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**REPORT FROM THE COMMISSION TO THE EUROPEAN PARLIAMENT, THE
COUNCIL, THE EUROPEAN ECONOMIC AND SOCIAL COMMITTEE AND THE
COMMITTEE OF THE REGIONS**

Evaluation of the European Heritage Label (EHL)

{SWD(2020) 161 final}

REPORT FROM THE COMMISSION TO THE EUROPEAN PARLIAMENT, THE COUNCIL, THE EUROPEAN ECONOMIC AND SOCIAL COMMITTEE AND THE COMMITTEE OF THE REGIONS

Evaluation of the European Heritage Label (EHL)

The European Heritage Label (EHL) is a European Union action¹ which aims to strengthen European citizens' sense of belonging to the Union, in particular that of young people, based on shared values and elements of European history and cultural heritage, as well as an appreciation of national and regional diversity. The Action focuses on common European history and values and contributes to strengthen intercultural dialogue; it places less emphasis on the preservation of sites. All Member States participate in the action, with the exception of Ireland and Sweden².

By today, the Commission has awarded the European Heritage Label to forty-eight sites for their symbolic value, the role they played in European history, and the activities they offer in order to **bring the European Union and its citizens closer together**. For the purpose of the action, "sites" mean monuments, natural, underwater, archaeological, industrial or urban sites, cultural landscapes, places of remembrance, cultural goods and objects and intangible heritage associated with a place, including contemporary heritage. The European Heritage Label is not associated with a monetary award.

The Commission implements the European Heritage Label with the support of a European panel of independent experts to carry out the selection and monitoring at Union level.

This **evaluation** report of the European Heritage Label is submitted in accordance with Article 18 of Decision 1194/2011/EU³ and is accompanied by a staff working document (SWD) presenting all evidence. It builds on 102 responses received from all interested parties in the framework of an open public consultation. The evaluation assesses progress in the implementation of the action during its **first six years of existence 2011–2017**, with a view to further developing the action to reach its full potential and to take a qualitative step forward. The evaluation examines five criteria: relevance, coherence, efficiency, effectiveness and EU added value, as provided in the Commission's Better Regulation Guidelines⁴.

Overall, the evaluation suggests that **the European Heritage Label action remains relevant to the current needs of the EU** and is in line with the New European Agenda for Culture⁵ and the rising interest in culture and cultural heritage among EU citizens, as shown by the high participation in the European Year of Cultural Heritage 2018. The findings of this evaluation, as detailed in the Staff Working Document (SWD), show that the Action should

¹ Decision No 1194/2011/EU of the European Parliament and of the Council of 16 November 2011 establishing a European Union action for the European Heritage Label, OJ L 303/1, 22.11.2011

² The UK was a Member State at the time of the evaluation but did not participate in the EHL action.

³ OJ L 303/1, 22.11.2011

⁴ https://ec.europa.eu/info/law/law-making-process/planning-and-proposing-law/better-regulation-why-and-how/better-regulation-guidelines-and-toolbox_en

⁵ Communication from the Commission to the European Parliament, the European Council, the Council, the European Economic and Social Committee and the Committee of the Regions "A New European Agenda for Culture", COM(2018) 267 final, 22.05.2018.

continue to be developed, but its geographical scope should not expand beyond the EU until the action becomes better-established within the EU.

1. Relevance

The findings of this evaluation show that the European Heritage Label is **relevant to the rising interest in culture and cultural heritage** among EU citizens. Facilitating the sharing of experiences and exchanges of best practices across the Union is highly relevant to the need for European cooperation in the field of culture and cultural heritage. It is the most promising way to develop professional understanding and practice, and to strengthen peer-to-peer connections within Europe. However, during the first years of implementation, **this potential of the action has not yet been fulfilled**, and not all Member States are involved in the action.

- The Commission will continue to further develop the action and step up efforts to involve all Member States in the action.

2. Coherence

The evaluation found that the European Heritage Label is a **distinctive initiative within the EU**. The European Heritage Label places less emphasis on the preservation of the sites, focusing instead on raising European citizens' awareness of European history and culture. The evaluation also found that in terms of objectives, the European Heritage Label displays more similarities with other EU initiatives and programmes in the cultural field, rather than with UNESCO programmes. However, some risk of overlap was identified between the European Heritage Label and the Council of Europe's Cultural Routes.

Due to the **transversal nature of cultural heritage**, the European Heritage Label offers some potential for synergies with social, economic and international policy areas. These could be developed as a result of more active policy collaboration under the New European Agenda for Culture, and the European Framework for Action on Cultural Heritage⁶. Some synergies could also be achieved between the European Heritage Label and EU programmes in the field of education and training such as the Erasmus+ programme.

- The Commission will maintain the focus on the European significance of the European Cultural Heritage sites in the history and culture of Europe and/or the building of the Union as a distinctive feature of the action and the basis for its development and achievement of its objectives.
- The Commission will seek to exploit coherencies and synergies identified between the European Heritage Label and other EU actions in the fields of culture, education and citizenship (e.g. Europe for Citizens programme, Erasmus+ programme, DiscoverEU, European Capitals of Culture, etc.).

3. Efficiency and governance

A **wide range of sites**, both tangible and intangible, individual and multiple, national and transnational, are eligible for the attribution of the European Heritage Label. The evaluation considers this **an advantage in attracting and uniting a variety of potential sites for the Label** and the distinction of the action from other initiatives in the field of cultural heritage. The introduction of **common selection criteria** was one of the key changes introduced in 2011, when the European Heritage Label was transformed from an intergovernmental initiative to an EU-level action. The common selection criteria ensure the relevance of sites to the European Heritage Label's objectives as the designated **sites clearly define their**

⁶ European Framework for Action on Cultural Heritage, SWD(2018) 491 final, 05.12.2018.

European significance and commit to implementing activities to achieve the action's objectives. Moreover, the common selection criteria have contributed to shaping the action's identity.

The evaluation highlighted that, compared with other programmes or initiatives in the field of cultural heritage, the criterion of **European significance is a distinctive feature of the action**, and de facto the core criterion for the attribution of European Heritage Label. The evaluation found, however, that **the development of a European narrative is difficult** for a large share of candidate sites.

- The Commission will seek to support potential sites for attribution of the label, as well as European Heritage Label sites to develop their European narratives in order to meet and continue meeting the criterion of European significance.

The evaluation found that while the **potential for cooperation and thematic networking** is built into the eligibility categories, it has not yet been fully exploited. The majority of sites labelled between the years 2013 and 2017 were individual sites, mostly historic buildings, documentary and architectural heritage, and places of remembrance. Prior to the year 2018, only one transnational and one national thematic site were labelled.

- The Commission will step up its efforts to promote cooperation and thematic networking between Member States, with a view to labelling more transnational and national thematic sites.

The Impact Assessment of the action assumed that a **two-stage selection process**, i.e. pre-selection at national level first, and then selection at Union level, would be a way to ensure fair geographical distribution of the Label across the EU. The evaluation found that geographical distribution of European Heritage Label sites remains imbalanced after the first years of implementation of the action, with more EHL sites in larger states.

- The Commission will encourage all the Member States to participate in the action and promote applications from participating Member States without a designated site .

The selection of sites for the attribution of the Label involves two stages: Pre-selection of up to two sites at national level every two years; following that, selection of the sites by the European panel under the responsibility of the Commission. The evaluation found that a two-stage selection process may lack efficiency as all applications are assessed, even those where the applicant site does not clearly demonstrate the symbolic European value in the application. As each participating Member State establishes its own procedures and its own calendar for the pre-selection in accordance with the principle of subsidiarity, this results in different opportunities for cultural heritage sites to participate in the action.

The action's **European-level selection with the support of the EU panel works well**. The evaluators identified one area in which the efficiency of the assessment process could be increased. The Label may be attributed to a site only if its application meets all three criteria. Although three-quarters of non-selected sites did not meet the criterion of European significance, and could therefore not be attributed the label, the EU panel assessed the application against the other two criteria, namely the project proposed, and the operational capacity.

The panel communicates its selection decisions to candidate sites through their national coordinators, and issues a report on the pre-selected sites to the Commission for publication. Selected sites consider this communication and feedback sufficient, while non-selected sites would prefer a more individualised and detailed explanation. Candidate sites not selected for attribution of the label in a selection at Union level can submit new applications for pre-selection at national level in the following years.

- For the future selections, the Commission will consider ways to increase the efficiency of the selection process, as well as the opportunities to participate in the action for cultural heritage sites, namely through enhanced information.
- The Commission will explore options for streamlining the selection and evaluation processes and for providing more detailed feedback on the selection results. The EU Panel will continue to assess all criteria for attribution of the label with the objective to base the assessment on all information included in the application.

The evaluation questions the efficiency of national quotas, the selection of maximum one site per Member State per selection year. While the quotas might have been useful in the initial stages of the action as a means to control the number of EHL sites, they are likely to become an obstacle for the action's further development.

- Should Decision No 1194/2011/EU (legal base) be reviewed, the Commission would consider, in consultation with Member States, options for the elimination of the national quota of one site per Member State.

The evaluation found that site managers and the European panel involved in the exercise positively perceived the **first Monitoring of sites awarded the label** in 2016 aiming to ensure that they continue to meet the criteria and that they respect the project and work plan submitted in their application. The majority of site managers appreciated the opportunity of taking stock of their achievements and of the improvements brought to the site's performance. Analysis shows that half of all recommendations provided by the European panel during the Selection process had been fully or partially implemented by the time of monitoring. However, the monitoring in its current form functions more as a performance review rather than a monitoring in a strict sense. It puts forward the need for a clear monitoring framework with common indicators for the Member States to ensure a coherent approach to the monitoring procedure.

- The Commission will continue to evaluate and improve the monitoring procedures for future monitoring exercises.

The evaluation found that **communication of the European Heritage Label to the public** is moderate. Not all sites have exploited the visibility and branding materials created by the Commission. Furthermore, communication between the actors involved in the implementation of the European action, namely the Commission, the national coordinators and the site managers, is an area for improvement. Networking among sites is emerging, and great demand exists within the action for more intense communication.

- The Commission will step up its efforts to enhance communication activities about the European action and to promote cooperation and thematic networking among sites.

- Under the current Creative Europe programme⁷, funds have been allocated to the design and management of networking and capacity building activities for European Heritage Label sites in 2019 and 2020.

4. Effectiveness

The evaluation found that since its launch, the European Heritage Label action has made **progress in reaching its two general objectives**, namely strengthening European citizens' sense of belonging to the Union and strengthening intercultural dialogue. The majority of respondents to the Open Public Consultation who visited European Heritage Label sites agree that the visit had strengthened their sense of belonging to Europe. As regards strengthening intercultural dialogue, a limited understanding among site managers of intercultural dialogue and limited multilingual communication are the main obstacles to achieving progress towards this objective.

- The Commission will explore ways to enhance the site manager's understanding of and the commitment to strengthening intercultural dialogue to contribute better to the general objectives of the action.

The evaluation observed progress since the launch of the action in highlighting the sites' European significance and symbolic value and in raising the profile and attractiveness of the sites on a European scale. Despite this, developing a European narrative is still a challenge for some of the sites and identifying common topics remains difficult for the whole European Heritage Label network.

The evaluation also found that progress has been made in increasing European citizens' understanding of the history of Europe and the building of the Union, as well as of their common yet diverse cultural heritage. Respondents to the Open Public Consultation agreed that a visit to any of the EHL sites, directly or online, had improved their understanding of European history and culture and that it improved their knowledge about the building of Europe and its integration.

The evaluation found that most sites have improved and increased their access for visitors, including virtual accessibility in foreign languages. While the Label has been successfully added to the communication and education activities of the sites, there is still **a need to develop further educational activities** that address common cultural heritage. Reaching local audiences for collaboration with local communities remains a challenge for many sites. Up to now, little progress has been made in fostering synergies between cultural heritage and contemporary creation and creativity. Furthermore, no evidence was found that the EHL contributes to the economic and sustainable development of regions, in particular through cultural tourism, although one-third of sites report that they are involved in collaboration activities with local communities and businesses.

The evaluation found that half of all sites have implemented joint activities with EHL sites in other Member States, e.g. exhibitions, conferences, lectures, concerts, workshops and promotion events. Some sites prefer to cooperate with non-EHL sites dealing with a common topic, while half of EHL sites would like to improve cooperation within the action.

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Regulation (EU) No 1295/2013 of the European Parliament and of the Council of 11 December 2013 establishing the Creative Europe Programme (2014 to 2020), OJ L 347/221, 20.12.2013.

Establishing an EHL network as a structure for cooperation is a desire explicitly mentioned by stakeholders.

EHL sites report having gained a great number of **benefits from being designated**, including strengthened local support and European dimension; greater media attention; closer integration into Europe; as well as increased visibility and visitor numbers. Conversely, becoming an EHL site is also demanding in terms of human and financial resources for the implementation of their project.

- The Commission has launched activities to contribute to the capacity building of EHL sites to act at international level and to contribute to the achievements of the EHL's objective and the sustainability of its results, such as through training activities and staff mobility between sites.

5. EU added value

The added value provided by having the action operate at European level, in comparison to the previous intergovernmental action, lies primarily in highlighting the European significance of EHL sites. The sites can provide tangible content that fills abstract concepts like European values and identity. Furthermore, EHL sites can serve as a link between the European narratives and local sites and citizens. No concrete EU added value has so far been witnessed in strengthening intercultural dialogue. This might be a result of the characteristics of heritage sites, which seldom place a special focus on activities that offer great potential to support intercultural dialogue, as is seen in the fields of socio-culture, performing arts, urban spheres, etc.

The involvement of the EU has resulted in the establishment of common selection criteria, as well as selection and monitoring procedures at European level. These developments can be identified as an important added value compared to the former intergovernmental initiative. EHL sites recognise EU added value of the action in the opportunity to share their experiences and best practices, to learn from each other, and to develop narratives on common European topics.

The evaluation found that the action's EU added value may be limited by its scope being too narrow (i.e. by its focus on sites). A termination of the action would, however, be premature and could send a negative signal to citizens, and specifically to the stakeholders of the sites and the cultural heritage sector. The efforts undertaken by EHL sites to highlight their European significance and raise awareness among citizens would be severely damaged.

- The Commission will consider additional ways of broadening the scope of the action, in particular by developing and communicating the European narratives of the sites; enhancing cooperation and thematic networking among EHL sites; and contributing to their capacity building.