



Minister Mgr. Marek Maďarič
Ministerstvo kultúry Slovenskej republiky
Nám. SNP č. 33
813 31 Bratislava
Slovenská republika

Re: Law 376/2015

Brussels, 15 February 2016

Dear Sir

We have been informed by our Slovak member, that your ministry has enacted law 376/2015 on January 1st 2016 in respect of regulating access to the Conservation-Restoration profession.

Representing 24 Conservator-Restorer organisations located in 21 European countries E.C.C.O., the European Confederation of Conservator-Restorers' Organisations, is very concerned about this development. A Masters degree in Conservation-Restoration is necessary for access to the profession. Recently published Competences for Access to the Profession are the European benchmark within the field of Conservation-Restoration and provide the framework for professional self-regulation, which is at the core of European policy.

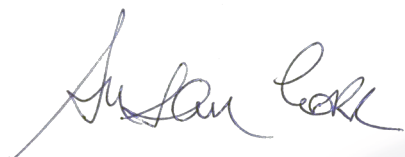
Article 3, § 33a (376/2015) does not comply with this standard and in fact undermines it by allowing access to the profession at high-school level. In effect the new law allows direct access into the profession. The stipulated 5 years specialized practice subsequent to such access is irrelevant, particularly as the law does not specify who is competent and accredited to assess such specialized practice. Furthermore such practice is never equivalent to a Masters degree.

To date the Chamber of Conservator-Restorers in Slovakia is a statutory professional body and regulates for standards in the profession in Slovakia. These standards comply with those of E.C.C.O. of which Slovakia through the Chamber is a member. E.C.C.O. is an expert group to the Council of Europe. We work within the framework of EU-legislation and the legislation of our national member organisations. This includes advice on the transposition of European directives such as the directive on mutual recognition of qualifications and the services directive.

In the light of the directives on mutual recognition and mobility of services the new law will allow unqualified people access to conservation-restoration work within Slovakia where such work is regulated for in many European countries given that cultural heritage is a matter of general public interest.

The European Commission in its recent communication "Toward an integrated approach to Cultural Heritage for Europe" together with the Council of Europe's Namur Declaration 2015 "Cultural Heritage for living better together. Towards a common Strategy for Europe" explicitly view cultural heritage as a strategic, social and economic recourse. The role of the Conservator-Restorer is a recognised and essential part of this cultural and economic strategy.

Therefore we urge the Ministry of culture to reconsider this law.



Susan Corr
E.C.C.O. President

Attached: Competences to the access of the Conservation-Restoration profession.