguese Origin", which would take a modern museological approach to celebrate the "meeting of cultures" (Vlachou, 2018a). Despite the creativity in these names, they have been criticised as "sound[ing] like euphemisms, poetic, metaphorical, romantic, imprecise [that] would not be adequate, would not respond to what is intended" (Vlachou, 2018a). After all, as Maria Vlachou, Executive Director of Acesso Cultura,[38] notes in a post on her *Musing on Culture* blog, if the intention is to build a modern museum that "integrate[s] the diverse voices that intend to be heard in this matter and promote critical thinking about this long and complex history", then such names would reveal a "lack of empathy towards the other versions of the story"—a story that "many see as a tragedy…[and that is] controversial, painful, and very topical" (Vlachou, 2018a). A museum name that refers to colonisation as "a trip" would be euphemistic and metaphorical, and thus, the museum's content would be euphemistic and metaphorical too (Vlachou, 2018a). Should the museum be founded anyway, Vlachou actually embraces the use of the term "Discoveries". After all, that is how the era and its activities are currently taught about and discussed both in Portugal and abroad, and it would thus clearly convey the focus of the museum. Moreover, what "better place than the 'Museum of the Discoveries' to question the term itself and be able to follow the evolution of our thinking around all the issues it encompasses" (Vlachou, 2018a)? Indeed, bearing such a name would not preclude the museum from tackling difficult or dark issues, and if, by doing so, it could sufficiently re-educate the public, a rebranding could be considered in 15-20 years, Vlachou argues.

Thus, those objecting to the uncritical founding of these museums of the discoveries are not calling for shame, guilt, or a refusal to connect with their country's past wrongs—they want to see a considered, purposeful reckoning with Portuguese colonialism in a meaningful way. In fact, many would like to see these museums founded but have specific ideas about how they should be established and run:

> Such a museological project should consider the way in which the so-called "grandiosity" of the history of Portugal was forged with bulldozing initiatives that in fact tore and destroyed other cultural and social fabrics, through explicit or insidious violence, whose history and existence have been mostly ignored. In other words, this museological project, in order to be an example of new, more inclusive modes of museology and research, will have to be openly polyvocal and capable of conveying this history in all its diversity and complexity, showing the aspects obliterated by a hegemonic—colonial and colonising perspective (Rocha, 2018).

Ever the politician, PM António Costa puts it simply: the Portuguese "mustn't have a complex, but rather take pride in being able to deal, in Portugal, with that period in history when we undoubtedly made our biggest contribution to the world" (Barchfield, 2018).

Whether the museum is eventually founded or not, this example shows that museums never represent the same thing to everyone. At best, the museum would celebrate the diversity and history of the Portuguese empire with all its atrocities and glories. The problem then becomes that such "world

---

[38] A cultural association that promotes physical, social, and intellectual access to cultural venues and offerings.

cultures" museums may have two purposes simultaneously: First, they may be a genuine attempt to understand the results of globalisation, including the "differentiated cosmopolitanism" found across the globe, and may generate interest in diasporic culture instead of further intrenching the exoticism that earlier ethnographic displays exploited (Coombes & Phillips, 2015, p. xxxvi). Second, however, they may also present globalisation as "the benign face of capitalism" that ignores the very tensions and conflicts that both result from and characterise cultural diversity (Coombes & Phillips, 2015, p. xxxvi), painting Portuguese expansion as, ultimately, a force for good.

3.4.4 Spoils of Exploration: Treasures in Portugal

Whether or not another Museum of the Discoveries is ever founded, there are, of course, other institutions in Portugal that house cultural artefacts originally from somewhere else. While an in-depth examination of all such artefacts is beyond the scope of any one work, some discussion of these existing collections is certainly warranted here.

Foreign cultural objects now sitting in Portuguese museums arrived there in various ways. In some cases, collections were amassed with the full knowledge, support, and participation of the culture of origin. This was the case for the Museu Nacional de Etnologia's 2000 exhibition *Os Indios, Nós* [*The Indians, Us*], which resulted from long-term investigation and fieldwork with the Wauja people in Brazil and "look[ed] to problematize its own research context and the concrete situations which accompany the collection of the objects acquired by the museum" (Neto, 2004, p. 8). The exhibition, comprising both found and commissioned artefacts, was accompanied by a fascinating and thoughtful book that described the process of collaboration and exhibition development. Some items were not collected due to their special value to the Wauja and were too rare, still in use, or of such "singular nature" in their ritual use that collection would be wholly inappropriate (Neto, 2004). The book also acknowledged the implications of the act of removal, transportation, and recontextualisation:

> The collection passed through all the phases of treatment demanded by museological protocol. Items were disinfected and their state of conservation carefully evaluated…They were each described, measured, photographed, organized in sets, and stored in the museum's depository.…The materials from which they were fabricated have gradually lost the intense colour and odour they brought from the tropical forest. Little by little, subdued by this new discipline, they seem to grow quiet, becoming equivalent to each other and all the other objects already belonging to the museum's collection.…They will always carry their materiality and their form. But in their wake also come observed facts, captured images and narratives, transported from their home terrain and now capable of lending them another voice for a different public. But the artefacts are also inseparable from the technical and practical procedures that have shaped their condition within the museum (Neto, 2004, p. 9).

Other artefacts in the museum, however, have a more indirect and complicated provenance. For example, the museum obtained a collection of Melanesian artefacts from the University of Porto, acquired in an

exchange with Berlin museums, which themselves received the artefacts after various late nineteenth-century German colonial expeditions to New Guinea and Melanesia (Vunidilo, 2015). These examples are among the more innocuous means of collection in ethnographic museums, so it is no wonder that such institutions face some of the most frequent and heated calls to "decolonise their collections and the minds of their staff" (Laely et al., 2019, p. 3). Nevertheless, David William Aparecido Ribeiro, a history faculty member at the University of São Paulo, notes that university museums with ethnographic and archaeological collections can play a key role in efforts to reinterpret and reframe collections formed as colonial legacies (Queiroz, 2020). Such museums have dedicated researchers examining the cultures and contexts the artefacts came from and can "offer more democratic venues for traditional populations to access their collections" (Queiroz, 2020). This sentiment is echoed by Marília Xavier Cury, who works at the university's Museum of Archeology and Ethnology. Cury collaborates with indigenous groups to "attach new meanings to [the museum's] collections", an arrangement in which the museum "agrees to be accountable to indigenous peoples for its handling of their ancestors' objects, while they, in turn, offer insights into the meanings of these pieces in their own cultures" (Queiroz, 2020).

Still other artefacts in Portuguese museums were acquired through decidedly questionable means. For instance, as Christian missionaries coerced indigenous peoples to renounce their religion, the proselytisers were often able to collect many artefacts that they then sent home to fill the collections of missionary museums, including the Museu de Macau in Lisbon, which has since been renamed the Macau Scientific and Cultural Centre Museum (Effiboley, 2020). Even more complicated is the provenance of a set of artefacts from Iraq that had been excavated by German archaeologist Walter Andrae in the early twentieth century and wound up in a museum in Porto for over a decade. Andrae had received his excavation permits for the ruins of Qalat Sherqat from authorities in the Ottoman Turkish Empire, the then rulers of Iraq, under the condition that the discoveries be divided between the empire and Andrae/Germany (Aruz & Harper, 1995). Departing Baghdad with Andrae's share of the finds, the German cargo ship stopped in the harbour at Lisbon just as Portugal entered the First World War (Aruz & Harper, 1995). The cargo was confiscated and given to a museum in Porto, where the artefacts stayed until Andrae was able to ransom them in 1926 (Aruz & Harper, 1995). Although the artefacts appear to no longer be in Portuguese hands, this episode shows just how happenstance some collections acquisitions in Portugal have been.

Other Portuguese museums have clearer and cleaner provenance records, but they may still express colonialist nostalgia and perpetuate lusotropicalist ideals. For example, the Museu do Oriente was opened in 2008 by the Fundação Oriente (itself founded "with the purpose of publicly acknowledging and continuing the historical and cultural relations between Portugal and China" (Peralta, 2015, p. 308) to celebrate the 600-year-old relationship between the Portuguese and East Asian peoples (Peralta, 2015)). As Elsa Peralta, a researcher at the Centre for Comparative Studies at University of Lisbon, observes, the museum seeks to "mediat[e] historical understandings through the aesthetic qualities of historical artifacts" (Peralta, 2015, p. 308). Indeed, the museum's very name reveals an "emotive

appropriation of the historical past", as the term "Oriente" references the world that the Portuguese "discovered" (Peralta, 2015). Inside, the museum's interpretive principles emphasise mutually beneficial trade, the decorative arts, and cultural interchange (Peralta, 2015). While the museum may be lauded for its multidiscursive approach, it also presents Asian cultures as "part of a static and nonproblematizing Orient" and conveys "a palpable sense of nostalgia and loss" (Peralta, 2015, p. 318). Moreover, by stressing the hybridity of many of its objects, the museum seeks to establish "a certain kind of equality" (Peralta, 2015, p. 314), homogenising the contributions of the various cultures and thus failing to address questions of hegemony and other power imbalances. Even if its objects were acquired by appropriate means, the museum's interpretative framework helps fuel resistance against "modes of representation other than the nostalgic mode of historical grandeur and civilizing legacy" (Peralta, 2015, p. 303).

Recently, the Angolan Minister of Culture, Tourism, and Environment, Filipe Zau, drafted a proposal regarding the numerous Angolan cultural artefacts currently held in Portuguese museums. The proposal asks that an inventory of such artefacts be made in order to estimate how many were illegally removed from Angola (Carlos, 2022). Zau referenced a similar agreement recently signed between Angola and France to return two sculptures acquired by Angolan authorities that previously belonged to the collection of the Palace of Versailles (Carlos, 2022). As the minister notes, issues of cultural identity are closely linked to issues of sovereignty; since the sculptures had important links to French culture, he saw it as only fitting to return them, stating, "I think this is a principle that all peoples should have, especially friendly peoples" (Carlos, 2022).

Portuguese historian and member of Parliament Joacine Katar Moreira has echoed the desire for such an inventory. Previously, Katar Moreira has introduced legislative initiatives for inventorying Portuguese state museums as part of a larger push to decolonise Portuguese museums and monuments and return their cultural heritage holdings to their countries of origin (Carlos, 2022). To those who argued that such holdings had since become part of Portugal's own national heritage, Katar Moreira questioned whether "works taken from an environment of subjugation and domination of other peoples" could rightly be considered national heritage (Carlos, 2022). The institutional resistance and national discussions surrounding such initiatives highlights the "systemic denial of the negative impacts of the violence of Portuguese colonialism" (Carlos, 2022). Some have rightly pointed out that as of early 2022, the Angolan government did not have an official strategy for requesting and handling artefact repatriation (Carlos, 2022). However, others have pointed out that regardless of Angola's "preparedness", Portugal is a signatory to international conventions that require the return of cultural heritage, namely, the UNESCO convention on export in cases of armed conflict and a convention on the prohibition of the illicit export of cultural goods (Carlos, 2022).

In November 2022, an *Expresso* article reported that Portuguese Minister of Culture Pedro Adão e Silva confirmed that such an inventory would commence (Lusa Agency, 2022). However, Adão e Silva then refuted this, noting that what he had, in fact, said was that if such an inventory were to be created, the issue would be handled by academics and museum directors, as "the effective way to deal with this

issue is with reflection, discretion and some reserve. The worst way to deal with this issue is to create a polarised public debate, don't count on me for that" (Lusa Agency, 2022).

3.5 Brazil and Portugal: A Complicating and Complicated Context

Throughout history, the coloniser–colonised relationship has been marked by mutual influence, not one-way changes dictated only by the more militarily powerful entity. An empire is always affected by what it finds and seeks to dominate, and the relationship between Portugal and Brazil is no exception to this pattern. Indeed, what makes this relationship unique in some ways is that, particularly over the last two centuries since Brazil's independence, it has not been entirely clear which has been the more "dominant" or "powerful" nation.

Modern-day Brazil began as a colony, then became the seat of the empire, eventually gaining independence and even surpassing its former rulers in terms of economic and regional power. This trajectory was enabled by one very powerful economic force: slavery. The Portuguese empire's entire economy was organised around the slave trade, so it is unsurprising that "abolitionist feeling was notably weak throughout the Luso-Brazilian world" (Bethell, 1969, p. 118) or, as historian Laurentino Gomes puts it, "Brazil obstinately resisted ending the slave trade" (Lusa, 2022). Brazil, in particular, was considered dependent on slavery for its continued agricultural development due to the colony's extensive area and short labour supply, which then had severe implications for the overall security of the Portuguese empire (Bethell, 1969). The Portuguese royal family became dependent on British support following their flight to Brazil to escape Napoleon's troops. Within a few years of their arrival, two new Anglo-Portuguese treaties were signed that set the stage for the gradual abolition of the slave trade in Portuguese territory, in addition to granting Great Britain favourable trading rights in Brazil (Bethell, 1969). For the next decade, Great Britain continued to pressure Portugal to completely cease commercial activities involving enslaved persons, first prohibiting slavery north of the equator and then turning the focus south (Bethell, 1969). After Dom João returned to Portugal, it became clear that Brazil, having been elevated to the status of a kingdom, "had progressed too far during the thirteen years since the flight of the Portuguese court from Lisbon to Rio de Janeiro for anything less than complete political and economic equality with the mother country to be acceptable" (Bethell, 1969, p. 121). Thus, João's eldest son, perhaps recognising that "Brazilian self-consciousness had been considerably accelerated" (Bethell, 1969, p. 121), refused to return to Portugal and instead became a key figure in achieving Brazil's independence. Given Brazil's continued reluctance to abolish the slave trade even as Portugal itself gave ground, it seems clear that the colony therefore sought independence, at least in part, to avoid losing a crucial component of its economy (Bethell, 1969). As in the United States, Brazil's "legacy of slavery [continued] since the rulers that followed in the independent country did not give land, work, income, housing, education or opportunities to formerly enslaved people" (Lusa, 2022). This created, essentially, a caste system in which there is a "slavery ideology, which equates to a racist ideology", that treats Blacks and the descendants of enslaved people differently, so that they "still make up a large part of the

country's poor population" (Lusa, 2022).

Despite their political split, Brazil and Portugal have remained intertwined. Like many former empires, the majority of Portugal's official development assistance goes to its former colonies, albeit mainly those in Africa (The Guardian, 2015). Ironically, following the 2008 global financial crisis, Portugal relied heavily on trade with and financial support from a number of its foreign colonies, including Brazil, which considered buying some of the country's sovereign debt in 2011 (Reuters Staff, 2011). Indeed, Brazil's more powerful economy and influence on regional politics means that it has, at times, invested more in Portugal than Portugal has in it (Federal Research Division of the Library of Congress, n.d.). Culturally, Brazilian media account for a substantial amount of television and radio entertainment in Portugal. Despite different accents and dialects, language barriers are low, facilitating economic and cultural exchanges between the two nations. Today, there are numerous pieces of cultural patrimony shared between the two countries, including the remains of Dom Pedro, Brazil's first emperor.

3.5.1 Absence Makes the Heart Grow Fonder

In August 2022, Dom Pedro I's heart, preserved in a formaldehyde-filled flask, arrived in Brazil. The heart usually rests in an altar in the church of Nossa Senhora da Lapa in Porto in accordance with Dom Pedro's wishes and since the 1970s, has been separated from his body, which was transferred to a crypt in São Paulo in celebration of the 150th anniversary of Brazil's independence (Buschschlüter, 2022). The heart arrived to much pomp and circumstance, including military honours and the playing of the national and independence anthems (Buschschlüter, 2022). Although the loan went ahead, it was nevertheless a very contentious subject in the months leading up to the celebrations: The heart became a focal object in diplomatic relations between the two nations, a focus of criticism from those on the Left, and a rallying point for Brazilian nationalists.

The story of the heart is an apt example of how cultural heritage can be used as a political and diplomatic tool. In this case, the final approval for the loan was supposed to be confirmed during a meeting between the Brazilian and Portuguese presidents, Jair Bolsonaro and Marcelo Rebelo de Sousa, respectively; however, after learning that Rebelo de Sousa met with former President Luiz Inácio Lula da Silva, Bolsonaro cancelled his own meeting with the Portuguese head of state (da Paz, 2022). By refusing to meet with Rebelo de Sousa, but still accepting the loan of the heart, Bolsonaro was able to send a clear message to both his supporters and his detractors that Brazil had the clout to make demands on Portugal but also felt no obligation to observe established diplomatic protocols.

Once the loan was announced, left-leaning Brazilian voices criticised the government's initiative as necrophilic, morbid, and obsessive for using a dead man's body to bolster national pride (J. P. Henriques, 2022). This was particularly disdainful when there were "other important initiatives" that could be pursued to celebrate the country's bicentennial, including the reopening of the Museu do Ipiranga, a history museum with extensive collections related to the independence movement and its period (J. P.

Henriques, 2022). Bolsonaro was criticised for being more determined to bring the heart to Brazil than to eradicate the food poverty that affects nearly 33.1 million Brazilians; though this issue was not directly related to Brazil's independence, the criticism rightly highlighted Bolsonaro's priorities (Farias, 2022). There were practical concerns as well; Brazilian archaeologist Valdirene Ambiel expressed concern that Brazil is keeping Dom Pedro's body in unsafe conditions, failing to provide it "the minimum respect and dignity", so bringing the heart risked additional damage to the revered remains (D. Rodrigues, 2022).

Finally, many were concerned that the heart's visit would be not just a temporary bolster to national pride but was part of a more long-term ideological strategy. Specifically, Cláudia Castelo, a Portuguese researcher at the University of Lisbon, noted that the celebrations for the 150th and 200th anniversary of Brazilian independence bore a striking and purposeful resemblance (D. Rodrigues, 2022). Bolsonaro openly praised the dictatorship in power during the earlier celebrations, which brought most of Dom Pedro's body to its current resting place, and his quest to secure the return of the heart, even if only on loan, was a clear emulation of the same ideological rhetoric (D. Rodrigues, 2022). Among other aspects, this rhetoric centres the narrative of Brazilian independence around one central figure and ignores the contributions of the numerous other groups involved, including Black and indigenous peoples (D. Rodrigues, 2022). The loan request therefore echoes the request of the authoritarian dictatorship for Dom Pedro's body, which was then used as nationalist propaganda, and Bolsonaro himself was described as trying to mimic the generals whom he openly admired by using the heart as "'Bolsonarist' propaganda" (Lusa, 2022). Historian Laurentino Gomes told SAPO reporters that Bolsonaro is "appropriating this commemoration with language that borders on that of Mussolini's fascism" (Lusa, 2022).

Supporters of the decision to borrow the heart and tour it around Brazil have pushed back against such criticism, dismissing it as an attempt to "destr[oy] Brazilian history…[to] eradicate any kind of tie with Europe, and to create a new history in the children's heads" (D. Rodrigues, 2022). Thus, Dom Pedro and his heart have become an issue of debate between the Left and Right in Brazil, with the former seeking acknowledgement of both his dictatorial tendencies and the agency and contributions of other groups throughout Brazilian history, and the latter using him as a rallying point for Brazilian national pride. The subject was even included in a presidential debate in October 2022, forming the centrepiece in a heated discussion about "Brazil's past and present" (D. Rodrigues, 2022).

3.5.2 Heart Is Where the Home Is?

This episode of diplomatic relations brings up questions of ownership, colonisation, and repatriation. Although Dom Pedro left his body to the city of Porto, Brazil (or at least certain factions in Brazil) have laid claim to his remains—both ideologically and literally. Does Dom Pedro belong to Brazil? To Portugal? To both? His legacy affected the course of history in both countries, not least because his daughter became Queen of Portugal and his son became Emperor of Brazil. As the figurehead bridging Brazil's time as a colony and an independent nation, does Dom Pedro represent liberation, or does the fact that he continued to rule as emperor mean that the nation merely changed hands from one European

to…the same European? Finally, does returning Dom Pedro's body or loaning Brazil his heart count as repatriation? The man was born in Portugal but lived most of his life in Brazil; he was the ruler of both countries at some point during his life. Were his remains therefore *returning* or *leaving* home and their patria when they departed Portugal for Brazil?

This situation has implications for the larger debate on cultural heritage decolonisation in Portugal. Regardless of how "joint" the ownership of Dom Pedro's legacy is, his heart must exist in one or the other location. Although King Solomon might solve this issue by dividing it in two, any physical mutilation of the heart would, of course, desecrate its physical and conceptual integrity. As we can see, the negotiation of shared heritage such as museum artefacts whose history involves multiple nations, communities, and cultures is complex and has consequences with varying degrees of implication and impact. Numerous other objects have similarly complex histories, particularly hybrid art forms such as Indo-Portuguese art and goods that are manufactured in China but that bear Western decorative motifs, and these artefacts must be understood in a context of increasing global connectedness (Peralta, 2015). Therefore, regardless of how one feels about its necessity, repatriation is a delicate matter. Museums and the treasures they hold—both economically valuable and seemingly mundane—are both the cause of and potential solution to a variety of diplomatic, political, social, cultural, and ethical issues.

4 Conclusion

4.1 Tug of War: Reconciling the Past and Present in Portugal

This thesis examines the nested issues of decolonisation and repatriation in the current context of Portuguese museums. First, it looks at the global context of decolonisation movements in the cultural sphere to locate the situation in Portugal within a larger movement that has motivations and consequences far beyond the country's national borders. Almost all former (and current) hegemons are facing calls for the repatriation of cultural artefacts. The official responses to such calls have varied widely, though almost all have been slow to generate action on a national level. Because the national government of Portugal has not (yet) formulated a framework for handling repatriation claims, but the issue has at least been discussed, this may indicate that Portugal is on the same trajectory as countries like the Netherlands and Germany. However, this trajectory is not guaranteed. Portugal's path will be determined by a number of factors, including whether awareness of this issue among the general public increases, how museum professionals handle such requests at their institutions (e.g., moving the request "up the chain of command" or attempting to handle them in-house), and whether there is a larger societal recognition and acceptance of the moral obligation for restitution in the cultural sphere, which may be more palatable than more commonly discussed economic restitution efforts.

This thesis then looks at specific factors affecting the state of cultural heritage decolonisation in Portugal. Grounding its arguments in the history of lusotropicalist beliefs, the thesis traces the contemporary ramifications and manifestations of lusotropicalism, exemplified by both staunch and

quiet denials that racism is alive and well in Portugal. In turn, this presents major roadblocks for cultural heritage decolonisation efforts: If a society cannot agree that its past makes it at least partially culpable for certain present ills, how can progress be made to remedy those ills? After all, almost 50 years after Portugal's official political decolonisation with the independence of East Timor in 1975, Portugal is still struggling with the more enigmatic and abstruse decolonisation of *minds*. This naturally affects the willingness of politicians and the public to discuss the appropriateness of institutions like the Museum of Discoveries. The heated debate across various newspapers resulted in polarised discussions that the Minister of Culture wanted no part of, and time will tell if the lessons learned both in Portugal and elsewhere will be applied to future museum collections and exhibitions. Finally, the relationship between Brazil and Portugal is explored through the example of Dom Pedro's mortal remains. Recent negotiations about the importance and symbolism of this piece of shared cultural patrimony provide a specific illustration of just how complex repatriation efforts in Portugal can be. Of course, complex means neither impossible nor unnecessary. The exploration of these issues provides initial answers to the research questions proposed above. Below, some of the initial questions that inspired this research are addressed.

In what ways have calls for decolonising museums across the Western world affected the founding and management of various museums in Portugal over the last few decades?

Notably, the Minister of Culture has acknowledged that there is currently no framework for addressing repatriation claims, but that any such framework would need to be informed by museum professionals and scholars with deep knowledge in the area. The fact that this topic has even been broached is promising. A formal framework may still be years away, but the door has been opened. It seems evident that pressure is mounting for Portuguese museums to rethink museum narratives, including developing some sort of regulations or guidance for addressing repatriation claims. This is because as globalisation continues to accelerate the movement of people, capital, and information, museums are becoming "increasingly answerable not just to local but also to world audiences" (Coombes & Phillips, 2015, p. xxxv). The graffitiing of the Padrão dos Descobrimentos monument is a prime example of this: a foreign citizen used this symbol of national pride as a canvas for critiquing the actions—or lack thereof—of both Portugal and the Western world as a whole. Evidently, criticism of the failure to address historical wrongdoing that has serious ramifications for the present is growing. Indeed, while the 2021 report by the Future Museums Project Group, created by a 2019 decree from the Council of Ministers, did not explore the subject of repatriation, it did acknowledge that the issue is gaining international traction and merits "an informed and dispassionate professional approach that promotes reflection (…) and guidelines arising from the tutelage" (Camacho, 2021, p. 83).

What are some of the factors in Portuguese society that influence the current state of decolonisation and artefact repatriation efforts in Portugal?

As seen in the online material examined above, there are ongoing discussions on the topic of cultural

heritage decolonisation. The clearest influencing factor that emerged from these sources is that while many are in favour of recontextualising monuments, rethinking museum narratives, and giving due consideration to repatriation claims, there is also reluctance and even outright refusal to acknowledge the legitimacy of the decolonisation movement. The reasons cited for this delegitimisation centre around the idea that Portugal has never been, or at least currently is not, a "racist country". As such, it has no need to rethink its monuments and museums—indeed, to do so would be tantamount to erasing the country's history and denouncing its people not as explorers but solely as exploiters. As Renato Epifânio, an academic and the founder of the International Lusophone Movement, "Anyone who has any knowledge of Europe has to agree with us: Portugal is probably, if not definitely, the least racist country in Europe" (Badcock, 2018). Any attempt to complicate this narrative or dismantle the binary of "good" versus "bad" is seen as a threat to national identity. In short, lusotropicalist beliefs continue to hold much sway in Portugal and hinder attempts to hold meaningful, nuanced dialogue about Portugal's history and its effects on the present. Anything other than absolute praise of the past is denounced purely as seeking to stir up trouble where there is none.

This vein of lusotropicalism also appears in the debate surrounding the proposed Museum of the Discoveries, in which one side (e.g., those denouncing criticism of the museum) fails to acknowledge that those who are wary or critical of glorifying the Age of Discoveries at no point suggest that the era is one of which the country must be wholesale and unreservedly ashamed, recognising no benefits, points of interest or relevance to modern audiences. There is a disingenuous anger that sees any criticism as an attack rather than an attempt to provide nuance and multiple perspectives as well as to incorporate newfound information into our understanding of the past, which has never actually been uncomplicated but only appeared so to those who have thus far been most represented in the very Western monuments, museums, and other institutions their opponents are critiquing.

The situation is complicated still further when considering the case of Dom Pedro's remains. Clearly, Portugal has unique relationships with some of its former colonies, though not necessarily in the way lusotropicalism would have us believe. This increases both the practical and moral considerations in handling repatriation claims. After all, if the former colony has more economic power than the former empire, who has the fiscal responsibility for handling such claims? If the answer is Portugal, these items may never leave the country. Likewise, if two modern nations can stake equal claim to an artefact, who deserves final ownership over it? Can the artefact truly be shared?

In the case of former colonies in Africa, it may even be that the limited repatriation activity in Portuguese museums stems from (and in turn feeds) the country's lack of political clout in the region. Given the country's hasty withdrawal from many of its colonies following the Carnation Revolution, due both to the internal pressure to hand over power to liberation movements and to the fact that Portugal simply could not maintain military control there (Pinto, 2003), there was little time or opportunity to consolidate political and economic ties the way that, for example Great Britain and the United States had done. As such, "despite diplomatic pleasantries, a certain opposition continues to exist on the part of

governments and African administrators in charge of affairs within the [Países Africanos de Língua Oficial Portuguesa] towards investment and trade from the very country which was formerly the coloniser and is still not seen as just 'one of the rest'" (Cahen, 2003, p. 86). As we have seen, this is where museums' soft power comes to the fore: In order for a repatriation claim to gain traction, barring a country's official announcement of its determination to return artefacts, there must be public awareness, support, and pressure or economic or political impetus. African countries may submit repatriation requests as a tool for bargaining, and European countries may respond in hopes of furthering their own economic or political interests.

Finally, all of these discussions are being led by elites within Portugal, with occasional input from foreign or multinational voices, but general public discussion seems lacking, which could indicate a number of things: for example, the public has other, more pressing concerns, the public considers the topic taboo, or a combination of the two. Of course, there are likely numerous other factors at play, not least of which is a general lack of funding for museums, which affects the number and training of staff members. Future research should delve into this and other factors.

How do scholars, politicians, and the general public view repatriation and decolonisation efforts, particularly in the cultural heritage sector, in Portugal?

Notably, the opinion columns, blog posts, and other online media that appear when Googling "museum repatriation Portugal" or similar search terms, including the majority of the sources cited herein, show a clear selection bias. That is, regardless of how the authors feel about decolonisation, almost all of the top hits are written by highly educated individuals who live or work in Lisbon or another major metropolitan area. In some ways, this makes sense. If one wants to know about a subject, one asks the experts, and who knows more about museums than the people who work in or with them? Likewise, it makes sense to ask Lisbonites what they think about the possibility of building another museum in their city. Yet this also implies that any such material will consider limited viewpoints because the voices providing the narrative are themselves limited. While someone living up north in Pinhel, Portugal, may not be aware of the heated debate about the Museu das Descobertas in Lisbon, they are surely aware that Portugal no longer has formal colonies in Africa. They will have learned about decolonisation first-hand or in school. They will be familiar with the Age of Discoveries. They will understand that people of different ethnicities and cultures have different stories to tell. So yes, it may seem far-fetched to solicit an opinion article from a Pinhelense about the Museu das Descobertas in Lisbon, but due diligence on the part of journalists and researchers requires that more voices are consulted and shared than just those in the metropole with advanced degrees. Not only would this generate a more complete understanding of society's awareness of and opinions on this issue, but it could also reduce polarisation and estrangement between rural and urban, highly educated and less educated, wealthy and poor, old and young, etc.

Furthermore, such expanded coverage would reveal that, unsurprisingly, Lisbon is just one city in Portugal struggling with the past. In fact, the Núcleo Museológico Rota da Escravatura in Lagos provides

an excellent example of how such issues can be handled: In 2009, human remains discovered during the construction of a car park were identified as the skeletons of enslaved Africans (E. Rodrigues, 2016). It was decided that a museum would be constructed in association with the UNESCO "Rota do Escravo" project, which aimed to foster awareness of the history of slavery and the trade in enslaved people (E. Rodrigues, 2016). As Lagos Mayor Joaquina Matos stated at the museum opening, "This archaeological discovery revealed to us a historical reality that we cannot ignore, that we have a duty to remember. It was this heavy responsibility that the Municipality of Lagos fully assumed, when designing a museum nucleus that would give visibility to an old and sad history: our participation, for centuries, in the trafficking of human beings" (E. Rodrigues, 2016).

Finally, it is one thing to solicit opinions from politicians about decolonisation in the cultural heritage sector, but it is another to actually enact policies and procedures to effect such work. As seen outside of Portugal, "non-statutory policy does facilitate the process [of repatriation], providing useful step-by-step guidance for museums and claimant communities dealing with these inevitably complex matters" (Herman, 2021, p. 36). However, too much direct legislative action or interference on the part of politicians seems to exacerbate tensions rather than facilitate solutions, as seen in the case of the Parthenon Marbles. Therefore, while politicians may be useful at "jumpstart[ing] the process and break[ing] the bureaucratic deadlock", the actual work of addressing repatriation claims is best handled by "those with ancestral or cultural connections to the remains on the one side and professionals with relevant expertise on the other" (Herman, 2021, p. 36). The government can thus be most useful in providing initial policy guidance and funding for research and travel necessary to address such claims (Herman, 2021). In cases where specific legislation is passed that has bearing on repatriation efforts, no one should expect the results to be immediate or easy to achieve. That is, there is a learning curve while museums and communities build sustainable resources and relationships that enable them to identify, assess, and respond to repatriation claims (Herman, 2021).

4.2 Limitations and Future Research Directions

This thesis was limited by various factors, and the remaining gaps in the literature should be filled by future research. First, the majority of the work on this thesis was conducted at the height of the COVID-19 pandemic, which limited opportunities for data collection. Second, length limitations and other practical requirements meant that the scope had to be delimited in a way that made the research feasible for a single researcher. Given these two factors, the textual analysis herein was limited to material that was accessible online and pertained to discussions of race and racism in modern Portugal and how such discussions have affected the founding and management of museums and monuments dedicated to the Era of Discoveries. Future research should adopt different data collection methods, such as interviews and surveys, and focus on other issues, including the perspectives of non-academic and non-political actors in Portugal. Two avenues for future research are 1) the development and procedures surrounding specific ongoing repatriation claims in Portuguese museums and 2) how a chronic lack of financial

support and the insufficient valuation of museum staff affect the ability of Portuguese museums to engage in the vital work of cultural heritage decolonisation.[39]

4.3 Two Paths Diverged in a Wood…What's Next for Decolonisation in Portuguese Museums?

Importantly, whatever the future of museums in Portugal, it must be navigated carefully, as the wielding of soft power can tip into cultural imperialism or hegemony (Blankenberg, 2015). Two factors can help hold museums accountable: the emerging culture of stewardship and the social significance of the internet. By recognizing their role as stewards of discussion and connection, not gatekeepers of knowledge, museums can help strengthen civil society. To avoid becoming tools of propaganda, they must validate their legitimacy and moral authority through honesty and accountability towards their communities. They must also recognise that the extra-geographical networks formed by the internet amplify "the culture of engagement to one of global participation", meaning that they can and should be held to account by both local and global actors (Blankenberg, 2015, p. 103). These factors require that museums operate transparently, share multiple perspectives, and seek local engagement if they wish to remain relevant and influential. Concerns such as the ability of communities to care for their own cultural artefacts, the cost of researching and returning artefacts, and the inalienability of "public goods" must not be used as excuses to ignore, deny, or resist repatriation claims. Museums should not purposefully misunderstand work such as the Savoy–Sarr report, hysterically describing it as an attempt to empty their halls. Legitimate care should be taken to ensure that artefacts are being appropriately repatriated. That is, provenance research should not be used only "as a delaying tactic. [African] human remains do not belong in European depots but must be handed over to relatives of the deceased" (Opoku, 2018). It should be a matter of *how* repatriation claims are to be honoured, not *if*.

Finally, it is past time that society recognises, accepts, and appreciates that museums are not and should not be stationary, "neutral", or single-purpose institutions. The function and understanding of museums has been changing rapidly over the past century and will continue to evolve. Museums' ability to be "a platform to show the best of a local culture" while also being "a vehicle for historic preservation…learning and debate" should be seised upon so that these valuable institutions can continue to act as "a meeting place for social and cultural engagement, possibly even alleviating political and social tensions" (Matar, 2015, p. 89). Otherwise, they will remain the stagnant and increasingly irrelevant tools of past empires that, while still affecting our lives, have a shrinking relevance to our humanity and our visions of the future.

---

[39] See Vlachou's recent opinion article in Publico noting that "We need to identify, train, support and place in the right positions colleagues who can be leaders in our sector. Not people who will 'simply run' our museums and other cultural organisations, but people who have a vision of the future, who have the gift and ability to inspire others and whose thinking and practice can lead the way" (Vlachou, n.d.).

8 Bibliography

Advisory Committee on the National Policy Framework. (2020). *Colonial Collection: A Recognition of Injustice*. Council for Culture.

Agência Lusa. (2022a, June 22). "Racismo" atira refugiados não ucranianos para "fim da fila" na procura de casa. *CNN Portugal*. https://cnnportugal.iol.pt/refugiados/ucrania/racismo-atira-refugiados-nao-ucranianos-para-fim-da-fila-na-procura-de-casa/20220622/62b305cb0cf2ea4f0a50dc75

Agência Lusa. (2022b, August 2). Chega recusa "fazer do racismo um tema em Portugal". "Estamos a dar importância a isto porque eram atores brasileiros", declarou. *Observador*. https://observador.pt/2022/08/02/chega-recusa-fazer-do-racismo-um-tema-em-portugal-estamos-a-dar-importancia-a-isto-porque-eram-atores-brasileiros-declarou/

Alam, J. (2019). Transnational Social Media Monuments, Counter-Monuments, and the Future of the Nation-State. In L. A. Macaluso (Ed.), *Monument Culture: International Perspectives and the Future of Monuments in a Changing World* (pp. 191–203). Rowman & Littlefield.

Alberti, M. (2020, September 28). Portugal records surge in racist violence as far right rises. *The Guardian*. https://www.theguardian.com/world/2020/sep/28/portugal-sees-surge-in-racist-violence-as-far-right-rises

Allan, B., Perreault, A., Chenoweth, J., Biin, D., Hobenshield, S., Ormiston, T., Hardman, S. A., Lacerte, L., Wright, L., & Wilson, J. (2018). *How Racism Maintains Inequity and Colonization*. https://opentextbc.ca/indigenizationinstructors/chapter/how-racism-maintains-inequity-and-colonization/

Allen, T. W. (2012a). *The Invention of the White Race, Volume 1: Racial Oppression and Social Control* (2nd ed.). Verso.

Allen, T. W. (2012b). *The Invention of the White Race, Volume 2: The Origin of Racial Oppression in Anglo-America* (2nd ed.). Verso.

ArtDependence. (2021, October 7). Jacob Kohnstamm Appointed Chair of The Restitutions Committee. *Art Dependence Magazine*. https://www.artdependence.com/articles/jacob-

kohnstamm-appointed-chair-of-the-restitutions-committee/

Arts Council of England. (2022). *Restitution and Repatriation: A Practical Guide for Museums in England*. Arts Council of England.

Aruz, J., & Harper, P. (1995). *Assyrian Origins: Discoveries at Ashur on the Tigris: Antiquities in the Vorderasiatisches Museum, Berlin*. Metropolitan Museum of Art.

Atkinson, R. (2022, April 12). Largest-ever repatriation of cultural artefacts from a Scottish museum given green light. *Museums Association*. https://www.museumsassociation.org/museums-journal/news/2022/04/largest-ever-repatriation-of-cultural-artefacts-from-a-scottish-museum-given-green-light/

Badcock, J. (2018, July 29). Slavery memorial highlights Portugal's racism taboo. *BBC News*. https://www.bbc.com/news/world-europe-44965631

Barchfield, J. (2018, September 16). Lisbon museum plan stirs debate over Portugal's colonial past. *The Guardian*. http://www.theguardian.com/world/2018/sep/17/lisbon-museum-plan-stirs-debate-over-portugals-colonial-past

Barrett, J. (2015). Chapter 6: Museums, Human Rights, and Universalism Reconsidered. In S. Macdonald (Ed.), *The International Handbooks of Museum Studies: Museum Practice* (1st ed.). John Wiley & Sons, Ltd.

Bethell, L. (1969). The Independence of Brazil and the Abolition of the Brazilian Slave Trade: Anglo-Brazilian Relations, 1822–1826. *Journal of Latin American Studies*, *1*(2), 115–147. https://doi.org/10.1017/S0022216X00004442

Bhambra, G. K., Bouka, Y., Persaud, R. B., Rutazibwa, O. U., Thakur, V., Bell, D., Smith, K., Haastrup, T., & Adem, S. (2020, July 3). Why Is Mainstream International Relations Blind to Racism? *Foreign Policy*. https://foreignpolicy.com/2020/07/03/why-is-mainstream-international-relations-ir-blind-to-racism-colonialism/

Blakemore, E. (2021, January 12). How the Confederate battle flag became an enduring symbol of racism. *History*. https://www.nationalgeographic.com/history/article/how-confederate-battle-flag-became-symbol-racism

Blankenberg, N. (2015). When Soft Powers Collide. In G. D. Lord & N. Blankenberg (Eds.), *Cities,*

Museums, and Soft Power (pp. 100–115). American Association of Museums.

Blankenberg, N., & Lord, G. D. (2015). Thirty-two Ways for Museums to Active Their Soft Power. In

G. D. Lord & N. Blankenberg (Eds.), *Cities, Museums, and Soft Power* (pp. 201–239). American

Association of Museums.

Bounia, A. (2014). Codes of Ethics and Museum Research. *Journal of Conservation and Museum

Studies*, *12*, 1–7. https://doi.org/10.5334/jcms.1021214

Braga, R. (2020, August 21). Portugal, colonialism and racial justice – From denial to reparation.

OpenDemocracy. https://www.opendemocracy.net/en/democraciaabierta/justicia-racial-

colonialismo-portugal-negacionismo-reparaci%C3%B3n-en/

British Museum. (n.d.a). *Fact Sheet: British Museum Collection*.

British Museum. (n.d.b). *Palstave*. https://www.britishmuseum.org/collection/object/H_1959-0711-2

BUALA. (n.d.). *About us*. https://www.buala.org/en/about-us

Burkholder, M. A., & Johnson, L. L. (2008). *Colonial Latin America* (6th ed.). Oxford University

Press.

Buschschlüter, V. (2022, August 22). Pedro I: Emperor's embalmed heart arrives in Brazil. *BBC News*.

https://www.bbc.com/news/world-latin-america-62561928

Cahen, M. (2003). Chapter 6: What good is Portugal to an African? In S. Lloyd-Jones & A. C. Pinto

(Eds.), *The Last Empire: Thirty Years of Portuguese Decolonization* (pp. 83–98). Intellect Books.

Camacho, C. F. (2021). *Grupo de Projeto Museus no Futuro: Relatório Final.* Direção-Geral do

Património Cultura.

Card, B. (2015). London's Knowledge Quarter: The Soft Power of Museums in the Knowledge

Economy and Urban Development. In G. D. Lord & N. Blankenberg (Eds.), *Cities, Museums, and

Soft Power* (pp. 59–68). American Association of Museums.

Carlos, J. (2022, February 9). Angola vai discutir com Portugal retorno de obras de arte. *Deutsche

Welle*. https://www.dw.com/pt-002/angola-vai-discutir-com-portugal-retorno-de-obras-de-arte/a-

60711461

Carvalho, M. (2018, June 27). O duro fardo de ser português. *PÚBLICO*.

https://www.publico.pt/2018/06/27/culturaipsilon/opiniao/o-duro-fardo-de-ser-portugues-1835919

Casquilho-Martins, I., Belchior-Rocha, H., & Alves, D. R. (2022). Racial and Ethnic Discrimination in

    Portugal in Times of Pandemic Crisis. *Social Sciences*, *11*(184), 1–19.

    https://doi.org/10.3390/socsci11050184

Chari, S. (2010). Journeys to Repatriation: 15 Years of NAGPRA Grants, 1994–2008. *Museum*

    Anthropology, *33*(2), 210–217. https://doi.org/10.1111/j.1548-1379.2010.01099.x

Chazan, D. (2018, May 27). Emmanuel Macron says France may return museum artefacts to Africa.

    The Telegraph. https://www.telegraph.co.uk/news/2018/05/27/emmanuel-macron-says-france-

    may-return-museum-artefacts-africa/

Chiwanza, T. H. (2018, July 4). France Is Preparing To Return Stolen African Artefacts From Benin

    Dahomey, Mali And Others. *The African Exponent*. https://www.africanexponent.com/post/9022-

    france-is-preparing-to-return-stolen-artefacts-from-the-colonial-era

Cisneros, J. C., Ghilardi, A. M., Raja, N. B., & Stewens, P. P. (2022). The moral and legal imperative

    to return illegally exported fossils. *Nature Ecology & Evolution*, *6*(1), Article 1.

    https://doi.org/10.1038/s41559-021-01588-9

Coombes, A. E., & Phillips, R. B. (2015). Introduction: Museums in Transformation Dynamics of

    Democratization and Decolonization. In *The International Handbooks of Museum Studies:*

    Museum Practice (1st ed.). John Wiley & Sons, Ltd.

Costa, J. A. (2018, July 13). Sim ao Museu das "Descobertas", para que a história não se repita.

    PÚBLICO. https://www.publico.pt/2018/07/13/p3/cronica/sim-ao-museu-das-descobertas-para-

    que-a-historia-nao-se-repita-1835842

Cunha, M. I. (2010). Race, Crime and Criminal Justice in Portugal. In A. Kalunta-Crumpton (Ed.),

    Race, Crime and Criminal Justice: International Perspectives (pp. 144–161). Palgrave Macmillan

    UK. https://doi.org/10.1057/9780230283954_7

Cuno, J. (2014). Culture War: The Case Against Repatriating Museum Artifacts. *Foreign Affairs*,

    93(6), 119–129.

Curtis, N. G. W. (2006). Universal museums, museum objects and repatriation: The tangled stories of

    things. *Museum Management and Curatorship*, *21*(2), 117–127.

    https://doi.org/10.1080/09647770600402102

da Paz, M. (2022, July 1). Por causa de Lula, Bolsonaro cancela encontro com presidente português. *Metrópoles*. https://www.metropoles.com/brasil/politica-brasil/por-causa-de-lula-bolsonaro-cancela-encontro-com-presidente-portugues

Daily Sabah With AA. (2020, December 7). Germany resists calls for return of artifacts smuggled from Turkey decades ago. *Daily Sabah*. https://www.dailysabah.com/turkey/germany-resists-calls-for-return-of-artifacts-smuggled-from-turkey-decades-ago/news

Dalley, J. (2022, June 3). Should we send borrowed art back to Russia? *Financial Times*. https://www.ft.com/content/953c7783-a9de-4540-a86e-02d134e2fc1c

Davidson, L., & Pérez-Castellanos, L. (2019). *Cosmopolitan Ambassadors: International exhibitions, cultural diplomacy and the polycentral museum*. Vernon Press.

de Sousa, A. N. (2020, August 1). Hundreds join protests in Portugal after murder of Black man. *Al Jazeera*. https://www.aljazeera.com/news/2020/8/1/hundreds-join-protests-in-portugal-after-murder-of-black-man

Diário de Notícias. (2018, May 23). Interview: Eduardo Lourenço sees no need to "crucify" Portuguese past. *Diário de Notícias*. https://www.dn.pt/lusa/entrevista-eduardo-lourenco-nao-ve-necessidade-de-crucificar-passado-portugues-9368186.html

DN/Lusa. (2019, June 17). Censos 2021 não pergunta a etnia dos cidadãos. INE prefere fazer um inquérito. *Diário de Notícias*. https://www.dn.pt/pais/censos-2021-nao-vai-incluir-pergunta-sobre-origem-etnico-racial-dos-cidadaos--11019723.html

DN/Lusa. (2021, September 10). PJ identifica cidadã estrangeira suspeita de vandalismo no Padrão dos Descobrimentos. *Diário de Notícias*. https://www.dn.pt/sociedade/pj-identifica-cidada-estrangeira-suspeita-de-vandalismo-no-padrao-dos-descobrimentos-14021324.html

Duarte, V., & Pinheiro, T. G. (2019). *What is the current state of Portugal's demographics?* CaixaBank Research. https://www.caixabankresearch.com/en/economics-markets/labour-market-demographics/what-current-state-portugals-demographics

Duggan, M. (2015, October 23). Looking Back on NAGPRA: Partial Successes, But More to Be Done. *KSUT: Four Corners Public Radio*. https://www.ksut.org/post/looking-back-nagpra-partial-successes-more-be-done

Eboreime, J. (1995). Nigerian Museums and the Presentation of the National Heritage in Perspective. *Cambridge Anthropology*, *18*(1), 62–72.

e-cultura. (2018, April 7). *Museu dos Descobrimentos À Descoberta do Novo Mundo | e-cultura*. http://www.e-cultura.pt/patrimonio_item/13804

Effiboley, E. P. (2020). Reflections on the issue of repatriation of looted and illegally acquired African cultural objects in Western museums. *Contemporary Journal of African Studies*, *7*(1), 67–83. https://doi.org/10.4314/contjas.v7i1.5

Esteves, A. (2019, April 4). Working group recommends new question about ethnicity for 2021 Portugal Census. *European Commission*. https://ec.europa.eu/migrant-integration/news/working-group-recommends-new-question-about-ethnicity-2021-portugal-census_en

Esteves, A. (2021, July 29). Portugal: National plan to combat racism and discrimination 2021 - 2025. *European Commission*. https://ec.europa.eu/migrant-integration/news/portugal-national-plan-combat-racism-and-discrimination-2021-2025_en

Fanon, F. (1961). *The Wretched of the Earth: A Negro Psychoanalyst's Study of the Problems of Racism and Colonialism in the World Today*. Diana Publishing.

Farago, J. (2019, January 3). Artwork Taken From Africa, Returning to a Home Transformed. *The New York Times*. https://www.nytimes.com/2019/01/03/arts/design/african-art-france-museums-restitution.html

Farias, A. (2022, July 25). Preocupado em trazer ao país o coração de Dom Pedro I, Bolsonaro esquece o coração de milhares de novos brasileiros com fome. *CUT Paraná*. https://pr.cut.org.br/artigos/preocupado-em-trazer-ao-pais-o-coracao-de-dom-pedro-i-bolsonaro-esquece-o-coraca-a140

Federal Government Commissioner for Culture and the Media, Federal Foreign Office Minister of State for International Cultural Policy, & Cultural Affairs Ministers of the Länder. (2019). *Framework Principles for Dealing with Collections from Colonial Contexts*. Federal Foreign Office, Language Services Division.

Federal Research Division of the Library of Congress. (n.d.). Portugal—Brazil and East Timor. In *Country Studies/Area Handbook Series*. http://countrystudies.us/portugal/95.htm

Federal-Provincial-Territorial Meeting of Ministers Responsible for Justice and Public Safety. (2018).

Principles and Guidelines for Restorative Justice Practice in Criminal Matters.

https://scics.ca/en/product-produit/principles-and-guidelines-for-restorative-justice-practice-in-

criminal-matters-2018/

Feikert, C. (2009). *Repatriation of Historic Human Remains: Australia* [Web page].

https://www.loc.gov/law/help/repatriation-human-remains/australia.php

Fernandes, R. C., & Teles, F. (2021). Country Portugal. In J. Mulhall & S. Khan-Ruf (Eds.), *State of

Hate: Far Right Extremism in Europe 2021* (pp. 103–105). Hope not Hate and the Amadeu

Antonio Foundation.

Fincham, D. (2011). Deaccession of Art from the Public Trust. *Art, Antiquity, and Law*, *XVI*(2), 1–37.

Flessas, T. (2007). *The Repatriation Debate and the Discourse of the Commons (Working Paper)*.

London School of Economics and Political Science.

Franco, U. P. (2021, August 12). Padrão dos Descobrimentos: A polémica que já vem de longe.

Mensagem de Lisboa. http://amensagem.pt/2021/08/12/padrao-dos-descobrimentos-polemica-vem-

de-longe/

Gomes, M. S. (2019). Dos Museus dos Descobrimentos às Exposições do Império: O Corpo Colonial

em Portugal. *Revista Estudos Feministas*, *27*(3). https://doi.org/10.1590/1806-9584-

2019v27n357903

Gomez, J. (2022, June 7). Inside Lisbon's housing crisis. *Euronews*.

https://www.euronews.com/2022/07/01/inside-lisbons-housing-crisis

Government of Canada, D. of J. (2000, January 13). *Department of Justice—Restorative Justice*.

https://www.justice.gc.ca/eng/cj-jp/rj-jr/index.html

Grim, R., & Cohen, R. M. (2020, May 20). Weeks After Russia Sanctions, Russian Oligarch Received

$50 Million "Antiquities" Shipment Labeled "Fabergé" at Panama Address. *The Intercept*.

https://theintercept.com/2020/05/20/sanctions-russian-oligarch-vekselberg-faberge-eggs/

Gundu, Z. (2020). Looted Nigerian heritage – an interrogatory discourse around repatriation.

Contemporary Journal of African Studies, *7*(1), 47–66. https://doi.org/10.4314/contjas.v7i1.4

Hanink, J. (2016). Review of: Keeping Their Marbles: How the Treasures of the Past Ended Up in

Museums…and Why They Should Stay There [Review of *Review of: Keeping Their Marbles: How the Treasures of the Past Ended Up in Museums…and Why They Should Stay There*, by T. Jenkins]. *Bryn Mawr Classical Review*. https://bmcr.brynmawr.edu/2016/2016.12.06/

Hatzipanagos, R. (2018, October 11). The 'decolonization' of the American museum—The Washington Post. *Washington Post*. https://www.washingtonpost.com/nation/2018/10/12/decolonization-american-museum/

Henriques, J. G. (2011, September 12). Portugal is race blind, but not for the right reasons. *The Guardian*. http://www.theguardian.com/commentisfree/2011/sep/12/portugal-race

Henriques, J. P. (2022, June 25). Coração de D. Pedro. Trasladação gera polémica no Brasil. *Diário de Notícias*. https://www.dn.pt/politica/coracao-de-d-pedro-trasladacao-polemica-no-brasil-14968655.html

Herman, A. (2021). *Restitution: The Return of Cultural Artefacts*. Lund Humphries and Sotheby's Institute of Art.

Herman, A. (2022, 25). Fabergé in London – Russia sanctions and immunity from seizure | Institute of Art and Law. *The Institute of Art & Law*. https://ial.uk.com/faberge-london-sanctions/

Hickley, C. (2020). The Netherlands: Museums confront the country's colonial past. *The UNESCO Courier*. https://en.unesco.org/courier/2020-4/netherlands-museums-confront-countrys-colonial-past

Hickley, C. (2019a, March 14). Dutch museums take initiative to repatriate colonial-era artefacts. *The Art Newspaper*. http://www.theartnewspaper.com/news/dutch-museums-take-initiative-to-repatriate-colonial-era-artefacts

Hickley, C. (2019b, July 18). Austria promises to return ancient artefacts to Russia that were taken as war trophies. *The Art Newspaper*. https://www.theartnewspaper.com/2019/07/18/austria-promises-to-return-ancient-artefacts-to-russia-that-were-taken-as-war-trophies

Hunt, T., Dorgerloh, H., & Thomas, N. (2018, November 27). *Restitution Report: Museum directors respond*. http://www.theartnewspaper.com/comment/restitution-report-museums-directors-respond

James, C. (2007). "Reverse Racism": Students' Response to Equity Programs. In *Race and Racialization: Essential Readings* (1st ed.). Canadian Scholars' Press.

Jenkins, T. (2011). *Contesting Human Remains in Museum Collections*. Routledge.

Jenkins, T. (2016). *Keeping Their Marbles: How the Treasures of the Past Ended up in Museums...and Why They Should Stay There*. Oxford University Press.

Jenkins, T. (2018, November 25). Why western museums should keep their treasures. *The Guardian*. http://www.theguardian.com/culture/2018/nov/25/benin-bronzes-why-western-museums-should-keep-treasures

Joseph, G. L. (2015). Museums in the Age of Brazilian Soft Power. In G. D. Lord & N. Blankenberg (Eds.), *Cities, Museums, and Soft Power* (pp. 71–85). American Association of Museums.

Laely, T., Meyer, M., Mugume, A., & Schwere, R. (2019). *Towards mutuality in international museum cooperation. Reflections on a Swiss-Ugandan cooperative museum project*. https://doi.org/10.5167/UZH-171383

Lonetree, A. (2012). *Decolonizing Museums: Representing Native America in National and Tribal Museums*. University of North Carolina Press.

Lopes, M. (2021, February 22). Chega questiona Costa se mantém confiança política no deputado que pede destruição do Padrão dos Descobrimentos. *PÚBLICO*. https://www.publico.pt/2021/02/22/politica/noticia/chega-questiona-costa-mantem-confianca-politica-deputado-pede-destruicao-padrao-descobrimentos-1951704

Lord, G. D., & Blankenberg, N. (Eds.). (2015). *Cities, Museums, and Soft Power*. American Association of Museums.

Luke, C., & Kersel, M. (2013). *US Cultural Diplomacy and Archaeology: Soft Power, Hard Heritage*. Routledge.

Lusa. (2021, 18). Ministério Público pede pelo menos 22 de prisão para acusado de matar Bruno Candé. *Sábado*. https://www.sabado.pt/ultima-hora/detalhe/ministerio-publico-pede-pelo-menos-22-de-prisao-para-acusado-de-matar-bruno-cande

Lusa. (2022, July 17). Brasil: Pedido de empréstimo do coração de D. Pedro "é um eco autoritário de uma ditadura." *SAPO 24*. https://24.sapo.pt/atualidade/artigos/brasil-emprestimo-do-coracao-de-d-pedro-e-um-eco-autoritario-de-uma-ditadura

Lusa Agency, A. L. (2022, November 25). Ministro da Cultura contesta manchete sobre alegada

listagem de património a devolver a ex-colónias. *Observador*.

https://observador.pt/2022/11/25/governo-portugues-vai-fazer-lista-de-patrimonio-com-origem-

nas-ex-colonias/

Maddra, S. (1996). The Wounded Knee Ghost Dance Shirt. *Journal of Museum Ethnography*, *8*, 41–

58.

Majority Rule, Minority Rights. (n.d.). Principles of Democracy. Retrieved February 19, 2023, from

https://www.principlesofdemocracy.org/majority

Marcos, P. M. (2021). Portugal, Race and Memory: A Conversation, a Reckoning. *BUALA*.

https://www.buala.org/en/to-read/portugal-race-and-memory-a-conversation-a-reckoning

Martins, M. J. (2021, February 25). *Padrão dos Descobrimentos. A nau da discórdia*.

https://www.dn.pt/cultura/padrao-dos-descobrimentos-a-nau-da-discordia-13388926.html

MASHME.EU. (n.d.). *About Us: Museu Interativo/ Parque temático—World of Discoveries*. Retrieved

December 4, 2022, from https://www.worldofdiscoveries.com/museu/about-us

Matar, H. (2015). Museums as Signifiers in the Gulf. In G. D. Lord & N. Blankenberg (Eds.), *Cities,

Museums, and Soft Power* (pp. 71–85). American Association of Museums.

McLean, P. (1999, August 2). Ghost shirt dances back. *BBC News*.

http://news.bbc.co.uk/2/hi/uk_news/409876.stm

Merriam-Webster. (n.d.). Definition of Russophobia. In *Merriam-Webster.com Dictionary*.

https://www.merriam-webster.com/dictionary/Russophobia

Miles, M. M. (2017). War and Passion: Who Keeps the Art? *Case Western Reserve Journal of

International Law*, *49*(1), 18.

Miliyollie, & Fedorova, A. (2019). These portraits demonstrate the true diversity of Russian society,

and the challenges still faced by minorities. *The Calvert Journal*.

https://www.calvertjournal.com/features/show/11333/st-petersburg-diversity-race

Mosbacher, M. (2022, May 5). Should we confiscate the Fabergé eggs? *Prospect Magazine*.

https://www.prospectmagazine.co.uk/arts-and-books/should-we-confiscate-the-faberge-eggs-

london-exhibition-russia-ukraine

Museu dos Descobrimentos. (n.d.). *Município de Belmonte*. https://cm-belmonte.pt/diretorio/museu-

dos-descobrimentos/

Nationaal Museum van Wereldculturen. (2019). *Claims for Return of Cultural Objects NMVW Principles and Process*.

Nayeri, F. (2018, November 27). Return of African Artifacts Sets a Tricky Precedent for Europe's Museums. *The New York Times*. https://www.nytimes.com/2018/11/27/arts/design/macron-report-restitution-precedent.html

Neto, A. B. (2004). *Visiting the Wauja Indians: Masks and Other Living Objects from an Amazonian Collection*. Museu Nacional de Etnologia.

Network of European Restitution Committees. (2019). *Guide to the work of the Restitution Committees Five ways of resolving claims*. NERC.

Ogbechie, S. O. (2016). The Postcolonial African Museum in the Age of Cultural Informatics. *Biblioteca Pinacoteca*, 159–180.

Olivares, F. (2015). Museums in Public Diplomacy. In G. D. Lord & N. Blankenberg (Eds.), *Cities, Museums, and Soft Power* (pp. 49–56). American Association of Museums.

Onciul, B. (2015). *Museums, Heritage and Indigenous Voice: Decolonising Engagement*. Routledge.

Opoku, K. (2015, May 31). Defence Of "Universal Museums" Through Omissions And Irrelevancies. *Modern Ghana*. https://www.modernghana.com/news/620665/defence-of-universal-museums-through-omissions-and-irrel.html

Opoku, K. (2018, December 30). Miracles, Reverses, And Hope In Restitution Of Looted African Artefacts. *Modern Ghana*. https://www.modernghana.com/news/906639/miracles-reverses-and-hope-in-restitution-of-looted-africa.html

Opoku, K. (2020, February 28). Will Portugal Be The Last Former Colonialist State To Restitute Looted African Artefacts? *Modern Ghana*. https://www.modernghana.com/news/986892/will-portugal-be-the-last-former-colonialist-state.html

Peralta, E. (2015). The Presence of the Past: Imagination and Affect in the Museu do Oriente, Portugal. In *The International Handbooks of Museum Studies* (pp. 303–320). American Cancer Society. https://doi.org/10.1002/9781118829059.wbihms115

Peralta, E., & Jensen, L. (2017). From austerity to postcolonial nostalgia: Crisis and national identity in

Portugal and Denmark. In S. Jonsson & J. Willén (Eds.), *Austere Histories in European Societies: Social Exclusion and the Contest of Colonial Memories* (pp. 74–91). Routledge.

Pettigrew, T. F., & Meertens, R. W. (1995). Subtle and blatant prejudice in Western Europe. *European Journal of Social Psychology*, *25*, 57–75.

Pickering, M., & Gordon, P. (2011, June 8). *Understanding Museums—Repatriation*. National Museum of Australia. https://nma.gov.au/research/understanding-museums/MPickering_PGordon_2011.html

Pinto, A. C. (2003). Chapter 2: The transition to democracy and Portugal's decolonization. In S. Lloyd-Jones & A. C. Pinto (Eds.), *The Last Empire: Thirty Years of Portuguese Decolonization* (pp. 17–35). Intellect Books.

Prescott, C. C. (2019). Enshrining Racial Hierarchy through Settler Commemoration. In L. A. Macaluso (Ed.), *Monument Culture: Internaitonal Perspectives and the Future of Monuments in a Changing World* (pp. 49–59).

Queiroz. (2020, September). Revisiting and reclaiming the past. *Pesquisa*. https://revistapesquisa.fapesp.br/en/revisiting-and-reclaiming-the-past/

Raposo, L. (2018, April 18). Um museu, muitos nomes: A narrativa de Portugal e o Mundo. *PÚBLICO*. https://www.publico.pt/2018/04/18/culturaipsilon/opiniao/um-museu-muitos-nomes-a-narrativa-de-portugal-e-o-mundo-1810476

Reiner-Roth, S. (2020). EU requests Elgin Marbles return to Greece from British Museum post-Brexit. *The Architect's Newspaper*. https://www.archpaper.com/2020/02/eu-requests-elgin-marbles-to-be-returned-to-greece/

Returning Heritage. (2019). *Ghost Dance Shirt returned by Glasgow to Lakota Sioux Indian Community*. https://www.returningheritage.com/ghost-dance-shirt-returned-by-glasgow-city-council-to-the-lakota-sioux-indian-community-y

Reuters Staff. (2011, March 30). Brazil may buy Portugal debt, Rousseff says-report. *Reuters*. https://www.reuters.com/article/portugal-brazil-idUSLDE72T0DX20110330

Rocha, D. (2018, May 22). Agentes culturais contra a designação e missão do "Museu da Descoberta" da Câmara Municipal de Lisboa. *PÚBLICO*.

https://www.publico.pt/2018/05/22/culturaipsilon/opiniao/agentes-culturais-contra-a-designacao-e-missao-do-museu-da-descoberta-da-camara-municipal-de-lisboa-1830756

Rodrigues, D. (2022, August 25). Why a 224-Year-Old Human Heart Is Touring Brazil. *Atlas Obscura*. http://www.atlasobscura.com/articles/dom-pedro-heart-portugal-brazil

Rodrigues, E. (2016, June 9). Lagos abre museu para que não se apague memória do «legado terrível» da escravatura. *Sul Informação*. http://www.sulinformacao.pt/2016/06/lagos-abre-nucleo-museologico-para-que-nao-se-apague-memoria-do-legado-terrivel-da-escravatura/

Roussell, A., Henne, K., Glover, K. S., & Willits, D. (2017). Impossibility of a "Reverse Racism" Effect. *Criminology & Public Policy*, *18*(1), E5–E16. https://doi.org/10.1111/1745-9133.12289

Rowley, S., & Hausler, K. (2008). The Journey Home: A Case Study in Proactive Repatriation. In M. Gabriel & J. Dahl (Eds.), *Utimut: Past Heritage—Future Partnerships, Discussions on Repatriation in the 21st Century*. IWGIA.

Rudenstine, D. (2002). Lord Elgin and the Ottomans: The Question of Permission. *CARDOZO LAW REVIEW*, *23*, 24.

Saad, L. F. (2020). *Me and White Supremacy: How to Recognise Your Privilege, Combat Racism, and Change the World*. Quercus Editions Ltd.

Savoy, B., & Sarr, F. (2018). *The Restitution of African Cultural Heritage. Toward a New Relational Ethics* (p. 252).

Saxby, J. (2019, February 19). Does Returning Colonial Loot Run the Risk of Collective Amnesia? | Frieze. *Frieze*. https://www.frieze.com/article/does-returning-colonial-loot-run-risk-collective-amnesia

Schengen Visa News. (2023, March 18). Portugal Extends Temporary Protection for Displaced People From Ukraine Until September. *SchengenVisaInfo.Com*. https://www.schengenvisainfo.com/news/portugal-extends-temporary-protection-for-displaced-people-from-ukraine-until-september/

Scher, R., & Scher, R. (2019, June 11). Better Safe Than Sorry: American Museums Take Measures Mindful of Repatriation of African Art. *ARTnews.Com*. https://www.artnews.com/artnews/news/african-art-repatriation-american-museums-12750/

Shoenberger, E. (2019, February 23). What does it mean to decolonize a museum? *MuseumNext*.

https://www.museumnext.com/article/what-does-it-mean-to-decolonize-a-museum/

Simões, A. (2021, February 19). O salazarismo não morreu. *PÚBLICO*.

https://www.publico.pt/2021/02/19/opiniao/noticia/salazarismo-nao-morreu-1951297

Simpson, C. (2022, May 20). Treasury to decide fate of Faberge eggs as V&A faces Russian sanctions

dilemma. *The Telegraph*. https://www.telegraph.co.uk/politics/2022/05/20/treasury-decide-fate-

faberge-eggs-va-faces-russian-sanctions/

Springer, J. W. (2006). Scholarship vs. Repatriationism. *Academic Questions*, *19*(1), 6–36.

https://doi.org/10.1007/s12129-005-1050-9

Stedelijk Museum. (2022, February 27). Painting by Kandinsky handed over to the heirs of Jewish

former owners. *Stedelijk Museum*. https://www.stedelijk.nl/en/news/painting-kandinsky-handed-

over-heirs-jewish-former-owners

Tam, S. (2012). In Museums We Trust: Analyzing the Mission of Museums, Deaccessioning Policies,

and the Public Trust. *Fordham Urban Law Journal*, *39*(3), 849–901.

Temudo, A. (2021). Current challenges for African cultural heritage: A case study of Guinea-Bissau.

MIDAS. Museus e estudos interdisciplinares, *13*, Article 13. https://doi.org/10.4000/midas.2909

The Guardian. (2015, April 22). Europe's former imperial powers continue to target aid to ex-colonies.

The Guardian. https://www.theguardian.com/global-development/2015/apr/22/europes-former-

imperial-powers-target-aid-ex-colonies

The Portugal News. (2019, June 18). Portugal census not to include question on race or ethnicity. *The

Portugal News*. https://www.theportugalnews.com/news/portugal-census-not-to-include-question-

on-race-or-ethnicity/49962

Trustees of the British Museum. (n.d.). Parthenon Sculptures: The Trustees' Statement. *The British

Museum*. https://www.britishmuseum.org/about-us/british-museum-story/contested-objects-

collection/parthenon-sculptures/parthenon

Ufheil, A. (2020, November 2). The History of Museums Is More Fraught Than You Might Think.

5280. https://www.5280.com/2020/11/the-history-of-museums-is-more-fraught-than-you-might-

think/

United Nations. (2021, December 8). Portugal at crossroads of anti-racism, say UN experts. *United Nations*. https://www.ohchr.org/en/press-releases/2021/12/portugal-crossroads-anti-racism-say-un-experts

United Nations Department of Economic and Social Affairs. (2007). *United Nations Declaration on the Rights of Indigenous Peoples | United Nations For Indigenous Peoples*. https://www.un.org/development/desa/indigenouspeoples/declaration-on-the-rights-of-indigenous-peoples.html

Vala, J., Brito, R., & Lopes, D. (2015). *Expressões dos Racismos em Portugal*. Imprensa de Ciências Sociais - U Lisboa.

Vala, J., Lopes, D., & Lima, M. (2008). Black Immigrants in Portugal: Luso-Tropicalism and Prejudice. *Journal of Social Issues*, *64*(2), 287–302.

Vicente, L. A. (2021, March 4). Padrão dos Encobrimentos ou a falta de um debate sério sobre as estátuas. *PÚBLICO*. https://www.publico.pt/2021/03/04/p3/noticia/padrao-encobrimentos-falta-debate-serio-estatuas-1952918

Viegas, N. (2019, April 4). Branco, negro, cigano ou asiático? Censos 2021 devem perguntar a etnia, recomenda grupo de trabalho. *Observador*. https://observador.pt/2019/04/04/branco-negro-cigano-ou-asiatico-censos-2021-devem-perguntar-a-etnia-recomenda-grupo-de-trabalho/

Vlachou, M. (n.d.). *O que podemos esperar de quem dirige um museu?* PÚBLICO. Retrieved August 30, 2022, from https://www.publico.pt/2022/08/29/culturaipsilon/opiniao/podemos-esperar-dirige-museu-2018461

Vlachou, M. (2018a, April 25). O Museu das (minhas) Descobertas. *Musing on Culture*. https://musingonculture-pt.blogspot.com/2018/04/o-museu-das-minhas-descobertas_44.html

Vlachou, M. (2018b, June 11). Discutindo a descolonização dos museus em Portugal. *Musing on Culture*. https://musingonculture-pt.blogspot.com/2018/06/discutindo-descolonizacao-dos-museus.html

Vunidilo, T. S. (2015). *I Yau Vakaviti: Fijian Treasures in International Museums – A Study of Repatriation, Ownership, and Cultural Rights*. University of Auckland.

Wilding, M. (2019, February 18). Museums grapple with rise in pleas for return of foreign treasures.

The Guardian. https://www.theguardian.com/uk-news/2019/feb/18/uk-museums-face-pressure-to-repatriate-foreign-items
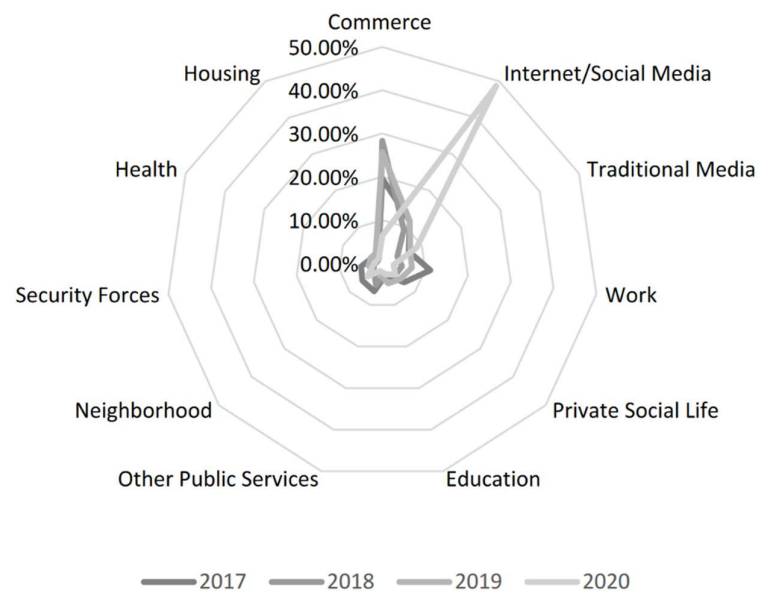
9 Annex A

Figure 1: Discriminatory practices reported to the Commission for Equality and Against Racial Discrimination, 2017 to 2020. Note the jump in complaints of online incidents over the studied time period. Source: Image from Casquilho-Martins et al. (2022) based on CICDR data.
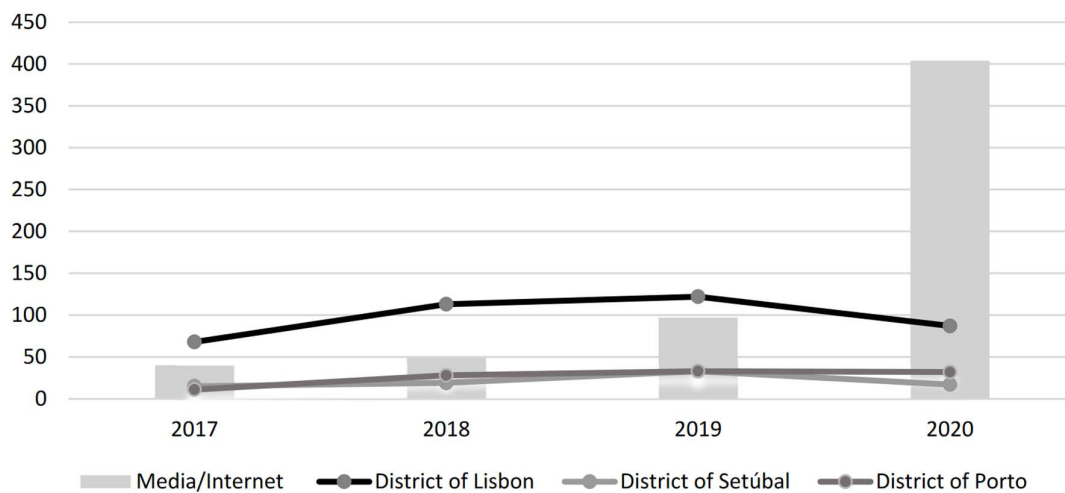

Figure 2: Complaints received from different geographical areas and online, 2017 to 2020. Note the jump in complaints of online incidents over the studied time period. Source: Image from Casquilho-Martins et al. (2022) based on CICDR data.