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*IMPACT ASSESSMENT*

*Accompanying document to the*

Proposal for a

**DECISION OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL**

**establishing a European Union action for the European Heritage Label**

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**List of main abbreviations**

EU: European Union

EHL: European Heritage Label

IA: Impact assessment

MS: Member States

Disclaimer: This IA report commits only the Commission's services involved in its preparation. The text is prepared as a basis for discussion and does not prejudge the final form of any decision to be taken by the Commission

Lead DG: DG EAC

Other involved services: SG, SJ, DG ELARG, DG ENTR, DG INFSO, DG MARE

**Modifications following the opinion of the Impact Assessment Board**

The draft IA report was discussed with the Impact Assessment Board in a meeting on 25 November 2009. Following this meeting and the opinion of the Impact Assessment Board, several changes have been made to the report.

Further information on the selection criteria that will be used to award the EHL has been provided. The added value of the EHL and the difference with other initiatives in the field of cultural heritage have been clarified. The proposed solutions to foster the participation of transnational sites have been specified. The objectives have been redefined in order to clarify the level of ambition of the initiative and to improve the coherence with the criteria that were used to compare the options. The report is also more specific about the costs of the initiative for the EU, but also at national level. It clarifies why the option of the attribution of the label on a temporary basis was dropped without further analysis. Finally, it specifies that the participation of MS in the EHL would be on a voluntary basis.

Some further changes which were not discussed in the Impact Assessment Board meeting and were not included in the Board's opinion, but which were mentioned in the Impact Assessment Quality Checklist have been made. These changes concern mostly the various tables and annexes of the IA report.

Finally, the report has been slightly adapted in order to take into account the entry into force of the Treaty of Lisbon on 1 December 2009. The legal basis for the EHL is now article 167 of the Treaty on the Functioning of the European Union, and the references to the European Community have transformed into references to the European Union.

1. SECTION 1: PROCEDURAL ISSUES AND CONTEXT SETTING

1.1. **General context**

*1.1.1. Political background*

The original concept for a "European Heritage Label (EHL)" was first proposed by the French Minister of Culture at the time, Renaud Donnedieu de Vabres as part of the response to the growing gap between the citizens and Europe, in particular young people.

The scheme was subsequently launched in April 2006 as an intergovernmental initiative under the leadership of France, Spain and Hungary, with the aim to "strengthen the support of European citizens for a shared European identity based on democratic values and human rights and to foster a sense of belonging to a common cultural space". All European States that wished to were invited to put forward cultural heritage sites that were symbolic of Europe's identity and to promote their European dimension. Rules of procedure for the EHL, as well as criteria for selection and an application form, were adopted and the initiative was formally launched in March 2007 to coincide with the 50th Anniversary of the Treaty of Rome when a first series of sites was awarded the EHL. From the beginnings, the official

documents of the intergovernmental initiative stated that "the ultimate objective of the EHL is to become a Community action". To this date, a total of 64 sites located in 17 EU MS as well as in Switzerland have obtained the label[1]. At first the secretariat was being carried out by France and currently by the Spanish Ministry of Culture. The intergovernmental EHL is analysed in detail in section 2.2.

The European Parliament supported the development of the EHL, first in its resolution of 29 November 2007 on a Renewed EU Tourism Policy: Towards a stronger partnership for European Tourism (2006/2129(INI)) where it proposes "that support be given for the creation of a European Heritage label aimed at highlighting the European dimension of the EU's sites and monuments" and subsequently in its resolution of 10 April 2008 on a European agenda for culture in a globalising world (2007/2211(INI)) in which it underlines "that a European heritage label should be established with a view to emphasising the European dimension of cultural goods, monuments, memorial sites, and places of remembrance, which all bear witness to Europe's history and heritage".

On 20 November 2008, the Council of Ministers of the European Union adopted conclusions inviting the European Commission to submit to it "an appropriate proposal for the creation of a European Heritage Label by the European Union and specifying the practical procedures for the implementation of the project."

An IA roadmap was prepared in February 2009. Because of the specificity of the agenda planning and of the preparation of the work programme for 2010 due to the arrival of a new College of Commissioners, this roadmap was not published. It served however as a communication tool, notably with the Inter Service Steering Group and the external consultant.

*1.1.2. The Council conclusions*

As mentioned above, right from the start, the ultimate objective of the EHL was to become a EU action. The request of the MS to transform the intergovernmental EHL into a formal initiative of the EU came however very soon after the official launch of the label. The reason for this is twofold. Firstly, several MS have a very strong political interest in the EHL, including France which held the Presidency of the EU at the moment of the adoption of the conclusions and Spain which will hold the Presidency in the first semester of 2010. Secondly, after the initial wave of labelling, it quickly became evident that the EHL is an initiative which is difficult to implement effectively and, as we will see in detail in section 2.2. of this report, the present procedures and practical arrangements of the EHL are far from being optimal.

The Council conclusions were an essential element in our reflexion because the negotiations which led to the adoption of these conclusions gave the MS a first opportunity to express their individual opinions on the EHL and on the added value of EU involvement, and because the final text gives a detailed view of their common expectations concerning the new EHL. Although the Commission retains freedom in

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[1]     The list of these sites is in Anex 4.

its right of initiative, the Council conclusions are an important political backdrop which cannot be ignored.

The conclusions take into consideration the main provisions of the existing intergovernmental EHL and emphasize the importance of raising the awareness of young people of a shared European cultural heritage and hence the need to promote their access to this shared heritage. According to the conclusions, the creation of a EHL by the EU which would aim to emphasize Europe's common history in a concrete way by enhancing the European dimension of its cultural heritage could contribute:

➢ to enhancing the value and raising the profile of Member States' heritage and that of the shared cultural heritage,

➢ to increasing knowledge and appreciation among citizens of their history and their shared yet diverse cultural heritage,

➢ to artistic, cultural and historical education and, in so doing, to stepping up intercultural dialogue, especially among young people,

➢ to the economic attractiveness and sustainable development of regions, in particular through cultural tourism,

➢ to the sharing of experiences and exchange of best practices across Europe as regards the enhancement of its cultural heritage,

➢ more generally, to the promotion of democratic values and human rights that form the foundation of European integration and European citizenship.

It is important to underline that the economic dimension of the EHL was not taken into account in the intergovernmental initiative.

One of the main concerns of the MS during the negotiations was to avoid duplication with existing initiatives such as the UNESCO World Heritage List and the Council of Europe's "European Cultural Routes" and to seek synergies and complementarities instead. It was therefore stated very clearly during the discussions that the added value of the EHL should be based (1) on the contribution made by the selected sites to European history and culture, (2) on a clear educational dimension reaching out to citizens, and (3) on the networking of the sites. It has become clear during the negotiations that the main focus of the EHL must be the interpretation and the promotion of the sites and not on conservation and protection. It is also very important that the EHL, unlike other existing initiatives, should not be awarded on the basis of the aesthetic value of a site, for example its natural beauty or architectural quality, but strictly on the basis of its symbolic value, in other words on the basis of what it represents or stands for in the common history of Europe. The options which have been tested all take into account this essential starting point.

While the EHL is considered as a particularly important initiative by several MS, notably those which are at the origin of the intergovernmental initiative, some other MS were more hesitant about the added value of this label and the actual need to make it a formal EU initiative. Therefore, before the adoption of the Council

conclusions there was a consensus between the MS that the new "communautarised" initiative should have very limited consequences both on the EU budget and on national budgets and that the participation of MS should be on a voluntary basis.

In order to improve the implementation of the EHL, the conclusions dedicate a considerable attention to the procedures and the practical arrangements of the future Label. The MS could reach an agreement on a number of principles:

➢ The selection of sites should be on a regular basis and based on criteria that are common, clear and transparent;

➢ The selection should be carried out initially at national and then at European level based on expert assessment;

➢ The number of sites covered each time should be reasonable and representative;

➢ The administrative arrangements should be flexible and streamlined, in compliance with the subsidiarity principle;

➢ Recipients should be required to comply with undertakings they have given and could be subject to periodic review;

➢ Sites already awarded the Label under the intergovernmental initiative should be taken into account and their status defined;

➢ The initiative could draw on existing EU funding, without prejudice to the support policies conducted by each of the Member States;

➢ The initiative could also be open to third countries participating in the EU's Culture Programme as there was an assumption that the costs for these countries might be covered by the programme.

At the same time, a number of questions were also left open for further analysis during the negotiations and the MS underlined that they expect the Commission to come forward with concrete proposals. These questions which can be summarised as follows became a central element of the subsequent consultation process:

➢ What precisely is a reasonable and representative number of sites?

➢ Shall the label be attributed to the sites for a limited period of time or on a permanent basis?

➢ Shall the label be attributed on the basis of an open competition or shall there be a reserved quota of sites for each MS?

➢ In the event of a quota system, how to determine the number of sites per country and should a system of rotation between the MS be implemented in order to keep control over the total number of labelled sites and to help keep the selection and monitoring procedures manageable?

➢ How to articulate the national level and the European level for the selection and monitoring procedures in order to ensure an homogeneous application of the rules while respecting the principle of subsidiarity?

The MS were unanimous that new common, clear and transparent criteria and their proper application were essential for the renewed EHL. These criteria were discussed at great length during the negotiations and the main elements were included in the conclusions. Several considerations were taken into account. Firstly, the need to ensure that there will be no overlap with other existing initiatives in the field of cultural heritage and to guarantee the added value of the EHL. Secondly, the need to ensure that the criteria will be efficient and unambiguous and at the same time that they will maintain a degree of flexibility in accordance with the principle of subsidiarity, respecting the multitude and diversity of potential sites, and the reality that the evaluation of the sites will inevitably have a subjective element. The national and European selection panels therefore need to have some discretion and the experience of the European Capitals of Culture was mentioned as a source of inspiration. Finally, it will be important to adapt the level of requirements for the management of the sites to the specificity of each site. A very diverse range of sites can potentially be awarded the label: whereas ambitious educational, information or promotion activities could be feasible from prestigious sites with a strong touristic potential, the criteria might well be met in a more modest way in the case of smaller sites with a strong symbolic value.

Because of the lengthy negotiations which already took place in the Council on the criteria and the limited room for manoeuvre on this matter, and because the main challenge for the EHL will be the proper application of these criteria through an effective process, it has been decided to present the criteria in greater detail in annex 3 to this report and to limit the current IA to a discussion of the label's administrative arrangements.

**1.2.     Consultation of interested parties**

Broad consultation has been undertaken in order to understand the various views on the EHL and to obtain necessary evidence. The consultation process started in March 2009 and was carried out in different stages for which all the required Commission consultation standards were applied. The results of the different elements of the consultation are summarized below and were duly taken into account for the subsequent steps of our analysis.

*1.2.1. Internal consultations*

The existing Inter-service Group for Culture met three times for the IA of the EHL. At the first meeting on 9 March 2009 the general context of the EHL and the roadmap for the IA were discussed. The objective of the second meeting on 29 June was to present the main results of the public consultation. The aim of the third meeting on 19 October was to discuss the first draft of the present IA report. The comments of the group were taken into account for the finalisation of the report.

In addition to colleagues from various departments of DG EAC, representatives from SG, SJ, DG ELARG, DG ENTR, DG INFSO and DG MARE participated in at least one of the meetings. DG COMP, DG RTD, AIDCO, BEPA and ESTAT while

not present at the meetings have asked to be kept informed about the various steps of the process. DG BUDG, DG AGRI, DG COMM, DG DEV, DG EMPL, DG ENV, DG JLS, DG MARKT, DG RELEX, DG REGIO, DG TAXUD and DG TRADE were invited but did not participate in the process.

*1.2.2. Consultation of stakeholders and European citizens*

1.2.2.1    Online consultation

An online consultation was held between 20 March to 15 May 2009, to gather comments from the public. This consultation was carried out with the help of the Interactive Policy Making tool and was accessible in six languages. We received a total of 226 answers. 72% of the answers were from individuals, 17%from organisations and 11%from public authorities. However caution needs to be applied when interpreting these figures as it was apparent in some answers that some smaller organisations preferred to answer as individuals in order to avoid the burden of registering in the Register of Interest Representatives.

The consultation consisted of 18 questions. Some of these questions were single choice questions and enabled a quantitative analysis to be made. Other questions were open questions intended for a qualitative analysis. The statistics displayed below are simply meant to indicate the general trends within the consultation. The sample is of course limited, making it difficult to draw general conclusions at the European level.

The main results of the online consultation were the following[2]:

➢ Only 42% of the participants had previously heard about the intergovernmental EHL. This low percentage is surprising given that the majority of participants in the consultation had a pre-existing interest in the cultural heritage field.

➢ 89% believe that the EHL can contribute to a greater sense of belonging to the EU.

➢ 90% believe that the involvement of the EU will bring an added value to the EHL.

➢ Concerning the potential impacts of the EHL, the following elements were mentioned: a greater sense of common belonging, the promotion of European values, a higher profile for cultural heritage, the strong educational value especially for young people, and economic development notably through tourism.

➢ The following challenges and risks were mentioned: the potentially limited impacts of the initiative, heavy bureaucracy, the costs, a risk of duplication with the UNESCO World Heritage List or the Council of Europe Cultural Routes or the lack of clarity concerning the objectives and selection criteria

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[2]    The full report can be consulted at the following link:
http://ec.europa.eu/culture/our-programmes-and-actions/doc/consultation_analysis_report_160709.pdf

which was considered as the main weakness of the current intergovernmental initiative. It is very important to note that these perceived risks and challenges were mostly expressed in answers which were generally positive to the EHL. The 11% of answers mentioned above which were negative concerning the EHL and the 10% of answers which were negative concerning the involvement of the EU were either not explained or did not enable any general trends to be drawn.

➢ The expected benefits from EU involvement are the following: a strengthened legitimacy and credibility for the EHL, clearer and more transparent objectives and criteria, greater impact of the Label due to a permanent secretariat, improved coordination between participating countries, networking of sites, and better visibility of the EHL.

➢ The originality of the EHL compared to other existing initiatives in the field of heritage should be based on: its strong European dimension, its educational dimension, the fact that the symbolic value of sites is more important than the aesthetic dimension, the fact that pedagogic and cultural programmes are at the core of the initiative rather than conservation, and the added value obtained from the networking of sites.

➢ Opinions were quite divided concerning the question of whether the EHL should be attributed on a permanent basis (54%) or for a limited duration (46%). It is interesting to note that those who were in favour of a limited duration generally considered that this period should be renewable and those who were in favour of a permanent attribution underlined the need for a strong monitoring system and ensuring the possibility of withdrawing the label if the sites no longer comply with the criteria.

➢ Opinions were also divided concerning national quotas and the number of sites which should be attributed to each country. A significant number of participants underlined that any quota set in advance would end up being artificial and arbitrary and preferred instead an open competition at European level which does not take into account the national origin of the candidate sites.

1.2.2.2    Consultation meeting

On 10 June 2009, a consultation meeting took place in Brussels[3]. This meeting was open to all interested individuals and organisations, rather than a pre-selected set of stakeholders. 71 participants registered including representatives of key international and national organisations active in the field of heritage, public authorities (national, regional and local level), heritage sites which had been awarded the EHL in the framework of the intergovernmental initiative, academics and students.

The meeting was very constructive and generally positive for the EHL. The discussions were framed around the same questions as the online consultation and confirmed its main results. The same trends emerged concerning the potential

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[3]    The report of this meeting is in Annex 1.

impacts of the EHL, its originality or the added value of EU intervention, and the same divisions appeared concerning the practical arrangements for the initiative.

Five elements need to be underlined:

➢ Representatives of the French Ministry of Culture which was at the origin at the EHL and of the Spanish Ministry of Culture which currently carries out the secretariat of the intergovernmental initiative chose to take part in the meeting, and on multiple occasions during the day the other participants made use of that to ask them for precisions concerning the actual objectives and procedures of the intergovernmental initiative. This was evidence of how little the current intergovernmental label is known, even by the main stakeholders in the heritage sector.

➢ There was general consensus that the EHL has a value of its own and does not overlap with other existing initiatives, such as the UNESCO World Heritage List, the Council of Europe Cultural Routes or the EU Prize for Cultural Heritage / Europa Nostra Awards. This was clearly confirmed by the representatives of ICOMOS (consultative body for the UNESCO World Heritage List), the European Institute of Cultural Routes and Europa Nostra which were present at the meeting. Nevertheless it demonstrated that clearer communication would be needed to clarify the differences, especially for the general public (concerning the other initiatives in the field of cultural heritage, see also annex 7).

➢ Opinions were clearly divided concerning the selection procedures to award the label. On the one hand, several representatives from civil society were in favour of an open competition at European level only in order to encourage the application of transnational sites, to ensure that the selection would be based on quality alone and to keep the practical arrangements light. They also underlined that some MS had a greater pool of relevant sites than others. On the other hand, representatives of national authorities insisted on the need to have a selection first at national and then only at European level. In their view this would be the only way to deliver a fair geographical distribution of labels across the EU and thus to ensure the continuing participation and commitment of MS in the initiative, and the possibility to reach as large a number of citizens as possible.

➢ In a first stage, opinions were also divided concerning the attribution of the EHL on a permanent basis or for a limited duration. Some representatives from civil society were in favour of a limited duration because this would be more effective in terms of keeping control over the overall number of sites and ensuring that the labelled sites continue to comply with the criteria and remain active. In contrast, managers of heritage sites were totally opposed to a limited duration because this would be counter-cultural for the heritage sector which is used to working on a long-term basis and because this would undermine the incentives for sites to invest in their development. They expressed their concern that such a decision would be felt by the sector as a very awkward decision imposed by "Brussels". The site managers were supported by the representatives of national authorities who also underlined that the EHL would be awarded mainly on the basis of the symbolic value of

sites and that this symbolic would not diminish over time. Over the debate, several civil society organisations, notably Europa Nostra, changed their positions and a very clear consensus emerged amongst all the participants that the best solution would be the attribution of the EHL on a permanent basis, but with a strong monitoring procedure and the possibility to withdraw the label.

➢ With regards to impacts, there was a consensus amongst participants that these would be first and foremost political and educational impacts, in other words social impacts, and that the initiative should focus mainly on these social impacts at the outset in order not to blur its message. There was also an interesting view expressed that the social impacts should actually be expressed in terms of 'societal' impacts in order to emphasise that the primary effects were not about social inequality but about identities. Opinions were rather mixed about the potential economic impacts because a great variety of sites can potentially be awarded the label and their touristic appeal will greatly depend on their nature, size or location. Furthermore, the contribution of the EHL will greatly depend on the prestige the label will acquire and thus on its quality and credibility, and this was considered by participants as a potential benefit more likely to occur in the long-term (this issue will be further discussed in section 3).

*1.2.3. Consultation meeting with MS experts*

On 24 June 2009, a meeting took place in Brussels with experts designated by the 27 MS[4]. The concept of this meeting was different from the meeting with stakeholders and citizens. As mentioned above, the MS had already had the opportunity to express their individual opinions on the EHL during the negotiations for the Council conclusions and the adopted text gives a fairly detailed view of their common expectations. However a number of issues concerning the practical arrangements of the future EHL were left open for further analysis. Therefore the aim of this meeting was twofold: (1) to inform the MS about the progresses of the IA and the first results of the consultation of stakeholders and citizens and (2) to make substantial progress on the questions which were still open. To this end, a discussion paper summarising the main issues at stake and proposing general orientations for the discussions was sent to the participants two weeks before the meeting.

The 27 MS sent experts to this meeting and all of them, including the MS which were more reluctant during the negotiations for the adoption of the conclusions, contributed very constructively to the debate. At this stage it is likely that a very large majority of the MS would join the new "communautarised" label.

A general consensus emerged between MS on several issues:

➢ the EHL should be attributed on a permanent basis. The two main reasons expressed by the 27 MS are very close to the conclusions which emerged during the consultation meeting with the stakeholders: (1) the label seeks to denote cultural heritage that has played a key role in European history and

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[4]  The report of this meeting is in Annex 2.

which therefore has a symbolic value which does not diminish over time, and (2) it would be more likely to encourage sites to take a long term approach and to invest in their development. The MS also agreed that the permanent attribution of the label should be linked to strong monitoring and review processes and the possibility to withdraw the label;

➢ a selection procedure at European level only –as advocated by some stakeholders- is not acceptable for the MS. They confirmed their wish for a two level approach. Several MS insisted that if the selection should take place at one level only, it should be the national level;

➢ a rotation system between the MS is an acceptable solution to keep the number of sites reasonable and to facilitate the practical arrangements (several MS suggested that a good compromise would be the participation of one third of the countries every year);

➢ there should be a certain element of competition for the attribution of the label;

➢ a permanent secretariat for the EHL is essential;

➢ the EHL could be open to the countries participating in the Culture programme, but as the implementation of the initiative is quite complex, it is wise to start first with the 27 MS before thinking about enlarging the initiative;

➢ the application of transnational sites should be encouraged.

However, despite the progress made during the meeting, certain challenging questions remained open either because there were still divergences between MS (are national quotas needed? what is a reasonable number of labelled sites?) or, because the positions expressed by some of the MS were not entirely free of contradictions (How to reconcile the wish to have an open competition at European level with the will to keep a pre-selection at national level? how to foster the selection of transnational sites while setting quotas of sites per country? how to ensure the excellence of the EHL and the relevance and quality of the selected sites without any limitations on the number of labels awarded each year?)

*1.2.4. External services*

Although most of the work has been conducted in-house, and was based on the consultation steps described above, some support services to assist the Commission in the preparation of the IA have been asked from ECOTEC as part of a DG Education and Culture framework contract with this consultant.

The main tasks requested of ECOTEC were: (1) to identify and analyse the existing literature and data in the field (2) to evaluate the strengths and weaknesses of the current intergovernmental EHL (3) to analyse other international cultural and heritage schemes, as well as other EU labels, in order to limit risks of overlap and learn any lessons (4) to assist the Commission in the analysis of the answers to the online consultation and (5) to provide the Commission with additional expertise

concerning the identification of the potential impacts of the EHL, the comparison of the options and the definition of monitoring and evaluation indicators. The main results of ECOTEC's work are summarized in a report[5]. Sections 5, 6 and 7 of the present report prepared by the services of the Commission draws many elements form ECOTEC's support services.

The regular meetings and exchanges with ECOTEC experts' also provided the Commission with a good opportunity to test and to fine tune its own ideas concerning the objectives of the EHL, the policy options and the development of the preferred option.

## 2. SECTION 2: PROBLEM DEFINITION

### 2.1. Problem

*2.1.1. The problem in 2005 when the intergovernmental EHL was conceived*

As mentioned in the previous section, the concept of the EHL was born as one of the responses to the problem of the existing gap between the EU and its citizens and between the reality of European integration and people's perceptions. This gap is linked to an important extent to a lack of knowledge of the history of Europe, of the role of the EU and of the functioning of its institutions.

The aim of the EHL was to use the potential of cultural heritage to strengthen European citizens' sense of belonging to Europe and promote a sense of European identity. It is important to note that right from the start, it was clear that the EHL alone could not fill the gap between citizens and the EU. It was meant more modestly to be one contribution alongside other initiatives aimed at addressing the same problem such as for example the "Plan D for Democracy, Dialogue and Debate" or "Communicating Europe in Partnership" of DG Communication or the Europe for Citizens programme.

This leads us to a second level of the problem which is that the reading or interpretation of cultural heritage in Europe, including of the most symbolic sites of our shared heritage, is still to a very large extent a national reading. The European dimension of our common heritage is insufficiently highlighted and its potential to stimulate intercultural dialogue is insufficiently exploited. This situation has been clearly acknowledged by the Ministers of Culture who launched the intergovernmental EHL and this initiative aimed to tackle this problem by identifying and designating sites which have played a key role in building and uniting Europe, promoting a European reading of these sites, developing their educational potential, and fostering the exchange of experience and of best practices.

The launch of the intergovernmental EHL was backed by a statistical survey carried out in five MS (Finland, France, Germany, Hungary and Italy) in March 2007 by IPSOS for the French Ministry of Culture[6]. This survey showed that 60 % of the respondents believed that shared cultural heritage could contribute to a greater sense

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[5] The full report can be consulted on:http://ec.europa.eu/dgs/education_culture/evalreports/index_en.htm
[6] http://www.culture.gouv.fr/culture/actualites/index-labeleurope.html

of belonging to Europe (85% in Italy, 76% in France, but only 11% in Hungary). However, the definition of what national heritage is and what European heritage is varied considerably from one country to another, and 49% of the respondents believed that European cultural heritage is merely the addition of the national heritage of European countries, while only 45% believed in the existence of a truly common cultural heritage shared by the inhabitants of the European Union. It is also interesting to note that Hungary, the only new Member State participating in this Survey, had a much more hesitant approach towards the common heritage of Europe than the other participating countries: 5% only of the Hungarian respondents believed that their national cultural heritage "is completely a part" of European cultural heritage (52% in Italy, average 28%), 59% believed that Europe represents a risk for Hungary's own identity (13% in Italy, average 34%), and 29% only of the Hungarian respondents answered that they were more interested in the cultural heritage of other EU MS than a few years ago (51% in Germany, average 44%).

A Eurobarometer survey on cultural values in Europe carried out for DG Education and Culture in September 2007[7] confirmed the overall tendencies of the IPSOS survey. The aim of this survey was to measure public opinion on culture and values in Europe and to form an initial insight into the ways in which citizens think and behave in this area, as well as to provide benchmarks against which future evolutions can be tracked. The survey was carried out by TNS Opinion & Social, interviewing 26,755 citizens in the 27 MS. 53% of respondents agreed with the statement that Europe is too diverse to speak of a common European culture (38% disagreed), however 77% agreed that the richness of Europe's culture comes from the history shared by its countries. The Eurobarometer also showed that respondents are as likely to be interested in arts and culture in the rest of the world as in other European countries (13-14% being very interested and 43% fairly interested). The survey also asked people about the ways in which Europeans could be assisted to get to know one another better: 22% answered support to heritage compared to 56% who answered teaching of foreign languages or 41% mentioning increased student and teacher exchange programmes like Erasmus. This shows us on the one hand that the ambitions of the EHL in bringing citizens closer to each other and closer to Europe should remain modest, and that the label will most probably not reach the same level of impacts in this respect as student exchanges or language learning. On the other hand, this also suggests that the potential role of heritage in developing mutual understanding is not sufficiently recognised and exploited and that there is room for improvement.

*2.1.2. The problem today*

In 2009, four years after the concept of the EHL was born, it is obvious that the gap between citizens and the EU still exists. This has been demonstrated recently by the disappointing turnout in the European elections in June 2009. This has also been demonstrated by a number of Eurobarometer surveys such as for example the Eurobarometer 70 published in December 2008 which shows that the perception of the image of the EU has not improved over the past few years. On the contrary the

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[7] http://ec.europa.eu/dgs/education_culture/publ/pdf/culture/barometer_en.pdf

number of Europeans who have a positive image of the EU (45%) is at its lowest level since the autumn of 2005[8].

At the second level of the problem, it is also clear that the EHL did not achieve concrete results so far despite the attribution of the Label to 64 sites since 2007[9]. The European dimension of our common heritage is still very insufficiently highlighted and its potential insufficiently exploited.  This is due in part to the fact that the EHL is only very recent and that the problem it seeks to address is complex and deep-rooted. It would probably have been surprising to find any major shift so quickly. But this is due also to the fact that the EHL is still very far from having reached its full potential and its implementation shows many deficiencies which need to addressed as we will see in the next section, notably concerning the educational and networking aspects[10].

**2.2.    Baseline Scenario: the existing intergovernmental EHL**

*2.2.1 Rationale, objectives and procedures of the intergovernmental EHL*

The rationale behind the intergovernmental EHL as described in the introduction to the EHL adopted by the participating countries on 25 January 2007 is that "Cultural heritage forms an integral part of our European identity and of our shared values and principles. Today's European culture is based on a history of border crossing exchange and dialogue, of interaction and transfer of people and values, of ideas, artistic movements and works of art. The EHL was designed to promote the transnational European dimension of cultural property, monuments, natural or urban sites, tangible and intangible, contemporary and traditional heritage and sites that have played a key role in building and uniting Europe."

The introduction to the EHL outlines the central objectives of the initiative which are "to strengthen the support of European citizens for a shared European identity based on democratic values and human rights, and to foster a sense of belonging to a common cultural space". The intergovernmental EHL also aims "to encourage people's understanding of, and respect and support for, their heritage and it represents a means of protecting and promoting our cultural heritage, with the aim of identifying and passing on that heritage to future generations".

In order to achieve these objectives, participating countries and labelled sites have to undertake education and information activities to promote the European dimension of heritage, as well as artistic and cultural activities to foster synergies between heritage and contemporary creation and creativity. They have to ensure the quality of facilities, notably accessibility for all members of the public. The establishment of a dynamic network of labelled sites is also foreseen.

Rules of procedure for the EHL were adopted on 25 January 2007. If the main responsibility for the selection of sites and the implementation of the label remains at

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[8]     http://ec.europa.eu/public_opinion/archives/eb/eb70/eb70_first_en.pdf
[9]     The list of these sites is in Annex 4.
[10]    An evaluation of the intergovernmental EHL was carried out by ECOTEC (see Section 2.2.2). The results are part of the ECOTEC report:
         http://ec.europa.eu/dgs/education_culture/evalreports/index_en.htm

national level, the creation of a European heritage committee composed of the Ministries of Culture or their representatives (supported if necessary by consultative bodies) is foreseen. The role of this committee is to seek a consensus on the sites pre-selected at national level and to take the final decision on the attribution of the Label, as well as to establish a quality charter and to adopt the rules for the implementation of the EHL. A withdrawal clause is included to enable the exclusion from the list of sites which do not respect the rules and conditions. A transitional clause mentions that in a first stage each country can designate a maximum of 4 sites.

### 2.2.2 *The weaknesses of the current intergovernmental EHL*

The weaknesses of the current EHL became evident as soon as the Commission started to look into this initiative. To name just two examples:

➢ Up to the beginning of 2009, absolutely no structured information on the EHL was available on the internet. Some bits and pieces such as speeches or press releases were scattered on a variety of sites, but it was almost impossible for an interested individual or organisation to assemble these elements into coherent and reliable information. The situation started to evolve in March 2009 when the Spanish Ministry of Culture launched the first web-pages dedicated to the EHL. These web pages are however rather difficult to locate for the general public because they are embedded within the Ministry's website. They were also initially accessible only in Spanish, and the pages are now gradually being translated into other languages. This is without any doubt one of the reasons why there is not much awareness of the existence of the EHL, and why even the main stakeholders in the field of cultural heritage do not have a clear understanding of its precise objectives and procedures, as was demonstrated by the various steps of the public consultation.

➢ As mentioned earlier, 64 sites in 18 countries have been awarded the label so far, but no database with the names and contact details of all the site managers exists. To this date, it was not possible for the Spanish Ministry to collect the necessary data from the participating countries, which also means that the secretariat of the EHL cannot get directly in touch with the managers of the 64 sites.

A more detailed evaluation of the strength and weaknesses of the initiative was carried out by ECOTEC as part of their support services and confirmed the first impressions. This evaluation was based on a close examination of all the official documents of the intergovernmental initiative (rules of procedure, application forms, etc…), interviews with Ministry officials, interviews with stakeholders, interviews and questionnaires sent to site managers and site visits.

The main findings of the evaluation of the intergovernmental EHL can be summarized as follows:

➢ The lack of clear and transparent objectives and procedures is the main criticism that was made to the EHL during the negotiations for the Council conclusions and during the public consultation. A deeper examination shows that the label actually has fairly ambitious and coherent objectives, even if

they leave too much room for diverging interpretations, and that rules of procedures were established to try to reach these objectives. The main problem is that to this date these rules of procedures were either not applied or insufficiently applied.

➢ Despite all the enthusiasm and good will shown by the current secretariat of the initiative whose activities are performed counting on support from the Spanish Ministry of Culture alone, the present form of revolving secretariat is not an optimal form of organisation for a complex initiative such as this. The lack of continuity does not enable a long term-approach to be developed and the building up of the necessary expertise.

➢ So far, the sites have been selected independently by participating countries and the interpretation and application of the selection criteria varied considerably from one country to another. The European committee foreseen in the rules of procedures was never established and as a result there was no overseeing body to take the final decision on the attribution of the Label and to ensure the quality of the process in all regards. As a consequence, the nature of the selected sites, their relevance, and their activities are rather disparate and in some cases difficult to comprehend.

➢ With the present organisation, there is no means, via the secretariat, to be assured that sites gaining the label are maintained to any quality levels indicated in their original application, or are undertaking activities in line with the label to a degree of quality which reflects the merit associated with the label.

➢ The educational aspects are regarded as fundamental by the institutional stakeholders and the site managers interviewed by ECOTEC, and some sites have developed interesting programmes, however there is no evidence that these programmes have evolved since the attribution of the label or that the European dimension has been strengthened.

➢ The networking between sites has limited itself so far to one meeting organised by the French Presidency of the EU in Avignon in December 2008 which brought together representatives from the first set of labelled sites. Little real progress has been made in promoting the transnational dimension of the EHL.

➢ Concerning promotion and communication, as mentioned before, except for the web-pages recently developed by the Spanish Ministry of Culture very little has been done to effectively promote the EHL at a transnational level, neither for the heritage and culture community, nor for the general public. At national level, there is no evidence of an effective promotion of the EHL by the Ministries. At the level of the 64 labelled sites, 42 have a website and only 8 actually display the EHL logo as part of their web-pages.

➢ The EHL has achieved few concrete results so far, and since the initial wave of labelling there has been little forward momentum with the initiative. In order to make an impact, the EHL needs to take a qualitative step forward.

This means at minimum implementing the current rules and procedures, before addressing all their limitations.

*2.2.4 How would the problem evolve, all things being equal?*

In the event that no action is taken by the EU, the most probable scenario is that the EHL would continue as an intergovernmental initiative, even if several MS have raised their concern that under the present revolving secretariat of the EHL the durability of the initiative is far from being ensured. After France in the initial phase and now Spain, no other MS has volunteered so far to take over the secretariat. Spain already drew attention to the burden created by the current situation and underlined that such a revolving secretariat could only be a transitional solution while waiting for the creation of a permanent secretariat.

If the EHL continues as an intergovernmental initiative, the initiative needs to take a qualitative step forward in order to achieve concrete results and to make an impact. However, at the present moment, there is absolutely no sign that the countries participating in the intergovernmental EHL are ready to take a more proactive approach without EU involvement. Therefore, the chances are very high that at best the intergovernmental approach will continue with a very low profile and with no significant results.

## 2.3. Legal basis and subsidiarity

The legal basis for this initiative can be found in article 167 of the Treaty on the Functioning of the European Union. This article gives the EU the mandate to "contribute to the flowering of the cultures of the MS, while respecting their national and regional diversity and at the same time bringing the common cultural heritage to the fore". The EU shall also encourage "cooperation between MS" in the field of culture and "if necessary, support and supplement their action". In accordance, with the Council conclusions, the participation of the MS would be on a voluntary basis. EU involvement in the EHL is expected to reinforce coordination between MS and thus to contribute to the development and the application of new common, clear and transparent selection criteria, as well as new selection and monitoring procedures for the EHL, thereby ensuring the relevance of the sites in the light of the objectives. The results of the evaluation of the current EHL mentioned above demonstrated that this could not be achieved with the intergovernmental arrangements. Other expected benefits of EU action are increasing the number of MS participating in the initiative, fostering the participation of transnational sites and resolving the problems linked to the present revolving secretariat. According to the MS, this should help to improve the value of the initiative in order to ensure the quality, credibility and long-term success of the EHL.

## 3. SECTION 3: OBJECTIVES

The proposed objectives for the renewed EHL derive from the objectives of the current intergovernmental initiative and from the Council conclusions which adapted and refined some of these original objectives, but they were re-evaluated and redefined in order notably to ensure that they are sufficiently specific, realistic and measurable, in other words that they are "SMART" enough.

As already mentioned, the problem described in section 2.1.1 is a broad and complex problem which cannot and will not be solved by the EHL alone. Different initiatives address this issue in complementary ways. Therefore it has been decided to propose four levels of objectives for the EHL:

- ➢ At a very basic level, the operational objectives refer to the improvements of the practical arrangements which are needed in order to address the deficiencies of the current intergovernmental label, as well as to the actual activities which should be implemented by the labelled sites. Output indicators would thus help to verify that sites receiving the Label have met the obligations they agreed to undertake when they made their application and were selected.

- ➢ The specific objectives relate to the direct improvements that sites – individually and collectively - would be intended to deliver as a result of their activities linked to the EHL designation or that the new practical arrangements would be intended to deliver. Hence result indicators would go beyond simply cataloguing what was done to look at its direct effects.

- ➢ The intermediate objectives are the highest level of impact that the EHL can achieve on its own. They refer to the impacts of the EHL on individuals and on heritage as a whole. At this level, the impacts can be measured and / or assessed with a degree of certainty with intermediate impact indicators.

- ➢ The general objectives reflect the overall ambition of the EHL and link it into the wider EU policy agenda. These goals are subject to many complex influences and whilst the EHL can make some contribution to their achievement, separating out and measuring that effect would be enormously difficult. It is important to repeat once again that the ambitions of the EHL concerning these general objectives are modest and that the contribution of the label will certainly not reach the same level of impacts as for example student exchanges or language learning.

It should be noted that the economic dimension of the EHL, notably linked to tourism, has been included only through specific and operational objectives related mainly to the marketing and the promotion of the sites. This is due to a number of factors. Firstly, as mentioned earlier, during the consultation process many stakeholders insisted that the primary effects of the EHL will be and should be social ones and they warned that stressing the economic objectives too much might blur the message of what the label is trying to achieve. The EHL may stimulate tourism and associated gains, but it is most appropriate to see these as secondary, indirect benefits.

Secondly, one of the specificities of the EHL is that the symbolic value of the sites and their European significance is more important than their aesthetic value. As a result, a great diversity of sites can possibly be awarded the label, some with a potential for touristic "mass appeal", others with less, some which already attract numerous visitors before being labelled, and others which are basically unknown. As a result it is almost impossible to set common economic objectives to be reached by all the sites without distorting the central aim of the label.

Thirdly, the capacity of the EHL to have a significant impact on the number of visitors to a site will depend greatly on the quality and the credibility the label will acquire and thus on the prestige it will develop. This is a process which will take a number of years. It would therefore seem more appropriate to consider building in more ambitious economic objectives at a later stage after evaluation of the initial functioning of the initiative.

This should however not prevent the MS and sites wishing to exploit the economic dimension of the EHL more actively to do so already in the initial stage.

## 3.1. General objectives

➢ Strengthen European citizens' sense of belonging to the European Union based on shared elements of history and cultural heritage, as well as an appreciation of diversity.

➢ Strengthen intercultural dialogue

## 3.2. Intermediate objectives

➢ Enhance the value and profile of sites which have played a key role in the history and the building of the European Union

➢ Increase European citizens' understanding of the building of Europe, and their common yet diverse cultural heritage, especially related to democratic values and human rights that underpin European integration

## 3.3. Specific objectives

➢ Develop sites' European significance

➢ Raise young people's awareness of their common cultural heritage

➢ Facilitate sharing of experiences and exchanges of best practice across Europe

➢ Increase access to heritage sites for all members of the public, especially young people

➢ Increase intercultural dialogue, especially among young people, through artistic, cultural and historical education

➢ Foster synergies between cultural heritage and contemporary creation and creativity

➢ Contribute to the attractiveness and the sustainable development of the regions

### 3.4. Operational objectives

*a) Practical arrangements for the EHL*

> ➢ Ensure the application of common, clear and transparent criteria for the selection of the sites

> ➢ Foster a fair distribution of labels across the European Union

> ➢ Introduce a monitoring procedure to ensure that the labelled sites respect their commitments

> ➢ Improve the complementarity with other initiatives in the field of cultural heritage, notably through good communication with relevant international bodies

> ➢ Ensure that the practical arrangements remain light and flexible for the EU and the MS

> ➢ Increase the visibility at European level, notably through the development of a website

> ➢ Develop transnational networks of sites to develop their European profile and exchange

*b) Activities of the labelled sites*

> ➢ Develop the European dimension of sites through appropriate information activities and multilingual signage

> ➢ Develop programmes of educational activities

> ➢ Undertake marketing and promotion of sites as tourist destinations locally, nationally and at European level

> ➢ Develop access to sites through site adaptations, visitor tools, staff training, privileged access for the young public

> ➢ Develop programmes of cultural activities: events, festivals, artist-in-residence schemes, etc

### 3.5. Consistency of these objectives with other EU policies

These objectives will help to meet the challenges mentioned in section 2 alongside other initiatives aimed at filling the gap between citizens and the EU such as the various EC initiatives in the field of information and communication.

They will contribute to the objectives of the European agenda for culture which are notably to foster cultural diversity and intercultural dialogue and to promote culture as catalyst for creativity. They are also fully in line with the goals of the new EU strategy for youth to improve access and full participation of young people in society and to foster solidarity between youth and society, as well as with other DG

Education and Culture policies and programmes such as Lifelong Learning or Europe for Citizens.

They are consistent with the activities in the field of heritage and tourism of other services of the Commission such as DG Information Society and Media, DG Maritime Affairs and Fisheries, DG Regional Policy or DG Enterprise and Industry.

They are also related to the Integrated Guidelines for Growth and Jobs 2008-10 which continue to emphasise the need to strengthen territorial and social cohesion, not least as a consequence of the development of large volumes of cross-border migration or to the Renewed Social Agenda which aims to develop cohesive and inclusive societies.

## 4. SECTION 4: POLICY OPTIONS

In order to achieve the objectives of the EHL, a wide range of policy options was considered. These options were then narrowed down through an initial screening taking into account the technical constraints of the EHL. Options which appeared to be completely unrealistic or unfeasible were excluded from further analysis.

### 4.1. Policy options not retained for analysis

The Council conclusions mention that the new EHL should keep "flexible and streamline administrative arrangements in compliance with the principle of subsidiarity." This was indeed a central element in the negotiations for the adoption of the conclusions. Without a strong commitment to keep the costs limited both at national and European level and a strong commitment to avoid all unnecessary bureaucracy, no agreement could have been reached between the MS. This same concern was also expressed on numerous occasions during the consultation process and it has been reinforced by the current context of financial and economic crisis which makes it highly unlikely that much funding will be available either at national or European level for the EHL in the coming years.

In light of these factors we excluded an option which would have involved continuing the EHL as an intergovernmental initiative but with significant financial support from the EU to develop sites and the networking between them, as well as an option which would have involved transforming the EHL into a EU initiative with significant financial support to the sites.

Because of the very clear consensus which emerged during the consultation phase (see sections 1.2.2. and 1.2.3.), all the retained options are based on the attribution of the EHL on a permanent basis with a strong monitoring procedure and the possibility to withdraw the label. Options based on the attribution of the EHL for a limited duration were considered as un-realistic because of the reticence of a vast majority of MS and were therefore excluded from further analysis.

### 4.2. Options retained for analysis

Flowing out of the screening process mentioned above, three main options were developed, with one of the options containing three sub-options. All of these options

would have very limited impacts on the EU budget. All of them also respect the principles of subsidiarity and proportionality.

*4.2.1. Option 1: Status quo (baseline scenario)*

The EHL continues as an intergovernmental initiative with a secretariat hosted by participating countries on a revolving basis (unfunded by the EU) and without any EU action. This is the baseline option against which the other options are tested.

*4.2.2. Option 2: Status quo plus limited EU financial support*

The EHL continues as an intergovernmental initiative with limited financial support from the EU budget to support part of the running costs of the secretariat, part of the communication costs, expert meetings and networking. Funding would have to come from either the current or future Culture programme. With this option, no new legislation as such is needed, although it might be necessary to take into account the specificity of the EHL while preparing the legal base of the future Culture programme

*4.2.3. Option 3: The EHL becomes a EU initiative through a decision by the Council and the Parliament*

This decision would specify the objectives and the rules of the new Label, define the common selection criteria, set up the selection and monitoring procedures and share clearly the tasks and responsibilities between the MS and the Commission. A secretariat would be provided by the Commission. Some limited financial support would be provided to assist the transnational networking of the sites, either through calls for proposals or by the direct organisation of expert meetings by the Commission. The Commission would also be responsible for the communication and the visibility of the EHL at European level. Three sub-options are possible according to the various selection and monitoring procedures that came up during the consultation phase:

➢ 3(a) Selection of sites is undertaken by the MS against common, clear and transparent criteria. Each year the MS put forward sites up to a maximum number and according to country quotas which could be on a rotating basis. The sites are then validated by the EU. Monitoring is a MS responsibility. The function of the Commission is to ensure a good coordination between the MS and the smooth running of the procedures and the practical arrangements.

➢ 3(b) Sites are selected through an open selection process which does not take into account the national origin of the candidate sites by an expert committee at European level. A limited number of Labels could be awarded each year. Monitoring functions would also be undertaken at EU level.

➢ 3(c) Sites are pre-selected by MS and then subject to final selection by an independent panel at EU level. MS nominations could be on a rotating basis. Monitoring is primarily a MS responsibility, but with supervision and review by the independent panel.

**5.**     **SECTION 5: ANALYSIS OF IMPACTS**

**5.1.**     **Development of the framework of impacts**

In order to undertake the impact assessment a range of potential impacts were identified. These were derived from consideration of a number of sources: from a review of the literature relating to the impact of culture and heritage; from an analysis of the objectives of the EHL; and from the comments and perspectives of individuals, organisations and MS who participated in the consultation process.

A number of considerations were important in assembling the list of potential impacts and then determining the likely impact of the EHL.

It is clear from the objectives of the EHL that the primary direct effects of the Label are likely to be social ones. As already mentioned in section 1.2.2.2., the participants in the consultation meeting placed particular emphasis on the political and educational dimensions and they stressed that the EHL should be concerned mostly with social / societal changes. A majority of the impacts examined in table 1 are therefore social / societal impacts.

Included in these social / societal impacts are the potential impacts on fundamental rights. As pointed out several times in the preceding sections of this report, European common values are at the core of the EHL and one of the foundation stones for the initiative concerns the building of a shared European identity based on democratic values and human rights. It should therefore be noted that the label is likely to have positive impacts (and certainly no negative ones) and thereby make a contribution to the objectives of the Charter of Fundamental Rights of the European Union.

Concerning the economic benefits of the EHL, as discussed in section 3, they should rather be considered as secondary or indirect benefits in a first stage. The potential impacts of the EHL on the local tourism industry have however been analysed. Some economic impacts are also possible in relation to innovation and creativity. One of the objectives of the EHL is to link cultural heritage to contemporary cultural activities and creation. Much will depend here on individual sites and their immediate local context, and on the extent to which active programmes of linking to creative industries and artists etc are built into sites' projects – and then delivered. And this will depend in part on the extent to which this is emphasised during the selection process.

In relation to environmental impacts, these are unlikely in general to be substantial. There is a risk that tourist footfall could become a problem at some sites but as we have seen, this should remain limited in a first stage. The EHL is also not primarily about conservation. There are a number of accolades in that domain already (e.g. the UNESCO World Heritage List or the Europa Nostra Awards, as well as numerous designations at national level) and whilst the EHL may secure the future of some sites for future generations that would otherwise not have been saved, it is important that it does not become seen as a Label for sites that could not secure one of these other designations.

Finally, the EHL will have no negative impacts on third countries. On the contrary, if at some stage of its development the EHL opens up to third countries participating in

the Culture programme as suggested by the Council conclusions, the potential benefits of the EHL will extend to these countries.

**5.2. The chain of effects**

The most direct effects of the Label will be on the sites themselves and then on individual citizens: indeed without those impacts on the sites, positive impacts on individuals will not be achieved. Thus the primary effects should be on raising the European dimension and the profile of sites, and on increasing access, especially for young people. Once such improvements are achieved we would then expect to see benefits on individuals in terms of increased interest in and understanding of European heritage, and Europe's cultural diversity.

Clearly at this point in the chain of effects, however, the possibility of positive effects starts to become affected by many other factors. The ultimate goal of the EHL is to change individual attitudes, and not just in terms of a person's view on this or that subject, but at a very deep-rooted level, namely their identity. Not only is this a very complex area, but it raises an insurmountable difficulty in terms of attributing someone's 'change of mind' to the EHL or indeed to any other single effect. Compared to the other influences on someone's identity, a visit to a labelled site clearly – in general – should not be counted as a major influence, although equally we cannot rule out the possibility that for any one individual a visit to certain sites could have a profound impact. For this reason, it would be unrealistic to expect the EHL in general and in aggregate to have anything other than a modest effect in areas such as the level of a greater sense of belonging to the EU and intercultural dialogue. Still less would we then anticipate a strong effect on behaviour such as participation in the democratic process.

**5.3. Quantification versus qualitative analysis**

It has not been possible to make quantitative estimates of the likely impacts for the EHL. No data is for example available from the sites which were awarded the EHL under the intergovernmental initiative that would enable us to construct reliable estimates of effects. Furthermore, if there is a growing literature on cultural heritage, most of the evidence about the socio-economic benefits of heritage is of a very general or unquantified nature. The literature review carried out by ECOTEC did help to understand the broad types of impact that might be possible and the likely balance of social, economic and environmental impacts, but it did not help with estimating the potential magnitudes of any effects and it did certainly not help to understand the effect that a designation such as the EHL might have over and above the impacts that would be taking place in the absence of the designation. Even the most prestigious designations such as the UNESCO World Heritage List have been the subject of very few detailed studies and in the UNESCO's own words: "the economic impact for local communities when a site is inscribed on the World Heritage List is still to be measured"[11]. Consequently, the assessment of options is conducted in qualitative and comparative terms. In the following section, an assessment is made of each option in terms of whether it would lead to an improvement or deterioration in an impact.

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[11]   http://unesdoc.unesco.org/images/0018/001809/180960m.pdf

With a view to measuring the impacts of the EHL in the future, section 7.2. proposes a set of indicators for the evaluation of the initiative which should enable also a quantitative analysis of the Label.

**5.4.    The likely impacts of the various policy options**

The summary table below presents a comparative assessment of the likely impact of the EHL under the different options. It was developed in close cooperation with ECOTEC and is based on the external expertise provided by the consultant. Against each impact an indication is given of the likely difference of each impact compared to the baseline. In the full table in annex 5, an explanation is also provided as to the assessment made. Naturally these differences depend on a chain of causality that runs from the changes envisaged under each option and further discussion of this is provided in the subsequent section that deals with efficiency, effectiveness and coherence.

*Table 1:  Comparison of options in terms of likely impacts compared to the baseline option*

| Option | Option 1:<br><br>Status quo | Option 2:<br><br>Status quo plus EU funding | Option 3: EU initiative… | | |
|---|---|---|---|---|---|
| | | | ..with MS selection<br><br>(a) | ..with EU level selection (b) | .. with MS pre-selection and EU level approval (c) |
| **KEY:**<br><br>= baseline or equivalent to baseline        + to +++ minor to major improvement compared to baseline<br><br> - to --- minor to major worsening compared to baseline | | | | | |
| **SOCIAL/SOCIETAL IMPACTS** | | | | | |
| Increased access to cultural heritage resources | = | + | ++ | ++ | +++ |
| Increased access to heritage for young people | = | (+) | + | ++ | +++ |
| Increased interest in and knowledge of common European heritage | = | (+) | + | ++ | ++ |
| Increased understanding of European cultural diversity | = | = | + | +++ | ++ |
| Increase in intercultural dialogue | = | = | + | + | + |
| Greater sense of belonging to the European Union | = | = | (+) | (+) | (+) |
| Stronger participation in the democratic process | = | = | = | = | = |
| **ECONOMIC IMPACTS** | | | | | |
| Positive effects on the local tourism industry, including number of people employed | = | = | (+) | (+) | (++) |
| Development of links with cultural and creative industries | = | = | (+) | (+) | (+) |
| Development of innovation and creativity | = | = | (+) | (+) | (+) |
| **ENVIRONMENTAL IMPACTS** | | | | | |
| Negative effects linked to over-development of tourism | = | = | + | + | + |
| Protection of cultural heritage | = | = | + | = | + |

## 6. SECTION 6: COMPARING THE OPTIONS

### 6.1. Criteria for comparing the options

Having looked at the likely impacts of the different options we turn in this section to an assessment in terms of three main criteria: effectiveness, efficiency and coherence. However, within these general criteria there are a range of sub-criteria to consider. These derive from the key features of the current EHL, from the Council conclusions, from the consultation process, and from the lessons learnt from other labelling and award schemes. The criteria selected are shown below and reflect closely all of the objectives proposed in section 3:

**Effectiveness**

➤ Representativeness – As mentioned above, it is important that the EHL is able to deliver a fair distribution of Labels across the EU Member States to ensure continuing participation and commitment in the development of a shared European identity.

➤ European dimension, significance of sites – It is essential for the EHL that national interpretations of culture and history are balanced with interpretations of sites' European significance.

➤ Transnationality and networking – This needs to be a key component of the EHL if it is to realise its aspirations to build a shared understanding of European cultural heritage. Inter alia it will enable the sharing of good practice, for example in relation to ways of improving access to sites.

➤ Visibility and profile – Having a high profile will be important for the EHL as it seeks to impact on the attitudes and identities of Europeans, and is also central to improving access, especially for young people, where new and creative ways may need to be found to open up sites.

➤ Artistic, cultural and historical education – Effective programmes of educational activities will be central to the success of the EHL in promulgating the role of sites in European culture and heritage and demonstrating the importance of intercultural dialogue to the development of tolerance and understanding.

➤ Programmes of cultural activities – It is important that the culture and heritage of EHL sites do not ossify and that their relevance to contemporary life is demonstrated through links to contemporary cultural activities and creativity. Programmes of cultural activities will be an important means by which this can be achieved.

**Efficiency**

➢ Selection processes – These are core to differentiating the options and different options offer different combinations of advantages and disadvantages.

➢ Delivery and compliance – Options are likely to vary in their ability to implement effective monitoring and evaluation processes.

➢ Administrative arrangements – It is important that whichever option is chosen the resulting administrative arrangements are 'flexible and streamlined/light'.

➢ Financial effects – Related to the preceding point, consideration also needs to be given to the financial implications for the EU for each of the options.

➢ Communication with other international bodies – Given the nature of the EHL concept and the existence of similar schemes, the ability to communicate with other bodies will be an important feature of the Label going forward.

**Coherence**

➢ Limitations of trade-offs across social, economic and environmental domains – The economic impacts of sites, though likely to be limited (as discussed in the preceding impact assessment), may bring negative environmental effects, and to mitigate these, conservation will need to be one of the criteria in awarding the Label. It is important to assess the extent to which the options will affect this trade-off.

➢ Synergies and complementarities with other initiatives – Synergies and complementarities offer the prospect of increasing the impact of the EHL. Some options may be more likely to offer them than others.

➢ Participation of third countries in the Culture programme – Although such participation is likely to take place only once the EHL is well established, consideration should be given to which option is more likely to deliver this effectively and efficiently.

In the following section each of the options is assessed against each of these criteria in terms of whether they would be likely to achieve an improvement or a worsening compared to the baseline position.

6.2. **Comparison of the options against effectiveness, efficiency and coherence criteria**

The summary table below, prepared in cooperation with ECOTEC, presents the scores of the options. The full table, including the comments, is in annex 6.

*Table 2: Comparison of the options against effectiveness, efficiency and coherence criteria*

| Option | Option 1: Status quo | Option 2: Status quo plus EU funding | Option 3: EU initiative… | | |
|---|---|---|---|---|---|
| | | | ..with MS selection (a) | ..with EU level selection (b) | .. with MS pre-selection and EU level selection (c) |
| **KEY:**<br>= baseline or equivalent to baseline          + to +++ minor to major improvement compared to baseline<br>- to --- minor to major worsening compared to baseline | | | | | |
| **EFFECTIVENESS** | | | | | |
| **Representativeness** | = | = | + | - | + |
| **European dimension – significance of sites** | = | (+) | + | +++ | ++ |
| **Transnationality and networking** | = | + | + | +++ | ++ |
| **Visibility, profile and access** | = | + | ++ | ++ | +++ |
| **Artistic, cultural and historical education** | = | = | + | ++ | ++ |
| **Programmes of cultural activities** | = | = | + | ++ | ++ |
| **EFFICIENCY** | | | | | |
| **Selection processes** | = | = | + | ++ | +++ |
| **Delivery and compliance (monitoring and QA)** | = | (+) | ++ | + | +++ |
| **Administrative arrangements at EU and MS level** | = | - | - | -- | --- |
| **Financial impacts for the EU** | = | - | -- | --- | -- |
| **Communication with other international bodies** | = | + | ++ | +++ | +++ |
| **COHERENCE** | | | | | |
| **Limitation of trade-offs across social, economic and environmental domains** | = | = | + | + | + |
| **Synergies and complementarities with other initiatives** | = | = | ++ | +++ | +++ |
| **Participation of third countries in Culture programme** | = | = | +++ | +++ | +++ |

**6.3.    Option 1: Status quo (baseline scenario)**

As already mentioned in section 2.2. and illustrated in tables 1 and 2, if the EHL continues as an intergovernmental initiative, it would need to take a qualitative step forward in order to reach concrete results and to make an impact. However, at the present moment, there is absolutely no sign that the countries participating in the intergovernmental EHL are ready to take a more proactive approach. On the contrary, the adoption of the Council conclusions suggests that the MS are convinced that the EHL can only reach its full potential through the 'communautarisation' of the label. Without such a 'communautarisation', the chances are very high that at best the initiative will continue with a very low profile and with no significant results. Option 1 would also imply that the Commission ignores the request made by the Council.

**6.4.    Option 2: Status quo plus limited EU financial support**

Thanks to the additional funding, this option is likely to deliver a small number of effectiveness and efficiency improvements compared to the baseline scenario which would feed through into some minor improvements on a limited range of impacts. The most significant effectiveness and efficiency gains are likely in the areas of transnationality/networking, and visibility/profile where additional funding might facilitate an increase in relevant activity including marketing and promotion. These improvements might then feed through into slight improvements in individuals' access to cultural heritage, including possibly youth access. There might also be some enhancement in the emphasis placed on the European significance of sites (e.g. through support to expert meetings) which, combined with the increased visibility and profile of sites, might deliver a rise in interest in and knowledge of common European heritage. However, with this option there is no guarantee that the numerous shortfalls in the practical arrangements and in the implementation of the initiative analysed in section 2.2.2. would be tackled effectively, and, as a result, that the overall quality of the initiative would improve significantly. It is also unlikely that this option would lever any significant benefits in terms of improved educational or cultural activity programmes. Option 2 (as option 1) would finally lack the strengthened legitimacy and credibility that comes from being an EU initiative and which was mentioned on numerous occasions during the public consultation. For all these reasons, it is very unlikely that the minor improvements that could be realised under option 2 would feed through into wider and deeper impacts.

**6.5.    Option 3: The EHL becomes a EU initiative through a decision by the Council and the Parliament**

The most substantial improvements in impacts would be achieved by making the EHL a EU initiative. Within this broad option, the sub-option of MS selection with a EU secretariat (3a) would probably deliver less marked improvements across the range of impacts and the fewest effectiveness and efficiency gains. This option

would involve a less 'active' EU level which would probably mean less emphasis placed upon and ability to realise in particular the European dimension, as well as transnationality and networking, or less likelihood of achieving improvements in education and cultural activity programmes. It would also make it less likely that visibility and profile could be raised to the same degree as with a stronger EU tier. As regards selection processes, transparency and clarity would probably not be as strong as under sub-options 3b and 3c and it would not be as possible to ensure the consistent application of criteria. The international aspects of the EHL (communication with other international bodies and synergies and complementarities with other initiatives) would also probably be weaker under sub-option 3a. As a consequence of these weaknesses, sub-option 3a would probably not deliver the same level of improvements in impacts as could be achieved under 3b and 3c. With weaker visibility/profile and less emphasis on the European dimension and transnationality/networking, this sub-option would be less likely to increase the numbers of individuals accessing cultural heritage and especially appreciating its European aspects.

In contrast, more active EU involvement (sub-options 3b and 3c) would be more likely to deliver greater benefits on account of: being able to ensure a greater focus on the European dimension, on transnationality and networking, and on enhancing educational programmes and programmes of cultural activities; being better equipped in terms of marketing and promotion; and having an enhanced capability in relation to monitoring and evaluation and adherence to quality standards. These factors would give sub-options 3b and 3c the propensity to drive up performance across a range of impacts, especially the social/societal ones.

Naturally, for the reasons already noted, even under these sub-options the achievement of greater economic impacts would be difficult at the outset, although some minor improvements to economic impacts would be possible if links were made to other areas of EU policy and programmes (in the areas of cultural and creative industries and innovation and creativity for example), and through networked activity in relation to tourism. These would probably be realised over the longer term. Through the new selection criteria and the enhanced monitoring capacity that would be achievable under a EU initiative, some positive impact might be possible in relation to the attenuation of negative environmental effects linked to the development of tourism, but this is likely to be limited.

If we compare now sub-options 3b (selection at EU level only) and 3c (combined MS and EU level selection), sub-option 3c offers the prospect of the same or better level of improvement as 3b across all impacts, except the increased understanding of cultural diversity (Table 1). In relation to the two impacts related to access, sub-option 3c is likely to deliver greater improvements by being better able to ensure that priority is accorded and delivered, not least through the commitment from and links between ministries that could be forged at national level. This was referred to very strongly during the consultation process. In relation to the effectiveness and efficiency criteria, sub-option 3c is also preferable on the basis that:

> it would continue to ensure a fair distribution of sites across Europe and hence be more likely to ensure the ownership and the commitment of all

Member States, even if this implies the equal treatment of all the MS while the pools of relevant sites may differ from one country to another;

➤ it is likely to be more effective in relation to the visibility and profile of the EHL since both levels could be engaged in marketing and publicity;

➤ it would be able to draw both on MS and EU resources in relation to selection and monitoring, whilst ensuring a consistent application of criteria and the engagement of all EU countries in the complex process of realising a shared sense of European identity;

➤ it would realise the same improvements as the EU only model (3b) in relation to the criteria related to communication with other international bodies and coherence.

**6.6.** **Administrative arrangements and financial impacts**

Whilst sub-option 3c offers the advantages mentioned above, it is also necessary to take into account the extent to which administrative arrangements across the options and sub-options are 'flexible and streamlined'. This requires us to take into account the fact that there is some trade-off between overall efficiency and effectiveness and the burden of administration: the lightest and most flexible administration is not necessarily the most effective or efficient; balance is key.

Option 1 would have no impact at all for the EU. All administrative arrangements and costs remain at MS level.

With option 2, the only involvement of the EU would be through a grant to support part of the running costs of the secretariat, part of the communication costs, expert meetings and networking. Funding would have to come from either the current or future Culture programme. One basis to estimate the size of the grant for the EHL, could be the current EU Prizes for heritage, literature, architecture or music which cover selection procedures, visibility and some staffing costs, but no networking. These grants range from 200 000 € to 360 000 € for total budgets which range from 333 333 € to 704 000 €. It needs to be pointed out that by definition grants consist of co-financing only, meaning that the recipient organisations must also put in resources of their own, which would not be straightforward with an intergovernmental arrangement. It also needs to be recalled that EU grants are subject to open competition, which creates uncertainty and reduces the reliability of this option.

With option 3, the administrative arrangements and the costs would be greater for the EU. A secretariat would be provided by the Commission. Some limited financial support would be provided to assist the transnational networking of the sites. The Commission would also be responsible for the communication and the visibility of the EHL at European level. On the basis of the experience of the European Capitals of Culture they can be estimated as follows for the 3 sub-options.

| Costs per year | Sub-option 3a | Sub-option 3b | Sub-option 3c |
|---|---|---|---|
| Secretariat | 1 staff member 122 000 € | 2 staff members 244 000 € | 2 staff members 244 000 € |
| Selection | - | 400 000 € | 200 000 € |
| Visibility | 250 000 € | 250 000 € | 250 000 € |
| Networking | 300 000 € | 300 000 € | 300 000 € |
| Total | 672 000 € | 1 114 000 € | 994 000 € |

The costs for visibility and networking would remain the same across the three options. The variations are linked to the selection procedure. With selection at national level only (3a), there would be no costs at EU level and less staff needed in the secretariat. With selection at EU level only and thus without the filtering of the pre-selection at national level, the number of applications to evaluate by the independent panel of experts would be much higher which would increase the linked costs.

With option 3, the only compulsory expenses for a MS would be the costs of their own pre-selection (3c) or selection procedure (3a) and of the monitoring of the sites located on the national territory (3a and 3c). If a parallel is drawn with the European Capitals of Culture, the selection process in MS typically occupies one member of staff in the national ministries or organising bodies during the relevant period. Any additional costs would be a national matter. Sub-option 3b with selection and monitoring at EU level would have much fewer administrative and financial implications for the MS, but as seen in section 1.2.3., the MS were not in favour of this option during the consultation meeting and preferred a two level approach.

It is very difficult to quantify the costs for the MS, as the nature and the size of the selection and monitoring procedures will greatly depend on the specificities of each MS. The needs will not be the same for a big MS with a large pool of potential sites, than for smaller MS with only a few potential sites. In accordance with the principle of subsidiarity, each MS should also have the possibility to establish the type of selection or monitoring procedure which is the most adapted to the national context. A flexible approach should enable each MS to choose the most cost-effective solution.

As a conclusion, option 3c is not the lightest option but, as we have shown in the previous sections, greater benefits would be realised across most of the criteria and hence greater cost-effectiveness would be achieved. Furthermore, the increase of the administrative and financial "burden" is not expected to be significant compared to the baseline or the other options, and it would be spread across the EU and MS. This option would also have the advantage of having greater political "buy in" or

commitment by the MS, which would consequently make it more likely that the sites would be made a priority in accessing funding through national sources or nationally administered sources.

**6.7.    Preferred policy option**

On the basis of the assessment above, as well as of the consultation process, the preferred option is option 3c (combined MS and EU level selection). With this option, the EU involvement brings a clear added value to the EHL and enables benefits that could not be achieved by MS acting alone. The most marked improvements in impacts would be in short-term effects where there would be a strong connection to the improvements in effectiveness and efficiency. Direct effects on factors such as a sense of belonging to the EU, intercultural dialogue and participation in the democratic process remain of course more limited since such high level impacts are affected by a vast array of influences, and, as discussed in section 2, the EHL is only one initiative amongst many others.

In order to work effectively and on the basis of the results of the IA and of the public consultation, the main features of the selected option should be the following:

➢ An overall legal framework to transform the EHL into a EU initiative provided by a Decision of the Council and Parliament. This Decision would, *inter alia,* specify the objectives and rules governing the label, establish clear, common and transparent selection criteria, and specify the arrangements for monitoring and evaluation. We have seen in section 2 that the present objectives and rules of the intergovernmental EHL leave too much room for diverging interpretations by the MS and this has harmed to the overall coherence and quality of the label so far. It is also essential to ensure that all the future rules will de facto be applied, and that they will be applied evenly by all the participating MS.

➢ The participation of the MS should be on a voluntary basis.

➢ A clear division of responsibilities is needed between sites, MS and EU level in terms of selection, delivery, and monitoring and evaluation in order to avoid overlaps, share the administrative burden, and thus ensure that the practical arrangements remain as light and flexible as possible.

➢ In order to emphasize the added value of the EHL compared to other initiatives in the field of heritage such as the UNESCO World Heritage List, the Council of Europe Cultural Routes or the EU Prize for cultural heritage / Europa Nostra Awards, the criteria of the EHL should be based clearly on the symbolic value of sites for Europe's identity and the role they have played in the history and the building of Europe, on the quality of the programme they submit and on the quality of their management plan. A good communication between the EHL and the other initiatives will be needed in order to foster synergies. This should be facilitated notably by the fact that both the European Institute of Cultural Routes and Europa Nostra receive EU grants in the framework of the Culture programme.

➢ In a first stage, the pre-selection of the sites should take place at MS level, and then in a second stage, the final selection should take place at EU level with the help of a panel of independent experts. This would ensure both a robust application of criteria and the giving of appropriate prominence to the European dimension, whilst also preserving an equitable distribution of sites across the EU.

➢ A pre-established rotation system with the participation of a limited number of MS each year, as discussed during the consultation phase, could have helped to keep the number of sites and the administrative burden reasonable while ensuring the long-term commitment of all MS. However, a consultation of the Legal Service of the Commission showed that this solution was not applicable for reasons of discrimination between the MS. Therefore, an alternative solution would be to give each MS the possibility to participate in the selection procedure each year, but after three successive years dedicated to the selection of new sites, each fourth year would be reserved for the monitoring procedure.

➢ This two-stages approach needs to be linked to national quotas, but these quotas must keep a certain flexibility because some countries have a greater pool of potential sites than others and all MS may not wish to propose the same number of sites. It is also politically very sensitive to attribute different quotas to the MS. Therefore the best compromise seems to be to give to each MS the possibility to pre-select up to a maximum of two sites every year in which a selection is made. These national quotas will keep the process manageable at European level by avoiding a too high number of applications from certain MS, while at the same time working as an incentive for all the voluntary MS to actually participate in the selection procedure.

➢ A certain element of competition should also be kept between the sites at EU level for the purpose of ensuring the general quality of the sites and thereby the prestige and credibility of the initiative. The panel of independent experts should therefore have the possibility to choose between the sites pre-selected by a MS and should select a maximum of one site per MS. A special priority should be given by the panel to sites with a strong transnational dimension. This should be facilitated by the selection criteria in which the cross-border or pan-European nature of the sites will be clearly mentioned (see annex 3). Special provisions should also be designed to enable the participation of several sites located in different MS which gather around one specific theme to propose a single application, or the participation of single sites which are geographically situated on the territory of at least two different MS. Such "transnational sites" should follow the same procedure as other sites for their application and should be pre-selected by one of the concerned MS. However, if the panel of independent experts judges that such "transnational sites" respect all the criteria, priority should be given to these sites during the final selection.

➢ The label should be attributed on a permanent basis because the symbolic value of the selected sites will not diminish over time and in order to encourage sites to take a long term approach and to invest in their development. However, in order to maintain the quality and the credibility

also in the long term, a strong monitoring system is needed to ensure that the labelled sites respect their commitments, as well as the possibility to withdraw the label. This monitoring should also take place first at national and then at European level.

➢ The consultation process has shown that it does not make sense to try to define what a "reasonable" number of labelled sites means numerically. Any number would be arbitrary. At the same time, it became clear that with too few sites, there would be an inadequate geographical spread and it would be harder to reach citizens for practical geographical reasons, which might undermine the initiative's objectives. Therefore, there should be no cap from the outset on the total number of sites which will be awarded the EHL, but the number of sites should increase slowly and progressively in order to keep the initiative manageable and to ensure its overall quality and credibility. The cap on the number of selected sites for each MS at each selection round will contribute to this.

➢ Because the implementation of the rules of the EHL will be a complex process, the EU action should in a first stage start with the 27 MS. It could then in a second stage be enlarged to the third countries participating in the Culture programme if the practical arrangements prove to be sufficiently strong and efficient.

➢ The Commission should provide the permanent secretariat of the initiative in order to ensure a greater stability than under current arrangements and enable expertise to be built up. This solution would enable to draw on existing experience such as for example in the framework of the European Capitals for culture or the EU Prize for Cultural Heritage / Europa Nostra Awards. It will however demand additional resources which need to be made available. In order to keep the practical arrangements as light and flexible as possible, certain administrative tasks could be externalized through tendering procedures.

➢ Transitional measures need to be taken in order to define the status of the sites which were awarded the EHL in the framework of the intergovernmental initiative. In order to ensure the overall coherence of the initiative, these sites will need to be re-assessed against the new criteria.

➢ In order to keep the impact on the EU budget limited without harming the overall quality of the initiative, funding at EU level should remain restricted to the costs of the secretariat, the costs of the European panel of experts, the visibility of the initiative at European level and some networking activities for the sites. On the basis of the experience of the European Capitals of Culture, this should not exceed a maximum of 1,5 million Euros a year, including the additional human resources needed to run the action (one administrator and one assistant).

➢ At a national level, the only compulsory expenses for a MS would be the costs of their own pre-selection procedure and of the monitoring of the sites located on the national territory. As the nature and the size of the selection and monitoring procedures will greatly depend on the specificities of each

MS, the costs will vary from one MS to another. A flexible approach should enable each MS to choose the most cost-effective solution according to the national context. Any additional costs would be a national matter.

## 7. SECTION 7: MONITORING AND EVALUATION

Monitoring and evaluation are crucial to ensure the effectiveness of the initiative, its credibility and its prestige. The monitoring and evaluation framework of the EHL will comprise two elements which need to be distinguished:

### 7.1. The monitoring of the labelled sites

As already mentioned in the previous section, the aim here is to verify that labelled sites have met the obligations they agreed to undertake when they made their application and were selected. This monitoring will be under the responsibility of the MS who will report to the European panel every 4 years. A set of indicators to be taken into account will be provided by the Commission. In the event that specific sites no longer meet their obligations, there will be a possibility to withdraw the Label.

### 7.2. The evaluation of the EHL programme as a whole

This evaluation will need to combine a focus on examining both the processes involved in operating the programme and the actual cumulative impact of the EHL at programme level. The aim will be to identify in which respects the programme is working well, where there is room for improvement and, crucially, how this improvement might best be achieved in the future. The monitoring of the labelled sites will of course feed into this evaluation. The evaluation will be under the responsibility of the Commission and will take the form of an external evaluation every 6 years.

Concerning the effectiveness of the processes involved in operating the programme, the annual selection process, the monitoring and evaluation plan, as well as the communication and marketing plan should be taken into consideration. Key indicators could include:

➢ the number of sites selected annually;

➢ the number and quality of the monitoring activities;

➢ the number of promotional events held by EHL sites, the number of new EHL websites launched;

➢ the networking and transnational initiatives established.

The impacts and outcomes of the EHL will be examined against the operationalisation of the objectives described in section 3. Key indicators should be defined in the social, economic and environmental areas. Social indicators could include:

➢ numbers reporting that their interest in cultural heritage has increased;

> ➢ numbers saying their appreciation of common European history has increased;

> ➢ numbers of activities organised by the sites towards young people;

> ➢ collaboration projects between EHL sites;

> ➢ number of cultural activities created or activities raising the awareness on democratic values/human rights.

Economic indicators could include:

> ➢ number of direct or indirect jobs created;

> ➢ number of jobs safeguarded;

> ➢ increase in  visitors numbers;

> ➢ number of partnerships projects between EHL sites and cultural and creative industries;

> ➢ number of partnerships projects between EHL sites and local business activities or leverage effect of investment on heritage on private and public sources.

Environmental indicators could include:

> ➢ number of sustainable management plans adopted by the sites;

> ➢ improved access to the sites with sustainable transport;

> ➢ landscapes and historic environment conditions.

Key measurement methods for these indicators could include visitors' surveys, site managers' surveys, focus groups, case studies or quantitative and qualitative analysis.

**MEETING SUMMARY**

**EHL PUBLIC CONSULTATION MEETING**

**10 JUNE 2009**

EUROPEAN COMMISSION
Directorate-General for Education and Culture

Culture, Multilingualism and Communication
**"Culture" programme and actions**

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| **EUROPEAN HERITAGE LABEL PUBLIC CONSULTATION MEETING**<br><br>**10 June 2009 Charlemagne Building (Sicco Mansholt room), Rue de la Loi 170, Brussels** |
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## SUMMARY OF THE MEETING

The meeting was open to all interested individuals and organisations. 71 participants registered including representatives of international and national organisations active in the field of heritage, public authorities (national, regional and local level), heritage sites which were awarded the European Heritage Label in the framework of the intergovernmental initiative, academics and students. The list of participants is attached.

After the opening by the European Commission and a presentation of the first results of the online consultation on the European Heritage Label, the discussions with the participants were centred around four questions: what are the potential impacts of a label in the field of cultural heritage? What is the added value of the European Heritage Label? Which role for the European Union in the European Heritage Label? How to implement the European Heritage Label effectively?

## 1. OPENING BY THE EUROPEAN COMMISSION

Ms Ann Branch, Head of the Culture Programme and Actions unit opened the meeting recalling that this would be a consultation meeting, organised in order to listen to stakeholders' views on the European Heritage Label.

She highlighted the context of the European Heritage Label: its beginnings as an intergovernmental initiative, the call of the Council Conclusions of 2008 to make it a European Union initiative and the steps taken by the Commission in order to prepare its proposal to the Council and the Parliament: the online consultation, the current public consultation meeting and a similar meeting with Member States experts, taking place on 24 June. The Commission would prepare an impact assessment report to summarize feedback received and examine the advantages and disadvantages of different ways of implementing the Label. This report would accompany the Commission proposal on the European Heritage Label, foreseen by February 2010.

## 2. PRESENTATION OF THE FIRST RESULTS OF THE ONLINE CONSULTATION ON THE EUROPEAN HERITAGE LABEL

Mr Jean-Philippe Gammel, the official responsible for the European Heritage Label in the Commission's Culture Programme and Actions unit, presented the results of the online consultation, which ran from 20 March until 15 May and received 226 responses. The presentation is attached.

## 3. OPEN DISCUSSION: WHAT ARE THE POTENTIAL IMPACTS OF A LABEL IN THE FIELD OF CULTURAL HERITAGE?

Ms Branch invited comments, on the basis of the following questions:

### 3.1. What social impacts?

Firstly, most participants commented that the main EHL impact would be political: EHL should build a bridge between the European project and the citizen, by exploiting the potential of common history and heritage, without fearing entering into controversial debates: European history was often complex and sometimes sensitive.

EHL should be a way of affirming European identity within the EU, but also a way of promoting this identity and European values linked to it abroad. Secondly, participants wished to better focus social impacts by speaking of societal impact: EHL would not have a direct impact on social inclusion, but could lead to a better integration of EU citizens, who would improve their capacities to seize opportunities at home and abroad in Europe. Educational impacts should also be mentioned in this section as EHL shall have a strong educational dimension, with programmes involving young people through schools, online learning or young tourists.

### 3.2. What economic impacts?

Participants had mixed opinions on the economic impacts, which were considered to mainly relate to tourism. Some foresaw an increase of tourism on EHL sites. While this might boost local development, it was recommended to promote sustainable tourism on the basis of lessons learnt in the management of the Unesco World Heritage Sites. Some other participants found it difficult to anticipate the impact on tourism, with the argument that the EHL sites were likely to be already well known. Nevertheless the quality of the cultural aspect of the visit should improve notably through a better interpretation of the sites, and it was hoped that this would lead to increasing numbers of targeted visitors, especially young people. In any case, although a raise in tourism was likely, it would take time to have a real impact. The example of tourist packages linked to Unesco World Heritage sites was mentioned.

### 3.3. What environmental impacts?

Most remarks focussed on the importance of promoting sustainable tourism to which there was a reference in the Council conclusions. Although EHL did not aim at conservation, it should under no circumstances endanger the sites. Appropriate clauses should be included in the award criteria in order to ensure respect for the sites and their eco-systems.

### 3.4. How to maximize the positive impacts of the European Heritage Label?

Participants were unanimous in indicating that a big communication effort would greatly increase the EHL impact, along with a strong educational dimension.

A clear selection framework, publicised over Europe would be of great help. Attention should be given also to the extent to which the organisations managing the sites worked on promoting European values and history. Networking among the awarded sites through Europe would also increase their impact.

### 3.5. Are there models of good practices to follow?

Unesco's studies on impacts were referred too, along with the experience of some existing European Heritage Label sites and best practices from European Capitals of Culture.

### 4. OPEN DISCUSSION: WHAT IS THE ADDED VALUE OF THE EUROPEAN HERITAGE LABEL?

Ms Branch introduced the topic recalling that this was at the core of the Council Conclusions. A preliminary survey to compare the Label with other existing initiatives had been undertaken by an

external consultant, Ecotec, providing support to the Commission in the preparation of the impact assessment report. The discussion was guided by the following key questions:

## 4.1.  What should the originality of this Label be, taking into account other existing national or international initiatives in the field of cultural heritage?

There was a general consensus that EHL had a value on its own and did not overlap with other existing initiatives, such as the Unesco World Heritage List, the Council of Europe Cultural Routes and the Europa Nostra awards. This was confirmed by the representatives of ICOMOS (consultative body for the UNESCO World Heritage List), the Institute of Cultural Routes and Europa Nostra which were present in the meeting. Nevertheless clear communication would be needed to clarify the differences for the general public.

Stakeholders involved in the Unesco World Heritage List underlined that the Unesco initiative had very different criteria: sites must be universal, authentic and with architectural value. The World Heritage List was first and foremost a prize for conservation, while the Label should aim at raising awareness. It could not be ruled out that a site was awarded both by Unesco and EHL, on condition that it matched the different criteria required by the respective awards. The aims of the Council of Europe  Cultural Routes were more similar to those of EHL, did not focus on specific sites but rather on themed routes across different countries, and complementarity with EHL seemed possible. Participants felt there was scope for EHL, as it should award sites with a symbolic value for Europe, with a strong educational focus and not necessarily of great aesthetic value. Furthermore it was observed that EHL was open to contemporary sites, such as the Gdansk shipyards, as well as to immaterial heritage, as long as it was attached to a site. Some participants felt that the transnational dimension should be emphasised. EHL criteria should be defined in such a way that they did not leave grey zones with other existing activities. As the Label was aimed at citizens, a communication plan should be required from competing sites as part of the selection criteria.

## 4.2.  Which selection criteria would enable this specificity to be highlighted?

Participants commented that selection should not involve much bureaucracy for the sites and for the Member States. On the one hand, some participants proposed a European selection process, with sites applying directly to a European panel. This would ensure a consistent interpretation of the European dimension and would encourage the participation of transnational sites proposed by more than one country. As one participant put it *"How will the European value be ensured by 27 national committees, each with their own national interpretations of history?"* On the other hand, organisations currently managing the intergovernmental Label were more sceptical about skipping a national level of selection, arguing that this could help to filter out many applications, thereby lightening the burden for the European panel. They favoured a two-stage selection procedure, first at the national level, followed by the European level.

The participants were also divided on whether the panel should be composed of independent experts, linked to civil society or whether it should be comprised of national representatives supported by expert advice. ICOMOS, the Institute of Cultural Routes and Europa Nostra reported on the selection procedure of their respective initiatives. The representative of ICOMOS underlined that the procedure for the World Heritage List had become very heavy over the years and strongly recommended learning from this experience in order to implement a lighter approach for the Label. A single level selection approach could be the solution.

## 4.3.  How to enhance the European dimension of our cultural heritage?

An awarded site should have cultural and historic meaning for several countries, across Europe, for instance by highlighting the contribution of artists coming from different countries, or remembering events with an impact on many countries. Attention should be given to the interpretation and

transmission of the symbolic value of these sites. Sites should be living places, communicating not only about the sites themselves but also about the European project.

As the European cultural space reached beyond current EU borders, some participants proposed that that EHL should be open to cooperation with neighbouring countries, in order to help build bridges and value common European memories. It was also mentioned that sites should be very carefully selected, in order to avoid reigniting recent memories of some conflicts.

**4.4. How to promote the access of young people to European cultural heritage?**

As expressed earlier, participants emphasised the educational efforts EHL sites should make in order to involve schools and other educational organisations, for instance through virtual visits and learning facilities based on new technologies. Sites could also cooperate with tourism associations to promote visits by young people.

**5. OPEN DISCUSSION: WHICH ROLE FOR THE EUROPEAN UNION IN THE EUROPEAN HERITAGE LABEL?**

After the specificity and the added value of the European Heritage Label, the debate focussed on the potential benefits of transforming the intergovernmental initiative into a formal EU initiative. The discussion was guided by the following key questions:

**5.1. Would the Label benefit from a closer involvement of the European Union?**

Stakeholders were in agreement with the Council that a closer involvement of the European Union would help in broadening the geographical coverage, defining clearer and more transparent criteria and procedures, as well as improving the visibility of the Label, all of which were difficult with a rotating secretariat.

**5.2. What role for the European Union in the selection process of the sites and in the monitoring process?**

Some participants felt that a formal designation by the Council of Ministers would be important symbolically and help the visibility of the initiative. Some other comments referred to the Commission as a permanent secretariat, playing a role similar to the one it ensured for the European Capitals of Culture. This permanent secretariat would ensure a consistent monitoring of the awarded sites and facilitate networking among them.

**6. OPEN DISCUSSION: HOW TO IMPLEMENT THE EUROPEAN HERITAGE LABEL EFFECTIVELY?**

The discussion was preceded by a presentation by French and Spanish representatives who had been ensuring the secretariat of the intergovernmental Label since its creation in 2007. They described the concept of the Label, the current number of sites (it had been agreed that each country participating in the Label could award up to 4 Labels) and the new website of the initiative hosted by the Spanish Ministry of Culture. They saw the Label's first years as a transition towards a Community initiative which would broaden the scope of the initiative and increase the number of participating countries. Some networking among the sites was already in place, but this aspect needed to be further developed. Many questions were raised by the participants to the French and Spanish representatives in order to clarify the aims and functioning of the current intergovernmental initiative. This confirmed that the EHL currently lacked visibility and was still rather unknown, even by the heritage sector itself. It also confirmed that in order to have an effective impact in the future, the new Label would need to have a strong communication strategy. The debate was then guided by the following key questions:

### 6.1. How to ensure that the number of sites awarded the Label will remain reasonable and representative?

As the Label started as an intergovernmental initiative, a given number of awards per country were set out. With the EU taking the lead, some participants questioned this approach as it would prevent transnational applications (unless a special quota was foreseen). On the one hand the number of awarded Labels should be limited to ensure their value and prestige, on the other hand bigger countries would be penalised if they had the same quota as smaller ones. In the case of national quotas, it was mentioned that in view of the aim of the initiative to reach citizens, it would be important that for the sites to be sufficiently spread out geographically in order to ensure that all citizens had reasonable access to such a site over the long run.

Another suggestion was to fix quotas over Europe focussing different categories/sectors, like the Europa Nostra Prize. Alternatively quotas for sectors could also be fixed at national level (plus national quotas). One participant suggested a categorisation of sites: Europe of artistic creators; Europe of architecture, styles and landscapes, Europe of the sacred and spirit, Europe of industry, Europe of democracy.

### 6.2. Should the Label be attributed on a permanent basis or for a limited time only?

Most participants felt that, for the sake of consistency, the Label should be attributed on a permanent basis, as its symbolic value did not change over time. Nevertheless periodic review should be possible to ensure that the key communication and educational activities were still in place. It was mentioned by one participant that EHL sites could receive a Commission grant for communication activities, either on a temporary basis and renewable or permanent but subject to monitoring. This would provide incentives to keep EHL sites up to the requested level, in a similar way as the Melina Mercouri prize did for the European Capitals of Culture. Nevertheless it was noted that a communication strategy would take time to be implemented; this should be considered while fixing the time span for monitoring or renewals.

### 6.3. How to raise the profile and visibility of the European Heritage Label?

Participants suggested linking the EHL to the European Heritage Days, encouraging national coordinators to include EHL sites available in the Days programmes. It was also recommended, that, although EHL could be awarded to immaterial heritage, this should nonetheless be anchored to a physical site. Partnership with local authorities and civil society was considered essential. A participant noted that EHL was two-fold, coupling the symbolic value of a site with a communication effort. In order to ensure that communication would be well conducted competing sites should not only provide a communication plan, but also some evidence of the quality of their current communication work. EHL awarded sites should clearly explain to visitors how and why they had been chosen.

### 6.4. How to keep the administrative arrangements light and flexible both at European and national level?

As a general remark it was suggested to keep EHL as open as possible in terms of categories, sectors and definitions. As the question of eligibility of private sites was raised, participants suggested that private sites should be eligible if they provided reasonable assurance of their capacity and with a guarantee of the Member States concerned (as in the case of Unesco).

### 7. CONCLUSIONS AND CLOSE OF THE MEETING

Ms Branch closed the meeting recalling next steps in preparing the proposal, which should be adopted by the Commission in February 2010 and then submitted to Parliament and Council during the Spanish presidency.

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# MEETING SUMMARY

# EHL MEMBER STATES' EXPERTS MEETING

## 24 JUNE 2009

EUROPEAN COMMISSION
Directorate-General for Education and Culture

Culture, Multilingualism and Communication
**"Culture" programme and actions**

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EUROPEAN HERITAGE LABEL (EHL) MEMBER STATES' EXPERTS MEETING
BRUSSELS, 24 JUNE 2009

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## SUMMARY OF THE MEETING

## PRESENTATION OF THE MAIN STEPS OF THE IMPACT ASSESSMENT AND OBJECTIVES OF THE MEETING

Ms Odile Quintin, Director General of DG Education and Culture, opened the meeting and briefly recalled the origins of the Label, as an intergovernmental initiative and the Council Conclusions of November 2008 inviting the Commission to submit to it "an appropriate proposal for the creation of a European Heritage Label by the European Union and specifying the practical procedures for the implementation of the project.". She then informed the participants on the main steps of the impact assessment which was currently underway and which included a public consultation (online consultation, stakeholder meeting and current meeting). She announced that the Commission envisaged presenting its draft proposal at the beginning of 2010, during the Spanish Presidency.

She restated that the Commission would take into account the achievements of the intergovernmental phase of the Label in the impact assessment and in the preparation of the Commission's proposal. However she also underlined that with the adoption of the Council conclusions, the Label entered into a new phase and that the Commission and the 27 Member States would now have to determine together what the new forms of the Label should be in order to make it as effective and attractive as possible.

Ms Quintin made clear that, throughout the consultation phase a broad consensus emerged concerning the general orientations of the future Label. However, two important questions still raised some concerns concerning the practical details of the implementation of the label and needed further discussion: how to ensure that the number of sites awarded the European Heritage Label remained reasonable and representative and how to keep the administrative arrangements for the future European Heritage Label light and flexible at national and European level? The current meeting would therefore focus on those two issues. She invited MS experts to intervene freely and frankly in the discussion, to test a range of ideas in order to find the most suitable solutions.

## PRESENTATION OF THE FIRST RESULTS OF THE PUBLIC CONSULTATION

Mr Jean-Philippe Gammel, European Commission, presented the key messages received through the online public consultation (attached). He then briefly related feedback from the stakeholder meeting held on 10 June, where the key messages had echoed those of the on-line consultation, with a stronger focus on the practical arrangements for the implementation of the Label. This had been greatly helped by the presence of Icomos (consultative body for Unesco, in charge of the instruction of applications for the World Heritage List), the European Institute of Cultural Routes (in charge of the instruction of applications for the Council of Europe's Cultural Routes) and Europa Nostra (managing the European Union Prize for Cultural Heritage). They all agreed that the scope of EHL would not overlap existing initiatives and put forward concrete proposals to implement it in a flexible way.

The number of sites to be awarded per country and the way of selecting the sites seemed to be the most complex issues. The Member States actually implementing the intergovernmental European Heritage Label were in favour of keeping a two level selection process starting with a pre-selection at national level. Civil society organisations were more in favour of an open, single stage competition at European level without any quotas of sites per country.

**OPEN DISCUSSION ON:**

*How to ensure that the number of sites awarded the European Heritage Label remains reasonable and representative?*

*How to keep the administrative arrangements for the future European Heritage Label light and flexible at national and European level?*

As proposed by Ms Quintin at the beginning of the meeting, it was agreed to take together the two points in the agenda, as they partially overlapped. The two questions guided the interventions, which had been prepared on the basis of two discussion papers (attached) received in advance by participants and presenting a detailed set of implementation issues.

ES thanked the Commission for its readiness to take EHL forward. It highlighted the dual nature - political and technical – of selection issues. As three levels of power were involved (local, national, European) ES feared that a selection only at EU level would undermine the political dimension and be detrimental to smaller or more peripheral sites. Other examples of combined selection procedures at national and EU level were available, for instance in the education field. A maximum number of sites should be set to ensure quality as well as a quota of sites per country. ES proposed a rotation procedure, with 9 MS entitled to apply each year for a maximum of 3 Labels per country. Quality should be the main criterion to decide to award the Label. Although some costs were inevitable, it should be remembered that there would also be benefits, especially from an awareness-raising/educational point of view. ES strongly recommended to learning from the experience of the Unesco scheme in order not to repeat the same mistakes: procedures should stay as light as possible.

IT proposed to take inspiration from a national practice in place to facilitate applications to the UNESCO World Heritage List: a committee set in place to disseminate information, provide guidance and "filter out" applications. This same Committee also provided follow-up after selection of a site. IT proposed a two-phase selection, with national pre-selection managed by a national authority on the basis of common criteria set at European level. Final selection should be managed by a panel of EU experts. IT would leave the number of Labels open. As for duration, the Label should be permanent in order to enable sites to invest in sustainable activities. National monitoring should be foreseen. Priority should be given to sites with a broad access to the public and with a transnational character.

CZ called for a system similar to the one for the European Capitals of Culture. Each MS should be left free to define what European added value meant nationally. CZ was in favour of a rotation system, with each MS applying every fourth year, in order not to inflate the number of Labels. Monitoring would be ensured at national level. The attribution of the Label should be permanent.

AT favoured an open selection procedure (in two phases) on a rotation base, with no set number of Labels. EHL should remain a voluntary initiative, leaving MS free to decide whether to participate. As for the duration, Labels should be temporary, but renewals could be allowed. Costs should be as limited as possible, both for the selection procedure and for the sites themselves.

The AT representative welcomed the EHL as a way of highlighting the richness of common EU heritage. He recalled that the EU dimension should be ensured consistently: common guidelines and selection forms were much needed AT commented that communication efforts were needed in order to raise the EHL profile.

PL was in favour of a two-phase selection with no national quotas. The European panel should be composed by recognised EU cultural experts. Rotation was an option that could be considered, but it could involve imbalances between MS who had already implemented the intergovernmental Label and those who did not. It might be introduced in a second phase only. Labels should be permanent, but

subject to monitoring and there should a possibility of withdrawal in case the criteria were not respected. PL was in favour of the selection of transnational sites but drew attention to possible problems with sites which are common with third countries. PL commented that communication costs should not be disproportionate for EHL awarded sites.

NL was in favour of national selections, based on common guidelines and criteria, especially to define the European dimension. It raised attention to the fact that the same number of Labels per MS would go against quality in smaller countries. If a limited number was to be decided, it should be weighted upon the country size and population. NL would be against rotation as it did not seem to encourage transnational cooperation.

LT supported an open competition, with no fixed quota per country. Nevertheless MS should be responsible for ensuring the quality and EU significance of the proposed sites. As for priorities, sites should have a strong transnational dimension and promote cross-border cooperation. It was in favour of awarding the Label for a limited time of 5-7 years, renewable upon monitoring of educational and communication activities in place. LT supported a permanent EU secretariat, with monitoring procedures at national level. Participation in EHL should be voluntary for each MS.

FR thanked the Commission for the very comprehensive feedback on the consultation process and the focussed questions for discussion. FR agreed with ES concerning a rotation principle (9 countries every third year), with a fixed number of Labels per country at every selection (with no difference between bigger and smaller countries)... It supported a selection at two levels (national and European) and agreed on the need for common criteria and guidelines. At European level, FR suggested the creation of a panel on the model of the European Capitals of Culture which should be supported by a consultative scientific committee. FR strongly supported the permanent nature of the Labels, is it took time to be set in place and should be based on long term strategies, but with monitoring. The European dimension should be strongly emphasised, as well as the networking among sites, in order to maximise awareness-raising of citizens.

UK thanked the Commission for the consensual way it was steering the process. It agreed on keeping procedures light and on shifting EHL focus away from conservation and towards projects with a strong educational dimension. UK could support EHL as it was being currently developed. UK would be in favour of temporary designations, as it felt it would be more appropriate for the nature of projects targeted by the Label, although it agreed that it should be for a realistic duration. UK strongly reminded that as EHL should not insist on architectural value; there would be no contradiction in awarding temporary labels, as they would be devoted mainly to the communication activities implemented.

SE did not have yet an established position, but was inclined at the current time to favour an open competition, but could accept rotation between Member States. It stressed the need for very clear EU criteria and guidelines, with a special focus on the EU dimension and the educational value. EHL should remain voluntary for Member States. Thematic criteria could also be proposed to promote cooperation among countries. As for selection procedures: the most efficient would be to allow sites to apply directly to a European panel, but this way the local and national involvement would be lost. Sites should not be inward looking but promote access and cooperation across borders. The Label should be either permanent with a possibility of withdrawal, or temporary but long-term with the possibility for renewal.

FI would welcome a maximum number of Labels per year at EU level, with no national quotas, but with a rotation process. This would minimize the selection workload at national level. As for length, FI was in favour of temporary Labels, in order to avoid heavy monitoring. It would also support thematic priorities.

BE emphasised the transnational aspect of sites designation. BE warned that, as the definition of heritage was evolving, including modern, contemporary, etc. a closed number of perennial sites did not seem to be adapted. A national committee should be set in place, supported by an expert committee: it would be in charge of pre-selection and monitoring. For the final selection, BE would be in favour of a European panel made up of recognised experts. The number of sites per country should

be linked to the frequency of calls (for instance three every year per country plus a number of transnational sites). Rotations would not help transnational cooperation. Monitoring should be done nationally and upon two negative monitoring opinions for example, the Label could be withdrawn. The mechanism of a "passive list" could be a way of documenting the history of the Label: intergovernmental sites and those no longer matching Label criteria could be put on the list.

DE was in favour of a two-phase open procedure (national and European), with no national quotas. Nevertheless there should be no more than 10-15 labels per year, favouring transnational applications. Final decision should be taken by the Council of Culture Ministers, on the basis of the recommendations of the European panel. The Label should be permanent, but could be withdrawn; alternatively, it could be temporary but renewable. As for the secretariat, DE invited to consider the most cost effective solution which might be an external solution such as the EAC executive agency or a third body like Europa Nostra for example.

DK although initially not in favour of EHL, could agree with the current focus, especially with the aim of raising awareness of young people of common EU history. DK thought that a European panel was essential to guarantee the European dimension. It supported a country rotation, with no fixed number of Labels. The Label should be permanent, with periodic monitoring and with a strong transnational focus.

LUX recommended fixing very detailed criteria and priorities. In a first phase there should not be limits per country. All applications should be submitted to a European panel. In a second phase a rotation system could be envisaged. The Label should be permanent as it highlighted a permanent value. Regular monitoring should be set in place with a possibility of withdrawal of the Label.

HU was in favour of a two-phase selection procedure, with very stringent criteria, especially on the European dimension. There should be a pre-selection at national level, but the final selection should be European and made by an independent jury. HU would favour no rotation and no fixed number. Thematic priorities could be set in place to better focus applications.

MT pleaded for an open call, with no set number per country but stringent criteria and transnational value. The Label should permanent, but monitored and with the possibility of withdrawal.

EL proposed a two-phase selection, with pre-selection at national level and selection made by an EU independent expert committee. EL was not in favour of setting a fixed number of Labels, at least in the first phase, but quality criteria should be stringent and with a transnational dimension. Labels should be permanent.

SI agreed on two-phase selection with common stringent criteria and no fixed quotas. Special priority should be given to transnational nominations. Labels should be permanent or alternatively, firstly temporary (during a trial phase) rather than permanent.

SK was in favour of an open competition in two phases, with a permanent secretariat. Labels should be permanent with monitoring.

*Conclusions by the European Commission*

Mr Vladimir Šucha thanked the participants for the very constructive and frank debate, based on mutual trust and invited them to send in detailed position papers, if they so wished. He underlined the many challenging questions which remained open either because there were still divergences between Member States on certain issues or, more strikingly, because the positions expressed by some of the Member States were not entirely free of contradictions, namely: how to reconcile the wish to have an open competition at European level with the will to keep a pre-selection at national level ?

- how to foster the selection of transnational sites while setting quotas of sites per country ?

- how to keep the administrative arrangements light and flexible despite a selection at two levels and the involvement of the Council of Ministers in the designation procedure?

- how to strengthen the role of the European panel of experts without jeopardising local involvement ?

- how to ensure the excellence of the Label and the relevance and quality of the selected sites without any limitations on the number of Labels awarded each year?

Mr Šucha concluded by saying that the Commission would nevertheless take up these challenges and was confident it would find reasonable solutions, on the basis of the common willingness of the Member States to develop the EHL.

| Member States' experts meeting 24 June 2009 |
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| **EUROPEAN HERITAGE LABEL**<br>**Member States' experts meeting**<br>**Brussels, 24 June 2009**<br><br>**Discussion papers** |
| :--- |

Introduction:

At its meeting on 20 November 2008, the Council of the European Union (Education, Youth and Culture) adopted conclusions inviting the European Commission to submit to it "an appropriate proposal for the creation of a European Heritage Label by the European Union and specifying the practical procedures for the implementation of the project."

These conclusions give a fairly detailed basis for the European Commission for the preparation of its proposal. However, during the negotiations for the adoption of these conclusions, a number of issues were left open by the Member States for further analysis.

The Impact Assessment and public consultation which were launched by the European Commission, and which are still underway, have been very useful in helping to move forward on several of these issues. It transpires that there is indeed broad consensus concerning the general orientations of the future Label. However, two important questions still raise some concerns and need further discussion: how to ensure that the number of sites awarded the European Heritage Label remains reasonable and representative and how to keep the administrative arrangements for the future European Heritage Label light and flexible at national and European level? The Member States experts' meeting offers an opportunity to make substantial progress on these issues. The following two discussion papers are aimed at contributing to the orientation of the discussions.

| Discussion paper n°1: how to ensure that the number of sites awarded the European Heritage Label remains reasonable and representative? |
| --- |

The Council conclusions mention as one of the main principles of the future European Heritage Label that the project should be based on a "regular selection procedure […] covering a reasonable and representative number of sites each time" (section 3b).

The need to keep the number of sites awarded the label reasonable has indeed been a major concern of Member States and of stakeholders during the negotiation phase for the adoption of the conclusions as well as during the current public consultation process. It is considered an essential condition to ensure the quality and credibility of the European Heritage Label, as well as to keep the initiative manageable both at national and European level. It also has implications for the very design of the selection process. However, beyond consensus on the fact that the number should be reasonable, few concrete solutions have been proposed as to how this should be implemented in practice.

A first important question which still requires an answer is what is actually a reasonable and representative number of sites? Once this is determined, practical arrangements for the implementation need to be designed.

1. Shall the label be attributed on the basis of an open competition or shall there be a reserved number of sites for each Member State?

Two main options are possible for the attribution of the Label to the sites. The first is to have an open competition which does not take into account the national origin of the candidate sites. Only the quality of the sites and the proposed programmes would be considered. Special attention could be given to sites with a strong transnational dimension. This solution would guarantee the overall excellence of the selected sites. The risk is that this could create an imbalance between the various Member States. However the advantage would be that it would in many ways be better adapted to reality in the sense that it could better accommodate the fact that some countries have a greater pool of potential sites than others, due to their size and other factors. By avoiding systematic national quotas, it would also be easier to keep to a reasonable number of sites. If this option were chosen, the number of sites per year to be selected would need to be defined.

The other option is to have a reserved number of sites for each Member State according to a system close to the one implemented for the European Capitals of Culture (in this instance two Member States per year can host the title). In this case, should the same number of sites be attributed to each Member State or should the size of each country be considered, and if so, what should be the formula for deciding the number of sites?

Should transnational sites be made a special priority? For example, should a parallel procedure be launched for a small number of transnational sites which could apply directly to the European level every year, thereby providing an added incentive for this kind of initiative?

2. Is a system of rotation for the selection of the sites the solution?

One solution that came up during the consultation process is to have a system of rotation between the Member States for the selection and attribution of the Label. For example, only one third or one fourth of the Member States would be allowed to propose sites in any given year. Such a rotation system would help to avoid the number of sites awarded the Label increasing too fast, it would help to keep the selection procedure more manageable each year and it would considerably decrease the work burden at national level.

Would such a rotation system be an acceptable solution? If yes, what would be a reasonable time span between two selection rounds for a Member State? Three years, four years or five years?

3. Shall the label be attributed to the sites for a limited period of time or on a permanent basis?

Another idea which emerged during the negotiation process in the Council was to attribute the label for only a limited, but renewable, duration. The arguments in favour of this solution were that this would be coherent with the fact that this label is much more about the educational and cultural projects put forward by the sites (cf. 2b of the conclusions) than about conservation or preservation, and that this would help to ensure its distinctiveness vis-à-vis other existing initiatives. On the other hand, it was also mentioned that the time period needed to be long enough, and renewable, for the sites to feel that the investment effort was justified.

The label could thus be awarded for example for 5 or 6 years and after this period a Member State could choose to either propose the renewal of the same site for a new period or to propose a new site. The advantage here would be to keep control over the overall number of sites awarded the label and to ensure that the sites actually comply with the commitments they have made. This idea appealed to many stakeholders during the consultation process.

Would the attribution of the label for a limited period be acceptable or is such an option inconceivable in the heritage field where organisations are traditionally used to work in the long term? If yes, would it be conceivable to have two lists as was proposed by several stakeholders: one "active" list with the sites which currently hold the label and one "passive" list with the sites which held it in the past?

In case the label is attributed on a permanent basis, how can it be ensured that the sites comply with commitments they may have made ten or twenty years earlier? The conclusions mention that the sites "could be subject to periodic review" (3f). What form should this review take if the label is attributed on a permanent basis? Should it be possible for the label to be withdrawn from certain sites? Under which conditions?

**Discussion paper n°2: how to keep the administrative arrangements for the future European Heritage Label light and flexible at national and European level?**

The Council conclusions mention that the European Heritage Label should keep "flexible and streamline administrative arrangements in compliance with the principle of subsidiarity." (3b)

This was indeed a central element in the negotiations for the adoption of the conclusions. Without a strong commitment to keep the costs limited both at national and European level and a strong commitment to avoid all unnecessary bureaucracy, no agreement could have been reached between the Member States. This same concern has been expressed on numerous occasions during the consultation process and several stakeholders have underlined the importance of also taking into account the potential hidden costs (including for example self-generating bidding processes) or potential inflation of the workload which might only become apparent after several years.

An appropriate division of tasks between national and EU level will be one of the main challenges for the future label. There is general consensus that subsidiarity should remain the key principle and that the EU should intervene only where it can bring a clear added value to the initiative. Concerning the selection procedures for example, the conclusions mention that the selection procedure should be carried out initially at national level and then only at European level.

The main tasks for the Member States would thus be to organise the first stage of the selection procedure and the regular monitoring of all the sites awarded the label on their territory in order to ensure that they comply with undertakings they have given. The main tasks of the Commission would be to ensure the homogeneous application of the criteria by all the Member States, to guarantee the continuity of the label through a permanent secretariat, to support the work of the group of European experts in charge of the second stage of the selection and monitoring procedures, to facilitate networking activities and to ensure the visibility of the label, for example through a common portal or website.

1.Which practical arrangements at European level?

The permanent secretariat would replace the current revolving secretariat of the intergovernmental label and its core tasks would be the general coordination of the label and provision of support for the European experts panel. This secretariat should remain as light as possible.

Concerning the financial implications at European level, in addition to the secretariat of the label, the costs should be limited to funding the work of the European experts, some networking activities between the sites and a website.

2. Which practical arrangements at national level?

In accordance with the subsidiarity principle, the practical arrangements at Member State level should remain as flexible as possible in order to be tailored to national circumstances. However, how can it be ensured that this flexibility will not harm the overall quality and prestige of the label and that each Member State will respect the common rules and criteria?

Participation in the label will be on a voluntary basis. Each Member State which decides to participate will have to commit itself to the effective organisation of the selection and

monitoring procedures at national level. How can it be ensured that the workload associated with these procedures can be kept under control?

The financial obligations linked to the label at a national level should be limited to the practical organisation of these procedures. Any other expenses linked to the label, either during the bidding phase for the attribution of the label or during the implementation of the educational and cultural programmes on the sites should be left to the free decision of Member States and should not create formal obligations for them. How can potential hidden costs of the label be avoided (for example, expensive self-generating bidding processes)?

Although the Council conclusions refer to a first selection occurring at national level, the consultation leads us to believe that this will in fact be a rather expensive approach and more difficult to prevent unexpected costs arising both for Member States and the sites themselves. Another more cost-effective solution which came up during the consultation would be to leave the sites themselves to apply directly to an independent expert organising body recruited by the European Commission (see also question 1 above), which would design a simple procedure and simple application form. This would have the advantage of taking away the organising burden and its associated costs at the national level. Would such a solution be conceivable?

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# CRITERIA FOR THE SELECTION OF THE SITES

The first question which needs to be raised concerning the criteria is which type of heritage should be eligible for the attribution of the EHL. This question was debated in the Council during the preparation of the conclusions. After long and complex negotiations, MS agreed on a list inspired by various UNESCO and Council of Europe conventions. This list includes: "monuments, natural or urban sites, cultural lanscapes and places of remembrance, as well as cultural goods and intangible heritage attached to a place, including contemporary heritage". The complexity of the negotiations between the MS leaves little room for manoeuvre. During the Inter-service group meetings, DG MARE and DG INFSO requested the addition of "cultural objects" to the list in order to ensure that traditional ships or film heritage were also covered by the definition as far as they were linked to a physical site.

Further to the question of the type of heritage which should be eligible, a set of criteria was designed for the actual selection of the candidate sites. These criteria are largely inspired by the Council conclusions in which the MS made a number of proposals. These proposals were then discussed and re-evaluated during the consultation process and they were then further developed by the Commission. Two main concerns were taken into account. Firstly, to ensure that there will be no overlap with other existing initiatives in the field of cultural heritage and reinforce the added value of the EHL. Secondly, to link these criteria as much as possible to the objectives of the EHL, especially to the operational objectives and to the activities that should be implemented by the sites in order to contribute to the specific, intermediate and general objectives. The criteria are listed below and are divided into three categories linked to the European dimension of the sites, the quality of the projects they submit and the quality of the management proposed.

1. European dimension

Candidates for the label shall have a symbolic value for Europe's identity and shall have played a key role in the history and the building of Europe. The sites shall therefore justify:

➢ their cross-border or pan-European nature: the past and present influence and attraction of a candidate site must go beyond the national borders of a Member State;

➢ and/or the place and role of a site in European history and European integration, and its links with key European events or personalities, as well as with cultural, artistic, political, social, scientific or technological movements ;

➢ and/or the place and role of a site in the development and promotion of common values such as freedom, democracy, respect for human rights, cultural diversity, tolerance and solidarity that underpin European integration.

These criteria are not cumulative. Each site must justify that it fits into one of the criteria as a pre-condition for being selected. The strong European dimension and the symbolic value of sites are essential elements for the originality of the EHL compared to other initiatives, notably the UNESCO World Heritage List. The three criteria are built mainly on elements which are present in the Council conclusions

and were discussed at length by the MS in this context. Some room for interpretation was deliberately left open, firstly for reasons of subsidiarity as there are some differences in interpretation between MS, and secondly in order not to close the door to highly original sites which might have a strong potential and are difficult to foresee. The selection panels at national and / or EU level will therefore have an essential role to play in evaluating if the European dimension and the symbolic value of a site are strong enough and if the site is relevant in the light of the objectives of the EHL. Inspiration should be drawn from the experience of managing the European Capitals of Culture, which have a degree of flexibility in the criteria, and which is recognised as necessary for such an event in the light of European diversity in this area.

2. Quality of the project submitted

Candidates for the label shall submit a project which promotes their European dimension and commits them to all the following elements:

- ➢ raising awareness on the European significance of the site, in particular through appropriate information activities, signage and staff training;

- ➢ organising educational activities, especially for young people, which increase the understanding of the common history of Europe and of its shared yet diverse heritage and which strengthen the sense of belonging to a common space;

- ➢ promoting multilingualism by using several languages of the European Union;

- ➢ taking part in the activities of networks of sites awarded the European Heritage Label in order to exchange experiences and initiate common projects;

- ➢ raising the profile and the attractiveness of the site on a European scale, notably through the use of modern technologies.

- ➢ The organisation of artistic and cultural activities (for example events, festivals, residencies) which foster the mobility of European artists and collections, stimulate intercultural dialogue and encourage linkage between heritage and contemporary creation and creativity are welcomed whenever the specificity of the site allows it.

These criteria are cumulative except for the last indent which will depend on the "physical" capacity of a site to actually organise such artistic and cultural activities. They derive directly from the operational objectives of the EHL and will therefore contribute concretely and progressively to the achievement of the higher level objectives. These elements are all derived from the Council conclusions and are essential to ensuring the added value of the label and to achieving its objectives, so that the sites actively reach out to and educate citizens, rather than simply limiting themselves, for example, to a plaque placed on a building.

3. Quality of the management proposed

Candidates for the label shall submit a management plan which commits them to all the following elements:

➢ ensuring the sound management of the site;

➢ ensuring the protection of the site and its transmission to future generations in accordance with the relevant protection regimes;

➢ ensuring the quality of the reception facilities such as the historical presentation, the visitors information, the signage, etc.

➢ ensuring access for the widest possible public, notably through site adaptations or staff training;

➢ according special attention to young people, in particular by allowing them privileged access to the site;

➢ undertaking the promotion of sites as tourist destinations;

➢ developing a coherent and comprehensive communication strategy highlighting the European dimension of the site;

➢ ensuring the management plan is as environmentally friendly as possible in order to limit potential negative impacts of tourism.

These criteria are also cumulative and derive from the operational objectives of the EHL. The quality of management was a concern expressed notably by the MS which do not yet participate in the intergovernmental initiative and was therefore included in the Council conclusions. Furthermore, it is essential for ensuring the effective implementation of the key elements of the project, mentioned above.

Two remarks need to be made concerning the criteria in the last two categories and the fact that they are cumulative. The first is that although these criteria may look very ambitious, many potential sites for the EHL do already fulfil a number of them and will therefore only have to make limited adjustments and investments. This is notably a lesson learnt from the analysis ECOTEC made from the sites which were already awarded the label in the intergovernmental initiative[12]. The second is that a very diverse range of sites can potentially be awarded the label. If we take the list of the intergovernmental EHL, the Robert Schumann house in Scy-Chazelles is very different from the Acropolis in Athens, and the Gdansk shipyards are very different from the Franja Hospital at Dolenji Novaki in Slovenia. The level of requirements for each criterion will therefore vary considerably from one site to another and must be adapted to the specificity of each site. In the case of some prestigious sites, ambitious educational, information or promotion activities can be expected, whereas for smaller sites with a strong symbolic value, the criteria can be met in a more modest way. Here too, the national and / or European selection panels will have an

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[12] See ECOTEC report: http://ec.europa.eu/dgs/education_culture/evalreports/index_en.htm

essential role to play by evaluating what is relevant and appropriate for each candidate site.

For the reasons mentioned above, it is also very difficult to estimate the costs of participating in the EHL for a site. Each criteria in the last two categories may potentially ask for investments from a site and have costs. But this will vary greatly from one site to another and on what is already in place. Quantification is not therefore possible.

It needs to be repeated in this context that participation of the MS and the sites will be voluntary, so none of the costs will be "imposed". On the other hand, one of the benefits for the sites is that it may of course open the door for them to sources of national funding.

**LIST OF THE COUNTRIES PARTICIPATING IN THE**

**INTERGOVERNMENTAL EUROPEAN HERITAGE LABEL**

**AND OF THE SELECTED SITES**

**(OCTOBER 2009)**

| COUNTRY | SITE |
|---|---|
| BELGIUM | Palace of the Prince-Bishops at Liege |
| | Stoneware of Raeren (German Community) |
| | Archaeological site of Ename |
| | Archaeological site of Coudenberg |
| BULGARIA | Archaeological site of  Debelt |
| | Memorial Vassil Lesvki |
| | Historic town of Rousse |
| | Boris Christoff Music Centre |
| CYPRUS | Fortifications of Nicosia |
| | Castle of Kolossi |
| | Site of Kourion |
| | Circuit of 6 churches with Byzantine and post Byzantine frescos, Troodos |
| CZECH REPUBLIC | Castle of Kynzvart |
| | Zlín, town of Tomas Bat'a |
| | Vítkovice coal mine at Ostrava |
| | Memorial of Antonin Dvorak at Vysoka |
| FRANCE | Cluny Abbey |
| | House of Robert Schumann, near Metz |
| | Pope's Palace Court, Avignon |
| GREECE | Acrópolis, Athens |
| | Knossos Palace |
| | Archaeological site of Poliochne |
| | Byzantine site of Monemvasia |
| HUNGARY | Royal castle of Esztergom |
| | Szigetvar fortress |
| | The Reformed college and great church at Debrecen |
| | Royal palace of Visegrád |
| ITALY | Birthplaces of Rossini, Puccini and Verdi |
| | Birthplace of Gasperi |

| COUNTRY | SITE |
| --- | --- |
| | Ventotene Island |
| | Capitole Place in Roma |
| LATVIA | Historic centre of Riga |
| | Rundale Palace |
| | Town of Kuldiga |
| LITHUANIA | Mikalojus Konstantinas Ciurlionis' works |
| | Historical centre of  Kaunas |
| | Zemaitija (lowlands) region and the Hill of Crosses |
| | Museum of Genocide Victims (1940-41) at Vilnius |
| MALTA | Catacombs of Rabat |
| POLAND | Gdansk Shipyards |
| | Hill of Lech at Gniezno (Cathedral, church, palaces, museum) |
| | Cathedral St Wenceslas and Stanislas, Krakow |
| | Town of Lublin |
| PORTUGAL | Braga cathedral |
| | Convent of Jesus at Setubal |
| | General library of the University of Coimbra |
| | Abolition of the death penalty |
| ROMANIA | Archaeological site of Istria |
| | Cantacuzino Palace at Bucarest |
| | Roman Athenaeum at Bucarest |
| | Park Brancusi at Targu Jiu |
| SLOVAKIA | Pre Romanesque Ecclesiastical Architecture, St Margaret church, Kopcany |
| | The Castle of Červený Kameň |
| | The Barrow of General Milan Rastislav Štefánik at Bradlo |
| SLOVENIA | Memorial church of the Holy Spirit at Javorca |
| | Franja Hospital at Dolenji Novaki |
| | Zale Cemetery at Ljubljana |
| SPAIN | Crown Aragon Archive |
| | Yuste Royal Monastery |
| | Cap Finisterre |

| COUNTRY | SITE |
|---|---|
| | Students Residence, Madrid |
| SWITZERLAND | Cathedral St Peter in Geneva |
| | Castle of La Sarraz |
| | Hospice of St Gotthard |

**TABLE 1**

**COMPARISON OF THE OPTIONS IN TERMS OF**

**LIKELY IMPACTS COMPARED TO BASELINE OPTION**

*Table 1: Comparison of options in terms of likely impacts compared to the baseline option*

| Option | Option 1:<br><br>Status quo | Option 2:<br><br>Status quo plus EU funding | Option 3: EU initiative… | | | Assessment |
|---|---|---|---|---|---|---|
| | | | ..with MS selection<br><br>(a) | ..with EU level selection<br><br>(b) | .. with MS pre-selection and EU level approval (c) | |
| **KEY:** | | | | | | |
| = baseline or equivalent to baseline | | + to +++ minor to major improvement compared to baseline | | | - to --- minor to major worsening compared to baseline | |
| **SOCIAL/SOCIETAL IMPACTS** | | | | | | |
| Increased access to cultural heritage resources | = | + | ++ | ++ | +++ | This effect is most likely to be felt for under-developed sites for whom the Label offers a more substantial opportunity for profile-raising and increased visitor numbers. There might be some improvement under option 2 due to improvements in visibility and profile (see table 2). Access is likely to be most improved under option 3 on account of enhanced management plans and improved monitoring. MS involvement in option 3c would enhance this further. |
| Increased access to heritage for young people | = | (+) | + | ++ | +++ | There might be some improvement under option 2 in light of the likely general effects on access. Access is likely to be improved under option 3 on account of enhanced management plans and improved monitoring. Option 3 provides for enhanced opportunities to link heritage/culture with education (and thereby young people) through an integrated approach from the Commission via DG EAC. 3(c) would ensure MS inter- (or intra-) ministry engagement (between education and culture domains). |
| Increased interest in and knowledge of common European heritage | = | (+) | + | ++ | ++ | This impact assumes that as a consequence of visiting a labelled site individuals will increase their interest in and knowledge of common European heritage. Achieving this will depend on sites realising a number of obligations including effectively communicating their European aspects. Improvements against the baseline would be realised through better central coordination and emphasis on commonalities, expressed through activity at labelled sites and higher profile/access to information pertaining to the EHL from central (web based) sources. Such benefits would most likely be realised under option 3 and especially where there is a strong EU tier (3b and 3c). Some benefits might be achieved through option 2 where there may be a slight improvement in the European dimension (see table 2) |

| Option | Option 1: Status quo | Option 2: Status quo plus EU funding | Option 3: EU initiative… | | | Assessment |
|---|---|---|---|---|---|---|
| | | | ..with MS selection (a) | ..with EU level selection (b) | .. with MS pre-selection and EU level approval (c) | |
| Increased understanding of European cultural diversity | = | = | + | +++ | ++ | This impact assumes that individuals will have an increased understanding of European cultural diversity on account of interacting with labelled sites. EU intervention might be better able to emphasise such cultural diversity aspects. This impact is likely to flow most directly through an emphasis upon the transnational aspects of the Label. Option 3(b) provides an enhanced opportunity to co-ordinate and emphasise this as a priority. |
| Increase in intercultural dialogue | = | = | + | + | + | This effect goes a step beyond impacts on the knowledge and understanding of individuals and assumes that as a result of increases in these areas there will be greater levels of intercultural dialogue. This is therefore a long-term term effect and would be more difficult to achieve than other effects since it would involve more complex activities – especially transnationality - and might not be inherent to all sites. EU intervention would be better able to emphasise intercultural dialogue through the secretariat and by co-ordinating events, networking etc. |
| Greater sense of belonging to the European Union | = | = | (+) | (+) | (+) | Strong evidence from across many fields of research makes the link between cultural identity and heritage. But any impacts the Label might make on sense of belonging would be considerably affected by other factors and would be realised only in the long term. Again, it goes a step beyond raised levels of knowledge and understanding. However, the key aim of the EHL to increase a sense of belonging to Europe (and the EU) would be enhanced by EU involvement and the coordination and encouragement of this level of activity aimed specifically at emphasising the European aspects of the Label. |
| Stronger participation in the democratic process | = | = | = | = | = | This would be an indirect effect of the Label, would be highly dependent on many other factors, and could be realised only in the long-term; however, the relation between democratic participation and a sense of belonging or ownership is evidenced in research and the assumption then is that citizens will be encouraged to participate as they understand the European dimensions of their own cultural heritage. For New Member States this may be of particular importance as they seek greater integration with 'old' Europe. |

| Option | Option 1: Status quo | Option 2: Status quo plus EU funding | Option 3: EU initiative… | | | Assessment |
|---|---|---|---|---|---|---|
| | | | ..with MS selection (a) | ..with EU level selection (b) | .. with MS pre-selection and EU level approval (c) | |
| **ECONOMIC IMPACTS** | | | | | | |
| Positive effects on the local tourism industry, including number of people employed | = | = | (+) | (+) | (++) | Direct economic benefits through increased visitor numbers are unlikely to be major effect of the EHL in a first stage, especially in established tourist sites with already high visitor figures. Rather, EHL is likely to impact most on the quality of the visitor experience and in developing and enhancing their understanding of the site from a European perspective. Nonetheless there are likely to be positive effects on local and regional tourism through the greater publicity and potentially the attraction of new visitors attracted via networked activity, which are likely to be greater under a EU initiative for the reasons set out in Table 2. Some additional employment is likely to be generated directly and indirectly at sites and downstream through service industries, especially if the EHL acquires a strong credibility and prestige. Option 3c might have the strongest impact in the long term because it ensures best mix between the quality of the selected sites and the fair distribution of labels across MS. |
| Development of links with cultural and creative industries | = | = | (+) | (+) | (+) | Impacts here as a direct result of the EHL are likely to be minimal in a first stage. But option 3 could potentially place a greater emphasis upon integration with creative industries, particularly on site and through networked events and activities. Improvements on this impact may also flow from better links to other EU policies and programmes. |
| Development of innovation and creativity | = | = | (+) | (+) | (+) | Direct impacts as a result of EHL are likely to be marginal. However, option 3 could provide greater priority for integrating innovative techniques for promoting the EHL on sites, and through networking, particularly emphasising the use of Information and Communication Technologies. Improvements might also be derived from closer links to other policies and programmes of the EU. |
| **ENVIRONMENTAL IMPACTS** | | | | | | |
| Negative effects linked to over-development of tourism | = | = | + | + | + | Effects are highly variable due to locality-dependent nature of this impact. However, the enhanced monitoring capacity offered by option 3 would enable a greater emphasis and more resource to be placed upon amelioration and monitoring of impacts, with management plans and sustainable development objectives incorporated into monitoring and evaluation. |

| Option | Option 1: Status quo | Option 2: Status quo plus EU funding | Option 3: EU initiative… | | | Assessment |
|---|---|---|---|---|---|---|
| | | | ..with MS selection (a) | ..with EU level selection (b) | .. with MS pre-selection and EU level approval (c) | |
| Protection of cultural heritage | = | = | + | = | + | The label may be regarded as an extra 'layer' of conservation/protection – although clearly there is no legal basis or intent for this to be so. However, as an unintended 'side effect', the raising of the profile of some sites from a heritage perspective should be regarded as a positive effect. This should be a little bit stronger under options 3a and 3c which would ensure a greater ownership by the MS. |

# TABLE 2

# COMPARISON OF THE OPTIONS AGAINST

# EFFECTIVENESS, EFFICIENCY AND COHERENCE CRITERIA

*Table 2:  Comparison of the options against effectiveness, efficiency and coherence criteria*

| Option | Option 1:<br><br>Status quo | Option 2:<br><br>Status quo plus EU funding | Option 3: EU initiative… | | | Assessment |
|---|---|---|---|---|---|---|
| | | | ..with MS selection<br><br>(a) | ..with EU level selection (b) | .. with MS pre-selection and EU level selection (c) | |
| **KEY:**<br>=  baseline or equivalent to baseline | | | + to +++ minor to major improvement compared to baseline | | - to --- minor to major worsening compared to baseline | |
| **EFFECTIVENESS** | | | | | | |
| **Representativeness** | = | = | + | - | + | Transforming the EHL into a EU action would probably increase the number of MS participating in the initiative. EU level selection alone, without reference to the nationality of a site (option 3b), carries the risk that it would favour countries with well-developed cultural heritage sectors who are more used and better able to make high quality applications, irrespective of the actual merit of a site. Some countries might therefore be under-represented. |
| **European dimension – significance of sites** | = | (+) | + | +++ | ++ | Under the intergovernmental initiative, Labelled sites have varied in their European significance and the way in which they have sought to make it clear, yet this is central to developing European citizens' understanding of their common yet diverse cultural heritage.  In general, improvements would be possible through better marketing and networking. Additional funding alone (option 2) might have a marginal positive effect on the priority accorded to the European significance of sites, provided it were used to support expert meetings.  More substantial gains would be likely if an EU level secretariat were in place (option 3), since it would be more possible to ensure that this dimension were given priority.  This would be especially so if there was some form of EU level selection (options 3b and 3c).  EU level selection alone would be most likely to stress the European dimension (option 3b). |
| **Transnationality and networking** | = | + | + | +++ | ++ | Funding to support networking would achieve some improvement on this dimension (option 2). It is also important to facilitate the selection of "transnational sites" which thus depend simultaneously from several MS. If MS selection were to predominate (option 2 or 3a) this would still be difficult..  The transnational dimension could be better emphasised if there were to be some form of EU level selection process (options 3b and 3c), and especially if MS level selection were to be removed altogether (option 3b).  There is also experience in the Commission about how best to ensure exchanges of good practice and build partnerships.  The EU |

| Option | Option 1: Status quo | Option 2: Status quo plus EU funding | Option 3: EU initiative… | | | Assessment |
|---|---|---|---|---|---|---|
| | | | ..with MS selection (a) | ..with EU level selection (b) | .. with MS pre-selection and EU level selection (c) | |
| | | | | | | also has strong potential to act as an 'honest broker' (legitimacy). |
| **Visibility, profile and access** | = | + | ++ | ++ | +++ | High visibility and profile are important for raising awareness of the sites and for opening up access. The low visibility from which the intergovernmental EHL has suffered might be improved through the extra funding available under option 2. But leaving the secretariat function at MS level means that the effectiveness of publicity and marketing activities will depend upon the competences of a particular ministry to effectively commission these activities on a pan-European level. Visibility would be improved by being a full EU initiative (option 3), able to benefit directly from being able to use the EC's established media channels and experience in this area (e.g. through European Years, ECOC, EU Prize for Cultural Heritage / Europa Nostra Awards) ); and access would be more likely to be enhanced by ensuring compliance with this objective. Profile would also stand to benefit through the involvement of a tier of EU level selection which would be more likely to be perceived as expert and independent (options 3b and 3c). Having both MS and EU involvement would be most likely to ensure high visibility and profile since marketing and publicity could take place at both levels, as used in the European Years to good effect. Access would probably also benefit through improved sharing of good practice through close MS involvement. |
| **Artistic, cultural and historical education** | = | = | + | ++ | ++ | Additional funding for central activities (option 2) would be unlikely to lever improvements in sites' educational activities. Making the EHL a EU initiative (option 3) could deliver improvements if greater emphasis were to be placed upon this component through selection and subsequent enforcement, which would be strongest under options 3b and 3c. |
| **Programmes of cultural activities** | = | = | + | ++ | ++ | Extra funding alone (option 2) would not have any effect on the effectiveness of sites' cultural programme. Greater stress could be placed on this element through the more rigorous selection processes possible under a EU initiative, especially under options 3b and 3c. |
| **EFFICIENCY** | | | | | | |
| **Selection processes** | = | = | + | ++ | +++ | Whilst selection criteria were established for the intergovernmental EHL, the selection process has not always been transparent, and there has been much scope for national interpretation of the criteria. Additional funding |

| Option | Option 1: Status quo | Option 2: Status quo plus EU funding | Option 3: EU initiative… | | | Assessment |
|---|---|---|---|---|---|---|
| | | | ..with MS selection (a) | ..with EU level selection (b) | .. with MS pre-selection and EU level selection (c) | |
| | | | | | | for the status quo model (option 2) would be unlikely to impact upon this to any significant degree. Making the EHL a EU initiative (option 3) would have the effect of increasing the transparency of the process and the clarity with which the criteria are applied. Selection at EU level (options 3b and 3c) would in particular help to ensure that criteria are consistently applied. However, it is important that MS commitment is maintained (as in option 3c), not least because (a) the complex processes through which European identity will be realised need to involve both European level and national interpretations of culture and history; (b) there is a need to ensure a fair distribution of sites across MS (see 'Representativeness' criterion above); and (c) MS represent an important resource and infrastructure. MS commitment would be jeopardised under option 3b. |
| **Delivery and compliance (monitoring and QA)** | = | (+) | ++ | + | +++ | Additional funding for the status quo option (option 2) might make monitoring (which has not taken place under the intergovernmental EHL) possible on the part of the secretariat but establishing and maintaining systems would still depend on the expertise available within a given ministry.<br><br>A EU initiative (option 3) in contrast would be more likely to be able to use expertise available to the Commission to set up and maintain the necessary systems and would not be subject to having to transfer systems periodically, as would be the case with a revolving ministry-based secretariat. However, centralising responsibility for monitoring and QA processes at EU level which would be necessary if there were solely EU level selection (option 3b) would probably be too remote (and hence less efficient) and would also load additional administration onto the secretariat. Critically, it would carry a significant risk of losing commitment at MS level to their sites and thus disengagement of the ministries (and their agencies) who should maintain the key relationship with sites in this regard. At the same time, there would be value in having some form of review at EU level which is independent of each MS, e.g. the expert panel to check that obligations have been fulfilled after 3 years. This would suggest that the best model would be a clear distribution of functions between MS and EU levels (option 3c). |

| Option | Option 1: Status quo | Option 2: Status quo plus EU funding | Option 3: EU initiative… | | | Assessment |
|---|---|---|---|---|---|---|
| | | | ..with MS selection (a) | ..with EU level selection (b) | .. with MS pre-selection and EU level selection (c) | |
| **Administrative arrangements at EU and MS level** | = | - | - | -- | --- | The administrative burden would increase under all of the options compared to the baseline. Under option 3a the administrative burden would be largely shared across MS, whereas under 3b a significant burden would fall on the central secretariat in organising selection, monitoring etc. Administration would probably be most substantial under option 3c where it would be necessary to ensure close integration between the MS and EU selection processes, requiring significant communication and liaison functions. |
| **Financial impacts for the EU** | = | - | -- | --- | -- | Although all of the options would have very limited impacts on the EU budget, the financial implications for the EU need to be taken into account. In addition to the funding of some networking and communication activities (option 2), option 3 would also imply the costs of the secretariat which would be provided by the Commission. The financial implications are therefore related to the scale of the administrative tasks required from the EU level and thus would be greater under options 3b than under options 3a and 3c where more tasks would be shared between EU and MS level. |
| **Communication with other international bodies** | = | + | ++ | +++ | +++ | A secretariat at MS level (option 2) would be unlikely to be able to open up the same quality of communication with other international bodies than a secretariat at EU level. Credibility in those communications would be increased where the EU has a role in selection (options 3b and 3c). |
| **COHERENCE** | | | | | | |
| **Limitation of trade-offs across social, economic and environmental domains** | = | = | + | + | + | The social and economic success of sites (greater access, more tourism) is likely to lead to negative environmental effects under whichever option is pursued. However, the magnitude of the trade-off may be positively affected by incorporating management plans and sustainable development objectives into selection and monitoring requirements. |
| **Synergies and complementarities with other initiatives** | = | = | ++ | +++ | +++ | An EU-level secretariat (option 3) offers much greater prospect of realising such synergies and complementarities than where the secretariat rests with the MS (options 1 and 2) since communication channels and joint working are already established (e.g. with the Council of Europe on Heritage Days). The credibility of the EU with other bodies is probably greatest where there is some form of EU-level selection (options 3b and |

| Option | Option 1: Status quo | Option 2: Status quo plus EU funding | Option 3: EU initiative… | | | Assessment |
|---|---|---|---|---|---|---|
| | | | ..with MS selection (a) | ..with EU level selection (b) | .. with MS pre-selection and EU level selection (c) | |
| | | | | | | 3c) |
| **Participation of third countries in Culture programme** | = | = | +++ | +++ | +++ | Even if it is quite likely that the EHL will commence with the EU 27 and that the participation of third countries would be considered only in a second stage after a first evaluation, this is much more likely to be facilitated effectively where the secretariat is provided by the Commission (option 3). It is unlikely that there would be much difference between the sub-options under option 3. |

# OTHER INTERNATIONAL INITIATIVES

# IN THE FIELD OF CULTURAL HERITAGE

Besides the EHL a number of other international initiatives exist in the field of cultural heritage including notably the UNESCO World Heritage List, the Council of Europe Cultural Routes or the EU Prize for Cultural Heritage / Europa Nostra Awards. This has created confusion around the EHL, as well as some fears concerning possible overlaps. Therefore, the Commission asked ECOTEC as part of their support services to examine these different schemes. ECOTEC's analysis demonstrated clearly that the EHL is very different from the other initiatives and that it has the potential to add value in terms of all three of its core elements: the European dimension, pedagogy and networking[13].

The UNESCO World Heritage Convention was adopted in 1972. Once a country has ratified the Convention, it can nominate sites to be considered for inclusion on the World Heritage List. To date, 890 sites are listed: 689 cultural, 176 natural and 25 mixed properties, in 148 states. There are four main differences between the EHL and the World Heritage List. The EHL focuses on sites which have played a key role in the history and the building of Europe while the UNESCO list designates sites of universal value. The EHL is not about the beauty of a site or its architectural quality but about its symbolic value for European integration. To name just one example, the UNESCO designated the Kremlin and the Red Square in Moscow which has a wonderful architecture but was also the residence of Stalin, while the intergovernmental EHL designated the Gdansk Shipyards which have a symbolic signification for the reunification of Europe. In contrast to the UNESCO list, the EHL is not about the conservation of sites, but about the activities they propose and their educational dimension, especially for young people. Finally, the EHL seeks to stimulate the networking of labelled sites, as well as common projects.

The Europa Nostra Awards began in 1978 and became the EU Prize for Cultural Heritage / Europa Nostra Awards in 2002 when Europa Nostra started to cooperate with the European Commission in the framework of the Culture programme[14]. In 2009, 60 % of the budget of the Prize / Awards came from a EU grant (200 000 € for a 333 333 € total budget). Each year awards are attributed in four categories: conservation, research, education and dedicated services. In contrast to the EHL, the Awards focus on the conservation of cultural heritage. They are one off prizes which recognize achievements after the fact, and unlike the EHL do not set in train development activities; nor are they designations which can be subsequently withdrawn if criteria are not met. Furthermore, the awarded achievements do not need to have a European narrative, but the prize seeks to highlight excellence at European level and promote exchange of practice.

The Cultural Routes programme was launched by the Council of Europe in 1987. 25 routes have been designated to date involving approximately 30 000 towns and cities. The Mozart route for example is a network set up along 18 historic routes taken by Mozart across ten countries. Technical support is provided to the routes by the European Institute of Cultural Routes in Luxembourg which currently benefits from an

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[13]     See ECOTEC report: http://ec.europa.eu/dgs/education_culture/evalreports/index_en.htm
[14]     Europa Nostra is the pan-European federation for cultural heritage.  It represents over 250 heritage NGOs in 45 countries across Europe, and works to recognise good practice among heritage projects.

EU operating grant in the framework of the Culture programme for which it has to compete through an open call for proposals. In terms of objectives, the Cultural Routes are probably the closest to the EHL as they also aim at raising awareness on a European cultural identity and European citizenship or at promoting intercultural dialogue. However the modus operandi of the Routes is very different to the EHL. Firstly, while the EHL concentrates mostly on the 27 EU MS, the Cultural Routes are open to the 47 MS of the Council of Europe and over recent years, the focus of the initiative has been very much on the countries which are not in the EU. Secondly, while the EHL is attributed to individual sites which have to implement a number of very specific activities, the Cultural Routes concern very loose and very large thematic networks of sites that span several countries and often simply signpost visitors to towns and cultural attractions en route with very little obligations for the sites themselves. Thirdly, while the EHL aims at promoting a European reading of symbolic sites of the building of Europe, the objective of the thematic networks of the Cultural Routes is to illustrate the history of influences and exchanges across Europe, but the themes in themselves can sometimes have a limited European significance (the Routes of the Olive Tree, Parks and Gardens, the Iron Route in the Pyrenees, …).

As mentioned in section 1.2.2.2 of the IA report, the representatives of ICOMOS (consultative body for the UNESCO World Heritage List), the European Institute of Cultural Routes and Europa Nostra who participated in the consultation meeting all confirmed the added value of the EHL. Nevertheless, they also underlined that clearer communication would be needed to clarify the differences, especially for the general public.

Communication between the intergovernmental EHL and the other initiatives has remained very limited so far, which has hindered the building of synergies. There is however a potential for cooperation. Firstly, because the initiatives all reward excellence and stimulate improvements in the field of cultural heritage, but they cover different aspects of the domain (preservation, conservation, promotion, information, education…). Secondly, because the initiatives have very different geographical scopes. It is also possible that one specific site takes part or is rewarded by two or more initiatives for different aspects of its work. So far, among the 64 sites of the intergovernmental label, 6 are also on the World Heritage List, 12 are part of Cultural Routes networks and 3 were rewarded by EU Prize for Cultural Heritage / Europa Nostra Awards. This is also a basis on which synergies could be developed.

**Profiles of other international initiatives against key features of the EHL:**

| Initiative | European Heritage Label | Council of Europe Cultural Routes | EU Prize for Cultural Heritage / Europa Nostra Awards | UNESCO World Heritage List |
|---|---|---|---|---|
| **Objectives** | | | | |
| Scope | Identification and promotion of European dimension of cultural heritage | Promotion of European heritage and culture | Conservation of European heritage | Preservation of global heritage |
| Emphasises common – yet diverse – European heritage | High | High | Low | No |
| Aims to develop stronger sense of European citizenship/belonging | High | High | Low | No |
| Promotes use of cultural tourism as a tool in social and economic development | High | High | Low | Medium |
| Targets needs of young people | High | High | Medium | Low |
| **Modus operandi** | | | | |
| General focus | Individual heritage sites | Development of routes based around themes that link cultural heritage sites | Individual heritage sites | Individual built heritage sites |
| Trans-national dimension (e.g. networking between heritage sites) | High | High | High | Low |
| Contains explicit pedagogical aspect | High | High | High | Low |
| Scale | 64 sites designated in 18 countries | 25 routes currently designated involving approx. 30,000 towns and cities and 174 NGOs | Around 30 awards are made each year with up to six prizes being awarded the Grand Prize of €10k each | 890 sites in 148 countries |

# Heritage designations: summary of selection criteria and processes:

| UNESCO World Heritage List | |
|---|---|
| **Selection Criteria** | **Selection processes** |
| Guidance for selection processes now 1000 pages long. To be included on the WH list, sites must be of outstanding universal value and meet at least one of the 10 criteria set out at:<br><br>http://whc.unesco.org/pg.cfm?cid=57<br><br>For example:<br><br>1. To represent a masterpiece of human creative genius.<br>2. To exhibit an important interchange of human values over a period of time.<br>3. Unique/exceptional testimony to culture.<br>4. Outstanding architecture, technology, landscape. | Country proposes site – a) tentative list created, then b) formal proposal made.<br><br>Evaluation of dossier by ICOMOS[15] and IUCN[16] according to site type.<br><br>On site evaluation – technical site report + Report by expert in the field.<br><br>Expert panel discussion and recommendation to World Heritage Committee to:<br><br>a. Put on list<br>b. Return for further information<br>c. Postpone<br>d. Reject<br><br>1.5 – 2 years for the process to complete. |

| Council of Europe Cultural Routes | |
|---|---|
| **Selection Criteria** | **Selection processes** |
| The routes are to be centred on a theme, which, in order to qualify for the programme, must fulfil a series of criteria.<br><br>Each theme or sub-theme is to be dealt with in a series of co-operation projects in specified priority fields of action.<br><br>Project initiators must form a network so as to improve co-operation and pool their experience. In order to be approved, these networks must in turn satisfy a number of criteria.<br><br>A 2007 resolution of the Council of Europe presents all selection criteria :<br>https://wcd.coe.int/ViewDoc.jsp?id=1194679 | The certification is awarded by the Council of Europe committee responsible for the Cultural Routes programme on a proposal from the advisory committee.<br><br>Networks must submit every three years an activity report to the Council of Europe. If some criteria are not fulfilled, a recommendation will be issued. If the recommendation is not followed within a year, the committee may withdraw the certification. |

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[15]    International Council on Monuments and Sites.
[16]    World Conservation Union.

| Europa Nostra Awards (selection procedure as of 2010 call) | |
|---|---|
| **Selection Criteria** | **Selection processes** |
| Europa Nostra Awards are awarded in 4 categories (conservation, research, dedicated service and education/training/awareness-raising). Each of the four categories has its own selection criteria. http://www.europanostra.org/UPLOADS/FILS/HA2010_call_conditions.pdf | Applicants from all European Countries\*  must fill a dossier and submit it in French or English to Europa Nostra Secretariat<br><br>A European Jury of independent experts designated by Europa Nostra select the award-winners. 3 out of 4 categories are also assessed on location by a local expert prior to the Jury meeting.<br><br>\*only entries from countries that are part of the EU Culture programme are eligible for the monetary award |