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ΣΥΛΛΟΓΟΣ ΣΥΝΤΗΡΗΤΩΝ ΑΡΧΑΙΟΤΗΤΩΝ  
& ΕΡΓΩΝ ΤΕΧΝΗΣ ΤΡΙΤΟΒΑΘΜΙΑΣ ΕΚΠΑΙΔΕΥΣΗΣ

ΠΡΑΚΤΙΚΑ ΣΥΝΕΔΡΙΩΝ/ΗΜΕΡΙΔΩΝ

ACAWA-GR CONFERENCE PROCEEDINGS

Papers of the National Associations of E.C.C.O.

### Ensuring high quality in safeguarding Cultural Heritage

The vital importance of protecting the title  
and regulating the profession of  
Conservation-Restoration in Europe

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### Regulation of Conservation-Restoration in Bulgaria

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# Regulation of Conservation-Restoration in Bulgaria

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## ABSTRACT

The article presents the regulation of conservation-restoration in Bulgaria. It explores current legislative documents, in particular the Cultural Heritage Act, along with some subordinate normative acts. The legal texts related to conservation-restoration are explained and discussed. The quality assurance issues are also commented on. The current challenges in the profession are reviewed in the context of the local social environment.

## 1. LEGAL REGULATION OF CONSERVATION-RESTORATION

The main legislative regulation of conservation-restoration in Bulgaria at present is formulated in the Cultural Heritage Act, passed in 2009. Chapter 8 of the law is devoted specifically to this subject matter and is entitled "Conservation and Restoration of Cultural Assets"<sup>1</sup>. It provides a definition of conservation-restoration as a "system process of activities, which aim at prevention of the destruction, stabilisation of their condition, as well as facilitation their perception and evaluation in maximum preservation of their authenticity" (Art. 163) [1]. The following Art. 164 contains the most important regulation texts:

*Par. 1. (suppl. – SG 54/11) The activities for conservation and restoration, and also for adaptation of immovable cultural assets, shall be done by persons, or under the permanent direction of persons, entered into the register under Art. 165.*

*Par. 2. The register under Par. 1 shall contain persons who have a Master's degree in:*  
*1. (amend. – SG 54/11) a subject in the field of conservation and restoration, and have three years of professional experience in this field;*  
*2. (new – SG 54/11) majoring in "Architecture" with specialisation for conservation and restoration in the field of immovable cultural heritage and three years of professional experience in this field or majoring in "Architecture" and five years of professional experience for conservation and restoration in the field of immovable cultural heritage;*  
*3. (prev. item 2, amend. – SG 54/11) other subjects with specialisation in the relevant area of conservation and restoration or applicable in the process of conservation and restoration and have minimum five years of professional experience in the same field.*

With the texts thus formulated (as seen above), Par. 2, Item 3 contradicts Item 1 entirely and, in practice, allows persons without any education or training in conservation-restoration to be listed in the Register. In fact, persons having no such education predominate in the Register, and it is really weird to see persons registered as holders of diplomas for higher education in Technology of Chemistry Production, Archaeology, Sewage and Water Supply, Electromechanics, Landscaping, Ecclesiastical Studies, Metallurgy, Indus-

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<sup>1</sup> The term "conservation-restoration" is translated in Bulgarian as "conservation and restoration" („консервация и реставрация“) because of the linguistic specificities.

trial Electricity Supply, Internal Combustion Engine, Dairy Products Industry, etc. Once registered, those people are allowed not only to practise conservation-restoration but to lead conservation-restoration projects and be decision-makers. The very use of the term “specialisation” in Item 3 is incorrect and misleading. Furthermore, it contradicts the definitions in the Higher Education Act: Art. 66, Par. 4 states that “A specialising trainee is anyone upgrading his/her qualifications under a specialised programme of study without seeking a higher degree or a new speciality”. [2]

Art. 165 is focused on the above-mentioned Register. Par. 1 stipulates that “the Ministry of Culture shall create and keep a public register of the persons, who have the right to perform activities on conservation and restoration in the relevant area [...]”

The following Art. 166 specifies that conservation-restoration in museums, universities and other institutions can be carried out “only under the direction of a person, listed in the Register under Art. 165.” The text does not clarify if this can be the full spectrum of activities, nor what kind of supervision is expected and what should be the expected specialisation of the supervisor. In reality, a supervisor can be any person included in the Register, even one with no education in conservation-restoration (Rf. Art. 164, Par. 2, Item 3 above). The text is an “excuse” for some institutions to appoint, as conservator-restorers, persons who do not have formal education in this discipline and in some cases – any experience at all.

Art. 167 deals with the specific administration of conservation-restoration of “movable cultural assets – national wealth”, the highest level of heritage listing and protection by the law.

In the Cultural Heritage Act, there is no distinction between the specialities in conservation-restoration. In practice, everyone listed in the Register under Art. 165 could perform conservation-restoration on any type of heritage objects, both movable and immovable. This is another flaw in the legal regulation.

By August 2022, the Cultural Heritage Act had been amended 26 times in only 13 years. The Association of Conservator-Restorers in Bulgaria (ACRB) has conducted a number of meetings with the state authorities since 2009 and has made several well-grounded proposals for correcting the texts considering conservation-restoration, though with no success so far. In spite of the numerous amendments, the law still lacks proper regulation of the professional discipline of conservation-restoration and generates a significant risk of incompetent work. In fact, ACRB alerted the Bulgarian Ministry of Culture and reported to E.C.C.O. about such cases of destructive practice on listed heritage objects. ACRB finds no serious arguments against the so-necessary amending of the regulatory texts and no arguments for “leaving the door open” to unqualified practice in the conservation-restoration of listed heritage, i.e. there is no deficit of qualified professionals. To date, more than 350 students have graduated with a Master’s degree from the Department of Conservation-Restoration at the National Academy of Art in Sofia<sup>2</sup> plus those who are degree graduates from institutions in other European countries. Regrettably, those who are actively practising the profession constitute less than half of the total number.

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<sup>2</sup> The Department of Conservation-Restoration at the National Academy of Art in Sofia was established in 1973. It provides full-time five-year Master’s degree programme and is the only accredited university programme in Conservation-Restoration in Bulgaria. In 2023, the Department will be celebrating its fiftieth anniversary.

## 2. QUALITY ASSURANCE

The professional title of conservator-restorer is not protected by the Cultural Heritage Act. No explanation is provided on the expected competencies of the practising professionals. A clarification in this respect would positively affect the identification of the roles of different professionals involved in the process of heritage conservation and protection and will have a positive impact towards increasing the quality of their performance. However, quality assurance of conservation-restoration is, in particular, scarcely considered in the Cultural Heritage Act. Article 83a, Par. 3 provisions that the result of the conservation-restoration work should be inspected by a specialised commission which "shall study the submitted project documentation, shall identify the quality of the accomplished conservation and restoration works and shall propose to the Minister of Culture to accept or to refuse with adequate justification the acceptance of the execution".

Art. 168 of the law addresses the conditions and procedure for performing conservation-restoration on movable cultural assets. It refers to Ordinance 4 of 12 June 2015 on the Conditions and Procedures for the Implementation of Conservation and Restoration Activities of Movable Cultural Assets (SG 46/15, amend. – SG 35/19)<sup>3</sup> of the Minister of Culture about the details in the regulations of this subject. The latter document contains, amongst others, a series of administrative requirements and restrictions when it comes to contracts between freelance professional conservator-restorers and owners or custodians of Cultural Assets – National Wealth. Concerning this type of heritage, however, the Ordinance is very loose on the regulations of the conservator-restorers occupying permanent positions in museums, who sometimes do not have professional education. The Ministry of Culture is required to keep a register of the Cultural Assets – National Wealth, but at the moment it is not publicly accessible.

The Ordinance under Art. 168 defines the aim of conservation-restoration, lists the "main conservation-restoration activities", formulates the content of the conservation-restoration documentation, and sets out "appropriate conditions" for practising, amongst other requirements. Nonetheless, not all museums are able to meet all the requirements and comply with all the regulations. The Ordinance though does not provide any explanation as to what "appropriate conditions" are<sup>4</sup>.

The profession conservator-restorer is listed in the National Classification of Occupations and Positions, but this in itself does not warrant quality.

Development and introduction of a system for certification and/or accreditation of conservator-restorers, based on periodic assessment of the competence level of conservator-restorers, could have a positive effect on quality assurance. The system should be supported by a clear definition and protection of the professional title conservator-restorer. At this point however, there is no political will or understanding of the necessity for introducing such a system.

## 3. CHALLENGES TO THE PROFESSION

The regulation of the profession of conservation-restoration in Bulgaria faces more challenges than the ones commented on above.

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<sup>3</sup> Bulgarian language version only.

<sup>4</sup> The quotes from the normative act are translated into English by the author of the article.

The national NACE nomenclature of economic activities places conservation-restoration in three different groups with an entirely different focus and subject, while some specific conservation-restoration types of specialisation are not included in the document. At the least, this is confusing—the nomenclature does not correspond to the specificity of the profession and to the objects of the conservation-restoration activity. This specific economic activity should fall under a new, separate category Cultural Heritage Protection, Conservation and Safeguarding. The current situation poses a serious obstacle to proper tax regulation.

Another challenge is the feminisation of the profession due to low pay, which results in gender misbalance. Because of the very low salaries, some museums outside the capital Sofia cannot employ specifically qualified professionals for the position of conservator-restorer. Many Conservation-Restoration graduates change their profession because of the poor perspectives on career development.

Continuing professional development and lifelong learning are not stimulated by museums and other heritage institutions.

Still another challenge is the (mis)communication between conservator-restorers and other professionals in the field of heritage conservation and protection, such as architects and archaeologists. This is probably a result of the misunderstanding of each other's role and expertise. Clear definitions of their professional competencies are important both at national and international levels in order to facilitate the multidisciplinary approach in the process of safeguarding the cultural heritage.

Further on, conservator-restorers should be equal members of interdisciplinary teams and adequately involved in the decision-making, planning and policy-making processes. So far, there is only one conservator-restorer in a permanent position at the National Institute for Immovable Cultural Heritage. This fact indicates the lack of understanding, at both political and administrative levels, of the role of the conservation-restoration profession.

Some particular areas of specialisation are not covered yet in the curriculum of the Department of Conservation-Restoration at the National Academy of Art. Conservator-restorers willing to work in fields such as the conservation of leather, technological objects, furniture, to mention a few, have to specialise further after their graduation. This necessitates the development of more specific education paths within the academic programmes and of closer cooperation with other universities and academies in order to systematically create opportunities for the necessary capacity building and specialisation.

## REFERENCES

[1] National Assembly, 'Cultural Heritage Act'. State Gazette, 2021. Accessed: Mar. 06, 2023. [Online]. Available: [https://mc.government.bg/files/3696\\_CulturalHeritage-Act-Bulgaria.pdf](https://mc.government.bg/files/3696_CulturalHeritage-Act-Bulgaria.pdf)

[2] National Assembly, 'Higher Education Act'. State Gazette, 2016. Accessed: Mar. 06, 2023. [Online]. Available: [http://lll.mon.bg/uploaded\\_files/zkn\\_viseto\\_obr\\_01.03.2016\\_EN.pdf](http://lll.mon.bg/uploaded_files/zkn_viseto_obr_01.03.2016_EN.pdf)