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CULTURAL HERITAGE MANAGEMENT IN TURKEY AND EGYPT: A COMPARATIVE STUDY

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ABSTRACT

Recently, there are various threats encountering the cultural heritage worldwide. Indeed, these threats make conservation and management of cultural heritage a complex process to deal with. Since the 1970s, the UNESCO started to issue many guidelines and charters related to the management and conservation of the cultural heritage. Meanwhile, the Cultural Heritage Management (CHM) including sustainability has become a significant concept especially in the European countries. Turkey and Egypt are famous for their diversified cultural and natural heritage attractions which give an opportunity for both countries to be appealing tourist destinations Nevertheless, cultural heritage of Turkey and Egypt suffers from several major problems at present. All of these require a selective policy, urgent conservation, constant monitoring, protection, and maintenance. This paper aims to examine and compare cultural heritage management in both countries according to specific criteria which will evaluate the current situation of the cultural heritage management in Turkey and Egypt from different aspects (legal framework, institutional/administrational framework, resources, and current challenges). Also, this paper shows how the cultural heritage management has been developed in both countries. Generally, it highlights the increasing importance of cultural heritage management. Furthermore; it will emphasize the significance of sustainability practices in managing world heritage sites.

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INTRODUCTION

Heritage is always the matter of debate concerning its definitions, preservation and management approaches (Fredholm, 2015). Cultural heritage, with its social and economic impacts, is considered as an important asset for the destinations (Scheffler, 2011) through its role in attracting investments, creating jobs and increasing tourism income (Bandarin & van Oers, 2012). Destinations try to find ways to differentiate themselves and create unique identities to take advantage in dense competition and function of cultural heritage seems crucial in doing that. Preserving the cultural heritage can protect the national and cultural identity, strengthen the economic and political aspects, and enrich the urban context (Boztaş, 2014; Scheffler, 2011).

Unfortunately, in the last decades, the cultural heritage has suffered the consequences of urbanization, industrialization, climate change, pollution, and intense pressure from tourism development (Jokilehto, 2005). Before the1970s, there were not proper practices for cultural heritage management and the adopted approach in most heritage sites was the "conservation" in order to protect these sites, but since the 1970's "Cultural Heritage Management (CHM)" has been implemented with laying a particular stress on the "sustainability". This approach aims to develop and preserve the heritage and make it sustainable for the next generations through utilizing it in an innovative way (Boztaş, 2014; Mangialardi et al., 2016). Furthermore, the cultural heritage management needs a multidisciplinary understanding of heritage (Guzmán, Roders & Colenbrander, 2017) as this approach deals with the integration of a wide range of complex and interrelated management considerations (Leask, 2006). The management of cultural heritage requires the identification of two things: heritage types (e.g., tangible, intangible) and values of heritage (e.g., historical, scientific, social and economic) (Guzmán et al., 2017).

Tourism activities undertaken at World Heritage Sites (WHS) are with no doubt an important issue (Pedersen, 2002; Bastemur & Günes, 2011). However, some conflicts exist about how to carry out tourism on heritage sites. From the conservative perspective, heritage tourism has been perceived as a threat to the preservation of the site and considered to have a negative impact on the conservation goals (Aas, Ladkin & Fletcher, 2005). While the tourism activity at some sites is well developed and organized, at others it is an insignificant activity and there are no serious management practices (Leask, 2006). Thus, just possessing these sites are not sufficient but preserving and managing creates difference (Seker, Alkan, Kutoglu, Akcin & Kahya, 2010).

This paper focuses on the cultural heritage management applications merely in Turkey and Egypt due to several reasons. Firstly, Turkey and Egypt are located in the same region, as well as, both countries are rich in their cultural heritage. Secondly, cultural heritage is considered as a crucial part of the tourism supply for both countries and it is a widely used product in the tourism portfolio of both countries. Thirdly, according to UNESCO and ICOMOS reports in 2016 and 2017, the cultural heritage sites in both countries are facing the same threats especially for their world heritage properties; additionally, both countries are suffering from a lack of robust cultural heritage management approaches.

The main objective of this paper is to compare the cultural heritage management approaches in Egypt and Turkey through evaluating the current situation of cultural heritage sites, and shed light on the differences between two countries. Moreover, this paper aims to elaborate cultural heritage management concepts, and to discuss the requirements of an effective management process.

LITERATURE REVIEW

Cultural Heritage Management Concepts (CHM)

There is a growing interest in the management of cultural heritage properties which has increased especially after UNESCO issued the guidelines of heritage management (Pedersen, 2002; Cooper & Helmy, 2008). The concept of Cultural Heritage Management is handled in several disciplines, which have different interest areas related to cultural and archaeological resources (Gültekin, 2012) such as archaeological heritage management (Kerber, 1994), historical buildings and sites managing (Orbasli, 2000) or monitoring and evaluation of historical sites (UNESCO), all providing different perspectives and definitions about CHM.

The management studies on heritage sites began in the 1970s and the concept firstly used by The ICOMOS International Committee on Archaeological Heritage Management (ICAHM). In 1972, UNESCO World Heritage Convention established the "World Heritage Committee", which aims to preserve the cultural and natural heritage worldwide with responsibility of determining the World Heritage. In literature, the discipline dealing with cultural sites management is also known as Cultural Resources Management (CRM) (Mangialardi et al., 2016). For instance, in the Unites States, much of historic preservation is carried out in a framework of CRM (Knudson, 1999; Nemaheni, 2003) which contains different concepts such as conservation, restoration, safeguarding, history, architecture and preservation of archaeological sites (Mangialardi et al., 2016).

Many changes have occurred in CHM since 1993. Firstly, ICOMOS issued its guideline, as well as UNESCO which started writing the Guidelines for the Management of World Cultural Heritage Sites, that was modified respectively in 1993 and 1998. In the 2000s, the CHM approach was modified globally and many European projects applied it. Additionally, in the same decade, the sustainability concept became a significant principle for conserving the heritage sites (Jokilehto, 2005). The World Heritage concept becomes substantial in the context of CHM approach as it gives priority to manage heritage sites.

Recently, the cultural heritage management approaches have changed. They have been transformed from "the conventional approach" which gives more attention to the resource itself, to "the human approach", which gives attention to the resource and the visitor in order to achieve the required balance regarding the quality of the visitor experience (Rowe, 2009), while following the preservation practices and principles at the heritage property (Figure 1). Moreover, the local community participation in heritage management and ensuring the benefits for them becomes one of the most important principles in managing cultural heritage (Cooper & Helmy, 2008).

The outstanding universal value of the heritage becomes the indicator of choosing the cultural heritage to be in the World Heritage List and this gives priority for management (Boztaş, 2014). Preservation of cultural heritage can increase the awareness of values, cultural identity and support the sustainability in the world of globalization (Mason & Avrami, 2002). The cultural heritage management is a complicated and changeable process and it should be modified according to the changes in the political, economic and physical settings (Vacharopoulou, 2005).

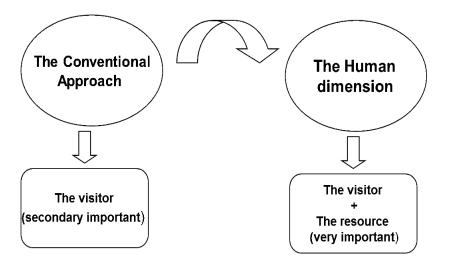
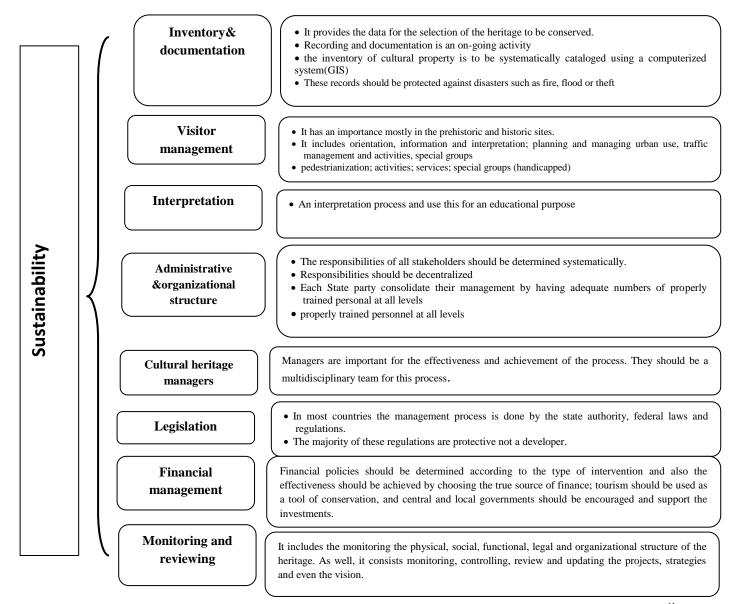
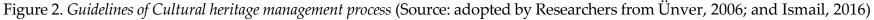


Figure 1. Shift in CHM approach (Source: Authors' own figure)

The Requirements and Guidelines of Cultural Heritage Management Process

There are some requirements for the management approach in order to make it more efficient. Management guidelines for the world Cultural Heritage Sites were initially prepared by a group of conservation experts in 1983. Then, it was published by ICCROM and updated to include the most current activities and principles in 1998. The guideline, in general, provides recommendations for implementation by state party in several areas. These are inventory and documentation; interpretation; visitor management; education of the society; administrative and organizational structure; legislation; financial management; and lastly monitoring and reviewing (Ünver, 2006; Ismail, 2016) (Figure 2).





CULTURAL HERITAGE MANAGEMENT IN TURKEY AND EGYPT

In recent years, cultural heritage management in Turkey and Egypt is facing various problems, i.e. the poor condition of many heritage properties due to development pressures, tourism and agricultural growth. Even though Turkey and Egypt have an appropriate legislative context theoretically, the governments have many challenges- regarding financial resources, staff and skills - to implement it. It becomes so difficult to understand the status of heritage in one country without recognizing the background of this country such as the economic and political situation and its cultural policies. These elements have impressive impacts on the business and management environment (Zan, 2014). CHM mainly concerns the legal and administrative requirements.

In respect to safeguarding whether Turkey and Egypt are managing these sites effectively, it is essential, firstly to evaluate the current situation and to reveal the troubles that these sites have. Two main categories of troubles could be noted. The general problems in all cultural heritage sites in both countries are often related to the national system of WHS management as well as the problems which are related particularly to the heritage sites themselves (Somuncu & Yiğit, 2010).

Cultural Heritage Management in Turkey

Land of Turkey having hosted many civilizations, like Hattis, Troy, Hittites, Urartians, Lydians, Lycians, Pergamon, combines heritage roots of Europe and Asia. Turkey is, thus, noted by some researchers as being a "melting pot" of various cultures where classical culture was shaped.

Turkey has a rich world heritage list. It contains seventeen WHS fifteen of which are cultural and two are mixed properties of both cultural and natural values. The number of these sites will probably increase because Turkish heritage inventory has not completed yet, as many valuable heritage sites are being discovered almost every day. Hence, in order to preserve this rich Turkish cultural heritage and to ensure its sustainability many efforts should be made (Yıldız, 2010; Boztaş, 2014; UNESCO, 2016). The Ministry of Culture and Tourism is the main body responsible for preparing and processing the WHS with some international assistance.

Turkey has some cases that are considered among the best practices for preserving cultural heritage. In 2012, UNESCO announced on its official website that Historic Areas of Istanbul as one of the best practices in terms of conservation, local community, boundaries, sustainable development tourism and interpretation as well as other different aspects (whc.unesco.org).

On the other hand, Turkey has also some issues to resolve regarding CHM. One critique about CHM is that sites were identified, nominated and inscribed to the World Heritage List with no meaningful consultation of local communities and other stakeholders (Somuncu & Yiğit, 2010; Human, 2015). The cultural heritage sites in Turkey seem to suffer from significant challenges even after inscription to UNESCO list. These challenges result from mainly lack of professional management and misuse of lands which could be recognized in most of the other developing countries as well. UNESCO and Turkey are working together to create effective tools and stronger policies for the sustainable development of historic cities (Yıldız, 2010; UNESCO, 2016). Additionally, Turkey has a distinctive blend of natural and cultural attraction as well as, legislative framework, which all require effective management (Yıldız, 2010). Conservation efforts have been undertaken with legislation that was strict but weakly enforced and ill-equipped with implementation tools, and a centralized administrative (Yıldırım, 2015). There is an also shortage in the planning process as it does not include the conservation policies and this makes a gap in the Turkish conservation system (Boztaş, 2014).

Turkey has performed many actions to realize its main goal in order to implement heritage management policies in the context of the World Heritage Convention. In 2004, Turkish authorities adopted the state's heritage conservation legislation in order to bring Turkey's heritage management in line with international standards to protect all listed heritage sites in Turkey (Human, 2015). Turkish local councils on the conservation of the cultural heritage are controlling and monitoring all alterations in cultural heritage sites such as excavation works, development projects, construction and demolition (Özdoğan, 2013).

Mostly the museums hold the management of archaeological sites in Turkey. The General Directorate of Waqf is responsible for preserving the majority of Islamic monuments. Furthermore, the fountains, city walls and water channels are managed by the municipalities. City councils also allocate a specific amount of their budget for improving the historical properties (ICOMOS Turkey).

On the other hand, due to a large number of heritage sites in Turkey, it becomes so critical for the Ministry of Culture and Tourism to carry out renovation and conservation plans at these sites (ICOMOS Turkey). Indeed, Turkey does not give any permission to the private sector to work at archaeological sites; it only gives the authority to the universities and museums to undertake all restoration missions and operations at these sites (Özdoğan, 2013). In spite of this fact, Turkey is working on the development of public and civil renovation projects to maintain the characteristic features of sites that have lost their original functions, through initiatives from academic research as well as practical applications (UNESCO, 2016). As the inventory of Turkish heritage properties is not finished yet, the demolition risk of unregistered heritage properties is also high (ICOMOS Turkey).

Cultural Heritage Management in Egypt

Egypt is considered as one of the richest countries in the world regarding the number of heritage sites (Hang & Kong, 2008). Egypt's Cultural Heritage has become more valuable because of its role in creating an image that is based on Pharaonic identity, while promoting the country as a tourism destination. It essentially depends on the unique and diversified blend of the cultural heritage sites such as, the pyramids, the temples in Luxor and Aswan, the mosques and churches in Cairo and many other treasures. Although Egypt is considered as an ideal case of a tourism destination which depends mainly on unique historical attractions, these attractions are facing many threats due to the urban development and tourism activities. Unfortunately, Egypt has particular difficulties in preserving its heritage (Hang & Kong, 2008; Cooper & Helmy, 2010).

Cultural management practices of Egypt date back to the mid-19th century when the traditional approach was executed with little indication of a proper system. Egypt has started to improve the application of CHM system in their heritage sites relying on sustainability principles for a few decades (Tassie & Hassan, 2004).

Egypt has faced severe social and political conditions since 2011 and many heritage sites were looted and destroyed due to the absence of a system for management and insufficient restoration and maintenance of cultural heritage sites. It is obvious that Egypt has serious problems at the cultural heritage landscape sites caused by the lack of comprehensive vision for management and conservation (Nofal, 2011; Marzouk, Metawie, & Ali, 2016). The Supreme Council of Antiquities became the first responsible authority in Egypt - under the supervision of the Ministry of Culture - for the management and conservation of archeological sites (Hang & Kong, 2008; Cooper & Helmy, 2010). This Council has various responsibilities such as conservation and renewal works, research and scientific studies, the management and monitoring all the cultural heritage sites (Cooper & Helmy, 2010). However, there are other administrative organs and bodies concerned with cultural heritage and cultural landscapes in Egypt and they are working to assist the Supreme Council of Antiquities, each one in its fields (Nofal, 2011).

The majority of the archaeological sites, including the WHS like Giza pyramids and Saqqarah, are suffering from the lack of an integrated program of site management. This inadequacy can cause negative impacts for the conservation of the monuments as well as the tourist experience. Besides, Egypt confronts difficulties to preserve these sites because of its unhealthy financial situation. The government can hardly allocate sufficient budget for these treasures' upkeep (Hang & Kong, 2008). Therefore, many international associations are supporting numerous of heritage sites in Egypt financially, in particular for restoration, conservation, and technical support (Tassie & Hassan, 2004).

In the last five decades, a lot of attempts have been made in order to ameliorate the cultural heritage sites and their facilities. Accordingly, many changes have been undertaken in legislation framework and in the planning process. Despite all the efforts of authorities, many obstacles such as economic, social, technical and political problems- still stand which make the implementation a hard work (Abada, 2008). Generally, the governmental bodies in Egypt give more attention to the world cultural heritage sites in UNESCO list and they disregard other cultural heritage sites which are not registered in the list.

Comparison of Cultural Heritage Management in Turkey and Egypt

Turkey and Egypt have affluent cultural heritage properties which are seen as essential elements of the tourism supply for both countries. The management approach of nations for these properties changes according to many things, i.e. cultural background, political view, prosperity level. Notwithstanding, it is possible to make comparisons of two countries' approach with the help of some basic factors. In this study, the comparison of cultural heritage management in Turkey and Egypt is presented according to various criteria indicating the legal, organizational, and governance differences and similarities (Table 1).

The data and the information used in this comparative study have been collected from different sources, e.g. secondary sources, literature review, interviews with professionals. It is aimed to offer as much an exhaustive comprehension as to evaluate the cultural heritage management approach in both countries that is summarized in Table 1.

CRITERIA	EGYPT	TURKEY	
WORLD HERITAGE			
Signing the World Heritage Convention	• 1974	• 1983	
(UNESCO Convention concerning the			
Protection of the World Cultural and			
Natural Heritage)			
UNESCO list Heritage Sites	Cultural sites:5	Cultural sites:15	
	• Natural sites :1	Natural sites: None	
	• Mixed sites : 1	• Mixed sites: 2	
Tentative list	• 33 heritage sites	• 71 heritage sites	
World Heritage in Danger	• One cultural heritage site (Abu Mena)	• None	
The recent Heritage Site inscribed	• Whale valley (2002)	Archeological site of Ani (2016)	
ICOMOS Membership	• Egypt is not a member in ICOMOS	Turkey is a member in ICOMOS	
(ICOMOS National Committee)	ICOMOS national committee doesn't establish in Egypt	• In 1974 Turkey established ICOMOS Turkey National which carried out their work in the context of international practices and ICOMOS guideline	
Legal and Institutional Framework			
Legal Framework	• Egyptian law on the protection of Antiquities: law No.117 of	Significant changes in existing law are made for the protection of cultural	
Ŭ	1983	assets in the last period in Turkey:	
	• In 2010 new legislation: Law No.3 of 2010		
	• Although Egypt has the legislation and laws to protect the heritage sites but actually till now these laws are not effective	 On 25/4/1973 the Antiquities Act No. 1710, Republic is the first general- protection legislation. 	
	as a result of various economic, political, technical social	• In 1983 many modifications have been occurred e.g. the removal of No. of	
	problems.	Cultural and Natural Heritage Protection Act 2863; these modifications have been conducted at different dates in the law.	
		• Currently, Turkey is depending on the Cultural and Natural Heritage	

Table 1. Cultural Heritage Management in Turkey and Egypt: A Comparative Analysis

Institutional framework/Administration and organizational structure (for cultural heritage management and conservation)	 Ministry of Antiquities Ministry of culture: The supreme council of Egyptian antiquities (under the umbrella of the Ministry of Culture.) This council is responsible for several tasks such as restoration, and renovation, management and supervision of all the archaeological historical sites including museums Ministry of Tourism Municipalities (by Law 144 in 2006) 	 Protection Act 2863 which is issued in 1983. In 2003, Turkey has adopted around ten laws and regulations, which had various implications for heritage protection. In 2004 and 5226 some modifications have been made, it was the final version of law which changed heritage management in Turkey (important changes). Law 5226 was an important law as it mentioned to some essential concepts and definitions, it altered the role of local authorities and their responsibilities. Also, created new financial resources for municipalities to carry out conservation, changed organizational structures and devolved responsibilities to local authorities Other laws which set forth provisions regarding the use and construction conditions in the heritage Site are, firstly, "Zoning Law" numbered 3194, "Law on Preservation by Renovation and Utilization by Revitalization of Deteriorated Historical and Cultural Properties" numbered 5366 and "Tourism Encouragement Law" numbered 5216 and "Municipality Law" numbered 5393 which address the management of the Site is in effect as general laws. The management conducted mostly by the central Government in Turkey The role of central Government is more dominant in Turkey The rurkish Ministry of Culture and Tourism (MoCT) with its central, regional and local branches is the primary agency with management authority in heritage conservation. It is the main authority concerned with the implementation of the World Heritage Convention, managing issues relating to cultural and natural properties, including tourism The main body responsible for cultural heritage in the MoCT is the GDCHM (the General Directorate of Cultural Heritage and Museums) Regional Conservation Councils (RCCs), which are responsible for "scientifically guiding the intervention at listed sites The Ministry of Environment and Urbanism is also involved, as the Convention also deals with natural properties and sites Municip
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Heritage Documentation	 Many entities in Egypt are interested in the documentation of the heritage sites especially those registered as monuments in the ministry of state of antiquities The National Center for Documentation of Cultural and Natural Heritage (CultNat) was established The Center aims to apply the latest technological innovations in documentation and disseminationof Egypt's cultural heritage, the tangible and intangible. Many CULTNAT projects are devoted to document the tangible heritage, such as the Archeological map of Egypt which utilizes multimedia in conjunction with Geographical Information Systems (GIS) technologies to create an effective documentation and management tool for ancient Egyptian archeological sites 	 The organizations interested in documentation and preservation of cultural heritage in Turkey are increasing in number almost every day, but they need to be completed as soon as possible for effective conservation interventions There are two departments in Ankara which are responsible for research and documentation of monuments and cultural heritage sites ✓ The General Directorate of Monuments and Museums. ✓ The General Directorate of Conservation with branch offices in major towns.
Evaluation of current situation in cultural heritage sites in Turkey and Egypt		
Current challenges in heritage sites	1.1 The limited perception of official bodies of heritage areas regardless of their historical value	The problems related to national World Heritage management system that are common problems found in all World Heritage Sites of Turkey:
	 1.2 The overlapping of the administrative responsibilities of the authorized governmental bodies in most heritage sites in Egypt. 1.3 The shortage of legislations for Conservation and <i>Preservation in some aspects</i>. it seems that is not clear especially when selecting some proposed development projects to be conducted in these areas 1.4 Limited financial resources for conservation and development of heritage sites in Egypt and depending on international funds and UNESCO assistance. 1.5 Lack of awareness about the value of these heritage sites in particular amongst a large number of officials and decisionmakers, and the local community. 1.6 Resorting to local solutions and formal treatments in urban Conservation in historical areas in Egypt. This has led to the vanishing of some distinctive cultural values in these areas. 	 1.1 Management Plan and lack of policy formulations the most important obstacle in effective management and protection of WHSs in Turkey 1.2 Administrative Structure: lack of necessary communication and cooperation between institutions interested in heritage and conservation 1.3 Buffer Zone: In Turkey, no World Heritage Sites have any buffer zone. World Heritage Sites are facing serious problems due to increased number of tourists, urbanization and construction activities. 1.4. Financial Resources: Available financial resources for conservation and development of World Heritage are not sufficient for all areas. 1.5. Tourism/Visitor Management Plan: There is no appropriate public use plan (tourism/visitor management plan) for World Heritage Sites in Turkey. 1.6. Information shortage and Promotion Deficiency: Lack of recognition, orientation and even insufficient information signs in Turkey's all World Heritage sites. 1.7. Local people residing within surrounding areas of heritage sites are poorly aware of their values and protected status. 1.8. Lack of sufficient communication and cooperation among stakeholders working for the preservation of World Heritage Sites.

Role of Non- Governmental initiatives in cultural heritage sites	 1.7 The neglected impacts of development projects when dealing with heritage, these impacts have resulted in radical changes in the historical areas regardless of the role of the citizens or the local communities in the processes 1.8 No comprehensive vision to deal with the Egyptian heritage sites All the Egyptian authorities dealing with the heritage sites with one single approach without taking into consideration the differences between the nature of these sites. Some individual popular and volunteer efforts have emerged. Also, some private institutions became active, representing 	 1.9. Monitoring: In the Turkish World Heritage Sites, there is no official monitoring activity to check the effectiveness of management programs. 1.10. Staff Problems 1.11. Inadequate facilities especially sites not included in the UNESCO list and lacking of laboratory and storage areas. 1.12. Abandonment: archaeological sites are abandoned when the excavation work is finished. Many archaeological sites in Turkey are open to theft, illegal excavation or looting. 1.13. Ongoing excavations are conducted by Turkish and foreign scientists, but storage areas are adequate to either contain or display the finds. 1.14. Lack of mitigation efforts: There are no mitigation efforts taken against natural or other environmental disasters in Turkey. 1.15. Fragmentation of heritage activities is the second notable feature of the system. Besides many bodies within the MoCT, the GDF, the Turkish Parliament and even the Ministry of Defense play roles at different points in the heritage chain 1.16. Lack of communication between tourism and cultural sectors Civil public associations Foundations
	civil society recently involved in this field.The efforts of NGOs include the conservation, development, and renovation of some heritage sites in Egypt.	• Chambers of Architects All of them are active in both the cultural and natural heritage fields in Turkey
	Management plan approach in Turkey	and Egypt
Site management plan	There are some site management plans for specific world heritage sites in Egypt, but most of them are not effective and just "paper plans"	The Management Plan approach occurred firstly in 1994. This
Sustainable management practice within the management system	• The Egyptian tourism started to apply sustainable development principles in their practices, but when it comes to the issue of sustainability of archaeological sites, this objective seems to be too general.	• There is a council to provide the sustainability of the management process in heritage sites under the control of the central government.
Visitor management	There is a shortage of visitor centers and visitor management	There is no appropriate public use plan (tourism/visitor management plan)

Local community involvement in cultural heritage management	 activities and programs in many Egyptian archeological sites Most of the archaeological sites need to provide advanced interpretive and techniques in order to improve the visitor experience and, reduce the pressure of visitation. Egyptian authorities paying little attention to the local community in cultural heritage management even in the world heritage sites (ex. Conflict between local community and the state in Giza Pyramids project) 	 for World Heritage Sites in Turkey. T and here is a shortage of visitor centers in cultural and natural sites in Turkey. There is a gradually increase in local community participation in managing heritage sites in order to improve their image as protectors of the heritage sites. UNESCO appreciated Turkey's approach to enhancing community involvement as an example of 'international best practices'.
Financial management for heritages sites	 Lack of funds: The Egyptian authorities can only put limited budget for the up keeping of the heritage sites. They give the attention mostly to the urgent tasks such as restoration and renovations. This might reflect directly on the effectiveness of implementing policies and strategies for cultural heritage sites. 	 lack of financial sources of central and local Governments for conserving the heritage Mostly, the central government in Turkey is doing the best to develop projects despite the lack of sponsors and resources. According to the law, the Ministry of Culture and Tourism is providing the financial support for maintenance and restoration, as well as other institutions which specify from their budget.
Monitoring the plans and conservation projects in heritage sites as an apart of CHM	 The Supreme Council of Egyptian Antiquities This council is responsible for several tasks such as restoration researches, excavation, renovation, management and supervision of all heritage sites including Museums <u>Also, the Council is responsible for tourism management</u>: Planning and managing tourism activities in heritage sites; define the acceptable carrying capacity of every site; evaluating the impacts of tourism on archaeological sites. 	 A representative from the MoCT (almost museum staff) is monitoring the Turkish and foreign Archaeologists. Although, the planning and implementation process are undertaking in Turkey, but the reviewing and monitoring stage is always a missing part. As a result, the sustainability concept cannot be mentioned
Human resources	 However, Egypt has an adequate number of archaeologists and architects, but there is shortage in some expertise especially site planners, site managers, and impact evaluators for historical sites This confirms that there is lack of professionals with management and planning educational backgrounds. 	• Limited financial resources and lake of professional experts make the decisions to save a damaged building or site in Turkey so difficult and critical.

Source: Adopted by researchers from Abada,2008; Boztaş, 2014; Cooper & Helmy,2010; Fushiya, 2013; Günlü et al., 2009; Hang & Kong, 2008; Human, 2015; ICOMOS, Turkey, 2017; Kilic, 2008; Luke, 2013; Marzouk et al, 2016; MOCT, 2017; Nofal, 2011; Özdoğan, 2013; Saraç, 2003; Somuncu & Yiğit, 2010; Tassie, 2004; Tawab,2012; Ulusan & Yüncü, 2016; UNESCO, Egypt, 2017; UNESCO, Turkey, 2017; Ünver, 2006; Yıldırım, 2015; Yıldız, 2010.

According to the Table (1), the main results concerning the cultural heritage management context in Turkey and Egypt are as follows:

Legal and Institutional Framework of cultural heritage; it is clear that both countries are trying to update their legislation and laws in order to ensure more protection for their cultural heritage sites. Unfortunately, these efforts encounter many obstacles due to several economic, social, technical and political problems which make the implementation a harder one. It seems that both countries have some difficulties when selecting some proposed development projects to be conducted in these areas. In this moment, some conflicting interests appear between some authorities and developers. In recent years, several important modifications in the current laws were made in order to preserve the heritage properties in both countries and this reflects positively on managing the cultural heritage, e.g. the modifications in the Turkish cultural heritage legislation concentrated on decentralization of the government power. In this context, increased roles, responsibilities and funding resources were given to local authorities, as well as incentives to the private bodies in order to protect the cultural and natural heritage (Yıldırım, 2015).

By comparing the organizational structures in Turkey and Egypt it can be noticed that the role of central government is dominant in both countries, the management is conducted mostly by the central government. Furthermore, in both countries, there are various governmental authorities who are in charge of managing world heritage sites and this cause overlapping in responsibilities. However, Turkey has a very important advantage as The Ministry of Culture and Tourism (MoCT) is the primary agency with management authority in heritage conservation. This Ministry is responsible for managing culture and tourism under one administrative authority, so it becomes easier for managing the heritage sites within two dimensions.

Current situation of the world heritage properties in both countries; although Egypt signed on the world heritage convention for the protection of cultural and natural sites 10 years before Turkey did, it seems that Turkey is going in a more progressive way concerning the WHL.

As it appears from the comparative study, the ICOMOS National Committee in Egypt is still under construction, although ICOMOS Turkey National Committee was established in 1974 and it operates within the framework of international practices. Regarding the world heritage list and the tentative list in both countries, many of properties are archaeological sites, although both countries have many exceptional natural and mixed sites that could potentially be inscribed in the world heritage list.

Egypt has very rich cultural and natural heritage sites but only 7 heritage sites are inscribed in WHL which is unparalleled with the richness of Egypt. On the other hand, Turkey has 17 heritage sites inscribed in UNESCO list. Furthermore, the number of Turkish heritage sites inscribed in WHL is increasing each year, the last Turkish heritage site was inscribed in 2017, while the last Egyptian heritage site was included in WHL in 2005, and it seems that Turkey is actively working more than Egypt. With regard to the year of the inscription, it is obvious that five of Egyptian heritage sites inscribed in 1979 and from this year till 2005 Egypt did not submit nomination proposals for any property. In other words, Egypt seems to lose its motivation to inscribe its heritage properties to WHS since 2005. Additionally, Turkey is trying to prepare the nominated sites to meet the criteria for inscription with continuous, stable and, more progressive ways.

Regarding the evaluation of current situation in cultural heritage sites in Turkey and Egypt; it is clearly shown that the cultural heritage sites in both countries are suffering from continuous threats. These threats can be divided into two main categories. Firstly, general threats which are facing all sites and related to the national system of WHS management. Secondly, the threats which are related to particular heritage sites. These threats can be categorized into high risky threats as management deficiencies, large-scale development projects and others might be called common threats like; shortage in the legal framework, looting, lack of authenticity, environmental conservation, threats to pressure, unrestrained visitation, lack of financial and human resources. Similarities about the threats on the cultural heritage sites are observed in both countries.

Management plan approach; the findings have clarified that there is a lack of management plan for heritage sites in both countries. In fact, the situation in Egypt is worse than Turkey as most of the existing management plans are only "papers plans" without effective actions and sometimes the plans do not follow the time frame so it results in many delays in implementation. It is obvious that there is a lack in visitor management programs and visitor centers in both countries, especially for the heritage sites that are not included in UNESCO list. Hence, there is a necessity for both countries to conduct new policies and approaches particularly for visitor and resource management. Additionally, it is observed that there is a lack of *local community involvement* in heritage management in Egypt. Some development projects conducted in the heritage areas has not taken the opinions of local community into the consideration. As a result, conflicts between authorities and the local communities occur in Egypt. On the contrary, UNESCO appreciated the Turkish efforts to raise the local community participation in management and development plans.

In terms of *financial management* of the heritages sites, it seems that the situation is almost the same for both countries. Mainly, the central governments are providing funds to develop projects. However, the funds are limited in both countries. Egypt is eager to allocate limited funds to urgent sites that need restoration and renovation whereas in Turkey it is the various governmental bodies and to some extent the sponsors who support the heritage sites.

Finally, the comparative study revealed that there is an absence of collaboration among *stakeholders* and this can affect the heritage sites negatively. Moreover, there is no integration between the city plans and the conservation plans, so this can lead to inefficiencies in creating and pursuing the monitoring systems of these sites in both countries.

CONCLUSION AND SUGGESTIONS

Evaluating and comparing the cultural heritage management approaches of Turkey and Egypt cases, which are two countries with quite different historical background but owning very rich cultural heritage sites, produced some valuable findings for the researchers and governing bodies in both countries.

This comparative study highlighted that general situation concerning the management of heritage sites does not seem different and despite the richness of both countries, they are suffering from the poor management systems for their cultural heritage sites due to several obstacles and threats. Regarding the presence of heritage sites in World Heritage List, Egypt appears to be less motivated than Turkey to inscribe its sites to WHL, especially since 2005. Thus, Egypt should give more attention to accelerate the inscription of new heritage sites in UNESCO list. Using the prestige of being in the WHL to attract more tourists at the one hand, and applying mitigation measures to eliminate the negative impacts of various threats, on the other hand, could provide opportunities for managing these sites better. However, these benefits are not recognized well by both countries even Turkey is slightly better than Egypt in some cases. Hence, it is recommended to the governing bodies in both countries to take necessary actions, firstly, to inscribe their heritage sites, which have outstanding value as World Heritage Sites and secondly, to manage these sites sustainably according to the universal criteria.

New strategies and policies should be adopted in both countries for managing the heritage sites effectively. Therefore, there is an urgent need to put priorities while dealing with important issues, e.g., the absence of management plans, lack of collaboration among stakeholders, deficiency of international investment and poor level of awareness. For Egypt, it is better to establish an authoritative entity that works under the supervision of the Ministry of Tourism in order to manage tourism activities at cultural and historical sites.

Degree of centralization of management is so high in both countries which creates some problems like delays in renovations, protecting the sites properly, and taking necessary actions. It is recommended to decentralize the monitoring and management of all heritage sites in both countries.

Supporting the collaboration between the public and the private sectors, particularly in the implementation phase, could be realized through different ways. There are several examples of partnership between public and private sectors in conserving heritage sites, e.g. in Spain, Italy, UK, US and Australia. The success of such collaboration aiming to protect and conserve the heritage sites depends mainly on the payoffs that the private companies are offered. For example, in Italy, the government gave the private sector some incentives such as tax reduction when they support the heritage sites financially (Fuligni, 2015). In US, the private sector and government collaborates in order to reuse some historical buildings which now allow the public access. The partnership between private and public sectors also supports the infrastructure projects which are serving the heritage sites (Macdonald& Cheong, 2014). Including the local community in the management of heritage sites, especially for the conservation of these sites, is crucial. The management process needs to be practiced within the legislative context which seeks for the partnership with the local community to raise their awareness about the values of these sites through conducting various programs and campaigns.

In addition, there is a necessity to benefit from tourist guides and travel agents in both countries so as to minimize the harmful impacts of tourism activities on heritage properties. For instance, travel agents can put limits on the number of groups who visit the heritage sites or direct the visitors to respect the environment, local traditions and values, and to follow the code of ethics in the heritage sites with regard to minimizing the harmful behaviors (Imon, Dioko, & Ong, 2007).

On the other hand, documentation and inventory of the cultural heritage in Turkey urgently needs to be completed for effective conservation. Additionally, it is vital to identify buffer zones to eliminate the construction nearby WHS, as well as there is an urgent need to apply the integrated approach between the city plans and conservation plans. It is recommended for both countries to give more attention to visitor management plans, particularly to develop visitor centers, in order to improve visitor experiences at heritage sites and minimize the negative impacts. As a final point, the governmental bodies which are responsible for managing cultural heritage sites in both countries should increase the number of qualified people who are able to work as planners and site managers.

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