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Auer, Jens; Segschneider, Martin

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‘Princess

Hedvig Sofia’  
and the Great

Northern War







'Princess Hedvig Sofia'  
and the Great Northern War



# ‘Princess Hedvig Sofia’ and the Great Northern War

EDITED BY  
RALF BLEILE AND JOACHIM KRÜGER



STIFTUNG  
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## EDITING

Angelika Abegg-Wigg

## ENGLISH PROOFREADING

Wilson Huntley

## IMAGE EDITING

Dorothea Berg, Jürgen Schüller

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# Underwater cultural heritage and international efforts to protect it, notably through UNESCO

THIJS J. MAARLEVELD

## Prologue

Archaeological research in Germany is embedded in an intricate system of cultural heritage management. Although this system developed slightly differently in the respective federal states, it builds on a long tradition, and integrates built heritage, prehistoric monuments and deeply buried archaeological deposits alike. What would be more logical than to integrate maritime remains and finds under water in this same system? Nothing, of course, but a wide range of challenges remains.

The reasons for this are actually quite a few. For one thing, unlike internal waters, the sea is not governed by the laws of one state alone, not to speak of the laws of individual federal states (and in Germany the protection of cultural values, including heritage, is not a matter for the federation, but for the individual states). The sea is and has always been a space that is governed by international agreement and power politics. The Law of the Sea is international law and closely connected with agreements governing war and peace. While peace prevails, it is not very attractive to upset that delicate balance. For another, heritage protection and archaeological research may be embedded in long traditions, but these traditions do nevertheless vary, not only among individual federal states, but across the globe. Thirdly, exploration of the underwater world has not, and certainly not primarily, been steered with protection of its heritage in mind. In fact, and partly this is still the case, the exploration of the deep is to a large extent guided by contingency and adventure, by a desire to go where no one has gone before.

A corollary of this approach is the wish to show physical evidence of one's adventurous endeavours once the adventure is concluded; in other words to collect and bring home souvenirs. In its extreme and commercialised form this may lead to extensive treasure hunting, a practice that has long been ostracised in connection with national treasures and archaeological remains on land, despite continued and harrowing excesses worldwide in areas where government fails. At sea, however, it openly continues. Where underwater cultural heritage is concerned, treasure hunting profits enormously from a fourth factor that distinguishes maritime life and dispute regulation at sea from the way people behave on land. This is the code of maritime behaviour which relates to jetsam, flotsam and wreck and which has been codified in salvage law ever since law codes were established. Never designed to deal with heritage issues, or the organisation of archaeology, salvage law has nevertheless frequently been cited in relationship to remains of the past, with very problematic results. Problems and challenges, however, are no reason to shun





Fig. 1  
Portrait of the Dutch  
lawyer and statesman  
Hugo de Groot, also  
known as Hugo Grotius,  
by Michiel Jansz.  
van Mierevelt (1567–  
1641), 1631, oil on panel.

away from resolving them. In parallel with the development of archaeology under water during the last forty years, approaching both submerged sites and maritime remains, the fundamental and legal approaches to underwater cultural heritage have changed. In this short essay, some aspects of this development will be sketched. Ultimately, this development should lead to a similar level of protection for heritage values at sea as they normally enjoy on land. It has notably been UNESCO that has provided a platform for discussion and development.

### **Freedom of the high seas**

In international law, one of the principles is the sovereignty of each individual state. Other states cannot meddle with the way a state organises its affairs internally, but states can agree to organise certain sectors in a particular way or to cooperate in certain domains. Such agreements are

called conventions. These can be bilateral agreements, agreements with a regional application amongst neighbouring states, or multilateral agreements. Moreover, dispute settlement over many issues that have arisen over time has led to customary practices and a body of customary law on how to resolve similar issues in similar ways, according to shared principles and values. More often than not such shared principles and values have been made explicit through the work of legal theorists.

Historically, it is actually wrong to say that the sea is not governed by the laws of one state alone. In fact, one of the traditional principles in customary law is that the sea itself is not governed by the laws of any state at all. Ships, seamen and their activities are governed by the laws of the state in which they are registered, the state of which they fly the flag and the state of their nationality, but the sea itself is free, according to the doctrine of the 'freedom of the high seas'. The concept was given a theoretical and juridical basis in the early 17<sup>th</sup> century by Hugo Grotius (fig. 1) when he formulated his 'De Mare Liberum' (1609) in the context of his more extensive work on the law of war and peace ('De iure Belli ac Pacis', 1625), and is still paramount today. Excluded from that freedom are the territorial waters, over which coastal states have full jurisdiction, and which according to Grotius were not to extend beyond three nautical miles, the absolute maximum range of a cannon ball. But things have changed since the 17<sup>th</sup> century. Not only in military matters where ordinary cannon have been supplemented with flying bombs and intercontinental ballistic missiles, but in possibly more peaceful matters as well. Concerns of an economic or environmental nature have also led to the wish to replace at least part of the freedom of the high seas by controlled management, either by a single state or by an alliance or congregation. Fishing quotas agreed through the European Union in pursuance of sustainable stocks are a much-discussed example of the latter. Offshore oil and gas are another field, and so are the efforts to reduce pollution or to increase safety of navigation. Nevertheless, although much qualified over time, and much limited in places, the central issue of the freedom of the high seas, the principle of freedom of navigation still stands.

### Law of the Sea

It is not necessary here to reiterate the complex history of international relations throughout the period between Grotius and the present day, or even the first half of the 20<sup>th</sup> century. With the establishment of the United Nations after World War II, however, it became more and more apparent that the UN should act as a platform not only to address security worldwide, or worldwide navigation but should also address the extent to which control over renewable and non-renewable resources in and under the sea was to be organised. This became a major endeavour, which through major steps in 1958, 1960 and 1973 led to the UN Convention on the Law of the Sea of 1982. It is one of the most encompassing conventions ever to have been negotiated. It reconfirms the principle of the freedom of the high seas while at the same time extending the agreed rights and responsibilities of coastal states for specific purposes. It thus establishes a range of maritime zones (fig. 2):

- the territorial sea,
- the contiguous zone,
- the continental shelf,
- the exclusive economic zone (EEZ), and
- the area.

The width of the territorial sea is agreed at twelve nautical miles from the baseline, and in that zone the full jurisdiction of the coastal state applies. The contiguous zone exists only if the coastal state has declared itself to have one. Its width is again twelve nautical miles, and it is contiguous

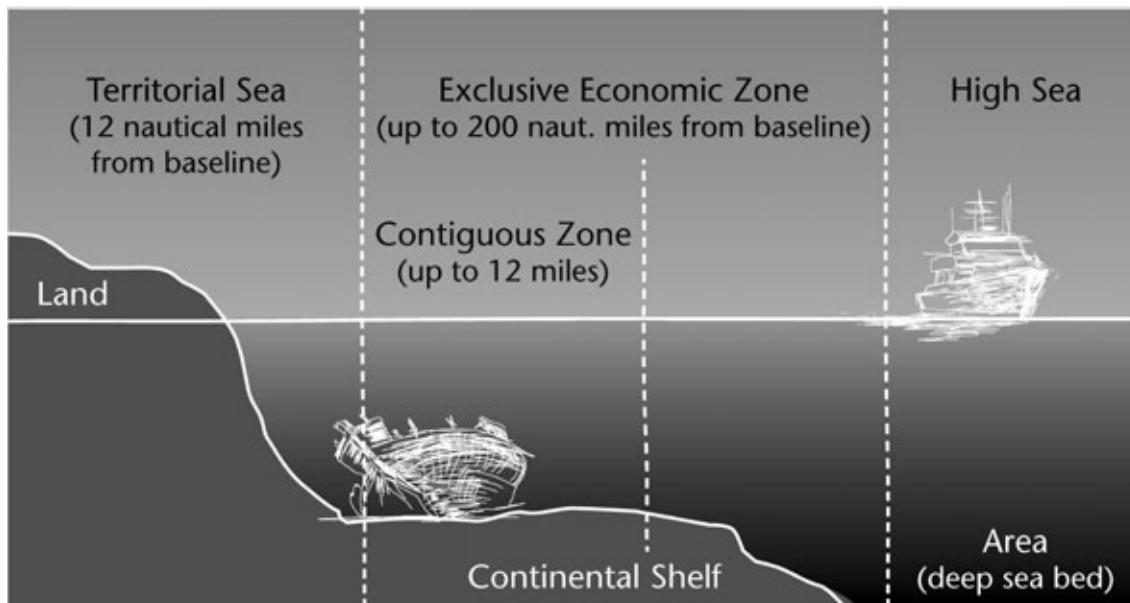


Fig. 2  
Maritime zones  
according to the  
UN Convention on  
the Law of the Sea.

with the territorial sea in the seaward direction. It thus extends to 24 miles from the baseline. In a way it is a fictional zone. It only applies to the situation in which the authorities reasonably suspect a vessel fleeing from or coming to their territory to be engaged in criminal activity such as smuggling. In that case they are allowed to stop the vessel and to assume that the seizure took place within their territory and jurisdiction. Surprisingly, the contiguous zone also applies to archaeological issues. Some coastal states, such as Denmark, have accordingly declared a heritage protection zone of 24 nautical miles. The continental shelf is the zone from the territorial waters to the drop-off of the continental shelf, or, in semi-enclosed seas, to the limits of the sector of it that the coastal state has agreed with its neighbours. It applies solely to the exploration and exploitation of mineral resources such as oil and gas. The exclusive economic zone (EEZ) gives the coastal state jurisdiction over other economic activities, over the resolution of environmental and planning issues, and over scientific research.

Logically, archaeology falls in with the latter two aspects, but the specific rulings of the contiguous zone have so far hindered the drawing of that logical conclusion. The EEZ overlaps with other zones and extends to a maximum of 200 nautical miles from the baseline. Finally, there is the area, the zone beyond all other zones and thus beyond any state jurisdiction. But even there, the 'freedom' is no longer as absolute as before. For some aspects, such as the exploration of its deep seabed, it is managed on behalf of all United Nations member states by the International Seabed Authority (ISA) from its base in Jamaica. According to Article 149 of the convention 'All objects of an archaeological and historical nature found in the Area shall be preserved or disposed of for the benefit of mankind as a whole'. The Law of the Sea Convention came into force in November 1994 and is adhered to by no less than 167 of the 193 UN members states.

### Salvage codes and heritage approaches: two ways of thinking

The Law of the Sea Convention refers to 'archaeological and historical objects found at sea' (Art. 303). In a way, that formulation is not very helpful. From the perspective of cultural heritage management, 'objects' or movable entities are not the whole story, and are not necessarily what matters most. Context, setting and the association between objects are defining factors in the significance of a monument, and are central in the research of an archaeological site. To make matters worse, objects or goods are definitely what matters most in relation to salvage. Salvage



is a maritime activity that goes back a long way, and which has been codified since antiquity, for instance in the so-called Rhodian Sea Laws (integrated in Justinian's law books of the 6<sup>th</sup> century AD as 'Lex Rhodia de iactu'). Neither the earlier rules, the later or present salvage regulations are designed to cater for heritage, nor should they be. They are meant for more or less contemporary jetsam, flotsam, and wrecks. Individual loss and individual gain of living individuals are central to the way in which these rules address fortuitous or deliberate finds. Quite understandably, the approach is object-oriented and rife with confidentiality and private allocation. It is meant to serve private interests. And so it should be, as it is private losses that are to be dealt with. The rules are in place to make the risks of loss at sea bearable for contemporary operators, not to deal or interfere with the heritage of a long past. It is obvious that the way salvage is organised and regulated is completely different from the approaches to heritage, monuments and archaeological sites that have developed to serve public interests. All those latter approaches are qualified by the public dimension, by concepts such as 'accessibility' and 'public ownership'. Graphically, the two ways of thinking, relating to heritage and salvage respectively, can be summarised in the following table. It lists some of the central concepts and organisational principles that govern and qualify heritage and archaeology on the one hand and salvage and search and rescue on the other:

<b>Heritage</b>	<b>Jetsam, Flotsam, Wreck</b>
Public interest	Private interest
Accessibility	Confidentiality
Public ownership	Private allocation
Site and context	Object

In relation to this table and the public interest of heritage protection, the formulation that was chosen in the Law of the Sea Convention has been relatively unfortunate. It is not very well informed and in a way it stimulated salvage-oriented thinking in relation to underwater cultural heritage. But on the other hand, it is the 'objects' which provide the link to smuggling, and thus to the use of the regulations of the contiguous zone. Moreover, Article 303 of the Law of the Sea Convention defines that 'States have the duty to protect objects of an archaeological and historical nature found at sea' and that they 'shall cooperate for this purpose'. It is a firm basis on which further protection could be developed, taking more archaeological and heritage-oriented thinking into account.

### **The Council of Europe and German developments**

The development of underwater archaeology has been more or less simultaneous with the long negotiation of the Law of the Sea Convention, and still continues today. A few exceptional discoveries and projects predate it, in Germany as elsewhere, but it basically took off from the late 1950s onwards. In most cases it took several decades more before attention was given to ways of regulating it. Problems turned out to be similar in different countries, but in view of different circumstances and different traditions of archaeology, different solutions were proposed. In 1978 the Parliamentary Assembly of the Council of Europe adopted 'Recommendation 848, on the underwater cultural heritage'. It was the result of a report that the Assembly had commissioned in order to find a common European approach to heritage issues in the UN Conference on the Law of the Sea. The report and the recommendation advised that a European Convention on the Underwater Cultural Heritage be drafted. It also advised to 'negotiate agreement between member states on the declaration of national cultural protection zones up to the 200-mile limit, wherever that limit is in keeping with geographical realities, as a basis for the implementation

of the proposed convention'. Acceptance of such a protection zone proved one step too far in pushing back the 'freedom of the high seas' and instead the Law of the Sea Convention ended up as it stands, and with a cultural protection zone of 24 miles as a maximum.

In the meantime, the negotiation of a European Convention on the Underwater Cultural Heritage was started at the Council of Europe, even before the Law of the Sea Convention was concluded. The text for this European convention was ready in 1985. It never came to be adopted, and this was largely due to political reasons that had little to do with heritage management as such, but all the more with the power politics that the Law of the Sea Convention tried to resolve. As a follow-up of 'Recommendation 848' the Council of Europe engaged in targeted capacity building, and in fact the discussions and negotiations on the European draft text also had a harmonising effect. The problems of underwater heritage management were taken more seriously in many European countries, and at least part of them was reiterated when a new European Convention on the Protection of the Archaeological Heritage was discussed. As a result, this 'revised' convention that was concluded in Malta in 1992 is applicable to archaeological remains on land as well as under water. The 'Valletta Convention' is a successful convention that is mostly known for setting the priority of *in situ* preservation and for the integration of heritage management in planning. It does not, however, address any of the tension between salvage and heritage that is so characteristic for heritage management at sea, or any of the other issues related to archaeology offshore.

In Germany likewise, the focus of developing underwater archaeology has been on internal waters. At the negotiations for a European Convention on the Underwater Cultural Heritage, Germany was represented by Professor Detlev Ellmers, the director of the Deutsches Schiffahrtsmuseum, an institution that sits in Bremerhaven, but which has a research brief for national maritime history. Later, international representation was mostly coordinated by the Verband der Landesarchäologen that established a specialised Commission for Underwater Archaeology in 1993. This is a logical result of the way archaeology in Germany is organised, through the respective federal states with regulations and laws set at that level. Coastal states such as Schleswig-Holstein or Mecklenburg-Vorpommern have collected data further seaward than the remit of their governments. But the fact remains that it is the federation that is responsible even for the territorial waters, let alone Germany's part of the continental shelf or its exclusive economic zone.

### **The ICOMOS Charter of 1996 and the UNESCO Convention of 2001**

In 1991 the International Committee on the Underwater Cultural Heritage (ICUCH) was established with the specific purpose of defining minimum standards to which future dealings with the world's underwater cultural heritage should answer. The need for these had become more and more pressing as more and more legal disputes had arisen over rights and responsibilities regarding cultural heritage found beneath the oceans. International lawyers had addressed some of the issues and had looked into resolving them in organisations such as the International Law Association (ILA). But there was nothing in terms of a doctrinal text supported by archaeologists and heritage professionals worldwide that they could refer to. Having such an agreed text was important to reflect the fact that heritage and archaeology – at sea as elsewhere – is not so much about 'objects' as salvage traditionally is. ICUCH was formed within the framework of ICOMOS, the International Council on Monuments and Sites. It is therefore best referred to as ICOMOS–ICUCH. As a professional organisation and an NGO affiliated with UNESCO, ICOMOS is an independent adviser to governments and to UNESCO on heritage matters worldwide. Notably, it advises, for example, on World Heritage and the 1972 World Heritage Convention, the Convention for the Protection of Cultural Property in the Event of Armed Conflict (1954), and the Convention on the Means of Prohibiting and Preventing the Illicit Import, Export and

Fig. 3  
Recently published  
manual for activities  
directed at underwater  
cultural heritage.



Transfer of Ownership of Cultural Property (1970). In relation to underwater cultural heritage it is ICOMOS-ICUCH that fulfils that role. With a dedicated membership of professionals from all over the world, ICUCH's first achievement was to prepare the text that was adopted at the eleventh General Assembly of ICOMOS in Sofia, Bulgaria in 1996 as the Charter for the Protection and Management of the Underwater Cultural Heritage.



Since then, the charter has had great impact. In 1997, UNESCO's General Conference decided that a binding legal instrument for the protection of underwater cultural heritage be elaborated, in elaboration also of the summary articles in the Law of the Sea Convention. This was not an easy task. In fact, the negotiations over the issues involved repeatedly reiterated the very complex issues and very complex and interlaced interests that had been addressed in negotiating the Law of the Sea Convention itself. Delegations were clearly afraid to upset the balance that had been struck in 1982. But the negotiations were fruitful nonetheless and led to the adoption of the Convention on the Protection of the Underwater Cultural Heritage in 2001. In January 2009 this 2001 UNESCO convention entered into force. As with all matters to do with the sea, it is a complex convention, catering for a range of different cooperation regimes between states depending on the location of heritage in any of the different maritime zones. In practice, however, without explicitly giving coastal states greater jurisdiction, it caters for the fact that the coastal state will generally take a coordinating role, in relationship to heritage on its continental shelf and in its EEZ, albeit 'for the benefit of humanity'. It is a 'competent authority' (Art. 22) that should take this coordinating role on behalf of the state party and take care of the cumulative archaeological inventory. Moreover, the 2001 convention integrates all the principles of the ICUCH Charter and reiterates them in the 'Rules Concerning Activities Directed at Underwater Cultural Heritage'. The convention has presently been ratified by 49 states. Without exception, all the other 195 member states of UNESCO subscribe to the rules.

## Conclusion

Extending existing systems of heritage management to include archaeology under water and to provide a similar level of protection for heritage at sea as for heritage on land has not been as simple as one would expect. Nevertheless, developments have come a long way. The guidance of the ICOMOS Charter for the Protection and Management of the Underwater Cultural Heritage of 1996, and the Rules Concerning Activities Directed at Underwater Cultural Heritage that are an integral part of the 2001 convention cannot be overstated. Recently, a manual has been prepared at UNESCO in which each rule is thoroughly discussed and explained (fig. 3). It has been published in English, Spanish, French and Chinese, while Arabic and Italian versions are in preparation. In Germany, like in many other countries, all these rules are adhered to. But the legal basis for protection is still not very solid. The 2001 convention has not yet been ratified by more than a quarter of the states that exist and make use of the sea. While, France, Spain, Portugal and Belgium have ratified, Germany has not. The main reason for this is probably that in a federal state where archaeology is the responsibility of individual states heritage is not seen as a matter of urgency for the federation. And perhaps it is not. But it is basically a matter of urgency at another level. There is urgency for all mankind. As long as treasure hunting persists and as long as it is tolerated that it distorts the issues to their own advantage, humanity, including German citizens, stands to lose. In September 2014, however, the German Foreign Office, in cooperation with the German Archaeological Institute held a study meeting in preparation for ratification. The impression is that there are no obstacles for the process to continue and to ensure that Germany joins in protecting the underwater cultural heritage.

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# List of authors

**Dr. Dan H. Andersen**  
Copenhagen,  
danh.andersen@gmail.com

**Staffan von Arbin M. A.**  
Bohusläns Museum, Uddevalla,  
staffan.arbin@vgregion.se

**Dr. Jens Auer**  
Institut for Historie,  
Syddansk Universitet, Esbjerg,  
auer@sdu.dk

**Prof. Dr. Oliver Auge**  
Historisches Seminar, Abteilung  
für Regionalgeschichte, Christian-  
Albrechts-Universität zu Kiel,  
oauge@email.uni-kiel.de

**Thomas Bergstrand M. A.**  
Bohusläns Museum, Uddevalla,  
thomas.bergstrand@vgregion.se

**Dr. Michael Bregnsbo**  
Institut for Historie,  
Syddansk Universitet, Odense,  
bregnsbo@sdu.dk

**Dr. Jan Drees**  
Schleswig, drees.sl@t-online.de

**Thomas Eisentraut M. A.**  
Archäologisches Landesmuseum,  
Stiftung Schleswig-Holsteinische  
Landesmuseen Schloss Gottorf,  
Schleswig, thomas.eisentraut@  
schloss-gottorf.de

**Prof. Dr. Lars Ericson Wolke**  
Försvarshögskolan, Stockholm,  
lars.ericsonwolke@fhs.se

**Melanie Greinert M. A.**  
Kiel, melanie.greinert@gmx.de

**Prof. Dr. Knud J. V. Jespersen**  
Institut for Historie, Syddansk Univer-  
sitet, Odense, kjvj@sdu.dk

**Prof. Dr. Martin Krieger**  
Historisches Seminar, Christian-  
Albrechts-Universität zu Kiel,  
krieger@email.uni-kiel.de

**Dr. Joachim Krüger**  
Archäologisches Landesmuseum,  
Stiftung Schleswig-Holsteinische  
Landesmuseen Schloss Gottorf,  
Schleswig, joachim.krueger@  
schloss-gottorf.de

**Dr. Uta Kuhl**  
Landesmuseum für Kunst und Kultur-  
geschichte, Stiftung Schleswig-  
Holsteinische Landesmuseen Schloss  
Gottorf, Schleswig,  
kuhl@schloss-gottorf.de

**Prof. Dr. Jan Kusber**  
Arbeitsbereich Osteuropäische  
Geschichte, Johannes Gutenberg-  
Universität Mainz,  
kusber@uni-mainz.de

**Prof. Dr. Konrad Küster**  
Musikwissenschaftliches Seminar,  
Albert-Ludwigs-Universität  
Freiburg, konrad.kuester@  
muwi.uni-freiburg.de

**Frode Kvalø**  
Norsk Maritimt Museum, Oslo,  
frode.kvalo@marmuseum.no

**Prof. Dr. Lars Olof Larsson**  
Kiel, larsson-lo@gmx.de

**Prof. Dr. Thijs J. Maarleveld**  
Institut for Historie,  
Syddansk Universitet, Esbjerg,  
t.maarleveld@sdu.dk

**Prof. Dr. Dr. h. c. Michael North**  
Lehrstuhl für Allgemeine Geschichte  
der Neuzeit, Ernst-Moritz-Arndt-  
Universität Greifswald,  
north@uni-greifswald.de

**Prof. Dr. Jens E. Olesen**  
Lehrstuhl für Nordische Geschichte,  
Ernst-Moritz-Arndt-Universität Greifs-  
wald, olesen@uni-greifswald.de

**Prof. Dr. Sverker Oredsson**  
Historiska institutionen, Lunds  
Universitet, Lund,  
sverker.oredsson@hist.lu.se

**Dr. Tilman Plath**  
Lehrstuhl für Osteuropäische  
Geschichte, Ernst-Moritz-Arndt-  
Universität Greifswald,  
tilman.plath@uni-greifswald.de

**Dr. Haik Thomas Porada**  
Leibniz-Institut für Länderkunde,  
Leipzig, H\_Porada@ifl-leipzig.de

**Prof. Dr. Arnd Reitemeier**  
Institut für Historische Landes-  
forschung, Georg-August-Universität  
Göttingen, arnd.reitemeier@  
phil.uni-goettingen.de

**Kai Schaake M. A.**  
Landesverband für Unterwasser-  
archäologie Mecklenburg-  
Vorpommern e.V., Putgarten/Rügen,  
k.schaake@uwa-mv.de

**Dr. Inger Schuberth**  
Lützen-Stiftung Göteborg,  
Wachtberg bei Bonn,  
Dr.Inger.Schuberth@t-online.de

**Dr. Jakob Seerup**  
Orlogsmuseet/The Royal Danish  
Naval Museum, Nationalmuseet,  
Copenhagen,  
jakob.seerup@natmus.dk

**Dr. Martin Segschneider**  
Archäologisches Landesamt  
Schleswig-Holstein, Schleswig,  
martin.segshneider@alsh.landsh.de

**Prof. Dr. Thomas Stamm-Kuhlmann**  
Allgemeine Geschichte der Neuesten  
Zeit, Ernst-Moritz-Arndt-Universität  
Greifswald,  
stamm@uni-greifswald.de

**Karl-Heinz Steinbruch M. A.**  
Mecklenburgica – Archiv- und  
Recherchedienst, Schwerin,  
Mecklenburgica.Steinbruch@  
t-online.de

**Prof. Dr. Gerd Steinwascher**  
Geschichte der Frühen Neuzeit,  
Carl von Ossietzky Universität,  
Niedersächsisches Landesarchiv,  
Oldenburg,  
gerd.steinwascher@  
nla.niedersachsen.de

**Mikkel H. Thomsen M. A.**  
Vikingskibsmuseet, Roskilde,  
mht@vikingskibsmuseet.dk

**Pekka Toivanen**  
Jakobstad

**Dr. Johanna Wassholm**  
Department of History, Åbo  
Akademi University, Turku,  
johanna.wassholm@abo.fi

**Anja Silke Wiesinger**  
Kiel, a\_wies@web.de

**Dr. Inga Lena Ångström Grandien**  
Stockholm,  
inga.lena@angstrom-grandien.com

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## Olesen, Struggle

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### Absolutism and baroque culture

Fig. 1: Photo: M. Müller.

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## Larsson,

### Art and royal representation

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## Auge, Duchy of

### Schleswig-Holstein-Gottorp

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## Drees, Hedvig Eleonora

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## Greinert, Hedvig Sofia

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## Wiesinger, Duke Frederick IV

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## Kuhl, War and games

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## Küster, Funeral Music

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## Jespersen, King Frederick IV

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Photo: C. Dannenberg

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Fig. 2: Photo: Th. Eisentraut.  
Fig. 3: www.marmuseum.no/Skipskiste+fra+utgravningen+av+fregatten+Lossen+42.jpg.hTLgJADMxMMW4-MNFUEXT0ZkU9TpQBtKETMTjnoY5T-ZjL5ACj1SoS.ips  
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Fig. 1: National Archives of Norway, Oslo, EA-3667/G/L0048a.  
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Photo: G. Lorenz, Wendtorf.

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Fig. 1: J. Auer 2014, based on a prepared map by NordNordWest, Wikimedia Commons.  
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Fig. 4: Rigsarkivet Copenhagen 0008, Admiralitets- og Kommissariatskollegiet, Skibsjournaler, Nr. 99A – 99bA, photo: J. Krüger.

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Fig. 1: Design and graphic J. Auer 2014, based on map data by NordNordWest, Wikimedia Commons.  
Fig. 2: Design and graphic J. Auer 2014.  
Fig. 3: Rigsarkivet Oslo, Manuskript-samlingen, quarto 48, daybook of Niels Trosner.  
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### **Reitemeier, Duchy of Bremen-Verden**

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On 25 April 1715, the Swedish Rear Admiral Carl Hans Wachtmeister scuttled his flagship *Prinsessan Hedvig Sofia* in the Baltic Sea off Bülk, after it had been badly damaged in a naval engagement off Femern during the course of the Great Northern War. In 2008, divers discovered the wreck and shortly afterwards underwater archaeologists were successful in identifying it. As a result, a window was opened into a past which had never had light cast on it in the Baltic region from an international perspective.

In this volume accompanying the special exhibition 'Of Swords, Sails and Cannon – The Sinking of the *Princess Hedvig Sofia*', 37 contributions from authors from Norway, Denmark, Sweden, Finland, Russia, and Germany delve more deeply into the topics presented in the exhibition. The key areas are 'Baltic in change around 1700', 'Absolutism in the Baltic region', 'Shipping and naval warfare', 'Underwater cultural heritage', and 'The Great Northern War – memorial culture'.

In addition a German-language exhibition catalogue has appeared.



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