

Restitution: Between Containment and Cooperation

Julia von Sigsfeld

Ethnologisches Museum and Museum für Asiatische Kunst, Staatliche Museen zu Berlin

Abstract: Museum practice has been shaped decisively in recent years by a ‘collaborative turn’. Celebrated with optimism and critiqued with wariness alike, collaboration has become central to how anthropological museums approach their work. Beyond individual collaborative projects, museums are now facing the deeper challenge of structural change. When it comes to restitution, collaboration can open up meaningful pathways. At the same time, however, restitution constitutes and in many ways exposes the limits of collaboration. This article explores the potentials and boundaries of collaboration in the context of restitution. While many structural challenges remain unresolved, the paper argues that there are possibilities to reshape restitution in more ethical terms, and that museums have the agency to do so. [*restitution, repatriation, collaboration, restitution governance*]

Introduction

Collaborative formats in museums are not at all recent but have been firmly embedded in museum practice since the new museology debates of the later twentieth century and have been celebrated and criticized alike. In recent years, however, they have gained even more importance. Following a more decided phase of institutional reflexivity over the past ten to fifteen years, anthropological museums in Germany and elsewhere are increasingly treating collaborative approaches as a cornerstone of their work (Scholz 2017; Labischinski 2020; Ballestero and Petschelies 2023).

Collaboration has therefore become a central response of anthropological museums as they navigate their colonial legacies and the future of the cultural belongings in their ‘care’ or housed in their ‘collections’. This turn towards collaboration reflects an awareness that the authoritative and exclusive position that institutions formerly occupied is no longer tenable, ethically justifiable or beneficial. It is essential to approach collaboration critically as both a discursive formation and a discursive practice, particularly in relation to restitution, given that the history of restitution is primarily one of refusal, denial and the persistence of coloniality.^{1, 2, 3}

1 Coloniality as a condition and system of power refers to the reproduction of relations and structures of inequality and exploitation in the aftermath of or beyond formal colonialism (see Quijano 2000; Lugones 2007).

2 See Open Restitution Africa’s research into the history of restitution cases (Open Restitution Africa: Climbing Mountains. openrestitution.africa. <https://openrestitution.africa/climbing-mountains/>, accessed April 2, 2025).

3 As a discursive formation, collaboration can be understood as the conceptual and normative frame-

The article will reflect upon restitution⁴ and collaboration, arguing that while collaboration can open up meaningful pathways to restitution, it also constitutes and in many ways exposes the limits of collaboration. Regardless of the structural challenges that pose profound challenges to restitution, particularly to its implementation in meaningful and just ways, it will also be argued that there are concrete possibilities to reshape restitution in more ethical and accountable terms.⁵

Collaboration as Containment? Historic Tensions between Collaboration and Return

If one looks at the long history of restitution claims, it is evident that historically collaboration has been put forth and posited against restitution. In many cases – frequently in the absence of legal or policy grounds for restitution and due to a lack of political will – collaboration has been proposed as a purportedly acceptable alternative.

Most recently, the new director of the British Museum, Nicholas Cullinan, stated in an interview that, rather than ‘undoing’ the collections, the museum’s future lies in collaborations (Kendall Adams 2025). The British Museum, Cullinan suggested, is a ‘global museum for everyone and [is] not going to be embarrassed about that anymore’ (ibid.). An earlier example dating back to the 1960s is a request from the Congolese government for the repatriation of works exhibited by the Royal Museum for Central Africa (Tervuren) as part of a travelling exhibition in the United States and Cana-

work that renders certain approaches possible, necessary and desirable. As a discursive practice, it takes shape in the concrete methods and means through which collaboration is enacted and negotiated. This article can only delve into these selectively; more systematic research could untangle the intricate dynamics of restitution and collaboration in different settings and under different conditions.

4 The article refers to the restitution of cultural belongings taken in so-called ‘colonial contexts’ (explicitly widely framed). Restitution, repatriation and return are used interchangeably here throughout. The terminology used to describe appropriated and musealized entities is necessarily contested: they may be artefacts, animated or sacred items, belongings, or (more-than-human) beings understood not as material property but as kin. I will mostly use the overarching term ‘cultural belongings’ here throughout to foreground their embeddedness in social, spiritual and historical relations, whatever their ontological status, or their relational bonds with people and communities (see e.g. Gouaffo 2023).

5 This article is based on analytical reflection and is informed by my current position as restitution coordinator of the Ethnological Museum and Museum of Asian Art in Berlin, as well as research conducted on restitution frameworks as a 2024 postdoctoral fellow of MECILA (The Maria Sibylla Merian Centre Conviviality-Inequality in Latin America). It draws on critical museum studies and is influenced by my positionality as a German-Latin American (non-Indigenous, *white*) social scientist and museum practitioner. The cases referenced, which refer to broader trends in the ‘Western’ museum sector, though focusing primarily on the German context, were selected based on their illustrative value for demonstrating structural patterns and tensions in restitution practice, particularly as they relate to collaboration.

da (Savoy 2021:20). The museum holds extensive collections from the Congo, taken during Belgium's colonial rule through coercive, extractive and violent means. The museum rejected the request and instead offered cooperation in the construction of a national museum as a precondition for potential loans (*ibid.*).

As standard practices of museum collaboration, the manufacture of replicas or the negotiation of temporary loans have similarly been deployed in efforts to circumvent restitution. A striking example dates back to the 1930s, when Oba Akenzua II (1899–1978), monarch of the Kingdom of Benin, requested the return of two royal throne stools looted during the 1897 British military expedition and later acquired by the Ethnologisches Museum Berlin.⁶ The Staatliche Museen zu Berlin declined the request but offered to produce replicas at the Oba's expense (Peraldi 2017:26). The replicas were dispatched from Germany in 1938, bearing the inscription: 'Replica of Oba Eresoyen's Stool / Oba Esigie's Stool, 1897 Benin Expedition war trophy now in the State Museum in Berlin' (*ibid.*). Decades later, Nigerian curator Ekpo Eyo attempted unsuccessfully to secure Benin Bronzes as loans for an exhibition accompanying the 1977 World Black and African Festival of Arts and Culture (FESTAC). The Stiftung Preußischer Kulturbesitz (the institutional context I am situated in at the time of writing as restitution coordinator of its Ethnologisches Museum and Museum für Asiatische Kunst) had refused Eyo's permanent loan request to display the Benin Bronzes in its possession a couple of years earlier, in 1972. The British Museum declined the loan of the original Queen Idia mask, which became the FESTAC festival's logo, from its collections. The British Museum still houses the replica that it offered as the alternative (Savoy 2021:90). While loan requests have been denied during restitution debates, they have also been offered as substitutes for returns. In 2009, for example, the Stiftung Preußischer Kulturbesitz declined a request by Nso' authority Fon Sehm Mbinglo I for the restitution of the Ngonso', the mother or founding ancestral figure of the Nso' people in present-day Cameroon, taken by German colonial officers in the context of German colonization. Instead, the Foundation proposed a loan, conditional upon adherence to museum conservation standards (Gram and Schoofs 2022:43).

Together, such cases demonstrate how collaboration and its associated mechanisms have at times functioned as a strategy of institutional retention and have served to postpone and displace demands or slow down processes of return. Rather than enabling return, collaboration has at times been mobilized to sustain institutional authority. At the same time, it is a key framework through which restitution is negotiated and, as I shall argue, it can be expanded upon and reimagined from here onwards. The following section turns to this ambivalence.

⁶ The 1897 British military invasion of the Kingdom of Benin was followed by looting of its cultural heritage (e.g. Digital Benin: Oral History. Prof. Osarhieme Benson Osadolor – British Invasion of Benin. <https://digitalbenin.org/oral-history/interactive/81>, accessed July 29, 2025). This in turn led to the dispersal of Benin's royal and cultural heritage across museums and private collections worldwide, with the so-called Benin Bronzes becoming emblematic of such colonial plunder.

Between Collaboration and Restitution

'Western' anthropological museums have undergone several discursive shifts in recent decades. These range from earlier claims to be fulfilling an encyclopaedic mission, to embodying universality, to more recent narratives of circulation or shared stewardship, and most recently collaboration (e.g. Abungu 2008; von Bose 2016; Tsogang Fossi 2025). On the one hand, collaboration may function as a renewed legitimizing strategy (Labischinski 2020). It can serve as a means through which museums seek to maintain relevance, while continuing to inscribe themselves in the futures of the cultural belongings and entities that have been turned into the museum objects they are being asked to relinquish. This raises the question: has 'collaboration' become the new buzzword, following the rhetorical appropriation and dilution of 'decolonization'? In this reading, collaboration risks becoming a mechanism of containment, offering engagement without surrendering control. It increasingly appears to overshadow both the surrendering of institutional spaces and of authority, and the acknowledgement of sovereignty over cultural heritage by descendant and Indigenous stakeholders and communities.

On the other hand, museums remain important sites for engaging with colonialism, colonial legacies and the challenges of decolonization. In Germany and elsewhere, change-oriented museum practice is currently threatened by reactionary and right-wing politics and attacks on pluralist memory politics. What is more, restitution cannot be reduced to one-off performative and self-contained acts that abdicate responsibility. Instead, restitution must be embedded in long-term commitments which require building ethical relations around accountability (Sarr and Savoy 2018). In this sense, collaboration can be and often is a strongly voiced demand by descendant communities. Museums living up to their responsibilities can entail, precisely, committing to the duties of care that result from their amassing of cultural belongings. This is particularly relevant given the indiscriminate conservation treatment with biocides, which have rendered many artefacts hazardous, complicating access and return. This calls for a further shift in institutional self-understanding, from museums as bastions of 'expert' knowledge to facilitators of engagement. Glicéria Tupinambá, for instance, who played a key role in the repatriation of an *Encantado*, a Tupinambá feather cape, from the National Museum of Denmark,⁷ envisions museums as potential spaces of encounter where Indigenous voices activate objects and bring them back to life again (Tupinambá and Brulon Soares 2023).

⁷ The Tupinambá feather mantle originates from the Tupinambá people. Within Tupinambá cosmology, the mantle is not merely an artefact or cultural belonging but an *Encantado*, a being with spiritual presence, agency and ongoing relational significance. It is understood as a living entity connected to ancestry, memory, and territory (Tupinambá et al. 2024). It was taken to Europe from present-day Brazil in the seventeenth century during the early period of colonial contact. The mantle came into the collection of the National Museum of Denmark in the nineteenth century. In 2024 it was transferred from Denmark's Nationalmuseet to Brazil's Museu Nacional.

As restitution increasingly becomes a cornerstone of contemporary museum practice, there is a growing emphasis on processes that emerge from and are shaped by collaboration. In many instances, collaboration is a necessary precondition for meaningful restitution. A significant example and precedent for the Ethnologisches Museum in Berlin was the collaborative project ‘Confronting Colonial Pasts, Envisioning Creative Futures’ (2019–2022), jointly undertaken by the museum and partners from the National Museum of Namibia (Binter and Ha-Eiros 2021). The collaborative project enabled deep engagement with the cultural belongings from Namibia by bringing together diverse sources of knowledge, forms of expertise and perspectives (Binter 2025). Instead of focusing primarily on the cultural belongings with links to the German genocide against the OvaHerero and Nama, the Namibian experts foregrounded earlier belongings, focusing on exploring their potential for future creative uses and cultural practices (Binter et al. 2024:95). As part of the project, twenty-three selected items were transferred to Windhoek for research and community engagement, and in 2024 ownership was permanently transferred by the Stiftung Preußischer Kulturbesitz. This process illustrates the productive potential of dialogue, shared research and circulation as steps towards restitution. Yet despite such advances, restitution is still too often treated as the *conclusion* to a process, one involving extensive provenance research into concrete contexts of appropriation that must predate any return dialogues. However, scholars and practitioners have long argued that restitution should not be viewed as an endpoint, but as a step within an ongoing process of (re-)engagement, reconnection and repair.

How far can collaboration go, however, when it is restricted by structures governing restitution that remain fundamentally unchanged? The next section considers how these structural conditions – national and international legal frameworks, institutional governance and policy ambiguities – shape and often limit the scope of restitution, posing constraints on collaborative aspirations.

Structural Conditions Governing Restitution

Museums are embedded in the structures of a (post- and neo-)colonial world and nation state-based world system. Within this system, restitution is implemented according to the (modern-colonial) logics of ownership. Historically, struggles for restitution have mainly been marked by asymmetry, by one-sided efforts and an unwillingness to establish (binding) mechanisms for return. Attempts to apply the 1970 UNESCO Convention on the Means of Prohibiting and Preventing the Illicit Import, Export and Transfer of Ownership of Cultural Property retrospectively have failed. A ‘right to restitution’ was ultimately excluded from the 2007 United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP). As a result, in the absence of enforceable international legal grounds, restitution has continued to depend largely on bilateral

negotiations and political will (van Beurden 2024:54). Cases of restitution are governed not only by public property law, such as the regulations around the de-accessioning of public goods,⁸ but also to a large extent by ‘political and diplomatic calculations’ (Losson 2022:198).⁹

As scholars have argued, restitution has largely been shaped by a regime which privileges the nation-state, tends to support the nationalization of cultural heritage, and is shaped by universalist claims to science and essentialist views of culture (Bienkowski 2016; Acuto and Flores 2019). In such a system, defined by state-to-state diplomacy, descendant communities and subnational stakeholders lack the formal means to claim the return of cultural belongings. Whether or not communities are able to engage in restitution processes internationally depends on the national legal frameworks that govern their right to self-determination (Ochoa Jiménez 2019, 2022).

In Germany, no specialized legislation exists to address the return of cultural belongings removed from their places of origin prior to 2007, when the *Kulturgutschutzgesetz* came into force, a law which does not apply retrospectively. As a result, claimants lack formal judicial pathways to pursue restitution.¹⁰ Restitution has so far relied primarily on political will, guided by the Framework Principles, a position paper issued in 2019, and will henceforth be informed by the newly issued Guidelines.^{11,12} These provide a basis for the repatriation of human remains, and the restitution of ‘artefacts from colonial contexts [...] appropriated in a way which is no longer legally and/or ethically justifiable.’¹³ In practice, cases have relied on demonstrating the context of injustice in the removal of cultural belongings, as well as on their special significance, as recommended by the German Museums Association’s Guidelines (2021).¹⁴ Yet this

8 See Pöschl (2024) for a detailed account.

9 See Aguigah (2023), Aguigah and König (2025).

10 See Thielecke (2020), Thielecke and Geißdorf (2021), for detailed accounts from the legal perspective.

11 Auswärtiges Amt. Framework Principles for dealing with collections from colonial contexts. <https://www.auswaertiges-amt.de/resource/blob/2210152/b2731f8b59210c77c68177cdcd3d03de/190412-stm-m-sammlungsgut-kolonial-kontext-en-data.pdf>, accessed July 24, 2025.

12 The new Guidelines, published on 14 October 2025 during the final stages of this article’s editing, expand upon the 2019 Framework Principles. Among other aspects, they foreground dialogue with ‘societies of origin’ and ‘states of origin,’ emphasize an interdisciplinary approach to (provenance) research, and call for museums to take an active role in repatriating human remains and identifying objects that were unethically or illegally appropriated. They further underscore respect for the individual ontological, epistemological and spiritual dimensions of each restitution process, as well as the unconditional nature of returns. See: Der Beauftragte der Bundesregierung für Kultur und Medien: Gemeinsame Leitlinien zum Umgang mit Kulturgütern und menschlichen Überresten aus kolonialen Kontexten. https://kulturstaatsminister.de/fileadmin/user_upload/Downloads/Aufarbeiten/CDR_251014_Gemeinsame_Leitlinien_Koloniales.pdf, accessed October 22, 2025.

13 See footnote 10 (Framework Principles, 2019:6) and footnote 12 (Gemeinsame Leitlinien, 2025:10).

14 For an overview of open restitution cases in Germany, see the civil society-led Restitution Monitor (Fues, Thomas: German Colonial Restitution Monitor. Dekolonial Erinnern/decolonial memories. <https://dekolonial-erinnern.de/german-colonial-restitution-monitor/>, accessed July 24, 2025).

framework is marked by ambiguities, particularly in terms of how ‘unethical’ or ‘illegitimate’ appropriation is defined and assessed, as well as the criteria for determining ‘cultural significance’. As with other (non-binding) frameworks, it raises critical questions about the legitimization of claims and the (in-)validation of the criteria put forth, as well as the methodologies that lead up to assessments (see e.g. Bienkowski 2014; Keenan 2023).

Achieving greater accountability when it comes to restitution requires the establishment of clear overarching legal, policy and governance frameworks (Mehler 2024). Such frameworks can provide more solid foundations for return processes. This would include designated funding and help advance good practices that predate restitution, such as facilitating the flow of information on cultural belongings held by museums, as well as in-person visits.¹⁵ Although legal frameworks risk narrowing the scope of returns through restrictive criteria, it could be argued that a legal framework has the potential to empower claimants and establish baseline standards of transparency and due process. Such a law would need to be drafted through broad consultation involving international experts, involved stakeholders, civil-society members and museum professionals. Further discussions are needed surrounding a legal framework and its pitfalls in Germany, where discussions around the possibility of a restitution law have been limited, partly due to the complexity of the federal system. Activists and engaged professionals have specifically called for a law on the repatriation of ancestral remains that would facilitate their return and prohibit their commodification on the art market.¹⁶

All in all, there remains significant potential for consolidating Germany’s restitution governance,¹⁷ particularly when looking at international examples. Countries

15 See Statement by the Expert Network on the Handling of Human Remains, July 1, 2024 (Kulturgutverluste. Stellungnahme des Expert*innen-Netzwerks zum Umgang mit menschlichen Überresten. https://kulturgutverluste.de/sites/default/files/2024-07/2024-07-01_Stellungnahme%20zu%20Restitutionsfonds.pdf, accessed April 2, 2025).

16 See Petition on the formation of the new Federal Government, January 19, 2025 (Fues, Thomas: Petition to Germany’s next government. Dekolonial Erinnern/decolonial memories. <https://dekolonial-erinnern.de/petition-to-the-future-german-government/>, accessed April 2, 2025). See: Der Beauftragte der Bundesregierung für Kultur und Medien: Gemeinsame Leitlinien zum Umgang mit Kulturgütern und menschlichen Überresten aus kolonialen Kontexten. https://kulturstaatsminister.de/fileadmin/user_upload/Downloads/Aufarbeiten/CDR_251014_Gemeinsame_Leitlinien_Koloniales.pdf, accessed October 22, 2025.

17 Several important steps have been taken in Germany in recent years, following decades of activist and scholarly efforts to make Germany address its colonial past, including collections from colonial contexts and their restitution. These include the establishment of a dedicated funding line for colonial-context provenance research at the German Lost Art Foundation in 2019, the launch of the Contact Point for Collections from Colonial Contexts in 2021, and the *Bundestag* Budget Committee’s October 2024 funding approval for a designated Contact Point for Ancestral Remains. Nevertheless, a comprehensive approach to restitution was not implemented by the 2021–2024 federal government (Fues 2024). A restitution fund of 2.4 Mio. Euros – contingent on the clarification of responsibilities between the

such as the Netherlands¹⁸ and Switzerland,¹⁹ for instance, have set up commissions as advisory bodies tasked with reviewing claims and issuing recommendations. These precedents show how external expertise can support restitution processes while promoting transparency through the public accessibility of provenance research findings and the resulting recommendations. From the perspective of how processes might be opened up further, they point to the importance of redesigning (institutional) decision-making structures to allow external input by non-institutional voices that goes beyond consultation.

Despite constraints embedded in broader governance systems, there are pathways to strengthen accountability, transparency and ethical commitment within current museum restitution practices. Their institutional structures, decision-making procedures and policies shape how these broader frameworks are interpreted and enacted in practice. The following section turns to these institutional workings.

Institutional Responsibilities and Ethical Restitution Practice

Museum practices concerned with the future of cultural belongings or entities, often grounded in partnerships such as collaborative provenance research, face significant challenges when it comes to the concrete process of restitution. Restitution tests the limits of such partnerships, demanding critical reflection on both the overarching restitution governance framework and the institutional procedures through which it is enacted.

Federal Foreign Office and the Federal Government Commissioner for Culture and Media – was not implemented before the collapse of the governing coalition at the end of 2024 (ibid.). The new 2025 Guidelines (see footnote 20) stipulate that the Federal Foreign Office will lead talks on restitution and that the federal government, the states and municipalities share the ‘responsibility’ for providing funding for restitutions and repatriations (2025:14). At the time of writing, the scope and operationalization of this funding remain unclear. In procedural terms, the Guidelines establish communication channels for return requests and emphasize the required consent of the state of origin in restitution procedures. They also express the intention to create a unified procedure among the federal state, the states and municipalities, in cooperation with the Federal Foreign Office and the Federal Commissioner for Culture and the Media. In addition, the Guidelines announce the formation of an expert body tasked with providing advice and guidance on repatriation and restitution processes. However, the Guidelines leave the detailed procedures to be defined at a later stage. The specific mandate and role of the expert body remain unclear at the time of writing.

18 Colonial Collections Committee. <https://committee.kolonialecollecties.nl>, accessed April 2, 2025.

19 Swiss Federal Office of Culture, Latest News 2023 (Bundesamt für Kultur: Bundesrat schafft eine unabhängige Kommission für historisch belastetes Kulturerbe. <https://www.bak.admin.ch/bak/de/home/aktuelles/aktuelles---archiv/aktuelles-2023/bundesrat-schafft-eine-unabhaengigekommission-historisch-belastetes-kulturerbe.html>, accessed April 2, 2025).

At the individual institutional level, museums play a pivotal role in shaping how restitution is implemented in practice and in direct communication with descendant communities and restitution stakeholders. Provenance research approaches, dialogue frameworks and internal governance structures determine how returns are implemented. Institutional approaches take on heightened significance given the absence of binding legal obligations. In practice, museums are often caught between meaningful community collaborations and the limitations imposed by the superseding governance of restitution. Further constraints arise given the absence of established institutional procedures for evaluating restitution requests beyond basic legal assessments. Decision-making processes are often opaque and hierarchical, leaving descendant communities and other stakeholders without clarity on criteria, procedures and timelines. As Bienkowski (2014) among others has argued, this risks reproducing harm and coloniality in the restitution processes themselves.

While overarching frameworks set the structural conditions under which restitution is possible, institutional practices shape how restitution is negotiated and enacted in practical terms. As argued here, there is the potential to take further an ethical restitution practice at the institutional level. This entails, at a minimum, making publicly available clear information on governance structures, procedures, contact persons for restitution inquiries and, where appropriate, detailed restitution reports.²⁰ Improving procedural accountability is essential: both the so far ad-hoc nature of many restitution processes in Germany and institutional opaqueness under the larger restitution framework have undermined trust by descendant communities.

As briefly mentioned above, there are significant limits to the decolonizing potential of restitution due to both its inscription in a world-system marked by ongoing coloniality and systems governing relationality marked by coloniality. As a result, restitution is often caught up in epistemological and ontological tensions arising from its relation to not just hegemonic ownership, but also the 'science' regime. Even though every case of restitution is unique and varies greatly in the way it unfolds, institutions must engage in reflective learning to refine their responses and procedures. Experiences from other museums, particularly those shaped by community- and Indigenous-led processes, can help inform the development of institutional guidelines, including policies for the proactive identification of potential cases of return as an ethical obligation going beyond the reactive response to claims.

Regardless, then, of the critical questions that can and should be raised about restitution, it remains important to ask: what (concrete or immediate) potential exists for greater accountability and for facilitating restitution as a cornerstone of postcolonial collaborative museum work?

²⁰ The Museum der Kulturen Basel, for instance, recently published a report online following the restitution to Veddah cultural centres in Sri Lanka (Museum der Kulturen Basel: Provenance Research. Restitution Dambana, Sri Lanka. <https://www.mkb.ch/dam/jcr:0ea359e3-d70d-482c8120-34a147ac39b3/Bericht%20zur%20Restitution%20Dambana.pdf>, accessed April 2, 2025).

Rethinking Knowledge Production and Engagement towards Restitution

In the past century, (anthropological) scholarship has reflected profoundly upon the ethics of knowledge production, especially in relation to the enduring power of coloniality. In this view, collaboration is a political practice embedded in unequal structures of power and recognition. Engaging with debates on epistemic justice allows for a deeper interrogation of how collaborative museum practices may reinforce or resist the very colonial structures they seek to redress. Far from being emancipatory a priori, collaboration must be situated within debates about the politics of knowledge, epistemic authority and representation, and reciprocity (e.g. Escobar 2003; Leyva et al. 2015). Likewise, museum restitution must be understood as a site of negotiation shaped by asymmetries in voice, access and valuation of knowledge.

If restitution is to be taken seriously as part of a broader socio-cultural process (Rasool in von Bose and Kuhn 2024), knowledge production surrounding restitution is not to be understood as an academic activity alone but as part of a wider process of social reckoning (van Beurden 2024). The first step towards more ethical restitution is to address the processes of knowledge production and negotiation that precede it. To confront knowledge hierarchies inscribed in restitution practices, the research supporting cases and legitimizing decisions requires re-evaluation. Knowledge that informs return processes cannot be generated solely or primarily from within institutions. Restitution can no longer rely on a narrow understanding of provenance research as an evidentiary exercise, caught within the (problematic) dichotomy of 'legitimate' versus 'illegitimate' acquisition (von Bose and Kuhn 2024). As Tsogang Fossi puts it:

What makes colonial collections [a] rather sensitive heritage [...] is not only the fact that entities have been taken with violence and violation, cunning or threats, death and desecration, but also the impossibility of re-evaluating them because the conditions for these cross-interpretations are arrogantly denied by certain actors or are politically hindered by a mode of operation that is strikingly reminiscent of colonial patterns of domination. (Tsogang Fossi 2025:109)

Over the past decade, postcolonial provenance research has emerged as an interdisciplinary and relational field, something which needs to be integrated more firmly within institutional approaches. Provenance research is increasingly understood as a cooperative and open-ended process of knowledge production that critically engages with historical and ongoing power dynamics and investigates the origins and histories of cultural belongings through a close exchange between diverse holders of knowledge (Binter et al. 2024:93). This approach moves beyond archive-based methods by embracing embodied, oral and performative knowledge traditions (ibid.). To displace institutional authority and monopoly over judgements, new methodologies must be embraced. Such methodological shifts are also crucial for structuring the relational pro-

cesses through which institutions and descendant communities and other stakeholders engage with restitution demands. This includes creating spaces for multi-perspective exchange, negotiation of standpoints, co-produced solutions and the development of joint (and creative) approaches.

One possible example of such dialogical engagement is the 2021 resumption of dialogue around the return of Ngonnso' (introduced above), following years of stalled exchanges and a process riddled with tensions and diverging standpoints surrounding the determination of the historical context of the loss and the circumstances of appropriation. Activities and protests by the campaign #BringBackNgonnso led by Sylvie Njobati have played a crucial role in drawing public attention to the longstanding restitution claim. Cooperation with Verena Rodatus, curator at the Ethnologisches Museum, led to a jointly curated online workshop that brought together Cameroonian historians, diaspora activists, Nso' community members, museum professionals, provenance researchers and representatives from various German institutions (Gram and Schoofs 2022: 43). The workshop marked an important attempt to approach restitution as a more dialogical process.²¹ The workshop's participants were able to discern the violent appropriation of Ngonnso' during the German colonial period, and, on the basis of descendant community knowledge, the central, cultural significance of Ngonnso' for the Nso' people.

Restitution practice, then, must be rooted in prior learnings and be adaptive to each context. It must respect Indigenous and cultural protocols and embrace what has been called a 'dialogue of knowledges' by decolonial approaches (see e.g. Leyva et al. 2015). Reframing restitution as part of a broader collaborative (but community-defined) approach to the care of collections allows returns to be embedded in processes of engagement, ritual and revitalization and not constitute an 'endpoint' to an adversarial, legalistic and bureaucratic process which can end up or often has ended up reproducing harm in the process.

In sum, addressing both the overarching governance framework and the institutional practices informed by them opens up ways of conceiving and practicing restitution not just as a transfer of ownership and/or the return of a museum object, but as *part* of collaborative attempts at building possibly new relations and giving meaning to ethical museum practice.

21 The Board of Trustees of the Stiftung Preußischer Kulturbesitz gave way to the restitution of the Ngonnso in 2022, but the entity remains in Berlin while the recently formed Cameroonian Restitution Commission decides on an overarching restitution plan and presents the German side with a government-backed return request. See: Ethnologisches Museum Berlin, press release, June 28 2022 (Ethnologisches Museum: Returning the Ngonnso' to Cameroon, <https://www.smb.museum/en/whats-new/detail/ethnologisches-museum-path-is-clear-for-returning-the-ngonnso-to-cameroon/>, accessed April 2, 2025).

Conclusion

As argued here, addressing both governance frameworks and institutional practices opens up the possibility of a museum restitution practice that is ethical, accountable and (more) relational, being situated within a larger commitment to care and of building descendant community-and Indigenous-defined futures. In any case, collaboration must not become another instrument of institutional power. It should never be imposed, however indirectly, as a precondition for negotiating returns. Restitution may at times take the form of a refusal to collaborate and as a rightful, decolonizing claim. Ultimately, however, each case of restitution unfolds within a unique context of political dynamics, power relations and discursive strategies. To grasp the concrete power relations and nuances, we need in-depth case-study research, ethnographies of collaboration and restitution processes, exploring how they are negotiated, and identifying the intricate dynamics in concrete cases (e.g. Ballestero and Petschelis 2023). Further collaborative, transdisciplinary reflections as represented in this issue of *Zeitschrift für Ethnologie* (2026) will be essential for shaping museum collaboration and more just and forward-looking practices of restitution.

Author's Note

An AI-based tool (ChatGPT) was used for spelling and grammar correction, as well as for the minor linguistic revision of existing sentences (language editing only); the author remains responsible for all content.

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