Babeş-Bolyai University, Cluj-Napoca

Faculty of European Studies

TEZĂ DE DOCTORAT

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Long Abstract

CONDUCĂTOR DE DOCTORAT

DOCTORAL COORDINATOR

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Doctoral student

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2022

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Development of European Policy Regarding Provenance Research of Nazi-looted Art Case Study of European Jewish-Owned Looted Art

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Development of European Policy Regarding Provenance Research of Nazi-looted Art Case Study of European Jewish-Owned Looted Art

Abstract

The rise of the Third Reich was and still is a traumatic event for the world. The Holocaust is considered to be one of the most horrific crimes in our collective human history. The Nazis murdered six million Jews, amongst them one and a half million children, as well as millions of other individuals. The JUST Act report (2020), composed by the US State Department, states that the Nazis confiscated, seized and wrongfully transferred Jewish people's property not only for the purpose of funding the war and equally to eliminate all other aspects of the Jewish cultural life.

The Nazi Party (1933) perpetrated the biggest theft of cultural property during WWII, and it was not a mere incidence of war, but an official policy. A national revolution became a cultural revolution, as well as political and economic. The forbidden fruits of this revolution have haunted us till this day.

This research focuses on the behaviour patterns of selected European states, namely Austria, Germany, and the Netherlands. It explores and maps state activity and suggests a set of practices, rules, and standards in use by the focus European states, regarding provenance research of Nazi-looted art and Nazi-looted art of Jewish ownership.

The research in Israel was conducted using a qualitative approach, which included data collection from in-depth, semi-structured interviews, analyses of various historical and present-day documents, plus discussion from the focus group. Data was analysed following principles grounded in theory. Interviewees included key art world figures, museum directors, art curators, senior diplomats, and senior government officials.

The findings provide new insights regarding provenance research of the Nazi-looted art phenomena, from historical points of view to recent events, and show readiness for a new approach. The findings describe the complexity of the phenomena, characterising the different interests that preside over global cultural institutions' practices, art business, and government views.

The research conclusions elaborate further on various actors' considerations, phenomena characteristics, and a suggested framework. The research adds a fresh approach to existing knowledge of provenance research of Nazi-looted art and Nazi-looted art of Jewish ownership and offer tools for European countries and other international art world actors to form a much-needed change on the matter.

The research conclusions and the European state provenance research policy of Nazi-looted art and Nazi-looted art of Jewish ownership model could serve European countries in preparing new strategies in governmental cultural diplomacy regarding handling Jewish-owned Nazi-looted art. This model is compatible with existing policy procedures of EU states and suitable for other regions, countries, and peoples.

Keywords: Provenance Research, Nazi-looted Art, Nazi Era, Restitution, Museums, European Culture.

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CHAPTER I: INTRODUCTION

The rise of the Third Reich was and still is a traumatic event for the world. The Holocaust is considered to be one of the most horrific crimes in our world collective history. The Nazis murdered six million Jews, amongst them one and a half million children, as well as millions of other individuals. During World War II (WWII), the Nazis also led one of the largest organised thefts in history. A report composed by the United States Department of State on March 2020 (The JUST Act, 2020) states that the Nazis confiscated, seized, and wrongfully transferred Jewish people's property not only for the purpose of funding the war but also to eliminate all other aspects of Jewish cultural life.

History shows plunder and pillage of cultural assets as an integral part of war, and cities containing private and public collections of valuable goods have been looted throughout time. Nonetheless, Nazi-era plunder was different in its essence. Once Hitler had been appointed chancellor in 1933, the Combat League for German Culture held their first meeting in Stuttgart and new ideas were then revealed. The rise of the National Socialist German Worker's Party (Nazi Party) in 1933 showed how a national revolution could be cultural as well as political or economic (Nichols, 1995). Looting art became a war priority and as stated by Feliciano (1995), Nazi art looting would not have been a priority were it not for Hitler and Göring being art lovers. Nazi art plunder occurred in a methodical manner and on an overwhelming scale throughout occupied Europe.

Hitler's wish was to transform his hometown Linz in Austria into the Third Reich's art capital, and to display Europe's treasures. Several scholars write that Hitler appointed a team to assist him with his plan, and special agents were dispatched to European countries. These agents acquired, through various means, more than 10,000 artworks, which were then stored in special depots all over Germany and Austria. As for the Nazis open policy of Jewish persecution and the destruction of their cultural heritage, which came to its final form on January 20, 1942, at the Wannsee Conference, the Nazis knew it allowed them to confiscate whatever suited them; amongst the loot were major Jewish-owned art collections throughout occupied Europe.

Once WWII ended, huge quantities of looted art and cultural goods were located by Allied forces. Collecting points were established all over Germany in order to sort through the art and later to be returned to its state of origin and the rightful owners.

The forbidden fruits of the Nazi's so-called cultural revolution have haunted us till this day. At the end of the war, art objects changed hands, transferred from one person to another, to dealers, art galleries, museum collections, and private owners. Yet post-war Europe was a wounded region and each state priority was to rebuild its country back as it had been. Provenance research of Nazi-looted art and Nazi-looted art of Jewish ownership was left aside at that time.

Many of the looted art pieces could be part of known museums and cultural institutions collections, with no knowledge to whom they belong. Some are even part of current public exhibits, with no knowledge of their provenance or ownership lineage. Legal battles between institutions and the art's possible heirs are still in progress. Yet the question remains unanswered: Where is the justice for these crimes?

The art world invests in looted art without a set governance on the matter or any practical solutions or policies in place. The 1990's brought new, international awareness to Nazi-looted art, which climaxed at the 1998 Washington Conference, when the Washington Principles were signed by 44 countries. However, only five European states started plans to create a mechanism to handle the matter, and unsuccessfully so.

The topic of provenance research of Nazi-era looted art is complex. It involves strong feelings and emotions, enormous amounts of money, and many different actors' conflict of interest. Combining these components might lead to a tragedy and, on the other hand, by looking into it all and understanding the terrain, might lead to a holistic solution, a cleaner art market for the public's sake and much-needed justice.

This research analyses active provenance research for Nazi-era looted art and how difficult it is to conduct maintaining the premise that each object has an owner. The research emphasises ownership and the object's creator. Once the piece transfers from its original, primary owner, it becomes licit or illicit, depending on the circumstances of its transaction dynamics, plus the wider historical context in which these translocations took place.

This research offers insights and presents ideas which will allow European countries to review their cultural policy on the matter of Nazi-looted art, and Nazi-looted art of Jewish ownership. The findings of this research rely heavily on interviews and document analyses conducted with government officials, diplomats, curators, cultural institutions directors, and Jewish community representatives. This research argues that provenance research is significant for reaching solutions concerning Nazi-looted art collections, that is, justice via restitution or compensation to the rightful owners. Furthermore, it claims that provenance research of Nazi-looted art has immense importance in maintaining and rebuilding European heritage by creating due diligence within cultural institutions collections and facing collections' provenance.

A brief history of the Nazi organised plunder is described, as well as what consists of Nazi-looted art, what provenance research is and its importance within the field of Nazi-era looted art, as well as art as a global commodity.

The research reviewed the efforts made by different actors to raise the attention of looted art to an international level, and the attempts made to reset various European governments cultural agendas on the matter.

To understand the motives of state leadership and its consideration, this research calls on theories from international relations, specifically realism theory. Realists view human nature as the foundation for understanding transnational and international relations. Human nature tends toward promoting solely its own interests. Equally, realism anthropomorphises states, generally assuming they solely promote their national interests (Wohlforth, 2016).

The European puzzle maintains different national governments and arenas, important pieces of the puzzle in creating a change of policy, with regard to this research main question. European actors have an independent role and the power to influence other European policy makers. The research concentrated on the behaviour patterns of focus European states with regard to provenance research of Nazi-looted art and Nazi-looted art of Jewish ownership. The research explored and mapped selected state activity and attempts to reset rules, standards, and practices used by the European focus states with regard to provenance research of Nazi-looted art. The research achieved clear wisdom on what needs to be done in order to create a more ethical, moral international society and developed insights on an appropriate government strategy in cultural diplomacy for handling Nazi-looted art.

Research Focus

The research concentrated on the behaviour patterns of focus European states with regard to provenance research of Nazi-looted art. The research explores and maps selected state activity and attempts to reset rules, standards, and practices used by the European' focus states with regard to provenance research of Nazi-looted art. The research develops propositions regarding what needs to be done to create a more ethical, moral international society and to offer an appropriate government strategy in cultural diplomacy.

Conducted in Israel, this research includes semi-structured interviews with past and present ministerial level decision makers, senior civil service officials, and representatives of EU member states, as well as Jewish organisations operating in Israel and abroad. The study also includes document analyses of material from national and international archives and focus group analyses on validating the information and adding more perspectives from a different population.

Research Interest

For the past five years I served as Director of Museums and Visual Art Department, at the Ministry of Culture and Sport in Israel. I was not familiar with the field of Museums and Art, but my vast knowledge and experience as a regulator familiar with government' regulation procedures allowed me

to share my broader view and bring it to the department I lead. I was able to see past the daily routine and make some needed changes.

One of the first issues I came across was the difficulty of museums to issue provenance research of Nazi-looted art.

I noticed the lack of knowledge and how reluctant Israeli museums are with regard to provenance research of Nazi-looted art. After participating in numerus events and discussions, I learned about the attempts made to find a solution to assist museums to issue the much-needed research of their collections.

The more I researched the subject the more I realised that no government (including Israel) had a comprehensive practices, rules, and standards aimed at ensuring the highest legal, moral, and ethical standards in the art trade, museums and other cultural institutions.

As advisor to the former General Director and the Ministry of Culture, and today as an advisor to the Minister of Culture and Sport, I gained direct acquaintance with senior government officials and the ministry's bureaucratic regulatory system. In addition, as ministry director of the museum and visual art department, I have first-hand familiarity with leading provenance research scholars and international organisation officials who aim to put this problem on the national agenda. I have working relations with senior museum personnel, such as curators who believe that provenance research is a basic exercise in due diligence and should be integrated into their job description.

Research Position

No positions were taken nor opinions expressed regarding the research on country leadership conduct. During the research and data collection process, efforts were made to address the country's actions using facts. No arguments nor criticism for or against a country's decision-making process or its leadership exist within the research.

The research attempts to understand different interests and motives of the phenomena and to analyse the difficulties of conducting provenance research for Nazi-era looted art in order to function within the premise that each object has an owner. This research emphasises that each object begins with an owner, its maker or its creator, and once it transfers from its original, primary owner, it becomes licit or illicit, depending on the circumstances of its transaction dynamics plus the wider historical context in which these translocations took place. An attempt was made to analyse economic and diplomatic involvement of transnational and international actors within the EU.

One of the qualitative research methodological challenges is to balance between being engaged with integration and empathy on the one hand, and being indifferent and having a critical way of thinking on the other (Shkedi, 2012). In this research, the participants are past and present high-level government officials as well as museum personnel and researchers. The researcher's consulting and

Israeli government work experience, familiarity with the participants' environment and limitations, together with the more objective perspective of an external researcher suited and supported the research.

The qualitative research description herein aims to lead the reader into an observational environment (Neuman, 2022). This dissertation aims to present rich and descriptive, informative data, so the reader might better receive an understanding of the current situation of the provenance research of Jewish-owned Nazi-looted art.

According to Patton (2015), the researcher aims to open to learning the informants' body language and other gestures. In the present research, the fact that I had been working in the Ministry of Culture and Sport for the past decade as former advisor to the Minister of Culture, and currently as Museums and Visual Art Department director, was very helpful in assessing and interpreting this study's collected data. Participants' intent—including body language nuance and speech was well understood and helped to create a comprehensive picture reflected in the research findings.

Gap in Knowledge

The research opens a window to unique perspectives on art restitution of the Nazi era, and through them invites managing the current cultural, diplomatic, ethical moral and economic environment. Most literary sources document accurate facts but with little practical interpretation of events or integrating any international conventions or laws. Hence, it is difficult to understand from the existing literature how reality is perceived and interpreted by different actors. Different models exist yet none seem to have solved the problem. There is also a need for more knowledge with regard to the models, to study their failures and create better ones. The current research aims to provide further information on the importance of provenance research, its unique value to the restitution process and European culture. The current research contributes to the existing knowledge, enabling better use of current cultural models for European countries.

Research Goals

The research goal is mainly to develop a policy model for European countries regarding handling Jewish-owned Nazi-looted art, under the premise that each object has an owner.

This model is suitable for use in EU member states; it is a compatible model with the region's countries and peoples and the similarities among them.

Secondary research goals:

1) To identify the social, ethical, legal, political and diplomatic issues and approaches which involve provenance research of Nazi-looted art of Jewish ownership (social and ethical issues);

2) To examine decision-making mechanisms that exist in the international community regarding the topic of illicit objects, restitution, and provenance research;

Main Research Question

What components might comprise a policy model for European countries regarding handling Jewish-owned Nazi-looted art?

Subsidiary Question Sets.

1) What issues and approaches are involved in provenance research of Jewish-owned Nazi-looted art? What social issues can be identified with regard to provenance research of Nazi-looted art? What Ethical issues can be identified with regard to provenance research of Nazi-looted art and Nazi-looted art of Jewish ownership?

2) What are the decision-making mechanisms that exist in the international community (the EU) regarding the topic of illicit objects, restitution and provenance research?

To understand the phenomena's needs and considerations, it is essential to first understand its history and the different issues and approaches. The first research question collects data on the provenance research and in particular on Nazi-looted art research. It allows the reader to understand the problem and what the social and moral effects are, and their current dynamics.

The data collected through the second research question describes the existing decision-making mechanism in Austria, Germany, and the Netherlands, using information and data obtained from different participants, combining relevant existing literature.

Research Boundaries

The research contributes an important tier to the currently available knowledge. It enables access to a new perspective and interpretation of the international policy on provenance research and restitution of Nazi-looted art. The main research objective was to develop a policy model for European countries regarding handling Jewish-owned Nazi-looted art. The research concentrates on the behaviour patterns of focus European states with regard to provenance research of Nazi-looted art. The research explores and maps selected state activity and attempts reset the rules, standards, and practices used by those European countries wishing to address provenance research of Nazi-looted art. The data collected throughout the research comprises qualitative research using a case study approach. The data was gathered through interviews and document analyses and was combined with the existing theories in international relations. This allowed for the research to develop propositions regarding what needs to be done to create a more ethical moral international society and offers insights that could form a key component in creating a government's strategy in cultural diplomacy.

The field research was conducted in Israel and involved international actors in the field. The data collection, including personal interviews, was done between 2019-2021.

Thesis Structure

Chapter I reviews the most relevant available and latest literature with regard to the research topics. The chapter begins by presenting current international relations theories to understand phenomena and processes of provenance research of Nazi-looted art of Jewish ownership. This chapter reviews the relevant literature in order to understand the different components, issues, and approaches involved within provenance research of Nazi-looted art of Jewish ownership. The chapter reviews the existing history and decision-making mechanisms in the international community regarding provenance research of art objects and art restitution in order to achieve a much deeper acquaintance with the phenomena.

Chapter II reviews the methodology used to conduct the research and explains the reasons for choosing the qualitative approach for this specific research. It describes the research design, data collection process, and method of data analysis. The chapter describes the different considerations and the careful selection process of the research population.

Chapter III reviews the findings that emerged from the in-depth interviews, the document analyses, and the focus group discussions. The findings were divided into themes and categories and presented according to research questions. The findings show participant perspective. The research provides a platform for different government officials and members of the art industry to present their personal interpretation of events and their distinctive view, allowing this research to achieve its strength and become unique.

Chapter IV presents a discussion of the findings. This chapter shares the connection between the relevant literature and the gathered findings. The researcher attempts to explain these specifically obtained findings through examining the connection amongst the findings and relevant literature and its analysis. This complex research has the ability to impact the international community; in many cases, the research findings add to existing knowledge.

Chapter V describes emergent conclusions from the discussion of the findings, in accordance with the research questions. The presented conclusions allowed the researcher to develop a strategy for cultural policy with regard to handling provenance research of Nazi-looted art and art restitution.

Importance of the Research

Culture heritage cannot be effectively protected without market transparency and due diligence. Each artwork has an owner and creator, but no object is heirless unless it is labelled as one. Once an object transfers from its maker/creator, it is connected at any given point to a person, location, and date. Therefore, an object always has an owner, whether identified or not.

Dealing with provenance research of looted artwork is a long, expensive, and complex process. There are legal issues, economic matters, and many interests that different actors raise. States need to make the efforts and seek justice despite time passing. When it comes to looted artworks, the scales of justice rise slowly, and it is the leaders' duty to balance them faster. Governments need to be encouraged to adopt the Washington and Terezin principles into their legal systems and legislate appropriate laws. Research must be carried out at national art collections, so institutions such as museums can identify Nazi-looted art and its heirs. Behind every confiscated, looted work of art lies the fate of an individual. Without engaging basic due diligence, the problem of provenance research will remain unsolved. The stories of these so-called heirless objects need to be told, as they are our past and therefore our present and future.

Possible Contribution to Knowledge

The research contributes to the existing international relations knowledge in the Nazi-looted art field by trying to achieve an appropriate solution to the Nazi-era looted art issue. The research tries to answer the question of a just and fair solution. The goal must be to locate the approach to better serve the cause - a legislative and ethical one, an economic and diplomatic one.

The findings and conclusions of this research reinforce some of the existing theories and provide them with a significantly fresh and unique view. This research illuminates an important cultural issue that is not yet the centre of attention for decisionmakers and state representatives in the field.

Key words: *Provenance Research, Nazi-looted Art, Nazi Era, Restitution, Museums, European Culture, EU diplomacy*

CHAPTER II: THEORETICAL PERSPECTIVE

2.1. The Conceptual Framework- Main Theories

Realism

International relations theories can serve to understand international actors' behaviour and their interest in the arena. The primary theory to shed light on state behaviour is realism. It relies on a state being self-centred human who acts to advance their self-interests. States act to advance their interests, and bilateral or multilateral cooperation is analysed in a way that enables others to anticipate the interests of each country. Mainly, the assumption is that power is the essence of world politics, and the struggle for power is socially constructed. The theory assists in understanding a state behavior in the global arena. States take care of their own interests, believing they are the most important player. There is no higher political authority above the state, and its basic acts aim at survival through power and self-serving practices. State sovereignty is the principal issue, since it grants the head of state the freedom and the responsibility to do what it takes to ensure state survival.

The Social Constructivism Approach

According to Wendt (1995), the constructivist approach to international politics emphasises the important role of shared norms and ideas in shaping state behaviour. Social relationships construct state ideas, even within international politics. There is no doubt that different interests and power matter in the world of politics but shared knowledge vastly determines their importance in deciding state cooperation, balance, or war. Baldwin (2016) suggests the use of three assumptions to describe a constructivist approach: 1) social construction of social reality; 2) social construction of knowledge; 3) the interaction between social construction of social reality and knowledge.

Wendt (1999) claims that in international relations there are those who see the power base as material forces, and those who view that power derives from ideas and cultural context. According to Baldwin (2016) the constructivism approach does not put the concept of power at the centre, rather viewing knowledge as a power source. Therefore, the research of an object's history brings knowledge of history, culture, and, therefore, state cultural identity. The advantage of a constructivist approach can be found in the attention given, in social analysis of the role of norms, values, institutions, ideas, identities and cultural context.

The international system is perceived by constructivists as an offshoot of sociological institutionalism, in which power derives from state ideas and cultural context. Herein, special importance placed on cultural norms and identities of human behaviour and action can allow a researcher to study why the policy maker makes policies as they do.

Public Diplomacy and Culture Diplomacy

The use of Public Diplomacy theory assists in creating some order (Snow, 2020). If one takes it out of the international relations field, the world becomes chaotic, governments turn to material power and stick to their weapons instead of turning to civic engagements and dialoguing. According to Cull (Cull, 2019), the foundations in public diplomacy are active listening, efforts made toward mutual understanding, promoting dialogue, collaboration, and culture, elements which are clearly embedded within this research. Public diplomacy linked to power, in its traditional form, it is about governments conversing with global actors and using their efforts to influence and engage those actors in support of national and international objectives. Both individuals, private groups as well as governments influence direct and indirect on another government's foreign policy.

The borders between the terms 'cultural diplomacy' (CD) and 'public diplomacy' are blurry, and yet many see CD as a public diplomacy component, a fashionably small part of public diplomacy (Mark 2010). According to Goff (2020) the EU uses CD to express its initiatives. Ronen and Shenkar (2017) suggest that culture is a powerful force, shaping perceptions, attitude, and behaviour. Most people take culture for granted, assuming their emotions, actions, and general state of mind are universal. Yet while

being exposed to other cultures, one notices differences. Understanding one's culture will make working relationships more efficient. Ronen and Shenkar (2017) aim to understand to what extent it is possible to set national cultures using norms, values, and work behaviour, which can contribute to international corporations.

The use of these theories in the research will help define and enable analysis of the cultural encounters which occur in EU states.

2.2 The Concepts

Culture: Culture has many definitions, all of which describe a collective phenomenon that can be associated with different collectives made up by a variety of individuals. Culture can be seen as an action of creativity, intended to express, present, create meaning, interpret and to create an identity within a society by using a creative language such as literature, sculpture, poetry, music, painting etc. Culture's main character is manifestation, the ability to express the existence of society by creative arts (Harel-Fisher, 2020).

Fine Arts: This research focuses on the classic term of 'fine art' by Clowney (2011) as visual art. Fine art was considered to have been created primarily for aesthetic and intellectual purposes and is judged for its beauty and meaningfulness; it includes specifically painting, sculpture, drawing, watercolour, graphics, and architecture.

Cultural Heritage: Cultural heritage is a society's legacy, physical artifacts inherited from past generations, which are a part of society. For research purposes, visual art, e.g., stolen paintings, sculptures and books are subject to preservation and government regulation should be in place to ensure their survival for future generations. As Bokava states, 'our cultural heritage is what makes us human' (2015).

Cultural Identity: Society focuses on building a joint identity and at the same time protecting and maintaining separate ones. Culture is a way for society do define itself, it grants a social resilience as well as a democratic one. A state that has more than one cultural identity or one national identity, which respects its citizens' cultural liberty, allows them to fulfil their freedom of speech, to develop their spiritual freedom, and practices an intercultural discourse might gain the general public's trust and association (Banting & Kymlicka, 2010). Henley (2016) notes, that there is a positive social value for cultural diversity, amongst others due to its support for openness, initiative, enriching inspiration and constant social development.

There is constant strain between respecting different social groups' cultural rights, while preserving and developing independent identity and the controlling power or organ, which seeks to promote joint identity by using cultural activity.

Provenance Research: Provenance defines as the place of origin or earliest known history of something. A record of ownership of a work of art or an antique, used as a guide to authenticity or quality (Oxford Dictionary).

Curators note that provenance is the history of ownership of a valued object. It tells the story of the object's journey. A full provenance provides a documented history of an object that can help prove its ownership, assign the object to a known artist, and establish the object's authenticity. It is often used to establish an object's value.

Provenance research of Nazi-looted art: A historical quest of a country, to learn about the art objects historical story. By searching for provenance, a country can practice remembrance, educate the public of the Holocaust by using a different view.

Nazi-looted Art: Artworks, including paintings, prints and sculptures, as well as other cultural property plundered from Jews by the Nazis and their allies and collaborators. It includes Judaica, meaning not only the ritual objects but also libraries and archival materials relating to Judaism and to Jewish organisations and Jewish life generally (Fisher & Weinberger, 2014).

European Jewish-Owned Looted Art: The remaining artistic treasures and cultural assets, Jewish-owned, which were plundered, expropriated, and forcibly sold in the years 1933-1945 all through Nazi era.

Art Restitution: Restoration of stolen, plundered, or illicitly taken art objects to their rightful owner.

Museums' Collections: A collection can contain assets owned by the museum, assets acquired by the museum itself or were donated by benefactors. A museum collection can also contain loaned assets given to it for a period of time (short- or long-term). Loan agreements can also be permanent, defined by the two parties, that is, museum and lender. The museum's collections may be on display, but most of collection is kept in storage.

Art Market: A physical or figurative venue where art can be bought or sold. Cultural objects, amongst which are art objects, have monetary value derived from their cultural worth. The price reflects the artistic merit of the object, assessed by subjective consensus in terms of originality, use of colour, content, style, etc., as well as the scarcity of the object. The art market requires a work of art, a seller and a buyer.

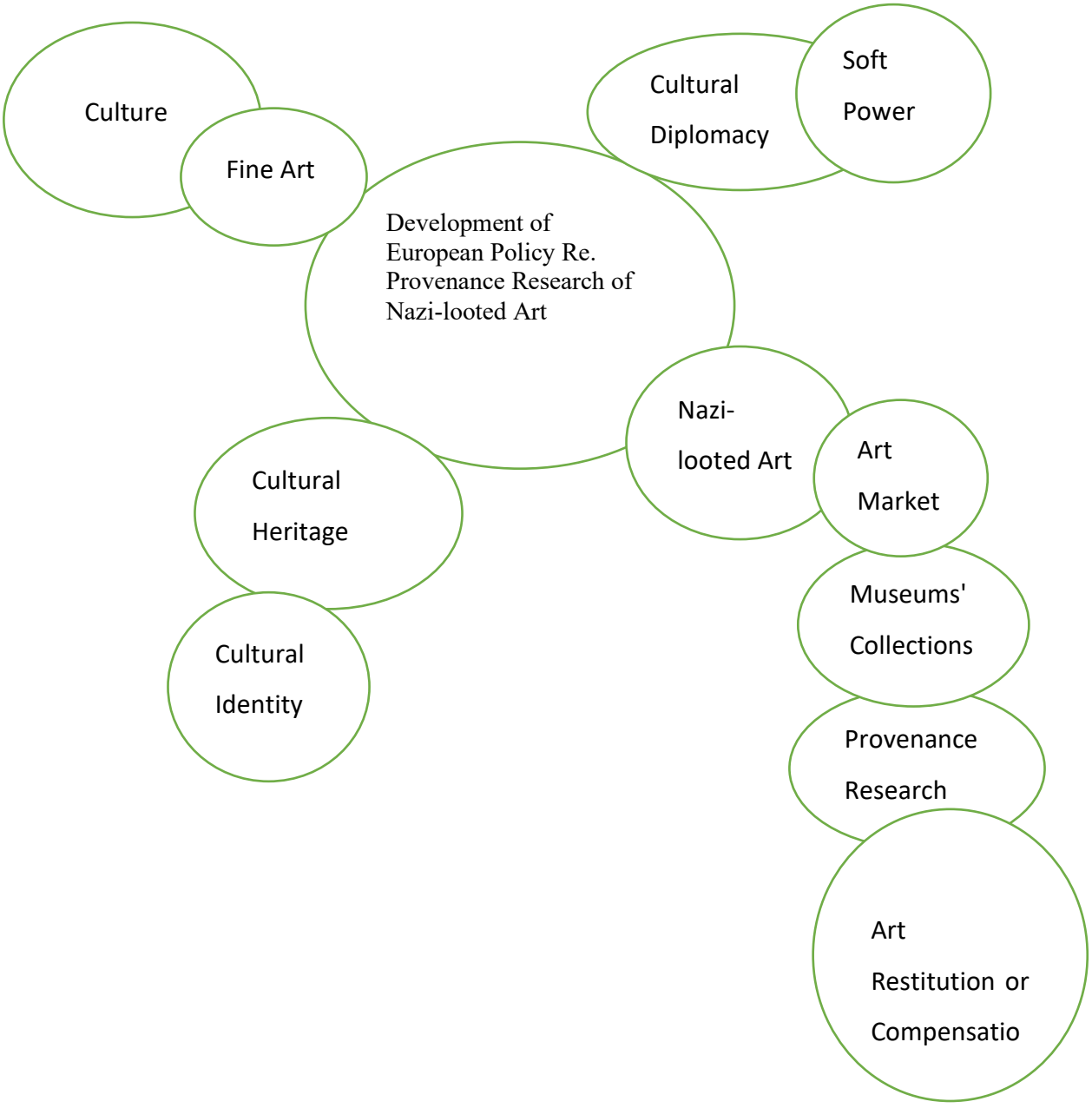
Cultural Diplomacy: As a central approach in international relations, governments converse with global actors and attempt to influence and engage those actors in support of national and international objectives. It can be direct or indirect influence on another government's foreign policy. It is based on the important role of shared norms and ideas and on an open dialogue in shaping state behaviour. The international system, perceived by cultural diplomacy believers, sees the possibility of a state to set agendas for other states and shape their preferences without the use of carrots and sticks, but through

persuasion and social influence, where there is a special importance of cultural norms and identities of a human behaviour to attract other actors to operate in the same way.

Soft Power: Within international relations 'soft power' is the most referenced term in public diplomacy. According to Nye, soft power is based on intangible or indirect influence such as ideology culture and values (Snow, 2020). Soft power is the ability to achieve a state wish through attraction rather than coercion. Attraction arises from a state's political ideals, its culture and policies. Soft power uses a country's cultural and values resources.

Figure1.1

The Conceptual Framework: A Visual Model



The visual model illustrates the way concepts interact and form a base of knowledge upon which the model for European State Provenance Research Policy of Nazi-looted Art / Nazi-looted Art of Jewish Ownership relies. The research goal can be achieved by using qualitative multi-stage multiple method research (Strauss and Corbin, 2015). The next chapter will describe the methodological considerations that underpinned this research and the data collection process..

CHAPTER III: METHODOLOGY

3.1 The Research Paradigm: Qualitative Approach

The research was conducted in the qualitative approach, and a case study was employed. The definition to qualitative research approach is an action that derives from the situation itself, which suggests a vantage point of view to those looking at the world (Lincoln & Denzin, 2000). Qualitative researchers study issues in their own natural place and try to find meaning or to interoperate situations in human terms (Shkedi, 2012). The qualitative research paradigm allows an understanding of personal experiences, actions, and reasons, rather than for examining existing theories or results (Hays & Wood, 2011).

For the past five years I am serving as Director of Museums and Visual Art Department, at the Ministry of Culture and Sport in Israel. For six years before that, I worked closely with the former Minister of Culture and Sport as an advisor. My vast knowledge and experience as a regulator, familiar with 'governmental regulation procedures, and my governmental ties and ministry experience allowed me to share thoughts with various people and to create personal contacts.

The research attempts to contribute an important tier to the currently available knowledge, by enabling access to a new perspective and interpretation of the international policy which takes place in the provenance research and restitution of Nazi-looted art. It is a topic where much is hidden from the public eye and is not all about fine art but also reveals true crime. Therefore, a data collection method based on interpersonal interaction is optimally suited to meet differences in mentality and where feelings have much impact.

The research data were gathered through interviews and research document analyses. The interviews were conducted with senior museum staff, government officials in Israel and abroad—been actively dealing with provenance research in recent years—and key actors in the international community handling the issue of provenance research of Nazi-looted art. The research has examined official records documenting the decision-making processes of the national and international platform following the Washington Conference, as well as data from international organizations.

3.2 Case Study

The research sought to explore the currently available knowledge and achieve wisdom on what needs to be done to create a more ethical moral international society and to develop insights that will form an important component in creating a government's strategy in cultural diplomacy. Therefore, a case study approach was chosen.

A case study approach is a design of inquiry in which the researcher develops a thorough analysis of a case, often a programme, event, activity, process, or one or more individuals. Cases are bounded by time and activity, and researchers collect detailed information using a variety of data collection procedures over a sustained period of time (Stake, 1995; Yin, 2009; 2013). Yosifon (2016) describes the course of a case study in which data are collected in the field, and then being analyzed by the researcher who tries to understand the actions of the subjects, and to identify patterns which deepen the understanding of a phenomenon. Due to the similarities with state characteristics, the data can also draw conclusions about the situation in other European countries' policy regarding provenance research of Nazi-looted art. A case study based on a grounded theory allows to build a new theory that contributes an important tier to the currently available knowledge. Furthermore, it enables access to a new perspective and interpretation of the international policy that takes place in the provenance research, that is, restitution of Nazi-looted art. In the research, a comprehensive examination of decision-making mechanisms, international community points of view on illicit art objects and their restitution and provenance research were performed. The research aim is to deepen the knowledge with the phenomena itself, its unique history, and its cultural implications, moreover, to draw the possible broader insights from it. Examining a number of smaller cases makes it possible to learn about countries in the European Union and recognise regions with similar geographical, social, and economic characteristics. Cross-case synthesis and cross-referencing findings could lead to better understanding regarding European countries' policies regarding provenance research of Nazi-looted art.

3.3 The Research Design

The research involved three stages. Table 2.1 illustrates the research design that guided this study.

Table 3.1

Research Design Guiding This Study

Stage	Aim	Research Tool	Research Population	Data Analysis Method

1	To identify the Social, Ethical, Political and Diplomatic issues and approaches which involve provenance research.	Semi-structured interviews. Research document analyses.	17 Interviews Curators, Art Museums CEOs, Art Dealers, Auction Houses personnel	Content Analysis
2	To examine decision-making mechanism and the way the international community sees the topic of illicit objects, restitution and provenance research	Semi-structured interviews. Research document analyses.	-Ministerial level, Senior officials. Claims Conference personnel -Former employees of the Company for location and Restitution of Holocaust Victims' Assets	Content analysis
3	To develop a working policy model for European countries for handling looted art.	Semi-structured interviews. Research document analyses.	17 Interviews Curators, Art Museums CEOs, Art Dealers, Auction Houses personnel, governments officials	Content analysis

Table 2.1 shows the research design that guided this study as well as the different stages of the research and research tools used in each stage.

3.4 The Sampling Method

The sampling method is an important component in qualitative research because it has a significant impact on the quality of the research findings. Hence, the goal of the research is crucial in selecting the sampling strategy.

According to Patton (2015) the primary method of anthropology, and the earliest tradition of qualitative inquiry, is ethnography. The main assumption is that once a group of people interact together for a period of time, they will eventually form a culture with its own behaviour patterns and shared beliefs that constitutes their own behavioural standards. In this research, interviewees comprise select government officials from several ministries, each holding a senior position and familiar with the phenomena of looted art. The interviews include museum' personnel and experienced contributors from the private sector and nongovernmental organisations related to the topic and who each share

different cultural affiliations. These contributors shared their perception regarding their understanding of the history of the phenomena, of internal and external policy processes. The data includes their point of view on what could be a moral and just solution regarding the phenomena. The strategy of maximum variation was chosen. Interviewees who took part in the research were very interested in expressing their personal thoughts and taking part in the research

3.5 The Research Population Profile

The research participants comprised 17 interviewees who sat for comprehensive, semi-structured interviews served in the past and present key positions in the states governments and who served in the past and present key positions in museums, cultural institutions and in the provenance research sphere. Interviewees include ambassadors, diplomats, government officials, lawyers, senior civil servants, and senior officials in NGO' agencies operating in the provenance research field. The interviewees' group includes eight women and nine men, ranging in age from 40 to 95 years.

The focus group had 5 participants, most of them in their 40s and 50s. All focus group participants currently work in the field of Nazi-looted art provenance research and have significant international and national experience.

3.6 Method of Data Analysis: Content Analysis

For research purposes, a grounded theory model was selected due to the fact that this method does not attempt to present a theory and prove it, but the theory emerges from the research itself.

Grounded theory is a structured and systematic scientific method (Strauss & Corbin 2015). Therefore, once instructions are followed, scientific research can be introduced; the main issue is how the researcher interprets the research findings. The use of grounded theory for research purposes allowed for a systematic collection of various types of information that describes an international phenomenon from different points of view. The process of gathering and categorising the information has created the possibility for the research discoveries and conclusions, with regard to the different procedures that have taken place in handling Jewish-owned looted art of Nazi era, and the recommendations of the participants for a suitable working model for European (Israel included) countries.

The data analysis method used in this research is called 'coding', it was taken from the grounded theory approach and also called 'categorisation' (Shkedi, 2012).

CHAPTER IV: FINDINGS

Chapter IV presents findings according to the subsidiary questions. Each subsidiary question represents the themes created in the data analysis process and its related categories. This chapter

presents the findings, which emerged during the semi-structured interviews and the documents analysis.

4.1 Findings Emerging from Research Question 1

What issues and approaches are involved in Provenance Research of Jewish-owned Nazi-looted art? What social issues and ethical issues can be identified with regard to provenance research of Nazi-looted art? And Nazi-looted art of Jewish ownership?

The content analysis conducted with regard to the data collected through the semi-structured interviews with past and present government officials as well as high-level officials and research document analyses. The content analysis yielded three themes, each containing three categories.

Table 4.1 presents the themes and categories that emerged from the content analysis.

Table 4.1 -*Issues and approaches that involved in Provenance Research of Nazi-looted art and Nazi-looted art of Jewish ownership*

Theme 1	**Theme 2**	**Theme 3**
Social Issues and Approaches	**Ethical Issues and Approaches**	**Political and Diplomatic Approaches**
Category 1: Culture heritage and Fine Art: *'it is not an individual crime, it was an entire mechanism, who made huge effort in order to eliminate the Jewish people, and a big part of it was to erase their culture and what it represented'*	**Category 1: Ethics and Laws**: *'a crime has been committed; we have to have a mechanism to deal with it'*	**Category 1: Political Considerations**: *'the failures of the process were designed more for political measure than anything else'*
Category 2: Training and Education: *'when we talk about provenance research there is not enough training, most countries don't have it. The lack of such expertise is a problem. It is also important in a point of Holocaust education'*	**Category 2: Restitution – a Just and Fair approach**: *'What does justice look like? Is it abstract or we can put a face to it?'*	**Category 2: Economy Considerations**: *'the failures of the process were designed more for political measure than anything else'*
Category 3: Personal and Community approaches: *'It's a very passionate affair, it gets personal because it is a study of trauma due to the great loss. They handle it by trying*	**Category 3: Museums Conflict of Interests**: *'museums are occupied in waiting time; it suits them since no one like to give away its art pieces'*	**Category 3: Universal v. Jewish Approach**: *'if we want to handle provenance research than we have to establish an international interest'*

to locate lost connections to objects, and some wish to shut the door on it'		

4.2 Finding Emerging from Research Question 2

What decision-making mechanism exists in the international community (mainly EU countries) regarding the restitution of looted art (illicit objects) and provenance research?

The content analysis conducted—with regard to the data collected through the semi-structured interviews with past and present government officials as well as high-level officials and research document analyses—yielded three themes, each containing two categories.

Table 4.2 presents the themes and categories that emerged from the content analysis.

Table 4.2: *Decision-making mechanisms which exists within the international community mainly in European countries with regard to restitution of Nazi-looted art*

Theme 1	**Theme 2**	**Theme 3**
The Impact of national and International public opinion	**Decision-Making Process**	**Cultural Institution Decision-Making Process**
Category 1: National Public opinion: *'The topic has to be bought up again to be talked about by the public.'*	**Category 1:** Political and Economic consideration (national and international): *'It requires a political will for a country to put in place a mechanism that accepted by all and to remove obstacles.'*	**Category 1**: Economic Considerations: *'Museums need to fine proper funding for the research, it is the same as fixing the stairs, or painting the walls, it is their job.'*
Category 2: International Public opinion: *'Today there is not enough publicity, not enough noise which will lead to an international political debate.'*	**Category 2:** Social considerations (national identity): *'Museums need to recognise that they keep the art pieces not just for themselves but for the public, mention the story on a label in fact they will be recognising what happened.'*	**Category 2:** Practical aspects within Museum's operational work: *'In a perfect world everything that enters a museum will go through the registrar office, will be written down and its provenance will be checked.'*

4.3 Focus Group Discussion

The focus group was asked to address three questions relating to the proposed working model. Data from the discussion was arranged as much as possible following categories that emerged from the personal interviews.

Questions:

What recommendations would you give to a country or an international organisation, wishing to work towards provenance research of Nazi-looted art but unfamiliar with the issues and approaches involved in the matter?

What components might comprise a policy model for European countries regarding handling Jewish-owned Nazi-looted art?

Table 4.3

Themes and Categories Emerging from the Focus Group Discussion

Themes	Categories
Theme 1: Components of the provenance research working model for European countries	**Training and Education:** *'where do we stand with regard to Holocaust remembrance'*
	Political Science: *'Israel has to become a leader of that international Ethical standard'*
	Economic Diplomacy: *'there is the need to create a special fund, to assist cultural institutions'*
Theme 2: Recommendations toward regulating provenance research process of Nazi-looted art	**Economic Planning**: *'there is the economic barrier to consider when it comes to practice provenance research'*
	Political Planning: *'we see lack of political will to regulate the field, due to art being prestige'*
	Legislation and Regulation of Cultural Heritage: *'should it be a state matter or the Jewish organisations/communities to handle Holocaust remembrance and cultural heritage: should it be a combined effort to resituate, to compensate? There is the need to unify laws when it comes to provenance research of Nazi-looted art especially with regard to statute of limitation and property march overt'*

4.4 Integrative Findings

The findings section includes items discussed during the in-depth interviews, throughout document analyses, and in the focus group discussion. Out of all the findings, the integrative findings relevant to the research questions have been selected and will be discussed in the next section. The following is a list of findings, arranged by research questions:

Integrative Findings: Question 1

What issues and approaches are involved in provenance research of Nazi-looted art; what social and ethical issues were identified with regard to provenance research of Nazi-looted art?

Cultural heritage and fine art: Provenance research of Nazi-looted art is an important part of preserving European and Jewish cultural heritage. It is a society legacy, inherited from past generations.

Training and education: Provenance research of Jewish-owned Nazi-looted art assists in telling the story of the Holocaust, educates the public and maintains remembrance. Furthermore, provenance research procedure lacks capable researchers. Therefore, training programmes are very important for achieving professional and competent researchers.

Personal and community approaches: Provenance research of Nazi-looted art involves high-level sentiments for those who handle it. Once Jewish property is involved, it raises the flag of antisemitism, on the other hand it is not only a Jewish matter but a cultural matter that concerns all.

Ethics and law: Provenance research involves addressing its legal and ethical issues.

Restitution – a just and fair solution: Provenance research is an important link towards a just and fair solution, that is, restitution becomes a moral commitment and the final goal.

Museums conflict of interest: Museums are in constant conflict of interest. On one hand, they wish to keep their collections intact and, at the same time, wish to keep their reputation as owners of clean collections.

Political considerations: Provenance research is a complex matter in need of political leadership. Jewish organisations' involvement can derail the topic from the broader view of cultural property into the debate over antisemitism. Therefore, states choose the easy way to focus on remembrance instead of locating the heir for restitution.

Economy considerations: Provenance research needs to be funded by states. Funding is an incentive for institutions to research their collections. Decisionmakers need to work together with cultural institutions to reach holistic economic solutions with regard to heirless objects, collections' safety, institutions' benefactors' privacy, and competent researchers. Public interest and the art market should be considered as well.

Universal versus Jewish approach: Provenance research is both a universal matter and a Jewish one. However, the Jewish approach is not popular compared to the universal one. The topic touches the international community and international cooperation is needed to achieve a solution. Israel should take the lead for the international community to follow.

Integrative Findings: Question 2

What decision-making mechanism exists in the international community (namely EU countries) regarding the restitution of looted art (illicit objects) and provenance research?

National public opinion: Public opinion is a powerful instrument. Decisionmakers are constantly influenced by public views and debate. Therefore, provenance research needs to be handled in the public arena for it to make it to a decision makers' agenda.

International public opinion: The international public opinion is important for national decisionmakers who find it very difficult to ignore the international sphere, as it is part of their decision-making process.

Political and economic considerations: The main political and economic consideration is funding. The process of provenance research needs governmental funding to produce results, as well as full governmental cooperation (different ministries). Furthermore, cultural institution collaboration is to be considered. Provenance research is valued as an international topic, therefore an international body, such as the European Union would do it justice by governing the process of the research.

Social considerations (national identity): Decisionmakers have their public interest in mind; therefore, they should consider educating the public to remember the cultural Holocaust in WWII. Public interest equals keeping state cultural treasures safe while exposing it to the public. Allowing public access to these art objects is in a state's best interest as well as creating due diligence of the process and setting behavioural norms.

Economic consideration of cultural institutions: Cultural institutions depends on funding. The provenance research process is a costly matter and institutions need funds to do it. Furthermore, institutions fear the idea of due diligence because it could lead to economic losses. Creating special foundations for assistance in funding would lead to institutions cooperating. Heirless objects located at cultural institutions should remain there for public interest.

Practical aspects within a museum's operational work: Museums are conservative institutions and, as such, bound to keep its collections intact and secret for sake of their donors and benefactors. Museums are to receive an item, check its provenance, and register its line of ownership correctly. Museums conserve and preserve art for public interest. Museums personnel are the most qualified to map museum collections, hence able to flag the Nazi-looted art needing to be researched.

CHAPTER V: CONCLUSIONS AND RECOMMENDATIONS

5.1 Conclusions Emerging from Research Question 1

The conclusions emerging from this study show that a policy model for European countries regarding handling Jewish-owned Nazi-looted art is characterised by researching provenance of Nazi-looted art and Nazi-looted art of Jewish ownership. Researching for provenance enables states to rebuild their cultural heritage, unify their society, and respect their citizens. It is associated with the need for professionals and capable researchers as well as with creating an inventory of looted art and being able

to identify possible heirs. By researching provenance, the art object's story is told and these stories raise awareness to the Jews' cultural losses and Holocaust history.

Further emerging from this study is the need to create a policy model for European countries regarding Nazi-looted art of Jewish ownership, which is associated with heightened emotions of different interest groups. In order to meet sensitivities and achieve solutions, it is best to review the issue as Nazi-looted art in general and not associate it with any type of group. A policy model is characterised by different laws and codes of ethics. It demands a reform within national and international laws. Ethics alone cannot lead to the needed change or deal with the issue of Nazi-looted art.

This study concludes that a policy model is associated with restitution policy, which cannot be separated from the act of provenance research. Cultural institutions and state art collection research is a major step towards achieving justice via restitution or compensation. Furthermore, the conclusions suggest that a policy model is associated with museums' strong wish to maintain and protect their collections by keeping art inside museum walls. Moreover, a policy model is associated with information, transparency, communication technologies, and applying due diligence to collections.

As for the political level, the conclusion emerging from this study is that a policy model for European countries regarding handling Jewish-owned Nazi-looted art is characterised by national and international politics. State leaders face the need to view their cultural policy as part of their national identity and their international dialogue. Moreover, a policy model is associated with funding. Art is a powerful political and economic tool, and the art market is an integral part of international economic diplomacy and its negotiations. Constructing a policy model for a state can be an economic opportunity, could strengthen the state and protect its national interest. A policy model is characterised as an international topic, which involves not only Jewish heritage but European cultural heritage as well. Therefore, it needs to be reviewed as an international matter.

5.2 Conclusions Emerging from Research Question 2

The conclusion emerging from this study is that a policy model for handling Nazi-looted art is characterised by decisionmakers' wishes to avoid damaging their image. An increased transparency of government actions allows the public to be more knowledgeable and contributes to advancing just solutions. It is also associated with awareness raising and international public opinion. A state should increase its transparency by public diplomacy activities and increased presence in international forums. This attitude exposes the state's cultural norms and behaviour to the international community and can enhance mutual cultural understanding and lead to mutually beneficial activity.

Furthermore, this research concludes that a policy model for European countries is characterised by different political actors promoting their national and international vision, thereby persuading others

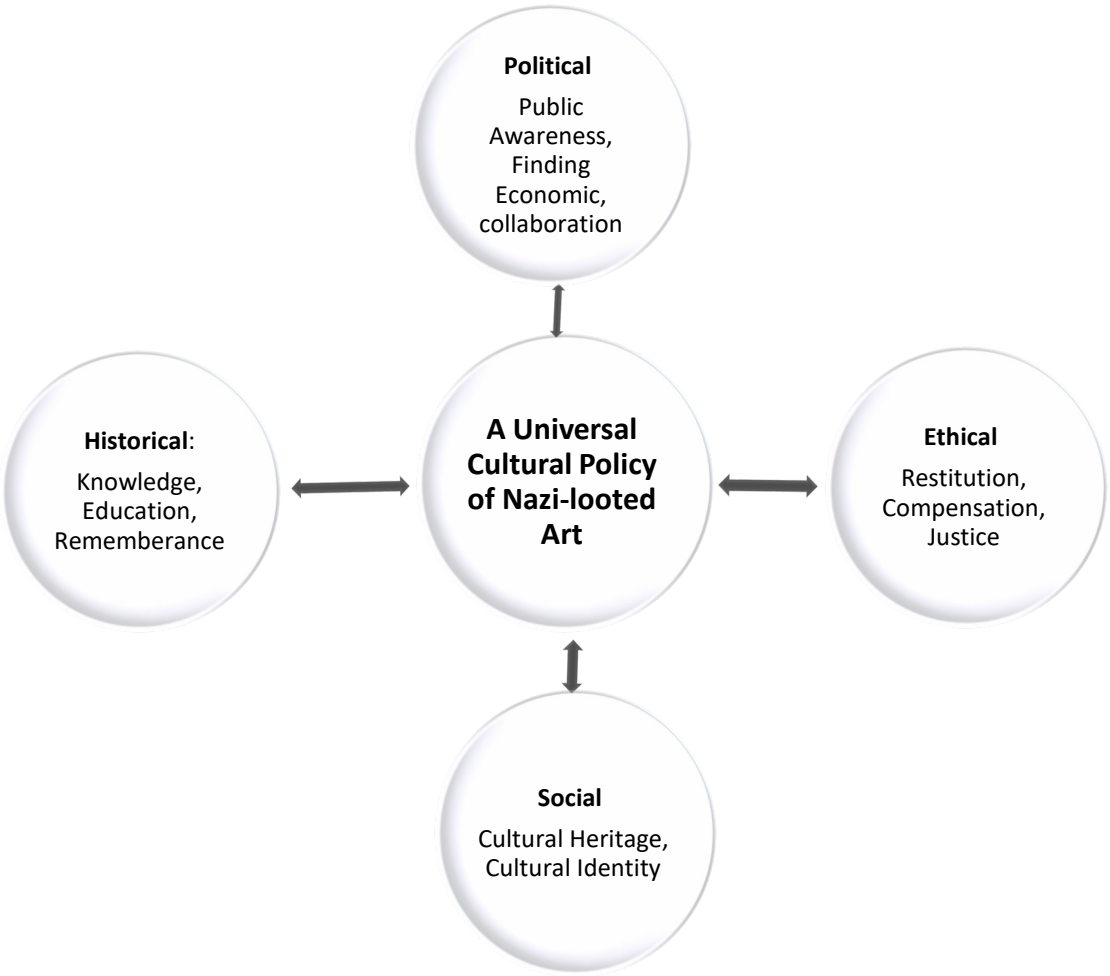
to join their vision. Political and economic considerations are linked. Hence, shared knowledge assists in bringing parties to the table in order to work on a holistic mechanism. Moreover, a policy model for European countries regarding handling Nazi-looted art is characterised by several policymakers' social considerations. A model would raise awareness by educating the public on the importance of cultural history, art, and the topic's complexities. Published stories of provenance research produces knowledge of cultural heritage, strengthens people's identity, and shapes state behaviour and norms. The study concludes that a policy model is associated with cultural institution funding, as well as understanding the institutions' conservative atmosphere.

The research concludes that a policy model needs to link museums work and their close collaboration to the communities from which their collections originate and their benefactors. The conclusions emerging from the research show that a policy model is characterised by transparency and due diligence of collections; museum personnel are the most qualified to oversee the research but need supervision because of possible conflict of interest. Moreover, it concludes that a policy model is associated with museums' freedom yet the knowledge and understanding of museums' agendas and routines as well as that a policy model for European countries regarding handling Nazi-looted art is associated with knowledge of practical aspects within a museum's operational work.

5.3 Conceptual Conclusions: Rethinking European Countries Provenance Research Policy of Nazi-looted Art and Nazi-looted Art of Jewish Ownership

The factual conclusions lead to rethinking provenance research of Nazi-looted of Jewish ownership. It enables developing and advancing an evidence-based strategy for a national based cultural policy for provenance research of Nazi-looted art, and of Nazi-looted art of Jewish ownership. Following these research findings, realising that the complexity of provenance research of Nazi-looted art of Jewish ownership process adds to its being a part of national cultural heritage preservation, physical, and ideological. The following Figure 5.1 illustrates four main concepts, which together allow for a new conceptual framework to be created, a multidisciplinary European policy theoretical framework for universalising Nazi-looted art provenance research.

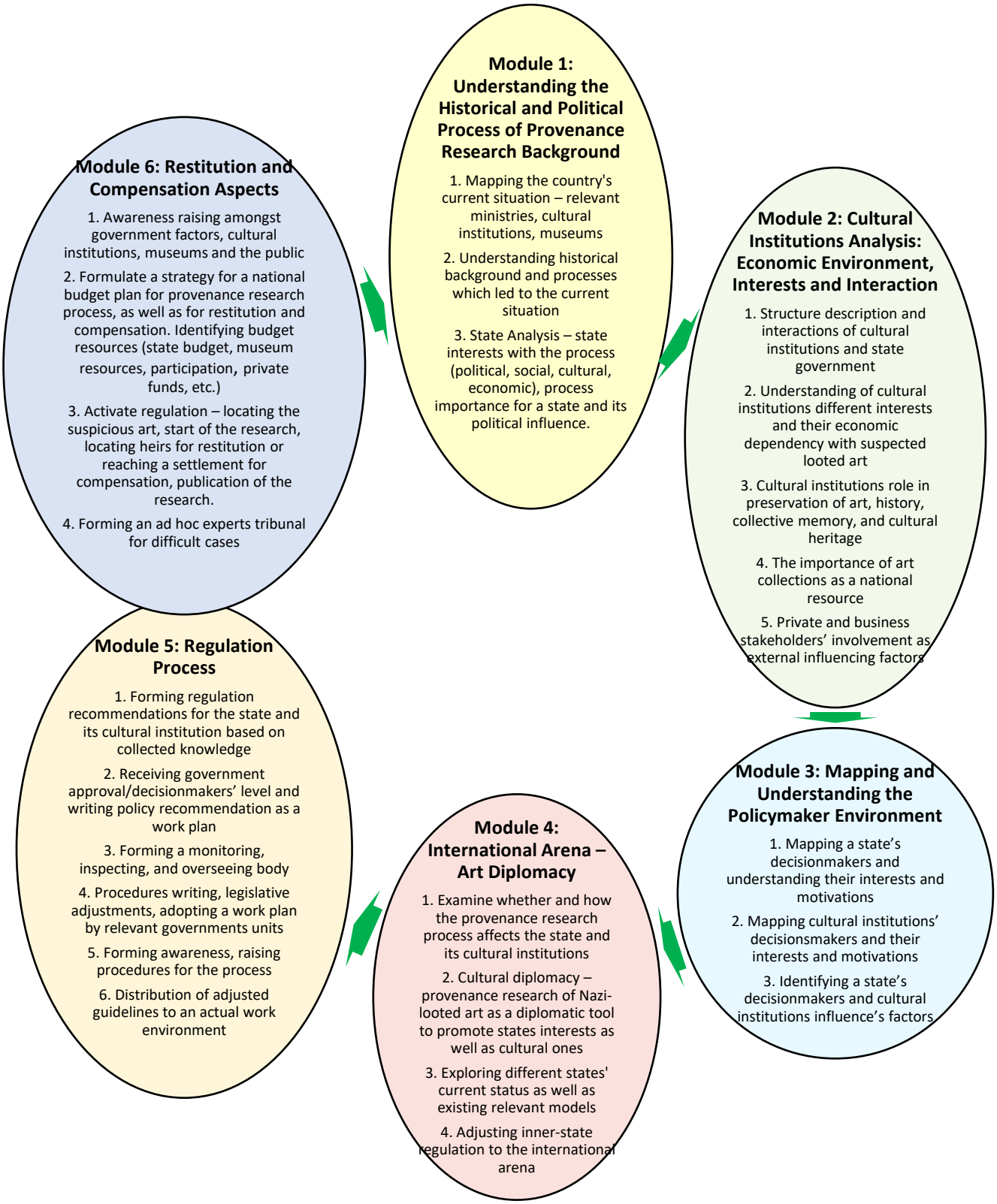
Figure 5.1 *The Theoretical Framework of Universalising Nazi-looted Art Research: Multidisciplinary European Policy of Nazi-looted Art*



the research provided a new theoretical framework and yielded policy recommendations for state decision makers interested in engaging the topic. Theses 4 main objectives needs to be addressed in rethinking the topic. It needs to be combined in order to create a new universal cultural policy, which will be based on remembrance, cultural identity, cultural heritage and justice.

This framework promotes gathering information and understanding the topic characteristics prior to formulating a practical policy strategy. The new theoretical framework allowed for a practical multidisciplinary policy model to be created upon the research findings and conclusions. Figure 5.2 illustrates the model for European state provenance research policy of Nazi-looted art and Nazi-looted art of Jewish ownership.

Figure 5.2 *The Model for European State Provenance Research Policy of Nazi-looted Art / Nazi-looted Art of Jewish Ownership*



The model is a new strategy. Comprises of 6 modules and offer a workflow method which allows to gather information and analyze it for each country, while understanding a state unique characteristics. That way it is possible to formulate the correct strategy. The model can grant tools for the regulation process

and assist cultural institutions. It can strengthen a state status, it can become a role model be effectively implementing international conventions and raise public awareness. The model can build societal awareness for cultural property, it allows to acquire knowledge and to educate the public.

5.4 Practical Implications and Advocacies

The research products are a valuable tool for states seeking to engage in the process of Nazi-looted art. The model developed from this research is based on the gathered data and can be used as a practical tool. Working according to the model would help to accurately study the provenance research phenomena, improve a country's knowledge of its own cultural heritage, and allow obstacles that rise to be overcome. The model suggests decision makers should work with their national cultural institutions to maintain and strengthen their credibility and to enhance their country's status in the art market. Accordingly, museum directors should increase transparency of museum collections. Museum directors need to work with curator personnel in order to unveil the collection's provenance, of which they are in charge. Museum personnel should be further educated and trained for provenance research, to expertly know the necessary processes. Museum board directors and trustees need to be part of the change. Due diligence is the future of museums' reputations and, ultimately, the art market will force their hand. Great cultural institutions can lead this global change and show the new path for all institutions. It is crucial to learn about the topic's unique characteristics, to be familiar with the various interests across the board. Transparency will strengthen the country's art market and assist art consumers; it will raise public awareness to its history and cultural heritage. It will expand public knowledge about art and art history and of the Nazi's greatest plunder. It will deepen public knowledge about the challenges of provenance research and the protection of society rights and will change societal norms surrounding looted art in general. A country that chooses to deepen its knowledge and take part in the process can eventually build a network of researchers and experts to support executive supervision and assist the country itself, thereby making it a role model fulfilling the numerous international convention directives on the matter.

5.5 Research Limitations

There are four research limitations. First, the research is a qualitative research therefore the number of participants is not high. Second, the research tools used with this research are: interviews, document analysis and focus group. These tools have been used to strengthen data validity. However, additional research tools, such as quantitative methodology on a broader population, can diversify the findings. Third, researcher’s position, effort has been made to objectively logical and on the other hand have critical thinking. Fourth limitation – generalisability. The ability to generalise from the research

population to the general population. Generalization could arise from the research conclusions based on the gathered data of the research on other European countries. However, the research was thorough and exhaustive in data gathering and its analysis. Moreover, since it used triangulation to achieve strong and confident findings, the reader can be the judge and decide on an understanding for themselves.

5.6 Contribution to the Knowledge

The Theoretical Framework model allowed for a new and original policy model. The theoretical framework combines practical recommendations of participants' years of experience in the field along with existing International Relations theories, such as realism, the social constructivism approach, and public and cultural diplomacy. The model is based on the important role of shared norms and ideas, and the open dialogue in shaping a state behaviour. The research data furthers the existing knowledge on Nazi plunder in its cultural heritage context. It sheds light on how important provenance research is as part of cultural identity and cultural heritage characteristics. The research allows practical knowledge for a variety of stakeholders, each part of the art market, that is, museums, cultural institutions, art lovers, collectors, etc. The research aims to raise process transparency. It is a scholarly pilot policy method, aiming to present its perception regarding European state handling of Nazi-looted art of Jewish ownership.

As for universal significant of the research and International cultural plans – the research presents an analysis, a groundwork, which assists in understanding how decision makers' motives, interests, and considerations, personal and professional, affect the process of provenance research of Nazi-looted art. It contributes to the existing knowledge on cultural institutions, mainly museums' modus operandi regarding Nazi-era looted art provenance research. The research defines characteristics of Nazi-looted art cultural policy and provides a detailed description of the history of the Nazi cultural plunder. Due to the similarities of the states' characteristics, the data allowed for broader conclusions and could influence other European countries' policies regarding provenance research of Nazi-looted art.

5.7 Future Research

The current available knowledge in the international arena, as to provenance research policy for Nazi-looted art of Jewish ownership, needs to be broader to allow a better understanding - if how and what influence decision makers' considerations to commit, or not, to art restitution and due diligence. Furthermore, broader research population and a mixed methods methodology could expand and deepen the current knowledge. The resent research is based on the case study of several European states;

expanding the research to other similar countries would allow a deeper scope of knowledge and contribute to the existing literature.

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