



**Slovak Archaeological Society**  
**an Affiliate of the Slovak Academy of Sciences**

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**NO GAMBLING WITH THE ARCHAEOLOGICAL CULTURAL HERITAGE IN SLOVAKIA!!!**

The members of the Slovak Archaeological Society, a professional organisation affiliated with the Slovak Academy of Sciences (222 members of the Archaeological Institute of the Slovak Academy of Sciences, Nitra, regional monuments preservation offices, the Monuments Board of the Slovak Republic, museums, universities, and public or private archaeological organisations) have addressed this Letter of Appeal to the MPs of the Slovak Parliament, requesting **DELETION of the Section 6(1)(f) from the Building Bill**, a draft of the new piece of legislation on land-use planning and construction.

Dear Members of the National Council of the Slovak Republic,

The Government of the Slovak Republic has approved the wording of the new Building Bill which brings about **substantial changes in the current system of the cultural heritage protection and conservation**. The Bill is to be debated at the forthcoming session of the National Council. We would like to draw your attention to the negative impact which the adoption of the new piece of legislation will have on the citizens of Slovakia and, in particular, on the protection and conservation of the Slovak archaeological heritage.

What we see as the most severe hazard in the area of archaeological heritage is the uncertainty and disarray expected to be brought about by the implementation of the new system of competences based on the new legislation. This concern is associated particularly with the Section 6(1)(f) of the new Building Bill, based on which the regional monuments preservation offices and the Monuments Board of the Slovak Republic are to be converted into a specialised building authority with competence over national cultural monuments, historical heritage reserves, and UNESCO cultural heritage sites. Moreover, according to Section 36 of the new Building Bill, a project engineer whose task is to summarise all the review comments and objections presented within the project concept approval proceedings, is to have a right to reject review comments and objections presented in the binding statements by affected parties. Of special concern is such a rejection in the case of requirement of rescue archaeology field surveys and excavations on construction sites previously not identified as archaeological discovery sites although a regional monuments preservation office may consider the locations as sites of potential archaeological value. This poses a risk that the project engineer, financed by the investor, may give preference to the interests of the investor over the justified demands of the regional monuments preservation authority.

As a consequence, this may result in a situation in which a lower level of protection (or none) will be granted to the archaeological heritage that is predominantly not classified as national cultural heritage, even though such locations comprise a majority of construction project sites. With regard to the current trend of hundreds of new archaeological discovery sites emerging every year from rescue archaeology surveys carried out on construction sites, such an approach will definitely result in **irretrievable losses of archaeological heritage of the Slovak Republic**.

The current system of archaeological heritage protection, implemented in 2002, has proved to be viable. Even though its functioning isn't ideal yet (mainly due to understaffing of expert authorities such as the regional monuments protection offices, regional museums, and other institutions), its key weaknesses have been successfully eliminated over the recent 20 years.

With regard to the above, we would like to ask you for your support of our proposal to **delete the controversial Section 6(1)(f) from the new Building Bill and to re-consider the project engineer and project designer competences** set out therein.

Bratislava, 7 February 2022

PhDr. Margaréta Musilová, President of the Slovak Archaeological Society, on behalf of the SAS Committee members

