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Extract from Rigsrevisionen's report on  
**archaeological investigations**  
submitted to the Public Accounts Committee



1849  
147.281  
237  
1976  
114.6  
22.480  
908

March 2018

# 1. Introduction and conclusion

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## 1.1. PURPOSE AND CONCLUSION

1. This report concerns archaeological investigations conducted in connection with construction works. The cost of such investigations are borne by the developers. Investigations are carried out by the archaeological museums, and the Ministry of Culture (the Agency for Culture and Palaces) determines the level of cost based on a recommendation made by the relevant archaeological museum. It is essential that the museums and the Agency for Culture and Palaces estimate the cost on a clear and consistent basis to ensure that unnecessary expenses are not imposed on the developers.

The Danish Museums Act, which came into force in 2002, introduced the principle that private developers shall bear the cost of archaeological investigations. The purpose of the Museums Act was to introduce a financing scheme that would adapt to the level of activity in the building and construction industry. Moreover, it should include a financial incentive for the developers to involve the museums as early as possible in the construction projects in order to preserve ancient relics found under the ground surface and thus reduce the need for archaeological investigations. However, developers rarely adjust their construction projects on that account, because other considerations carry more weight than the expenses for archaeological investigations. Still, there have been examples of developers who have abandoned construction projects due to expenses for archaeological investigations. The expenses for archaeological investigations soared in the years after the Museums Act came into force due to the general economic trends, among other things.

2. Before archaeological investigations are undertaken, the museums need to consider two aspects that the Agency for Culture and Palaces must approve based on recommendations made by the museums. First, the museums must make a professional appraisal of whether the significance of the ancient relics is such that an investigation must be presumed to generate new archaeological knowledge. Second, if this is the case, the museums must consider and work out an estimate of the cost of such an investigation. In addition, the agency must consider whether developers are entitled to a subsidy to cover part of their expenses for the investigation. On its website, the agency has published the framework set for the museums' professional appraisals and budgeting of archaeological investigations in the form of professional strategies, a guideline on archaeological investigations and general information.

The agency's approval of the appraisals made by the museums serves to ensure a consistent practice of administration and an overall professional prioritisation of archaeological investigations on national level.

3. The purpose of the study is to assess whether the Ministry of Culture is managing archaeological investigations in a satisfactory manner.

Rigsrevisionen initiated the study in August 2017.

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## CONCLUSION

It is Rigsrevisionen's assessment that the Ministry of Culture's management of archaeological investigations is unsatisfactory. The framework defined by the Agency for Culture and Palaces and the agency's administration of cases are not ensuring a consistent basis for the museums' professional appraisals and budgeting of archaeological investigations. Furthermore, the agency's management of subsidies is not sufficiently transparent. As a result, developers are not treated equally and risk being overcharged for investigations.

Since 2009, the Agency for Culture and Palaces has developed a number of national strategies to help the agency and museums in determining whether a find constitutes significant new archaeological knowledge and therefore requires an archaeological investigation. The agency has not completed all the planned strategies, and only approximately 55 per cent of archaeological investigations are covered by the current strategies. To this should be added that the existing strategies are only to a lesser extent useful for the appraisal of the importance of ancient relics. In most cases, the museums therefore define their own criteria to determine when a find of an ancient relic should be further investigated. This practice is rarely challenged or rejected by the agency. Thus, the agency fails to ensure that investigations are prioritised on an overall national level. This entails a risk of excessive expenses, because too many or too extensive archaeological investigations are carried out.

The Agency for Culture and Palaces has worked out a guideline on archaeological investigations that includes guidance on preparing estimates. The guidance does not include a specification of budget assumptions, and budgeting is thus largely left to the discretion of the museums. In the period from 2003 to 2015, archaeological investigations were increasingly and significantly overestimated by up to 150 per cent, on average. Rigsrevisionen's review of 89 cases from 2015 shows that only approximately 10 per cent of the museums' budgets were adjusted in connection with the agency's approval. Estimating the cost of an archaeological investigation can be difficult, because the extent and condition of ancient relics cannot be determined in advance. Estimates will inherently be uncertain. However, Rigsrevisionen is of the opinion that the estimates are too conservative. The estimates should be more accurate in the interests of the developers, who base their decision to proceed with or change their construction projects on the estimates prepared by the museums. If the cost of investigations is significantly overestimated, there is a risk that construction projects will be abandoned or adjusted for no valid reason.

The Agency for Culture and Palaces conducts only a general review of the accounts for the archaeological investigations. At the same time, the auditors of the museums have – for the past five years – failed to examine the business procedures and invoicing concerning investigations at 10 out of 27 museums. This entails a risk that the developers are invoiced incorrectly and covering cost beyond the statutory requirements.

Neither for its own benefit nor for the benefit of the developers has the agency put together a complete overview of the criteria upon which subsidies are granted. This makes it difficult for the developers to assess funding opportunities, and it entails a risk that comparable cases are assessed differently by the agency's case officers. Furthermore, the agency's decisions to grant subsidies are not always fully addressing the considerations that have led to the agency's final judgement.

In connection with this study, the Ministry for Culture has planned several initiatives to strengthen the administration of archaeological investigations.