Colonial Legacies in the Repatriation of Cultural Objects:

A Content Analysis of Dutch Policies (2020–2024)

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Amid growing global awareness of historical justice and the rights of formerly colonized nations in the Global South over their cultural heritage, the repatriation of colonial cultural objects has become increasingly important in Dutch foreign policy. This article analyzes how official Dutch discourse constructs representations of former colonies in government documents concerning cultural object repatriation between 2020 and 2024. Through qualitative content analysis, applying Herrmann et al.'s (1997) image theory, the study identifies narrative patterns that combine recognition of ownership rights with emphasis on procedures and cooperation mechanisms within Dutch policy frameworks. The findings reveal a discursive shift from colonial-era imagery toward partnership rhetoric, yet paternalistic concerns regarding technical standards, conservation, and governance capabilities persist. This representation frames repatriation as an asymmetrical cultural cooperation rather than mere object return. The study contributes to postcolonial international relations scholarship by demonstrating how repatriation serves as an arena for negotiating meaning, legitimacy, and power relations between former colonial powers and newly sovereign states.

Keywords: *Repatriation, Colonialism, Cultural Objects, The Netherlands, Indonesia*

Introduction

Over the past decade, European societies have undergone a significant shift in how they perceive colonial cultural heritage housed in their museums. Cultural objects that were once displayed as symbols of colonial glory are now increasingly scrutinized for their historical association with oppression and exploitation. This shift has been accompanied by growing global awareness of historical justice and the rights of formerly colonized nations to reclaim their cultural heritage (Prott, 2009).

These developments have driven the expansion of decolonial campaigns. These campaigns range from removing monuments that glorify colonial figures to decolonizing educational curricula. They also include reforming museological practices that perpetuate imperial perspectives (Hermkens & Venbrux, 2023; Sarr & Savoy, 2018; van Beurden, 2022).

In this context, repatriation discourse extends beyond the physical transfer of artifacts. It encompasses political, ethical, and epistemological struggles that reflect

how former colonial powers frame formerly colonized states within their cultural policies.

A comprehensive understanding of the repatriation discourse requires considering the historical contexts in which these cultural objects were brought to Europe. During the colonial era, European states positioned themselves as advanced, refined custodians of ancient civilizations (Adviescommissie Nationaal Beleidskader Koloniale Collecties, 2020). They claimed superior anthropological insight, cultural sensitivity, and political competence compared to other imperial powers in Asia (Yapp, 2016). European powers acquired objects from colonial territories through looting, exploitation, and highly unequal negotiations. This demonstrates that colonialism not only annexed territories but also eroded the cultural sovereignty of colonized societies (Adviescommissie Nationaal Beleidskader Koloniale Collecties, 2020; van Beurden, 2016).

In the Dutch colonial context, cultural objects were acquired across multiple regions through different forms of exploitation. The Indonesian archipelago formed the core of Dutch imperial rule. Here, cultural objects were obtained through military expeditions, political annexations, and highly unequal exchanges. Examples include the Lombok treasure and the Kris of Klungkung (Commissie Koloniale Collecties, 2023b, 2023a). In Ceylon (present-day Sri Lanka), the Dutch controlled coastal areas between 1640 and 1796. Cultural artifacts such as the Lewke Disava cannon were looted as war trophies (Commissie Koloniale Collecties,

2023c). In the Caribbean, particularly Suriname and Curaçao, colonial domination relied on slavery and plantation economies. This system also generated ethnographic and ritual collections that were later transferred to Dutch institutions. Beyond Asia and the Caribbean, the Dutch presence in West Africa—notably at Elmina in present-day Ghana—was tied to the transatlantic slave trade. Cultural objects from this region symbolized imperial control. These regional variations demonstrate that colonial collections in the Netherlands are embedded within histories of coercion, violence, and cultural dispossession (Adviescommissie Nationaal Beleidskader Koloniale Collecties, 2020).

Colonial collections in Europe now raise increasingly complex ethical, political, and epistemological questions. This has prompted a discursive shift in cultural policy and international relations. Across Europe and the broader Western world, decolonial movements have gained visibility in public discourse, academic institutions, and cultural policy agendas.

Ter Keurs (2009) emphasizes that collecting cultural objects during colonial times reflected asymmetrical power relations between colonizers and colonized. These collections were acquired through scientific, military, and religious expeditions. A critical turning point occurred in 2017 when French President Emmanuel Macron publicly addressed colonial cultural heritage. In his speech in Burkina Faso, Macron declared that collecting cultural objects during colonialism constituted a "crime against humanity." He

asserted that European museums could no longer serve as "prisons" for Africa's cultural heritage (Sarr & Savoy, 2018). This statement marked official recognition of colonialism as a serious ethical violation in modern European history. It provided an important backdrop for subsequent shifts in restitution discourse in the Netherlands.

Repatriation, however, is not a new demand. As a country with a long colonial history, the Netherlands has faced demands to return cultural objects acquired during the colonial period to its former colonies. Indonesia first raised this issue at the 1949 Round Table Conference. Repatriation was proposed as part of the decolonization agenda, though the matter was ultimately left unresolved (Scott, 2017).

Partial returns of colonial cultural objects occurred during the 1970s. These included three paintings by the maestro Raden Saleh, the Nagarakretagama manuscript, the Prajnaparamita statue, four memorabilia items of Prince Diponegoro, and 243 items from the Lombok treasure (Adviescommissie Nationaal Beleidskader Koloniale Collecties, 2020). However, repatriation in this period lacked a clear ethical or legal framework and was largely symbolic. Scott (2019) argues that such returns were framed as acts of goodwill by the Netherlands. They aimed to repair bilateral relations with Indonesia, which had been strained by the Dutch military aggression of December 1948.

Before the publication of the *Koloniale Collecties en Erkenning van Onrecht* report in 2020, Dutch restitution mechanisms positioned countries of origin as passive recipients. The 2019 restitution of the Museum Nusantara collection exemplifies this pattern. Dutch curators and the municipality of Delft internally selected which objects to keep from more than 18,000 cultural items. As the legal owner of the collection, Delft determined which items would remain in the Dutch national collection. Only approximately 1,500 objects were subsequently offered to Indonesia. The Indonesian government was not involved in the curatorial process or in nationwide public consultation (Antara, 2013; van Beurden, 2022).

This mechanism curtailed Indonesia's sovereignty in determining restitution priorities. It also imposed acceptance of the collection as a single package. Additionally, Indonesia had to bear all costs of transportation, management, and storage (Sudarto, 2016). This pattern illustrates that restitution before 2020 operated within a framework that reproduced colonial hierarchies. Substantive authority remained concentrated in the hands of the former colonial power.

Indonesia formally objected to this mechanism through Hilmar Farid, the Director General of Culture, in March 2016. Farid strongly criticized the narrative and priorities determined by the Dutch side. He asserted that the offered cultural objects amounted to "junk" that lacked cultural relevance or significant historical meaning. Much of the collection was redundant with similar items already existing in Indonesia. For example, wayang golek puppets were deemed less significant compared to other

heritage objects (Suyitno, 2016).

The Museum Nusantara case demonstrates the limitations of pre-2020 restitution practices. Before the policy shift emphasizing *onvoorwaardelijke teruggave* (unconditional return) and equitable dialogue, restitution was treated as a symbolic gesture laden with institutional control. It did not represent full recognition of the cultural rights and historical sovereignty of the country of origin.

Building on earlier restitution practices, subsequent developments signaled a shift toward a more structured and principle-based approach. The 2019 Museum Nusantara case had been marked by asymmetrical decision-making and the absence of a shared normative framework. International movements in Europe during the 2010s created a normative environment where ignoring repatriation demands was no longer politically or morally defensible. This occurred even without direct institutional pressure from bodies such as the United Nations or UNESCO. Following France's publication of the Sarr & Savoy report in 2018, the Netherlands released its own report in 2020. *Koloniale Collecties en Erkenning van Onrecht* was initiated by the Minister of Education, Culture, and Science, Ingrid van Engelshoven.

In this context, Van Engelshoven affirmed that "*Dit kan ook een pijnlijke confrontatie met het onrecht uit ons verleden betekenen*" ("This may also entail a painful confrontation with the injustices of our past") (Adviescommissie Nationaal Beleidskader Koloniale Collecties, 2020; Rijksoverheid, 2021). This statement represents a moral repositioning by the Netherlands following the publication of the 2020 report. It was later operationalized in the 2021 *Beleidsvisie Collecties uit een Koloniale Context*. This reflects a broader trend among former colonial powers toward critical self-reflection on their colonial legacies.

Recent developments indicate that pursuing historical redress through repatriation has shaped restitution negotiations and driven changes in Dutch foreign policy. The current phase of repatriation began with the release of *Koloniale Collecties en Erkenning van Onrecht* in 2020 and continued with implementation in 2023–2024. This phase is characterized by formal recognition of historical injustice and adoption of the principle of *onvoorwaardelijke teruggave* (unconditional return). This principle is supported by *herkomstonderzoek* (provenance research) and joint dialogue (Adviescommissie Nationaal Beleidskader Koloniale Collecties, 2020; Ministerie van Onderwijs, 2021).

The 2020 report of Advisory Committee on Colonial Collections Policy Framework defines unconditional return as "the willingness for unconditional return means that the interest in redressing historical injustice in a restitution request is not weighed against other interests, no matter how relevant those other interests may be individually" (Adviescommissie Nationaal Beleidskader Koloniale Collecties, 2020).

Consequently, returning cultural objects unlawfully acquired during the colonial period is no longer contingent upon technical conditions. These conditions previously included the readiness of storage facilities or

preservation capacity in the country of origin. This principle elevates recognition of colonial injustice above other Dutch national interests. These interests include educational, scientific, or legal ownership considerations. This marks a fundamental transformation in the moral and political architecture of Dutch cultural diplomacy

The articulation of *onvoorwaardelijke teruggave* (unconditional return) and the acknowledgment of *onvrijwillig bezitsverlies* (involuntary loss of ownership) reflect a shift in the moral geography of the Global North. Former colonial powers are increasingly called upon to confront both the symbolic and material legacies of empire.

This evolving perception shapes the Netherlands' policy formulation on repatriation. It also informs how formerly colonized states are represented in official documents. Within this framework, the perspectives and agency of formerly colonized nations in the Global South remain central to the discourse on representation. The construction of repatriation policy discourse plays a strategic role in determining the direction and approach taken in the return of cultural objects.

This study examines the narrative patterns employed by the Dutch government in responding to repatriation demands. It analyzes how the representation of formerly colonized states has influenced shifts in Dutch foreign policy regarding the restitution of colonial cultural objects. The study applies a content analysis approach to investigate colonial imagery in Dutch repatriation policy. This involves examining the linguistic patterns, terminology, and narrative constructions in official documents. The analysis identifies elements that remain consistent and those that exhibit change over time. This method enables the identification of thematic categories and the interpretation of meanings embedded in the texts. It examines how language choices and narrative structures contribute to the formation and legitimation of policy agendas. The study seeks to uncover how representations of formerly colonized states are constructed, sustained, or contested within restitution policy. It also examines how these representations influence contemporary cultural policymaking.

Extensive academic scholarship has addressed the identity of colonial cultural objects and the dynamics of restitution. Previous studies have shown that colonial cultural collections are not merely historical artifacts but also instruments of political domination. Ter Keurs (2009) argues that colonial collections were shaped by hybridity, politics of distribution, and colonial ideologies (including the Ethical Policy), rendering them not as "authentic" cultural representations but as complex products of interaction imbued with political meaning and prestige. Maulana (2022) argues that exhibiting colonial collections in European museums reinforced Dutch control over Indonesia. Within this framework, the restitution of colonial cultural objects represents both a reconstruction of historical narratives and an effort to redress injustice. This makes provenance research a crucial element.

Recent scholarship highlights the fundamental challenges inherent in provenance research, which constitutes a crucial pre-

requisite in restitution policy. Van Beurden (2022) demonstrates that the deaccessioning of more than 18,000 objects from the Museum Nusantara in Delft exposed methodological gaps in tracing the origins of collections. It also reflected diplomatic tensions between the Netherlands and Indonesia. Stutje (2022) underscores this complexity through the case of a diamond from Banjarmasin. In this case, ownership, meaning, and historical narratives overlap and compete, complicating the legitimacy of repatriation claims. Hermkens & Venbrux (2023) further argue that provenance research is frequently constrained by limited documentation, interpretive bias, and colonial contexts that hinder the reconstruction of cultural continuity. Meanwhile, Drieënhuizen & Sysling (2021) show that restitution processes are not merely about historical authentication. They also constitute a political arena in which ownership claims are shaped by postcolonial power relations.

Taken together, these studies affirm that provenance research is not simply a technical procedure. It is a contested historical, political, and epistemological field that fundamentally shapes the discourse on repatriation

In global discourse, the restitution of colonial cultural objects is understood not only in physical terms but also within broader social, political, and national identity contexts. Gaudenzi & Swenson (2017) describe restitution as a complex negotiation process, particularly in Dutch–Indonesian relations between 1949 and 1979.

Scott (2017; 2019) argues that the Netherlands has employed restitution as a diplomatic instrument, enabling the renewal of relations with former colonies while maintaining control over colonial narratives. Van Beurden (2022) shows that such asymmetries persisted in the 2019 repatriation case, in which Indonesia lacked full agency in determining which objects would be returned. Out of the 12,000 objects initially offered, the country ultimately received only about 1,500 "leftover" items. These examples highlight that restitution continues to operate as a contested arena shaped by political and economic interests between former colonial powers and formerly colonized nations.

Previous research has examined the legal, political, and diplomatic dimensions of restitution. However, little attention has been paid to how the Dutch government represents former colonies in repatriation policy discourse. This gap is particularly significant given recent policy developments.

This study addresses this gap by analyzing shifts in the colony image in Dutch restitution policy. The research focuses specifically on the 2023–2024 restitution period. It employs the colony image framework from Herrmann et al. (1997) image theory as an analytical tool. This framework examines the meanings embedded in the language and narratives of Dutch official documents. The study aims to explain how the image of former colonies is articulated within these documents. It also situates such representations within broader policy discourses.

The structure of this article is organized to progressively connect theory with empirical analysis and policy implications. Following the introduction and literature review, the discussion is divided into three analytical sections: Dutch policy discourse on repatriation, the representation of former colonies through the lens of image theory, and the implications of these representations for policy. This structure is designed to move from contextual background toward theoretical application and then to policy evaluation, ensuring coherence between historical developments, analytical framework, and empirical findings. By sequencing the sections in this way, the article demonstrates how discursive representations of former colonies are not only embedded in policy documents but also shape the evolving practices of Dutch cultural diplomacy and repatriation.

Methodology

This study employs content analysis as its primary methodological approach. Following Bryman (2012), content analysis is defined as a systematic and replicable technique for examining texts and documents in order to identify patterns and meanings. While often associated with quantitative approaches that rely on predefined categories, this study applies content analysis in a qualitative and interpretive manner. In this approach, policy documents are not treated as neutral administrative records but as ideological and discursive constructions, reflected in language choices, issue prioritization, and silences or omissions.

The analytical corpus in this study refers to a purposively selected body of texts that constitutes the primary material for content analysis. It primarily consists of official Dutch policy documents on the repatriation of colonial cultural objects issued between 2020 and 2024—including *Koloniale Collecties en Erkenning van Onrecht* (Colonial Collections and Recognition of Injustice, 2020), *Beleidsvisie Collecties uit een Koloniale Context* (Policy Vision on Collections from a Colonial Context, 2021), and *Implementatie Beleidsvisie Collecties uit een Koloniale Context* (Implementation of the Policy Vision on Collections from a Colonial Context, 2022), as well as advisory reports (2023–2024) issued by the Colonial Collections Committee on the restitution of specific colonial objects. These texts were selected as they represent the state's official position and authoritative narratives on restitution.

In addition, news articles and academic works were incorporated to provide historical context and triangulate interpretations. The analysis focuses on tracing keywords, terminology, and narrative constructions, combined with interpretive reading, to uncover how language choice, textual structure, and narrative strategies construct, sustain, or contest representations of formerly colonized states within Dutch repatriation policy.

The colony image framework developed by Herrmann et al. (1997) serves as the theoretical foundation for assessing how recipient states are represented in contemporary cultural policy. This framework also provides a basis for evaluating whether the

repatriation policies under review reflect an egalitarian reconfiguration of relations or, conversely, reproduce hierarchies rooted in colonial history.

Colony Image in Image Theory

Image theory in International Relations emphasizes that perceptions of other states are not neutral reflections of objective reality but are shaped through cognitive constructions mediated by language and the representational frameworks used to describe them (Herrmann et al., 1997). Theoretically, Herrmann & Fischerkeller (1995) identify five ideal strategic images: the enemy image, ally image, imperialist image, degenerate image, and colony image. However, in their empirical study (Herrmann et al., 1997) only four images were applied—excluding the imperialist image—as it was found to be of limited relevance among American respondents. These images function as interpretive frameworks that guide how the motivations, capabilities, and institutional processes of another state are understood, in contrast to structural realism which privileges the distribution of power as the primary determinant of international relations (Waltz, 1979).

Within the colony image, Herrmann et al. (1997) conceptualize perceptions of the target state as divided between two categories of actors: "good forces" and "bad forces." The good forces are typically perceived as cooperative elites or societal groups within the colony who are aligned with modernization and regarded as potential partners by the perceiving state. In contrast, the bad forces are seen as resistant, traditional, or non-co-

operative actors who are believed to obstruct integration or stability. This dichotomy is crucial because it demonstrates how colonial or postcolonial powers often construct former colonies not as coherent entities but as contested spaces characterized by an internal struggle between progressive (good) and obstructive (bad) forces.

Table 1. Colony Image: Attributes and Actors (Good and Bad Forces)

Components	Description
Motivation	**Good forces:** Paternalistic leaders, progressive modernizers, nationalists, leaders driven by the people's interests. **Bad forces:** Radical demagogues, xenophobic extremists, evil dictators, puppets of enemy great powers.
Capability	**Good forces:** "Well-meaning children" who require guidance; can use equipment under supervision, but lack discipline and skills to manage technology, infrastructure, or weapons. **Bad forces:** Untalented protégés supported by foreign powers; terrorists indicating moral weakness; immature agitators mistaking slogans for intelligence; conspirators skilled in deception; agents whose success depends on foreign patrons. and dogmas with intelligence.
Decisional Process	**Good forces:** Try hard but are incapable of efficient national governance. **Bad forces:** Highly disciplined units operating via strict top-down command.

(Summarized from Herrmann et al. (1997))

Dutch Policy Rethorics on the Repatriation of Colonial Cultural Objects

An analysis of Dutch government documents related to the repatriation of colonial cultural objects reveals that Dutch policy can be interpreted through a discourse rich in political, historical, and symbolic meanings, shaping the relationship between former colonizers and formerly colonized states. The repatriation discourse highlights two major themes: (1) the articulation of goodwill and the effort to redress historical injustices and (2) the implementation of policy vision between partnership and postcolonial hegemony.

The Expression of Goodwill and Redressing Historical Injustices

"*Het koloniaal verleden is een onderwerp dat vele mensen nog dagelijks persoonlijk raakt. We moeten daarom zorgvuldig omgaan met koloniale collecties. Ik vind het belangrijk dat de koloniale collecties toegankelijk zijn en vanuit verschillende perspectieven de daaraan verbonden verhalen vertellen. Dit kan ook een pijnlijke confrontatie met het onrecht uit ons verleden betekenen, een onrecht dat zich soms nog dagelijks laat navoelen. Geroofde cultuurgoederen horen daarbij niet in de Rijkscollectie thuis. Als een land dat wil, geven we het terug.*"

"The colonial past is a subject that still personally affects many people today. We must therefore handle colonial collections with care. I believe it is important that these collections are accessible and that the associated stories are told from multiple perspectives. This may also entail a painful confrontation with the injustices of our past, injustices that can still be felt today. Looted cultural goods do not belong in the national collection. If a country wishes to reclaim them, we will return them.")

(Rijksoverheid, 2021)

A statement by the Dutch Minister of Education, Culture, and Science, published in the article *"Kabinet: Herstel onrecht door teruggave van cultuurgoederen aan landen van herkomst"* ("Cabinet: Redressing Injustice through the Return of Cultural Objects to Countries of Origin"), signals a shift toward greater recognition of the rights of recipient countries to manage their own cultural heritage. These countries are portrayed as having suffered *onvrijwillig bezitsverlies* (involuntary loss of ownership) of cultural objects due to colonialism, forming the foundation for a discourse centered on *herstel van onrecht* (the redress of historical injustice).

This acknowledgment reframes repatriation not merely as a legal obligation but as an ethical and historical imperative. As Van Engelshoven asserted, *"Dit kan ook een pijnlijke confrontatie met het onrecht uit ons verleden betekenen"* (This may also entail a painful confrontation with the injustices of our past) (Rijksoverheid, 2021). Here, the term *'dit'* refers to the inclusion of multiple perspectives on colonial collections, not the mere presence of colonial objects. The use of the word *pijnlijk* ('painful') implicitly evokes recognition of historical wounds that demand accountability and reflection.

While this ethical framing appears progressive, it is important to note that repatriation has long been characterized in Dutch policy as an act of benevolence. The *Koloniale Collecties en Erkenning van Onrecht* report (2020) recalls the historical framing of repatriation as a "*teken van goede wil*" (sign of goodwill) in the context of the 1949 Round Table Conference in The Hague. Similarly,

Scott (2017) argues that repatriation with "goodwill" became part of the Dutch strategy to renew bilateral relations with Indonesia in the 1970s, exemplified by Queen Juliana's state visit to Jakarta. However, this historical narrative has been criticized by Hilmar Farid, Director General of Culture of Indonesia, who emphasized that the return of cultural objects should not be understood merely as an act of goodwill, generosity, or benevolence on the part of the former colonizer, but rather as a recognition of the inherent rights of the recipient state (Faizal, 2023). Within this critical framing, repatriation is thus represented as a moral gesture by the former colonial power, rather than as the rightful restitution of property to its legitimate owners.

The shifting perceptions regarding the presence of colonial cultural objects are also reflected in the Netherlands' tendency to align itself with broader international developments, rather than initiating repatriation autonomously or directly responding to claims submitted by formerly colonized states. The Netherlands has positioned itself within the momentum of as by van der Leden (2023) notes "Restitution Revolution," rather than leading it. This is particularly noteworthy given that repatriation claims had already been raised by former colonies such as Indonesia since the Round Table Conference in 1949 (Scott, 2017).

This dynamic is exemplified by Van Engelshoven's own statement: *"Daarnaast sluit ik met dit kader aan bij een brede internationale ontwikkeling: de sterke roep vanuit landen van herkomst en diasporagemeenschappen om teruggave"* ("In addition, through this frame-

work, I align with a broader international movement: the strong call from countries of origin and diaspora communities for the return [of cultural objects]") (Ministerie van Onderwijs, 2021). Ultimately, the decision regarding when, under what circumstances, and in what manner repatriation takes place remains under the control of the Dutch state. This indicates that, despite the formal recognition of claims made by former colonies, the underlying structures of colonial power relations have not been fully dismantled.

Repatriation Policy Vision: Between Partnership and Postcolonial Hegemony

"De volgende stap is dat ik bereid ben, conform de tweede aanbeveling, door teruggave van cultuurgoederen aan landen van herkomst en internationale samenwerking een bijdrage te leveren aan het herstellen van dit historisch onrecht, dat tot op de dag van vandaag nog als onrecht wordt ervaren. Het is deze bereidheid die de basis vormt voor het beleidskader voor de omgang met koloniale collecties."

"The next step is that I am willing, in accordance with the second recommendation, to contribute to the redress of this historical injustice—which is still experienced as injustice today—through the return of cultural goods to countries of origin and through international cooperation. This willingness forms the foundation of the policy framework for dealing with colonial collections."

(Minister Van Engelshoven, 2021)

This statement is taken from *Beleidsvisie Collecties uit een koloniale context*, a policy document released by the Dutch government on 29 January 2021 as an official guideline for the management of colonial collections in Dutch institutions. The vision responded to the report *Koloniale Collecties en Erkenning van*

Onrecht published by the Raad voor Cultuur, and was subsequently followed by the publication of *Implementatie Beleidsvisie Collecties uit een Koloniale Context* on 15 July 2022. This implementation document outlined practical steps to address repatriation requests, establish an independent evaluation committee, and support provenance research.

The Dutch repatriation mechanism begins with a formal request submitted by the country of origin to the State Secretary for Culture and Media (a junior minister under the Minister of Education, Culture, and Science), which is then forwarded to the Colonial Collections Committee for evaluation. Based on the results of provenance research, the Committee assesses whether the object in question was subject to *onvrijwillig bezitsverlies* (involuntary loss of ownership) during the colonial period (Adviescommissie Nationaal Beleidskader Koloniale Collecties, 2020; Ministerie van Onderwijs, 2021). If this can be established, unconditional restitution is recommended; if not, the Committee engages in a balancing of interests between the country of origin and the Netherlands. The Committee's recommendation forms the basis for the final decision by the State Secretary, who also facilitates the restitution process and strengthens international cultural cooperation (Ministerie van Onderwijs, 2022).

This framework reveals that the evaluation process remains under the control of the former colonizing state. Restitution decisions are based on two principal criteria: (1) whether the object was acquired through involuntary loss, and (2) whether it holds significant cultural, historical, or religious value for the country of origin. In cases where the first condition cannot be proven, the evaluation process becomes more complex and involves additional considerations (Adviescommissie Nationaal Beleidskader Koloniale Collecties, 2020). The statement, "*het belang van een koloniaal cultuurgoed dat zich in een Nederlands museum bevindt, zal vaak voor Nederland anders zijn dan voor het land van herkomst*" (the significance of a colonial cultural object located in a Dutch museum will often be different for the Netherlands than for the country of origin) (Adviescommissie Nationaal Beleidskader Koloniale Collecties, 2020), illustrates that although the rights of the countries of origin are formally acknowledged, Dutch authorities continue to define the meaning and value of such objects from their own perspective.

In practice, the final decision regarding repatriation remains in the hands of the Netherlands. This is evident in the protracted case of Lewke's Cannon, for which the Sri Lankan government submitted repatriation requests between 1964 and 1980 through diplomatic channels and UNESCO. These claims were initially rejected on the grounds that the cannon was considered a diplomatic gift rather than war spoil. Only in the late twentieth century was the Sinhala inscription on the cannon translated, revealing its provenance from the King of Kandy. The most recent evaluation by the Colonial Collections Committee concluded that the cannon was brought to the Netherlands in 1765 and was shortly thereafter "*Hij liet het kanon in november 1765 overbrengen naar de Republiek der Ned-*

erlanden, [...] kort daarna werd het als oorlogsbuit tentoongesteld in het 'curiositeitenkabinet' van de stadhouder in Den Haag" (He had the cannon transferred to the Dutch Republic in November 1765, [...] shortly thereafter it was displayed as war spoil in the stadtholder's cabinet of curiosities in The Hague) (Commissie Koloniale Collecties, 2023c). Nevertheless, the legitimacy of the claim still had to be substantiated through scientific and administrative processes led by Dutch authorities.

This reliance on colonial epistemological frameworks imposed by Western institutions is also evident in the broader repatriation structure, which is designed to preserve authority over national collections. Claim evaluations, while not imposing formal requirements, nevertheless place the burden on countries of origin to substantiate their historical narratives and submit them for validation by Dutch institutions. This pattern is not only reflected in the case of Lewke's Cannon, but also in other examples, such as *Java Man*. The fossil of *Java Man* (Homo erectus)—discovered by Eugène Dubois in Trinil, East Java, between 1891 and 1892—remains in the Netherlands, positioned as part of a universal scientific heritage and considered of national significance, despite Indonesia's repeated efforts to secure its return (Drieënhuizen & Sysling, 2021). These cases demonstrate how scientific value and narrative control are frequently used to justify the retention of colonial objects, reflecting how colonial logics of knowledge production continue to shape postcolonial relations today.

Nevertheless, policy developments in the 2023–2024 period indicate a discernible shift toward a more partnership-oriented discourse. These developments provide formerly colonized nations with an institutionalized arena to negotiate ownership and historical recognition on more equal terms (Faizal, 2023). Within this framework, countries of origin are formally acknowledged as possessing the right to submit claims for any colonial object they deem significant.

Indonesia, through the Tim Repatriasi Koleksi Indonesia established by the Directorate General of Culture, has actively submitted requests for the restitution of highly symbolic objects. Pursuant to these agreements, the *Lombokschat* (Lombok treasure) was ultimately returned in its entirety, following the partial restitution of the collection in 1977 (Commissie Koloniale Collecties, 2023b). The recognized right to initiate and negotiate claims also demonstrates how potential disputes—such as the contentious 2019 case of the repatriation of the former Nusantara Museum collection—may be effectively avoided. Thus, repatriation should not be understood merely as a technical framework for the recovery of cultural property, but rather as an arena of postcolonial political negotiation in which formerly colonized nations reassert symbolic sovereignty and contest historical narratives.

In this context, international cooperation is framed not only in terms of the return of objects but also in terms of institutional collaboration. The *Implementatie Beleidsvisie* document contains statements such as, "*Daarnaast zal ik onderzoeken hoe naar aanleid-*

ing van verzoeken tot teruggave van andere landen ook museale samenwerking kan worden gestimuleerd" ("In addition, I will explore how, in response to repatriation requests from other countries, museum cooperation can be stimulated") (Ministerie van Onderwijs, 2021), reflecting a growing commitment to scholarly exchange. Current museum collaborations increasingly emphasize bilateral engagement—particularly through joint research initiatives, staff training, and capacity development. Although elements of Dutch supervision remain, this evolving framework suggests a more dialogical relationship.

In sum, Dutch repatriation policy reflects a tension between institutional control and the recognition of historical claims by formerly colonized nations. While the legal and administrative frameworks continue to echo postcolonial power structures, recent developments indicate a gradual shift toward more collaborative and reciprocal approaches. Nevertheless, restitution remains contingent not on the inherent rights of the countries of origin, but on the terms and procedures defined by the Dutch state.

Colony Image in Dutch Policy Documents

Dutch government documents on the repatriation of colonial cultural objects (2020–2024) articulate a formal acknowledgment of historical injustices rooted in colonialism and set out key principles for restitution, notably the importance of *herkomstonderzoek* (provenance research) and the active involvement of countries of origin. Through the *Beleidsvisie* (2021) and its *Imple-*

mentatie (2022), the Netherlands establishes an ethical and legal framework that emphasizes collaboration, unconditional return, and long-term museological cooperation—signaling a shift toward a more equitable and reflective partnership. This subchapter examines how these policies represent former colonies by applying the three core components of image theory (Herrmann et al., 1997)—motivation, capability, and decision-making—to analyze whether the "colony" image is reinforced or transformed. In line with Herrmann et al. (1997), the colony image is conceptualized not only through these analytical components but also through a distinction between actors—"good forces" and "bad forces"—which resonates with Dutch policy narratives that highlight cooperative elites versus obstructive forces in former colonies.

Representing Motivation: Decolonization and The Demand for Historical Justice

The representation of formerly colonized states' motivations in Dutch repatriation policy reveals how postcolonial power relations are discursively maintained or contested. Informed by Herrmann et al.'s (1997) image theory, which emphasizes motivation as a key dimension in strategic perception, this analysis investigates how the Netherlands frames the intentions of source countries—such as nationalist revival, decolonial claims, and appeals for historical justice. These representations offer insight into whether the Dutch policy discourse marks a departure from or a continuation of hierarchical postcolonial dynamics.

In the *Koloniale Collecties en Erkenning van Onrecht* report, the Dutch government articulates an explicit recognition of the transformed status of formerly colonized nations. Once subordinated entities are now acknowledged as sovereign states with autonomous political will, shaped through historical processes and decolonial movements. The introductory sections of the report emphasize political emancipation as a central justification for restitution claims. Statements such as "*Er was sprake van een versnelde politieke en staatkundige emancipatie*" ("there was an accelerated political and constitutional emancipation") (Adviescommissie Nationaal Beleidskader Koloniale Collecties, 2020) frame former colonies as legitimate actors entitled to reclaim their cultural heritage. However, the fact that this acknowledgment only emerged in recent official discourse—more than seven decades after Indonesia's independence—reveals a prolonged institutional hesitation to fully recognize the political agency of formerly colonized states in matters of cultural ownership.

Decolonization is presented as a foundational element driving the nationalist resurgence of formerly colonized states. Its conceptual significance is underscored by the presence of a dedicated subsection—*2.5 De Dekolonisatie*—in the *Koloniale Collecties en Erkenning van Onrecht report*, where the term *dekolonisatie* appears nineteen times. This frequency reflects the Dutch government's emphasis on viewing former colonies as actors seeking transformation and modernization. Rather than treating decolonization as a matter of narrow nationalism or post-

colonial symbolism, the report frames it as an ongoing historical process that remains incomplete.

The process of decolonization is thus positioned as the historical foundation upon which claims for the repatriation of colonial cultural objects are built, echoing episodes such as Indonesia's 1945 struggle for independence. The report traces the emergence of Indonesian nationalism to the early twentieth century, particularly among the educated elite, and identifies the founding of the Indonesian National Party (PNI) by President Sukarno in 1927 as a key expression of resistance to colonial domination and exploitation (Adviescommissie Nationaal Beleidskader Koloniale Collecties, 2020).

Beyond Indonesia, the report also addresses the broader trajectory of Dutch decolonization, particularly in the Caribbean. It notes the political and economic motivations behind large-scale migration from Suriname and the Antilles to the Netherlands prior to independence. In contrast to Suriname, the Antillean islands pursued a different path—seeking self-determination within the Kingdom rather than full independence. Aruba became the first to obtain status aparte in 1986, followed by the dissolution of the Netherlands Antilles in 2010, after which Curaçao and Sint Maarten acquired autonomous status, while Bonaire, Sint Eustatius, and Saba were designated as special municipalities of the Netherlands, collectively referred to as the Caribbean Netherlands (Adviescommissie Nationaal Beleidskader Koloniale Collecties, 2020). These cases are invoked to underscore the heterogeneity of

postcolonial trajectories, but all are framed within the broader narrative of decolonization as a political and moral rationale for cultural restitution.

The representation of formerly colonized states' motivations in Dutch repatriation policy is evident in the government's explicit acknowledgment of the legitimate demands made by sovereign postcolonial nations. In the official policy document *Beleidsvisie collecties uit een koloniale context*, the Dutch Minister of Education, Culture, and Science affirms that the Netherlands' approach to colonial collections is shaped by "*de sterke roep vanuit landen van herkomst en diasporagemeenschappen om teruggave van cultuurgoederen*" (the strong calls from countries of origin and diaspora communities for the return of cultural objects) (Ministerie van Onderwijs, 2021). This statement signals a significant shift from a previously unilateral colonial framework toward a recognition of cultural sovereignty and historical justice as the normative basis for restitution.

This narrative move not only acknowledges the historical fact of postcolonial independence but also reframes the motivations behind repatriation claims. The Dutch government no longer views such claims as purely administrative or material requests, but rather as political-cultural expressions of national consciousness—one that preceded formal independence. Both *Koloniale Collecties en Erkenning van Onrecht* (2020) and *Beleidsvisie Collecties uit een Koloniale Context* (2021) emphasize that the return of cultural objects plays a vital role in the "reconstruction of national history," the "restoration of cultural dignity," and the "formation of postcolonial identity." Terminologies such as *symbolen van onafhankelijkheid* (symbols of independence), *nationaal erfgoed* (national heritage), and *erkenning van historische onrecht* (recognition of historical injustice) reflect a discursive transformation—one that locates restitution within the realm of symbolic sovereignty and historical redress, rather than collection management alone.

The motivations of formerly colonized states are represented in Dutch policy documents as *good forces*—legitimate and coherent actors grounded in claims for historical justice and cultural sovereignty, rather than as passive responders to colonial injustice. Through this lens, Dutch policy discourse reconstructs the image of former colonies in line with Herrmann et al. (1997)'s colony image—as entities with limited material capabilities but strong normative motivations to end symbolic and political dependence on former colonial powers. While this recognition does not always lead to fully symmetrical engagement, the emergence of nationalist discourse in official policy signals a notable shift in how the motivations of formerly colonized states are framed in the context of cultural restitution.

The emphasis on sovereignty and historical aspiration, particularly in *Koloniale Collecties en Erkenning van Onrecht* (2020) and *Beleidsvisie Collecties uit een Koloniale Context* (2021), presents formerly colonized states not merely as a postcolonial nation driven by nationalist sentiment, but as a rational actor asserting its historical rights through legal, diplomatic, and cultural means. The

narrative of decolonization and the symbolic reconstruction of national history through cultural heritage becomes central to how Dutch policy articulates the motivations underlying restitution demands. Thus, the representation of motivations in Dutch policy discourse reveals a shift from a conventional colony image toward a more adaptive and affirmative construction.

Representing Capability: Recipient States as Entities Still in Need of Guidance

The capability of formerly colonized states is a critical dimension in the discourse on the repatriation of colonial cultural objects. It concerns the extent to which source countries possess the institutional infrastructure, technical expertise, and cultural resources required to assess, preserve, and reinterpret returned heritage. Consequently, it is essential to examine how Dutch policy narratives construct the capabilities of these states—whether as an affirmation of their autonomy or as a continuation of hierarchical relations that position them as subordinate actors in need of technical guidance and supervision from the former colonizer.

Although official Dutch policies emphasize equality and unconditional return, the emphasis on infrastructure, training, and capacity-building simultaneously reproduces a discursive hierarchy that may be read as paternalistic. Indonesia is often portrayed as institutionally and technically unprepared, thus requiring assistance in building museum infrastructure, developing professional expertise, and understanding colonial heritage. This representation is reflected in statements that countries of origin "*behoeven ondersteuning bij het opzetten van een museale infrastructuur met goede bewaaromstandigheden, de opleiding van deskundige medewerkers*" (require support in developing museum infrastructure with proper storage conditions, as well as in staff training) (Adviescommissie Nationaal Beleidskader Koloniale Collecties, 2020).

Infrastructure limitations in formerly colonized countries are often cited as reasons for implementing repatriation cautiously or with specific conditions. In the official report, dialogue partners from Suriname and the Caribbean argued that "*dat eerst de museale infrastructuur op orde moet worden gebracht*" ("the museum infrastructure must first be improved before those countries can receive back all the objects") (Adviescommissie Nationaal Beleidskader Koloniale Collecties, 2020).

In addition, the criteria for assessing repatriation requests also take into account the management conditions in the country of origin. The Dutch government states, "*Ook de beheeromstandigheden op de plaats waar het cultuurgoed bij teruggave terecht zou komen, kunnen bij de beoordeling van een teruggaveverzoek een rol spelen*" ("the management conditions at the location to which the cultural object would be returned can play a role in the assessment of a repatriation request") (Adviescommissie Nationaal Beleidskader Koloniale Collecties, 2020). This indicates that the validity of a claim is not determined solely by historical grounds but also by the technical readiness of the requesting country, assessed through standards embedded in Dutch policy.

Nevertheless, although the capabilities of formerly colonized countries are still often regarded as requiring improvement, the Dutch government ultimately grants them full autonomy in managing repatriated collections. In Indonesia, for instance, concerns over infrastructure resurfaced after the fire at the National Museum on 16 September 2023, which damaged 817 objects made of bronze, ceramics, terracotta, and wood, as well as miniature collections and replicas of prehistoric artifacts (Azhari, 2023). Although the Ministry of Culture emphasized that previously repatriated items were unaffected and the museum reopened in October 2024 as a sign of institutional recovery (Prameswari, 2024), the incident reignited debates regarding Indonesia's technical preparedness. The incident was also noted in Dutch cultural discussions (Reinhart, 2023, DutchCulture), although Dutch authorities emphasized that they can no longer intervene in the management of repatriated collections.

Moreover, in *Beleidsvisie Collecties uit een Koloniale Context*, Dutch authorities reiterate that countries like Indonesia require sustained supervision and collaboration. This is evident in the statement: "*De Indonesische gesprekspartners geven aan intensiever met Nederland en met de Nederlandse musea te willen samenwerken op het gebied van herkomstonderzoek. Expliciet wordt daarbij genoemd het opleiden en de deskundigheidsbevordering van jonge museummedewerkers*" (Indonesian stakeholders expressed a desire to collaborate more intensively with Dutch museums in provenance research, specifically requesting training and capacity building for young museum professionals) (Adviescommissie Nationaal Beleidskader Koloniale Collecties, 2020).

Thus, while Dutch policy documents appear to support collaborative engagement, the narrative structure continues to frame Indonesia as a recipient of technical support rather than an equal partner. These representations sustain a subordinate image within the postcolonial relationship, in which the recognition of technical and epistemic capacity remains conditional upon validation by the former colonial power. Despite rhetorical shifts toward cooperation, Dutch cultural policy continues to reproduce structural asymmetries rooted in the legacies of colonial domination.

Representing Decision-Making: Postcolonial Governance

In postcolonial relations, the decision-making capacity of formerly colonized states serves as a key indicator of whether they are treated as equal partners or remain positioned within a subordinate structure. This subsection examines how Dutch government policy during the 2023–2024 period represents the decision-making agency of formerly colonized countries in determining the course of colonial collection repatriation. The analysis focuses on how these states are portrayed in processes of negotiation, historical assessment, and the attribution of meaning to returned cultural objects—whether as autonomous and rational actors or as entities requiring technocratic validation from the former colonizer.

Dutch policy discourse reflects a shift from unilateral dominance toward the recognition of the discursive autonomy of countries of origin in decision-making processes. The explicit statement from the Advisory Committee on Colonial Collections Policy Framework. that policies concerning colonial collections "*niet eenzijdig gebaseerd zijn op opvattingen van de voormalige koloniale mogendheid, maar mede op de opvattingen, wensen en verwachtingen van het betreffende herkomstland*" ("should not be based solely on the views of the former colonial power, but also on the perspectives, desires, and expectations of the country of origin") (Adviescommissie Nationaal Beleidskader Koloniale Collecties, 2020) signals an opening toward a more balanced relational framework.

This commitment is not only normative but also institutionalized in practice. The Advisory Committee on Colonial Collections Policy Framework. engaged in preliminary online consultations with representatives from countries of origin, as stated in the document: "*de Commissie heeft via het internet verkennende gesprekken gevoerd met vertegenwoordigers van deze landen*" ("the committee has conducted exploratory discussions via the internet with representatives of these countries") (Adviescommissie Nationaal Beleidskader Koloniale Collecties, 2020). This initiative demonstrates a deliberative involvement of formerly colonized states and signals that they are beginning to be treated as discursive partners in shaping policy.

Furthermore, the Dutch government supports the active participation of experts from the country of origin in provenance research, as reflected in the statement: "*Ik vind het ook belangrijk dat deskundigen uit het herkomstland betrokken worden bij het herkomstonderzoek. [...] Gezien de grote hoeveelheid collecties uit Indonesië in de Rijkscollectie heeft de Indonesische regering aangekondigd een commissie in te stellen om gesprekken tussen deskundigen te faciliteren.*" ("I also consider it important that experts from the country of origin are involved in provenance research. [...] The Indonesian government has announced the establishment of a committee to facilitate dialogue between experts.") (Ministerie van Onderwijs, 2021). This statement marks a shift from unilateral control to collaborative decision-making, where the country of origin plays an active role in directing research and shaping the return process.

Nevertheless, Dutch policy also reflects underlying assumptions that the limited documentation of provenance in formerly colonized countries is indicative of their administrative limitations in decision-making. This is evident in the 2023 repatriation process, particularly in the case of Sri Lanka. The provenance research on two *maha thuwakku* firearms noted that "over de herkomst van de maha thuwakku was nauwelijks informatie aanwezig" ("there was hardly any information available regarding the provenance of the *maha thuwakku*") , and for the silver *kastane*, it was stated that "the eighteenth-century archival trails of this object are less certain" (Commissie Koloniale Collecties, 2023d). Since repatriation relies heavily on provenance research, and such research is predominantly based on Dutch archival sources, while the committee frames

these limitations primarily as gaps in available information, the structural reliance on Dutch archival sources nevertheless reproduces asymmetry. Consequently, the decision-making power over repatriation outcomes remains largely in the hands of the Dutch state.

In this context, the Colonial Collections Committee stresses the importance of balancing diligence and expediency, as articulated in its operational principle: "*Uitgangspunt bij de werkwijze van de commissie en het reglement is een balans tussen zorgvuldigheid en voortvarendheid. (…) Nodeloze vertraging zou afbreuk doen aan de beleving van het gewenste herstel van onrecht*" ("The guiding principle for the committee's work and regulation is to strike a balance between care and efficiency. (…) Unnecessary delays would undermine the perception of the desired redress of injustice") (Ministerie van Onderwijs, 2022). While procedural in tone, this statement reflects a Dutch sense of urgency and implicitly reinforces the perception that formerly colonized countries may still lack the institutional capability to manage decision-making processes efficiently.

In sum, Dutch policy in 2023–2024 reveals an ambivalent representation of decision-making agency. On one hand, it acknowledges the deliberative capacity of formerly colonized states; on the other, it continues to imply doubts about their ability to govern efficiently. Within the framework of image theory (Herrmann et al., 1997), such representations position postcolonial states as increasingly rational and sovereign actors, yet still subject to verification and

oversight by the former colonial power. As such, postcolonial relations in the context of repatriation remain embedded in a decision-making structure marked by asymmetry and lingering hierarchies.

Analyzing Dutch government documents through the lens of the colony image demonstrates that the representation of formerly colonized states continues to be marked by asymmetric patterns that shape the direction of repatriation policy. The motivations of former colonies are acknowledged as legitimate insofar as they are framed through narratives of decolonization; however, their capabilities are portrayed as inadequate and in need of external assistance, while their decision-making capacity is considered subject to verification by the former colonizer. These perceived limitations underpin the policy emphasis on provenance research and technical supervision, which places the burden of proof on the country of origin, while the final decision ultimately remains in the hands of Dutch authorities. This dynamic explains why, in cases such as *Lewke's Cannon*, repatriation only became possible once Dutch institutions validated the historical and scientific legitimacy of the claim.

As the image of former colonies shifts toward recognition as sovereign partners, the discursive implications for policy also transform. Restitution is increasingly reframed not merely as an administrative matter but as an issue of historical justice and cultural sovereignty. This shift is evident in Dutch policy documents from 2020–2024, which more explicitly acknowledge the political motivations of formerly colonized states and

establish institutional mechanisms enabling them to submit claims directly. The ability of countries such as Indonesia to actively select symbolic objects—such as the *Lombokschat* or the *Kris Klungkung*—demonstrates how recognition of agency alters the structure of negotiation: repatriation becomes a bilateral process in which formerly colonized states gain discursive and procedural space to shape outcomes.

Thus, the application of image theory highlights the close interconnection between perception and policy. As the colony image shifts toward recognition of sovereignty, policies correspondingly evolve toward partnership, dialogical exchange, and institutional collaboration. Nevertheless, the dimensions of capability and decision-making remain conditional, paternalistic, and often framed as concessions granted by the Netherlands. Dutch acceptance of claims submitted by Indonesia and Sri Lanka illustrates how changes in the perception of motivation, capability, and decision-making capacity produce transformations in policy discourse. In this sense, the trajectory of Dutch repatriation policy can be read as a reflection of the slow but tangible transition from a colony image toward a more equitable postcolonial partnership.

Conclusion

This analysis demonstrates that Dutch repatriation policy reflects a gradual shift from the colony image toward greater recognition of the symbolic sovereignty of formerly colonized states. Through the application of image theory, it becomes evi-

dent that the representations of motivation, capability, and decision-making capacity of source countries have undergone a transformation that progressively opens broader avenues for participation. Policy developments during the 2020–2024 period indicate an increasing opportunity for formerly colonized nations to submit claims and shape discourse, thereby positioning repatriation not merely as the return of cultural objects but also as a postcolonial political process oriented toward historical recognition and cultural sovereignty.

Moreover, the application of image theory reveals how shifts in Dutch perceptions of former colonies have direct implications for the policy framework. As long as the colony image remained dominant, repatriation policy tended to emphasize technical supervision and scientific validation by Dutch institutions, as illustrated in the historical process surrounding the restitution of *Lewke's Cannon*. However, once the representation of source countries began to shift toward recognition of agency and sovereignty, policy mechanisms likewise evolved toward more dialogical approaches, including the formal acknowledgment of the right of formerly colonized states to submit claims and actively participate in negotiation processes.

For Global South nations, on the other hand, repatriation seems to emerge as an arena to negotiate meaning, legitimacy, and their position within contemporary international relations. In 2024, Indonesia established a Ministry of Culture, signaling greater institutional attention to cultural issues. The establishment of the Directorate Gen-

eral of Cultural Diplomacy, Promotion, and Cooperation within this ministry indicates a strengthened state agency to negotiate repatriation more assertively. The presence of such a bureaucratic unit enhances the capacity for more active engagement in repatriation negotiations while simultaneously affirming the Global South's bargaining power in the sphere of international cultural politics.

This study, however, has limitations. Its focus lies primarily on perceptual and representational dimensions, without engaging in a deeper analysis of domestic political contestation in the Netherlands or the role of broader European regional dynamics in shaping repatriation policy. Future research is therefore needed to examine the extent to which domestic politics, regional pressures, and Dutch colonial perceptions of Indonesia interact to produce current policy outcomes. A multi-level approach would provide a more comprehensive understanding of the drivers behind policy change while enabling more accurate predictions regarding the future trajectory of Dutch repatriation policy.

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