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COMMISSION STAFF WORKING DOCUMENT

EVALUATION

Evaluation of the European Heritage Label Action 2018-2024

Accompanying the document

**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 Action 2018-2024

{COM(2025) 366 final}

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Glossary

<i>Term or acronym</i>	<i>Meaning or definition</i>
the programme	Creative Europe
the EHL	European Heritage Label Action
DG EAC	Directorate-General for Education, Youth, Sport and Culture
EACEA	European Education and Culture Executive Agency
EHL BUREAU	European Heritage Label BUREAU
NC	National Coordinator

1. INTRODUCTION

Purpose and scope of the evaluation/fitness check

This Staff Working Document supports the Commission's report on the evaluation of the European Heritage Label (EHL) action for the period 2018-2024, as required by Decision No 1194/2011/EU of the European Parliament and of the Council. The EHL action aims to strengthen European citizens' sense of belonging to the Union, promote intercultural dialogue, and raise the profile of heritage sites that have played significant roles in European history, culture, and integration. In line with Article 18 of the Decision, the Commission is mandated to ensure an external, independent evaluation of the action every six years.

The evaluation examines the action's implementation and impact, focusing on key areas such as the efficiency of processes, the number of sites involved, the expansion of its geographical scope, and the potential for future improvements. It assesses whether the action has met its objectives, evaluates its continued relevance in the current EU context, and considers the role of the EU intervention in achieving these objectives. The evaluation also explores how well the action aligns with broader EU policies and its EU added value, particularly in fostering a shared European cultural identity and facilitating cooperation among EU Member States.

As per the European Commission's Better Regulation Guidelines and the Better Regulation Toolbox, this evaluation is structured around the five compulsory criteria: effectiveness, efficiency, coherence, EU added value, and relevance. It provides a systematic analysis of the EHL action, exploring the successes and challenges of the initiative. The evaluation considers both the current state of the action, and the lessons learned, offering an independent judgment based on evidence gathered through various sources, including feedback from stakeholders and expert assessments.

The report also outlines recommendations to improve the EHL's implementation in the future and to ensure its continued relevance and impact beyond 2025. The insights gained from this evaluation will directly inform the Commission's preparation for the next phase of the action.

2. WHAT WAS THE EXPECTED OUTCOME OF THE INTERVENTION?

2.1 Description of the intervention and its objectives

2.1.1 Description of the Action

The European Heritage Label (EHL) is a symbolic action established by the European Union to recognise and celebrate Europe's shared cultural heritage.

The EHL was launched in 2006 as an intergovernmental action under the leadership of France, Spain and Hungary with the goal to identify and designate sites that played a key role in building and uniting Europe, and to promote the European context of the selected sites. By 2010, the Label had been assigned to 68 sites across 18 EU Member States and Switzerland. Participating countries designated sites independently, based on their own judgement and interpretation of 'Europeanness'¹.

According to the *Impact Assessment* that preceded the Commission initiative in 2010, the intergovernmental selection procedures had resulted in disparities between the sites labelled, their relevance and activities. In addition, the EHL lacked visibility among stakeholders, and little progress had been made in the initiative's educational dimension. On request from participating Member States, the EHL was transformed into a formal action of the EU, with the aim of strengthening coordination between the states, and developing "common, clear, and transparent selection criteria"².

The current EU action for the European Heritage Label was established in 2011 by Decision No. 1194/2011/EU³.

Geared up at the European Level, the initiative aims to strengthen the sense of belonging among European citizens by highlighting and promoting the heritage sites that have played a significant role in the history, culture, and integration of Europe. The Label is a project-based action, focusing on cultural landmarks that hold a particular significance to the identity of the European Union, and intend to further promote their European dimension

¹ Commission Staff Working Document. Summary of the 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, 9 March 2010, SEC(2010) 198, 9.3.2010, p. 2 [hereinafter, 'Impact Assessment']

² Proposal for a Decision of the European Parliament and of the Council establishing a European Union action for the European Heritage Label, 9 March 2010, COM (2010) 76 final, p. 3 [hereinafter referred to as the 'Proposal for the European Heritage Label']

³ 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 L303/1, 22.11.2011

and foster a greater appreciation for the shared values and history of Europe. In this context, the action plays an essential role in unifying citizens from diverse national backgrounds and enhancing their sense of connection to the European project.

The procedure for attributing the European Heritage Label is carried out in two stages: at the national level a maximum of two candidate sites are pre-selected every two years. Out of these and based upon the recommendations made by a European Panel of independent experts⁴, the European Commission decides to attribute the European Heritage Label to a maximum of one site per participating Member State per year.

As of 2024, a total of 67 sites and 275 locations across 22 Member States have been awarded the European Heritage Label, encompassing a diverse range of locations that embody the rich cultural tapestry of the continent.

To ensure that designated sites continue to meet the criteria for which they were selected, the European Commission conducts regular monitoring exercises. The first monitoring year took place in 2016, examining sites awarded in 2013 and 2014. The second monitoring occurred in 2020, assessing sites that received the Label prior to 2019. In 2024, the third monitoring cycle evaluated the performance of all 67 European Heritage Label sites between 2020 and 2024.

2.1.2 Objectives

As outlined in **Article 3 of Decision No 1194/2011/EU**, the action shall contribute to the following general objectives:

- a) 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.*
- b) strengthen intercultural dialogue.*

⁴ A European panel of independent experts has been established to carry out the selection and monitoring at Union level. It ensures that the criteria are properly applied by the sites across the Member States. The European panel consists of 13 members, four of whom have been appointed by European Parliament, four by the Council, four by the Commission and one by the Committee of the Regions, in accordance with their respective procedures. The members are independent experts with substantial experience and expertise in the fields relevant to the objective of the action.

The primary objective of the EHL is to contribute to the strengthening of European identity, particularly among young people, by fostering a deeper understanding of Europe's common history and shared values. It encourages citizens to reflect on the historical moments and cultural landmarks that have shaped the European Union. By focusing on the symbolic value of heritage sites that represent both national and European histories, the EHL contributes to raising awareness about the richness of Europe's cultural diversity while underscoring the importance of unity in diversity. The initiative aims to create opportunities for citizens to engage with the cultural heritage of other Member States, thus deepening their understanding of European history and encouraging a sense of common belonging to the Union.

Another key goal of the EHL is to promote intercultural dialogue and mutual understanding between European citizens. By celebrating the diverse yet interconnected histories of European nations, the EHL encourages an exchange of knowledge and fosters respect for different cultures and traditions. In turn, this contributes to greater harmony and social cohesion across Europe. In the long run, the action seeks to break down barriers between communities, allowing citizens to discover shared narratives and histories that transcend national borders. Through its focus on common European values such as democracy, human rights, and the rule of law, the EHL reinforces the values at the heart of the European Union and helps to promote peace, solidarity, and cooperation.

In order to achieve the aforementioned objectives, the action shall seek to attain the following intermediate objectives:

- a) stressing the symbolic value and raising the profile of sites which have played a significant role in the history and culture of Europe and/or the building of the Union.*
- b) increasing European citizens' understanding of the history of Europe and of their common yet diverse cultural heritage, especially in relation to the democratic values and human rights that underpin the process of European integration.*

A central feature of the EHL is the visibility it provides to European heritage sites, particularly those that have been significant in the development and integration of the European Union. The Label aims to raise the profile of these sites, helping them attract visitors, foster local pride, and generate positive economic impacts. It serves as a tool to enhance the visibility of sites that may otherwise be under-recognised, spotlighting their

European dimension and showcasing their historical and cultural importance. This is crucial not only for the broader public's understanding of Europe's shared heritage but also for promoting sustainable tourism, which can generate economic benefits for the communities surrounding the sites. Furthermore, the EHL seeks to enhance accessibility to these sites, ensuring that they are open to a wide range of visitors, including younger generations, tourists, and marginalised groups.

In addition to promoting visibility, the EHL encourages the development of high-quality educational programs that engage citizens in learning about European heritage. These programs are designed to help individuals, particularly young people, develop a deeper connection to the history, culture, and values of Europe. The educational initiatives connected to the EHL provide an opportunity for citizens to explore the European dimension of the designated sites through various interactive methods, including exhibitions, workshops, and educational resources. These initiatives serve as an essential tool in fostering understanding, promoting critical thinking, and encouraging dialogue around European identity, democratic values, and shared history.

Figure 1 shows the Action's intervention logic. The main elements of each specific objective as implemented during 2018-2024 are explained below.

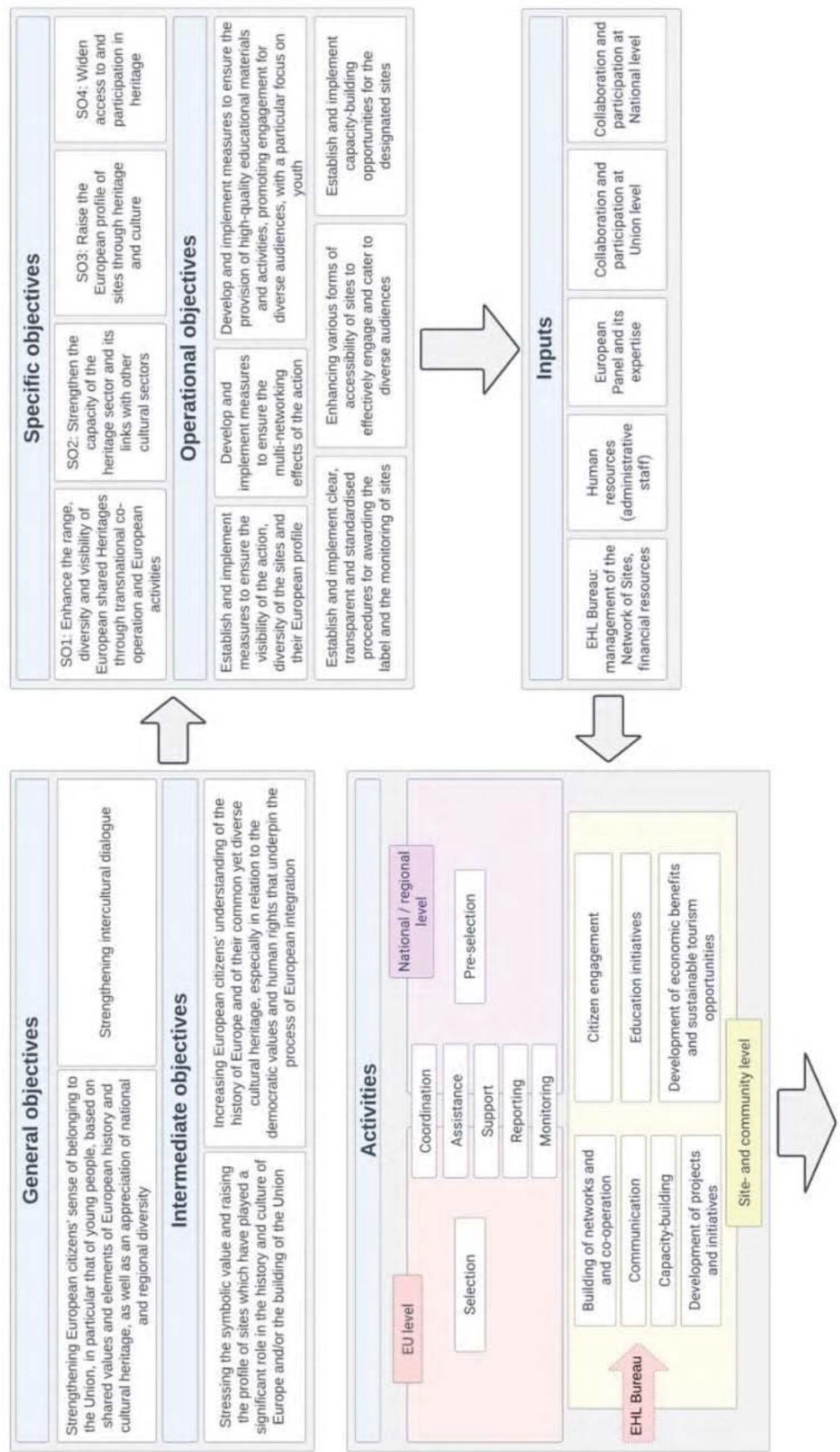
At a more operational level, as enshrined Article 3 of the Decision basing the action⁵, the EHL seeks to elevate the sites' actions and profile through a set of well-defined objectives. These objectives are core to the selection and monitoring of the sites.

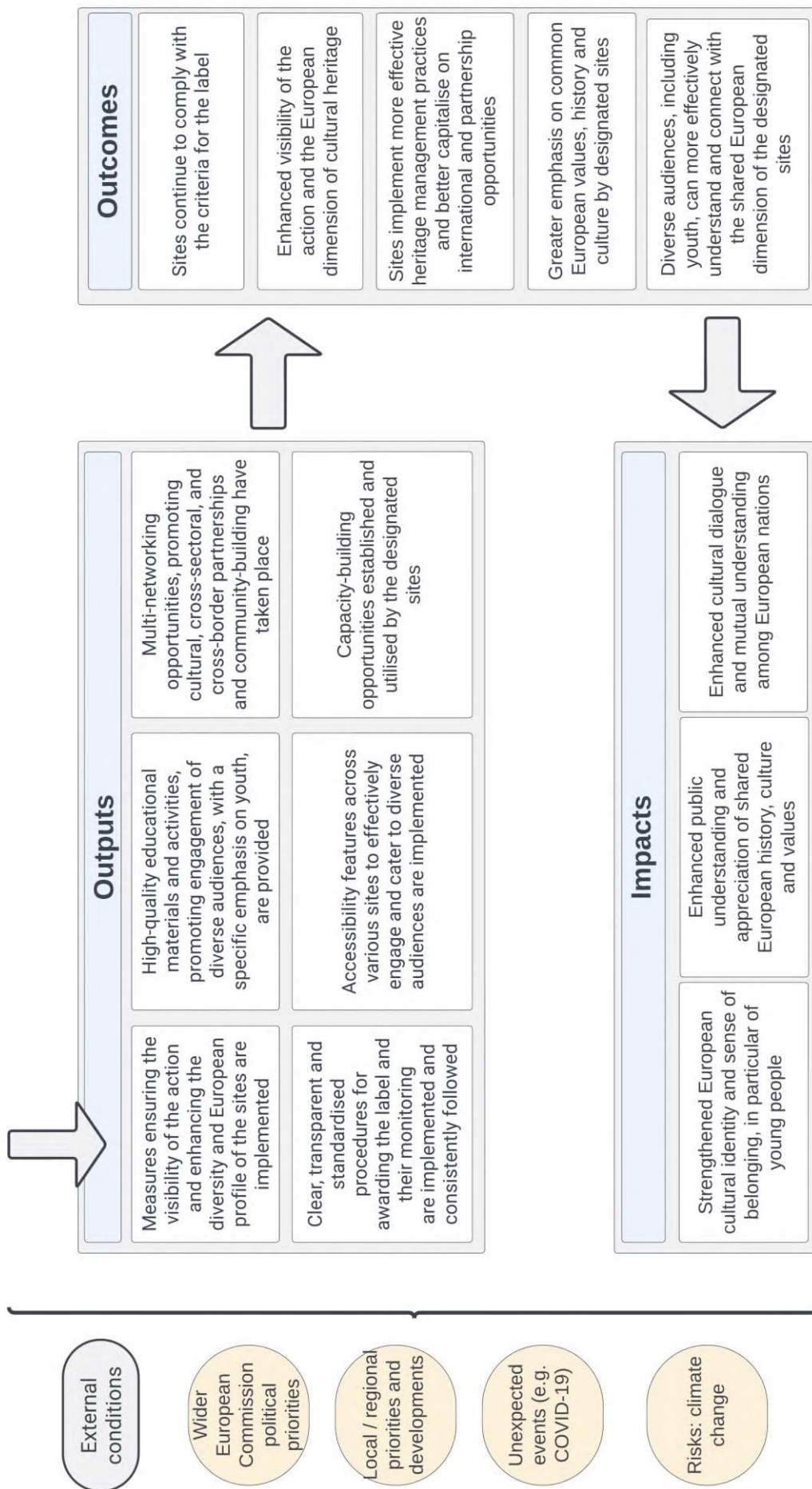
- a) highlighting their European significance.
- b) raising European citizens' awareness of their common cultural heritage, especially that of young people.
- c) facilitating the sharing of experiences and exchanges of best practices across the Union.
- d) increasing and/or improving access for all, especially young people.
- e) increasing intercultural dialogue, especially among young people, through artistic, cultural and historical education.

⁵ 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 L303/1, 22.11.2011

- f) fostering synergies between cultural heritage on one hand and contemporary creation and creativity on the other.
- g) contributing to the attractiveness and the economic and sustainable development of regions, in particular through cultural tourism.

Figure 1. Intervention logic of the EHL action





One of the primary aims of the EHL is to strengthen the capacity of the heritage sector and increase cooperation between different cultural and heritage sectors. Through collaboration among heritage sites, the initiative facilitates the exchange of best practices, expertise, and knowledge, contributing to the overall enhancement of heritage management and preservation across Europe. The initiative emphasises the importance of capacity-building, helping designated sites to improve their organizational practices, enhance visitor engagement, and develop effective conservation strategies. The capacity-building efforts are also designed to ensure that heritage sites can participate effectively in the EHL network and work collaboratively to amplify the action's impact. The goal is to build a community of heritage professionals and practitioners who are committed to preserving European heritage and promoting its values in a sustainable and inclusive manner.

The EHL is also concerned with promoting cooperation and networking among designated sites, which in turn fosters transnational collaboration. This networking is crucial for the development of synergies and the creation of a unified European heritage community. Through this cooperation, heritage sites can share resources, engage in joint projects, and create lasting partnerships with other cultural institutions and educational organizations. These transnational efforts not only help strengthen the European dimension of heritage but also enable sites to play a more active role in addressing common challenges, such as climate change, tourism management, and conservation issues.

While the main focus of the EHL is on cultural heritage, the initiative also contributes to broader societal goals, such as the promotion of sustainable tourism, local development, and community engagement. The action seeks to ensure that heritage sites serve as platforms for promoting local development and creating long-term economic benefits for the communities they serve. Through the integration of sustainable tourism practices, the EHL encourages heritage sites to engage with local stakeholders, including businesses, local authorities, and cultural organizations, in ways that foster economic growth while ensuring the preservation of cultural assets for future generations.

To achieve these diverse objectives, the EHL action operates at multiple levels: the EU level, national level, and site/community level. At the EU level, the activities focus on the overall coordination and management of the action, including the establishment of selection criteria and the facilitation of networking opportunities. The national level plays

a vital role in supporting the implementation of the action, particularly in the pre-selection phase and the promotion of EHL sites within their borders. At the site and community level, activities are centred around heritage management, educational programming, visitor engagement, and the development of local partnerships.

Ultimately, the European Heritage Label initiative aims to create a lasting impact by strengthening European cultural identity and improving the public's understanding of the shared heritage that unites Europe. It seeks to foster a sense of pride among citizens for their cultural heritage and to encourage a more inclusive, informed, and engaged European public. Through its focus on visibility, capacity-building, cooperation, and intercultural dialogue, the EHL is designed to contribute to the long-term sustainability of Europe's cultural heritage while reinforcing the values that bind European citizens together. In this way, the EHL supports not only the preservation of tangible and intangible heritage but also the continued growth of a shared European identity grounded in history, culture, and mutual respect.

2.2 Points of comparison

This evaluation provides a thorough overview of the evolution of the EHL action's results, aligned with the conclusions of the 2018 evaluation. The evaluation identifies key points of comparison between the two evaluation periods (2011-2017 and 2018-2024) in order to contextualise its findings and trace the overall development of the initiative. The analysis focused on determining whether certain issues in the implementation of the action were only present in the first evaluation (suggesting improvements), were identified in both evaluations (indicating ongoing challenges), or emerged in the second evaluation (highlighting new issues related to changes in governance, processes, or stakeholder needs). Additionally, the comparison examined whether specific issues were unique to sites designated in either evaluation period or whether they required more time to address, such as the development of European narratives or the expansion of multilingual offerings. These insights were used to assess the progress of the EHL action and inform targeted recommendations for its improvement. Since most of the indicators are qualitative and there is limited comparable quantitative data, a benchmarking approach was not applicable. Figure 2 displays the points of comparison between the 2011-2017 Evaluation Period and the 2018-2014 Evaluation Period, resolving around the five similar criteria.

Table 1. Points of comparison

Criteria	Indicator	Report of 2011-2017 evaluation period	Report of 2018-2024 evaluation period
Effectiveness	<i>The extent to which EHL continues to work towards achieving its general objectives</i>	Progress in fostering a stronger sense of belonging to the European Union among citizens, emphasising the need for long-term impact assessment. 75% of site coordinators reported challenges in developing educational programmes.	Observed significant advancements, particularly through the enhancement of educational programmes, events addressing European themes, and enhanced efforts to engage young people, with 86% of sites implementing diverse educational activities.
	<i>The extent to which the sites continue to contribute to the achievement of site-specific objectives</i>	All sites have effectively contributed to their specific objectives.	All sites have effectively contributed to their specific objectives.

Criteria	Indicator	Report of 2011-2017 evaluation period	Report of 2018-2024 evaluation period
	<i>The extent to which sites demonstrate a better understanding of intercultural dialogue and provide activities in different languages</i>	Identified widespread multilingualism at EHL sites but questioned whether this adequately fostered intercultural dialogue.	Documented more structured initiatives, such as programmes involving migrants and cross-border exchanges, though it acknowledged that intercultural dialogue remains an area requiring further exploration. Most sites made deliberate efforts to ensure their materials and exhibitions were accessible in multiple languages.
	<i>The extent to which the nature and intensity of obstacles (such as lack of human and financial resources) experienced by sites in implementing their work plans have evolved</i>	Highlighted significant challenges related to funding and staffing limitations.	Challenges related to funding persisted but also new obstacles arose following the COVID-19 pandemic. While the pandemic disrupted traditional activities, it also led to innovative adaptations such as the use of virtual tours and online workshops.
	<i>The extent to which EHL serves as a 'community of practice' and encouraged peer-to-peer collaboration</i>	Noted the nascent nature of peer collaboration among EHL sites.	Significant progress in developing the EHL 'community of practice', particularly through the establishment of the EHL Bureau.

Criteria	Indicator	Report of 2011-2017 evaluation period	Report of 2018-2024 evaluation period
Efficiency	<i>Level of balance (geographic, thematic, and type) in the distribution of awarded sites</i>	Observed uneven representation across Member States and thematic areas.	Significant progress in addressing this imbalance, with increased participation from smaller and less-represented Member States (sites awarded in 11 new Member States) and greater diversity in the types of heritage represented, including industrial and intangible heritage.
	<i>Level of different actors finding the selection criteria (incl. European significance) clear</i>	Nearly half (47%, N=24) of site coordinators found the criteria clear.	Larger share of respondents representing sites considered selection criteria to be clear (76%, N=16).
	<i>Level of transparency of pre-selection and selection procedures (in particular, application of Article 11-2)</i>	Stakeholders involved in the consultation programme overall agreed on the transparency and fairness of the selection procedures.	Selection procedures at both national and EU levels were overall widely regarded as fair and transparent by all stakeholders, while providing clearer and more user-focused feedback could help rejected applicants better understand the reasons for their rejection and enhance their perception of transparency.

Criteria	Indicator	Report of 2011-2017 evaluation period	Report of 2018-2024 evaluation period
Coherence	<i>Smooth operation of European Panel</i>	The European Panel's operations were deemed effective and efficient, with key areas for improvement identified as streamlining the selection process, enhancing the evaluation of procedures, and providing more detailed feedback to non-selected sites.	The operation of the European Panel was effective and efficient, with recommendations provided for future improvements in light of the action's growth and its apparent capacity limits in carrying out the monitoring.
	<i>Level of satisfaction with key roles in communication and the frequency of communication among different actors</i>	Highlighted inconsistencies in communication among stakeholders.	Significant improvements in this area, including enhanced coordination facilitated by the EHL Bureau and more frequent use of digital tools for information sharing.
	<i>Level of coherence between different initiatives (Cultural</i>	Identified limited synergies between the EHL and other EU cultural initiatives, such as the	Highlighted strengthened collaborations, particularly through joint events and shared promotional activities, which contributed to greater alignment with EU cultural policies.

Criteria	Indicator	Report of 2011-2017 evaluation period	Report of 2018-2024 evaluation period
EU added value	<i>Routes of the Council of Europe etc.)</i>	European Heritage Days and Cultural Routes.	
	<i>Level of cooperation and networking of sites</i>	Limited level of networking between the EHL sites.	Observed substantial progress in fostering cooperation through initiatives such as the EHL@Network and the EHL Bureau.
	<i>EU added value to the visibility of the Label</i>	Noted limited visibility of the EHL beyond local contexts.	Observed significant advancements, including targeted communication campaigns, enhanced digital strategies, and the establishment of the EHL Bureau.
	<i>Developing the network of EHL sites across Europe</i>	Noted that networking among sites was emerging, with 55% of sites (N=29) reporting involvement in collaboration projects.	Networking and international partnerships were identified as a key area of progress, with 72% of sites (N=42) reporting these as a significant benefit.

Criteria	Indicator	Report of 2011-2017 evaluation period	Report of 2018-2024 evaluation period
Relevance	<i>Relevance of EHL objectives to the needs of the EU</i>	Recognised the EHL's alignment with EU cultural objectives but noted limited evidence of its broader relevance.	Provided concrete examples of alignment with EU priorities, including sustainability initiatives, digital innovation, and efforts to engage underrepresented groups.
	<i>Share of EHL sites developing their own European narrative</i>	Most sites made significant progress in developing their own European narrative.	Most sites have made significant progress in developing their own European narrative, while further operationalisation of the European significance criterion and its application remains an opportunity to enhance impact.

3. HOW HAS THE SITUATION EVOLVED OVER THE EVALUATION PERIOD?

Current state of play

The evaluation notes that the European Heritage Label (EHL) has undergone significant evolution since its inception in 2006 as an intergovernmental initiative. Initially, the label was awarded to 68 sites across 19 countries by 2011. Under the current European initiative, the label has been awarded to 67 sites across 22 countries (2024 figures).

Following its formalisation at the EU level, the initiative experienced substantial developments with the introduction of updated criteria and a standardised selection process, which were designed to further institutionalise and solidify the label across the European Union. This step provided the framework for the structured cycles that would define the EHL's operation, focusing on site selection, monitoring, and evaluation. Under this new structure, the first cycle (2013–2018) included transition years for site selection (2013-2014), regular selection years (2015 and 2017), and the first monitoring year in 2016, alongside an independent evaluation conducted in 2018. Following the completion of this first cycle, the second cycle (2019–2024) continued to build on the foundations established, with selection years in 2019, 2021, and 2023, and monitoring years scheduled for 2020 and 2024. This cycle culminated with the second external evaluation in 2024. **The progress of the EHL throughout the evaluation period highlights an ongoing expansion and maturation of the initiative,** although there have been fluctuations in its level of participation. **Initially, the number of eligible Member States grew steadily,** increasing from 5 in 2013 to 24 by 2017. With the inclusion of Finland in 2017, the number of eligible Member States expanded further to 25 by 2019. Despite this growth, however, the number of participating Member States and the number of applications fluctuated after 2017, with a decline in participation until 2023 when a modest recovery was recorded. Specifically, 17 Member States submitted candidate sites in 2023, which marked a significant rebound compared to the prior selection years. This led to the awarding of 7 new sites, contributing to a 12% increase in the total number of labelled sites across Europe, bringing the total to 67. In terms of geographical representation, while the number of awarded Member States only decreased slightly from 12 in 2021 to 11 in 2023, the

geographical distribution of awarded sites continued to evolve. Central Europe witnessed notable growth, with new sites from Austria, Czechia, Poland, Romania, and Slovenia being awarded the EHL Label. Table 2 below showcases an overview of each selection rounds.

Table 1. Results of the EHL selections (2013-2023)

	2013	2014	2015	2017	2019	2021	2023
Eligible Member States	5	18	24	24	25	25	25
Participating Member States	5	13	11	19	15	15	17
Number of Applications	9	36	18	25	19	21	16
Awarded Sites	4	16	9	9	10	12	7
Awarded Member States	3	10	9	9	12	12	11
Total number of sites after selection	4	20	29	38	48	60	67

The EHL initiative has also witnessed a significant diversification of heritage typologies during the evaluation period. This includes the incorporation of sites that highlight underwater archaeology, such as the Underwater Cultural Heritage of the Azores, and those reflecting intangible heritage, such as ‘Zdravljica,’ which represents the European Spring of Nations. Additionally, 2019 marked the inclusion of several transnational sites, demonstrating an expanded vision for European heritage that embraces cross-border narratives. Notable examples include the Werkbund Estates 1927–1932, which span across four Member States (Germany, Poland, Czechia, and Austria), and Cisterscapes, which involves six Member States (Germany, Austria, Czechia, Poland, Slovenia, and Spain). The inclusion of such sites has not only enriched the geographical scope of the initiative but also deepened the historical representation across multiple periods, including prehistoric, medieval, modern, and contemporary heritage. Figure 2 below displays the number of sites per countries participating in the initiative.

As of the 2023 selection, the EHL portfolio comprises 67 sites, distributed across premodern, modern, and contemporary periods, with the highest concentration of sites representing the 19th century. Specifically, the 2023 selection added 5 modern sites, contributing to a broader representation of the 19th century, a period of significant socio-political change across Europe. The continued expansion of the EHL’s historical timeline highlights the initiative’s capacity to provide a balanced and well-rounded view of Europe’s diverse heritage, from prehistoric settlements to contemporary landmarks. The

inclusion of more modern sites has further strengthened the EHL's role as a platform for interpreting the legacies of nation-building and the formation of the European Union.

Beyond the growth of the number and diversity of sites, another major development during the evaluation period has been the establishment and strengthening of the EHL network. This network began with the EHL@Network initiative and evolved into the EHL Bureau, which was formalised in 2023. The Bureau has been instrumental in fostering collaboration among labelled sites, organising events like the European Heritage Label Days, and enhancing the overall visibility of the programme. Its efforts have been focused on creating a cohesive identity for EHL sites, transforming them from individual entities into an interconnected network that promotes European solidarity and a shared sense of belonging to the Union. The EHL Bureau has facilitated numerous collaborative initiatives, partnerships with educational institutions, and thematic projects that reflect European values such as mutual learning, cultural exchange, and the promotion of European heritage through joint efforts.

The transformation of the EHL into a dynamic network is underscored by the EHL and the increasing number of collaborative projects that promote the European dimension of cultural heritage. These initiatives are supported by a strategic focus on strengthening the relationships between labelled sites, fostering cross-border partnerships, and raising awareness of the shared cultural values of the EU. The Panel has recommended that thematic collaborations within the network should be expanded further to increase the visibility and impact of the EHL. Proposals such as the creation of cultural routes, joint ticketing schemes, and partnerships with Creative Europe, CERV and Horizon Europe programmes have been suggested to further enhance the cultural and educational experiences offered by EHL sites. These collaborations would not only create opportunities for mutual learning but also deepen public engagement with European history and heritage. The aim is to encourage a critical reflection on Europe's past while also inspiring forward-thinking discussions about its future.

To ensure the continued growth and sustainability of the EHL network, the Panel has consistently highlighted the importance of financial support and organisational development. The 2021 and 2023 selection reports emphasised the need for adequate resources to ensure that all labelled sites can participate in collaborative projects and benefit from networking opportunities. In this context, establishing the EHL Network as a

fully-fledged entity would ensure equal access to resources, enabling the network to function effectively and cohesively. As the EHL continues to evolve, the establishment of this permanent structure would provide the necessary framework for ensuring that all labelled sites can participate equally, and that the network's impact is maximised across the European Union. **The developments highlighted throughout the evaluation period reflect the ongoing commitment of the EHL initiative to promote European values, foster intercultural dialogue, and strengthen the connection between citizens and their shared heritage.** With its expanded network, increasingly diverse sites, and continued support for collaborative initiatives, the EHL has positioned itself as a key instrument in unifying Europe's cultural heritage, making it an essential vehicle for promoting the Union's identity and solidarity. As the programme moves forward, it will continue to play a critical role in the European integration process, offering a platform for cross-border dialogue and the collective preservation of European heritage.

4. EVALUATION FINDINGS (ANALYTICAL PART)

4.1. TO WHAT EXTENT WAS THE INTERVENTION SUCCESSFUL AND WHY

Introduction: Overview of the Intervention

The European Heritage Label (EHL) is a European Union (EU) initiative that aims to enhance the recognition and visibility of heritage sites that embody significant European values and history. Established in 2011, the initiative seeks to link cultural heritage to a shared European identity, promote intercultural dialogue, and encourage greater participation and inclusion in heritage activities. The intervention is targeted at historical sites across Europe, ranging from tangible monuments to intangible cultural heritage, with the goal of raising awareness of their European significance. The evaluation of this intervention explores its success based on three primary criteria: effectiveness, efficiency, EU added Value, relevance and coherence. These criteria are critical for assessing how well the EHL has met its objectives, how efficiently it has been implemented, and how well it integrates with other EU, national, and international initiatives. This comprehensive assessment draws from various sources, including site-level data, national reports, interviews with stakeholders, and survey results.

Objectives of the EHL Intervention

As enshrined in the decision basing the action, the main objectives of the EHL are:

- To promote intercultural dialogue and the sharing of European values through heritage sites.
- To enhance the European dimension of these sites, encouraging them to tell stories that transcend national boundaries and highlight shared European history.
- To foster inclusion and engagement, especially among youth and underrepresented groups, encouraging them to connect with heritage through education and participation.
- To support sustainability and responsible heritage management, ensuring that heritage sites contribute to the EU's broader sustainability agenda, including the green transition.

4.1.1. EFFECTIVENESS – TO WHAT EXTENT IS THE EHL EFFECTIVE IN FULFILLING EXPECTATIONS AND MEETING ITS OBJECTIVES?

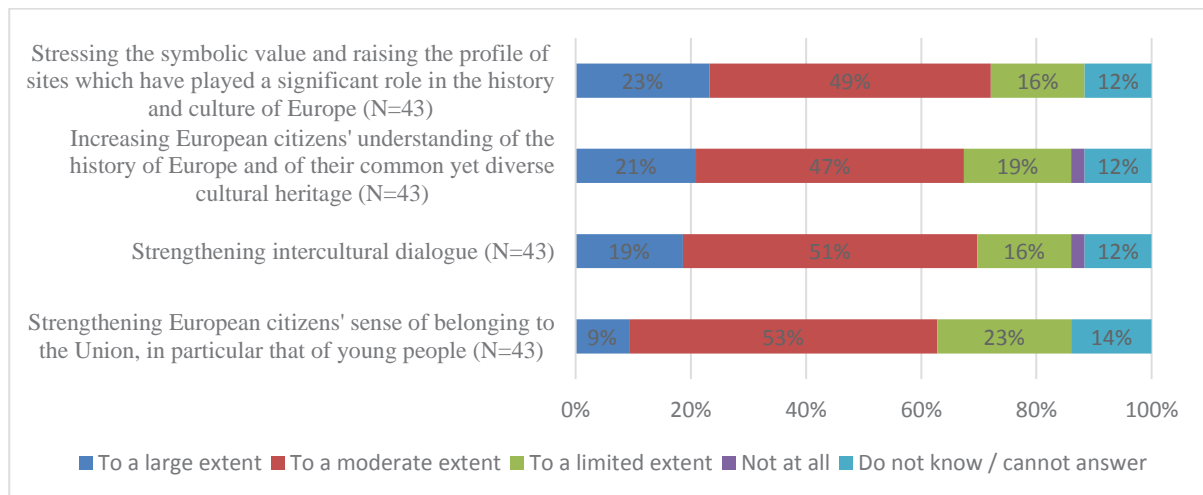
Key findings

- Significant progress was made across all EHL objectives, especially in enhancing the symbolic value of sites and raising their European profile.
- EHL sites report tangible benefits from their participation, particularly in communicating their European dimension and fostering international partnerships.
- Collaboration and knowledge sharing were strengthened through networks such as EHL@Network and the EHL Bureau.
- Progress towards the EHL's objectives was influenced by external factors such as the COVID-19 pandemic, as well as resource constraints faced by the sites.
- Selection procedures at both national and EU levels were generally seen as fair and transparent, with national coordinators providing strong pre-selection support to sites.
- The European Panel was effective in evaluating applications and was perceived as transparent and balanced, although feedback to non-selected sites could be improved.

ACHIEVEMENT OF OBJECTIVES

Achievement of Objectives: The EU's intervention has made significant progress toward its core objectives of enhancing the symbolic value of sites and boosting their European profile. Over the evaluation period (2018–2024), many EHL sites have reported tangible benefits from their participation, notably through the increased articulation of their European significance and the strengthening of international partnerships.

Figure 2. Progress towards EHL objectives according to EHL sites



Source: PPMI survey of heritage sites, question 27 'In your opinion, to what extent has the European Heritage Label progressed towards the achievement of its key objectives in the following areas during the period 2018-2024?'

Strengthening 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 European Heritage Label initiative has contributed significantly to raising awareness of Europe's shared cultural heritage by integrating European themes into educational initiatives, exhibitions, and interactive engagement activities. According to survey data, 65% of EHL sites incorporated European themes into their educational programmes and exhibitions. Finland's Seminaarinmäki Campus has successfully engaged more than 8,000 young people annually through structured educational initiatives that focus on European heritage and identity. Similarly, Italy's Ventotene site hosts annual *Seminars on European Federalism*, attended by hundreds of young Europeans to explore democracy and freedom, key elements of European unity.

Additional case studies further highlight the success of this objective. For instance, Poland's May 3rd Constitution site integrates workshops and guided discussions on democratic values and governance, attracting thousands of students annually. The Kalevala – Living Epic Heritage site in Finland has integrated multimedia resources to illustrate its connection to European literary traditions, enhancing young visitors' appreciation of shared cultural narratives. Despite these efforts, challenges remain in measuring the long-term impact of these initiatives on shaping European identity. Visitor surveys indicated that while 57% of respondents felt more connected to European heritage after visiting an EHL site, 23% remained uncertain about its broader European relevance. The formation of cultural identity is a complex and gradual process, making it difficult to quantify the effectiveness of EHL interventions in fostering a deeper sense of belonging among European citizens.

Strengthening intercultural dialogue.

The European Heritage Label has also played a crucial role in promoting intercultural dialogue by encouraging collaboration between different heritage sites and fostering knowledge exchange. The *Architects of Peace* exhibition, a joint effort between the Peace Palace in the Netherlands and the Mundaneum in Belgium, successfully brought together sites to promote themes of reconciliation and unity. Similarly, the *Europe Starts Here* comic book project, which involved multiple EHL sites, engaged thousands of young Europeans in reflecting on shared history through visual storytelling. Further examples of successful initiatives include the La Paranza cooperative in Naples, which engages youth in site preservation activities, fostering intercultural dialogue through hands-on participation. Another example is the Union of Lublin site in Poland, which actively promotes historical narratives of European cooperation by engaging students in debates on contemporary European integration challenges. Despite these achievements, some sites struggled to translate the concept of intercultural dialogue into practical actions. The 2020 European Panel monitoring report noted that while 84% of sites engaged in educational programmes, only 51% had specific initiatives to facilitate intercultural dialogue. Stakeholders highlighted the need for clearer guidelines on fostering exchange among diverse social groups beyond linguistic and historical collaborations.

Stressing the symbolic value and raising the profile of sites which have played a significant role in the history and culture of Europe and/or the building of the Union.

Many European Heritage Label sites have successfully integrated the European dimension into their communication strategies and outreach efforts. Between 2018 and 2024, 82% of sites reported active efforts to enhance their European significance through exhibitions, guided tours, and digital platforms. For instance, Finland's Seminaarinmäki Campus strengthened its engagement by launching bilingual resources, while the Maastricht Treaty site in the Netherlands developed an interactive heritage experience to connect visitors with the history of European integration. Smaller sites have particularly benefited from increased recognition, with 57% reporting a rise in visitor engagement following the award of the label. However, some sites faced challenges in maintaining visibility over time, with 23% stating that initial engagement did not translate into sustained public interest. An example of overcoming this challenge is the Ventotene site, which continuously renews its programming to remain relevant to younger audiences

External Factors Influencing Progress:

Several external factors have shaped the progress toward these objectives. Notably, the **COVID-19 pandemic** disrupted planned activities such as exhibitions and physical educational programs, pushing sites to adapt by transitioning to digital formats. This transition allowed for continued engagement but often lacked the personal interaction that is central to the effectiveness of cultural heritage programs. Similarly, **resource constraints**, including staffing shortages and limited financial capacity, also affected the implementation of site-specific plans.

Impact on Citizens' Sense of Belonging:

The **European Heritage Label** has contributed to strengthening a sense of European identity, especially among young people. However, while 65% of EHL sites integrated **European values** such as **tolerance**, **unity**, and **freedom** into their educational programs, challenges remain in measuring the long-term impact on youth's sense of belonging to the EU. Some sites found it difficult to translate the **abstract goal** of fostering a European identity *into practical, engaging activities for youth*.

Impact on Socio-Economic and Cultural Goals

Increased Visitor Numbers and Visibility

In terms of socio-economic benefits, the EHL has contributed to increased visibility for sites, translating into higher tourist numbers and greater local engagement. For example, 60% of surveyed sites in the 2024 monitoring cycle reported a significant increase in visitors since receiving the EHL label. This increase in tourism has brought economic benefits to surrounding communities, particularly in rural or less-visited areas, where heritage tourism can be a vital part of the local economy. In addition to boosting tourism, the EHL label has helped sites expand their cultural programming. This includes new educational activities, outreach programs, and cultural events designed to engage both local communities and tourists. For instance, 45% of sites surveyed developed new educational initiatives or improved existing ones to align with the EHL's objectives of promoting intercultural dialogue and shared European heritage.

Social Inclusion

One of the more profound impacts of the EHL has been in promoting social inclusion. Sites with the EHL label have increasingly involved underrepresented groups, including youth, minorities, and people with disabilities, in their cultural activities. The label has acted as a powerful tool for fostering inclusivity through projects that celebrate diversity and promote societal cohesion. For example, 33% of sites reported specific initiatives aimed at engaging young people, using heritage as a vehicle for education and participation.

Networking and Cross-Border Collaborations:

The **EHL's role in fostering networking** has been critical to strengthening collaboration between heritage sites. Through initiatives like the **EHL@Network** (2019-2022) and the **EHL Bureau** (2023-2026), sites have had the opportunity to participate in cross-border projects and share best practices. These networks, particularly the **EHL Bureau**, which received positive feedback from **77% of participating sites**, have helped address gaps in outreach and better support the sites' capacity-building efforts. However, **challenges related to cross-border collaboration** persist. **Financial limitations**, and **coordination challenges**, especially for **smaller sites**, hinder the full potential of these transnational collaborations. Additionally, sites facing **geographical isolation** or **bureaucratic delays** have struggled to engage meaningfully in international projects.

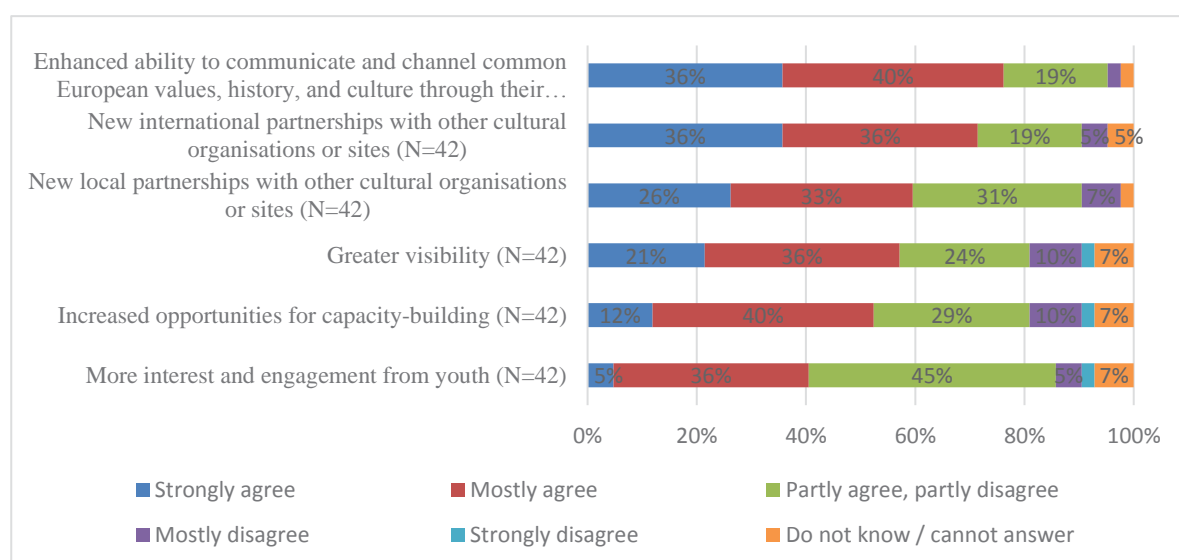
Quantitative Assessment

Quantitative data further illustrates the positive outcomes associated with the EHL intervention. According to monitoring reports from 2024:

- 33% of EHL sites (N=55) reported involvement in the European Heritage Days, a key EU initiative for promoting cultural heritage.
- 23% of sites were engaged in the European Cultural Routes, emphasizing cross-border heritage links.
- 47% of sites adopted green management practices (such as eco-certifications or sustainable tourism measures) due to their participation in the EHL, aligning with EU sustainability priorities.

BENEFITS OF THE EHL INTERVENTION

Figure 3. Benefits experienced by EHL sites



Source: PPMI survey of heritage sites, question 34 'Has your site enjoyed any of the following benefits of participation in the European Heritage Label during 2018-2024?'

Tangible Benefits for Sites

One of the most notable benefits of participation in the European Heritage Label initiative has been the enhanced communication of European history and values. According to the 2024 monitoring data, 65% of sites integrated European themes into their exhibitions, while 51% incorporated them into cultural events. Sites have also reported expanded international partnerships, with 75% engaging in joint projects with other European institutions. Case studies illustrate this further. The Peace of Westphalia site in Germany

used its designation to launch multilingual educational resources, broadening its appeal to international audiences. Similarly, the Alexandrovo Thracian Tomb in Bulgaria leveraged the label to align with the country's sustainable tourism strategy, attracting more environmentally conscious visitors.

Objective A: Highlighting the European significance of the sites

EHL sites have successfully embedded the European dimension into their communication strategies and activities. According to monitoring data, 82% of sites reported actively promoting their European significance through exhibitions, guided tours, and digital platforms. The Maastricht Treaty site in the Netherlands, for example, has developed interactive heritage experiences to connect visitors with the history of European integration. However, smaller sites faced challenges in articulating their European significance effectively due to limited resources and expertise.

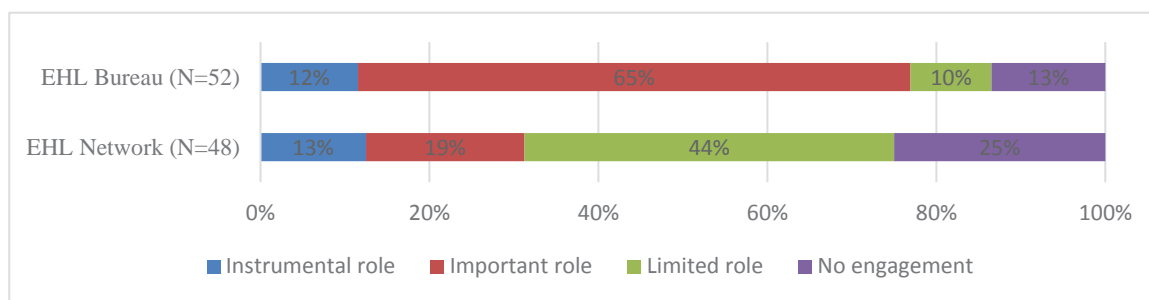
Objective B: Raising European citizens' awareness of their common cultural heritage, especially among young people

Educational initiatives have been instrumental in raising awareness of Europe's shared cultural heritage. Data shows that 65% of sites incorporated European themes into educational programmes and exhibitions. The Ventotene site in Italy successfully engages young audiences through its Seminars on European Federalism, while Finland's Seminaarinmäki Campus reaches over 8,000 students annually with heritage-related activities. Despite these successes, challenges remain in maintaining engagement beyond site visits, as long-term impact is difficult to measure.

Objective C: Facilitating the sharing of experiences and exchanges of best practices across the Union

Networking and collaboration have improved among EHL sites, with 75% participating in joint projects with European institutions. The EHL@Network (2019–2022) and the EHL Bureau (2023) have strengthened knowledge-sharing efforts. However, some sites, particularly smaller ones, struggle to engage in cross-border cooperation due to financial and logistical constraints. The Peace of Westphalia site in Germany successfully developed multilingual educational resources as part of a broader European collaboration, demonstrating the potential of these exchanges.

Figure 4. Sites' perception of the role of EHL networks



Source: EHL 2024 monitoring forms. Includes only sites that reported being a member of the relevant networks.

Objective D: Increasing and improving access for all, especially young people

Efforts to enhance accessibility have seen mixed results. While 86% of sites provide accessible informational materials, only 49% have implemented physical accessibility improvements since 2020. The May 3rd Constitution site in Poland has made progress by introducing digital copies of historical records and sensory-friendly tours for visitors with disabilities. However, digital accessibility remains underdeveloped, with only 26% of sites offering online adaptations for diverse audiences.

Objective E: Increasing intercultural dialogue, especially among young people, through artistic, cultural, and historical education

Intercultural dialogue has been promoted through exhibitions, performances, and heritage workshops. The Architects of Peace exhibition facilitated collaboration between Belgian and Dutch sites, while the La Paranza cooperative in Naples engaged youth in preservation activities. Despite these successes, only 51% of sites have developed dedicated intercultural dialogue initiatives, highlighting a need for clearer guidelines and stronger support mechanisms.

Objective F: Fostering synergies between cultural heritage and contemporary creativity

Several EHL sites have successfully integrated cultural heritage with contemporary artistic practices. The Colonies of Benevolence in the Netherlands used augmented reality and theatre performances to reinterpret historical narratives. Similarly, Italy's Museo Casa De Gasperi developed a television series exploring themes of European integration. However, such initiatives remain dependent on individual site capacity, with limited systematic support from the EHL framework.

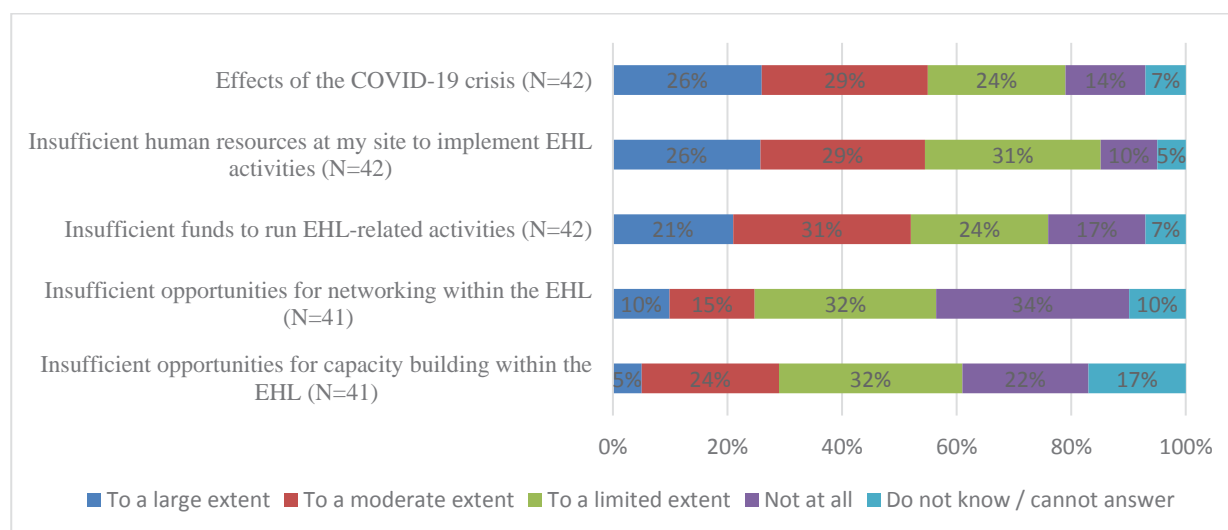
Objective G: Contributing to the attractiveness and economic and sustainable development of regions through cultural tourism

Sustainable tourism initiatives have been developed at 70% of EHL sites, with efforts to promote eco-friendly travel and integrate heritage into regional development plans. The Alexandrovo Thracian Tomb in Bulgaria aligned its activities with national sustainable tourism strategies, while the Peace of Westphalia sites in Germany developed the bilingual Peace Riders' Trail to encourage responsible tourism. However, financial constraints and limited infrastructure investment continue to hinder long-term sustainability in some regions.

Key Challenges and Areas for Improvement

Despite the benefits, several challenges remain. Limited multilingual access has restricted the outreach potential of some sites, with only 58% providing materials in more than two languages. Furthermore, the benefits of the EHL initiative have not been evenly distributed, with smaller sites struggling to attract international visitors. Stakeholders suggested the need for structured support in developing outreach and marketing strategies to sustain engagement beyond initial designation.

Figure 5. Challenges faced by EHL sites in achieving their site-specific objectives



Source: PPMI survey of heritage sites, question 39 'To what extent have the following challenges limited the achievement of your site-specific objectives during the 2018-2024 period?'

Resource Constraints:

Many sites, particularly smaller ones, faced significant resource limitations that impacted their ability to implement ambitious projects or maintain ongoing activities. Staffing shortages were cited as a major barrier, with 13% of sites reporting this as a key challenge in fulfilling their action plans. As a result, many sites had to adjust their original plans and focus on more manageable, resource-efficient activities.

Multilingualism:

While 86% of sites offered multilingual resources, the availability of digital resources remains insufficient. Only 26% of sites implemented digital accessibility measures, such as online educational content or virtual tours, which are crucial for reaching younger, international, and more digitally-savvy audiences.

Youth Engagement and Digital Initiatives

Digital tools have played a crucial role in broadening engagement, particularly among younger audiences. The *Europa om je heen* podcast successfully engaged a younger demographic by exploring European heritage through a modern, accessible format. Similarly, Poland's 3 May 1791 Constitution site maintained student engagement through virtual lessons during COVID-19 restrictions.

However, youth engagement remains inconsistent. While 67% of sites reported implementing youth-focused measures, the majority (76%) relied on traditional educational activities rather than innovative outreach strategies. The EHL Bureau has since introduced new funding initiatives to support digital and interactive youth engagement projects.

Challenges in Developing Cross-Border and Transnational Projects

EHL sites faced multiple barriers when attempting to develop and sustain cross-border initiatives. While 75% of sites participated in joint projects, only 40% engaged in long-term transnational collaborations. The primary obstacles identified were financial limitations, cited by 60% of surveyed sites, and administrative burdens, reported by 58%. The COVID-19 pandemic further disrupted these initiatives, forcing sites to shift towards virtual cooperation, which many found less effective than in-person exchanges. A notable

success story is the collaboration between Croatia’s Vučedol Culture Museum and Poland’s Union of Lublin site, which developed a shared exhibition on early European statehood.

Challenges in Implementing Action Plans

Survey data indicates that 49% of EHL sites had to adjust their original implementation plans due to financial constraints, with 36% citing staffing shortages as a key challenge. Poland’s May 3rd Constitution site successfully overcame this issue by securing external funding to support its educational initiatives. However, smaller sites with fewer resources struggled to execute their full action plans, particularly in areas such as digital engagement and youth outreach. Stakeholders have suggested that additional financial support and streamlined funding applications could alleviate these difficulties.

Table 3. Overview of challenges faced by sites during the implementation of their action plans

Financial constraints (19%)
Securing adequate funding was a notable challenge across all areas of action plan implementation. Sites faced difficulties financing new technologies, heritage conservation, infrastructure upgrades, and multilingual materials. Rising energy costs, inflation, and reduced visitor income during the COVID-19 pandemic worsened these issues. The unpredictability of external funding further complicated long-term planning. To cope, many sites prioritised essential activities, phased projects, or sought co-funding and local partnerships.
Human resource constraints (13%)
Staff shortages and turnover hindered the implementation of innovative or specialised strategies, including youth programmes, inclusion initiatives, and environmental management efforts. Some sites relied on temporary staff, volunteers, or under-trained personnel, limiting their capacity to meet their planned outputs. Some sites sought to retrain staff or increase volunteer engagement, though these efforts were constrained by financial limitations and often required external collaboration.
External factors (18%)

<p>The COVID-19 pandemic caused widespread disruptions, including site closures, reduced visitor numbers, and delays in planned initiatives. Many sites shifted to digital platforms, offering virtual tours and online content, but these adaptations required significant investment and could not always replace in-person experiences. Pandemic-related challenges also delayed infrastructure upgrades and negatively impacted youth engagement and revenue streams, slowing recovery and sustainable tourism efforts.</p>	
Organisational challenges (18%)	
<i>Regulatory and governance challenges</i>	<p>Bureaucratic delays, stringent material requirements, and conflicting stakeholder priorities increased costs and slowed project timelines, particularly for heritage sites embedded in broader institutional frameworks.</p>
<i>Infrastructure barriers</i>	<p>Heritage regulations restricted modifications to historic buildings, complicating efforts to improve accessibility, especially for visitors with disabilities.</p>
<i>Geographical and environmental challenges</i>	<p>Remote or environmentally vulnerable sites faced limited accessibility, infrastructure deficits, and exposure to natural disasters. Isolation hampered efforts to attract visitors, particularly school groups and younger audiences, while structural constraints further restricted accessibility and sustainability adaptations.</p>
Technical difficulties (9%)	
<p>Integrating modern technology and upgrading infrastructure proved challenging for some sites due to limited expertise and resources. Tools such as apps, interactive kiosks, and virtual reality content required significant investment to develop and maintain, posing additional obstacles.</p>	

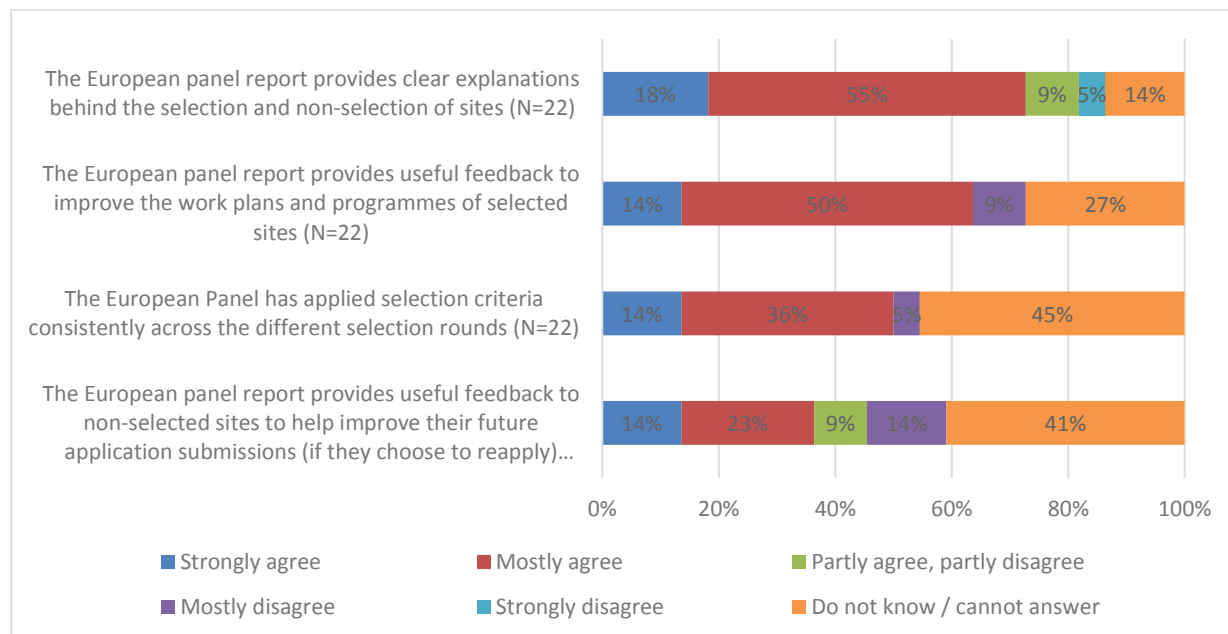
Source: PPMI analysis based on EHL 2024 monitoring data.

The Role of the European Panel During the Selection Phase

The European Panel played a critical role in ensuring a fair and transparent selection process. Of the 56 applications assessed between 2018 and 2024, 45% were deemed not to

meet one or more selection criteria. While 73% of national coordinators found the European Panel’s reports to be clear and useful, only 57% of non-selected sites felt they received adequate feedback for future applications. To address this, the EHL Bureau has introduced improved communication mechanisms to provide clearer guidance for unsuccessful applicants.

Figure 6. Perception of national coordinators regarding the work of the European Panel



Source: PPMI survey of national coordinators. Question 9: ‘To what extent do you agree or disagree with the following statements regarding the work of the European Panel?’

Composition of the European Panel

The European Panel has generally maintained a balanced geographic and expertise-based composition. Between 2018 and 2024, the panel included 25 experts from 17 EU Member States, covering various fields such as academia, cultural heritage institutions, and NGOs. However, stakeholders have suggested that the panel could benefit from greater diversity, particularly in terms of gender balance and representation of smaller EU countries. Some sites also noted that new panel members often faced a steep learning curve, with 68% recommending additional training to improve the consistency of evaluation standards.

Conclusion and Recommendations

The European Heritage Label initiative has been largely successful in achieving its objectives, particularly in fostering European identity, intercultural dialogue, and site visibility. However, challenges related to sustainability, engagement, and resource allocation require further attention. Strengthening youth engagement through digital storytelling, increasing multilingual support, and enhancing cross-border collaboration are key areas for future improvement. Survey data suggests that sites with dedicated digital outreach strategies and strong governmental alignment experienced the highest levels of success. With continued support and strategic adjustments, the EHL initiative can further strengthen European cultural heritage and deepen its impact on identity and inclusion.

4.1.2. EFFICIENCY

Key findings

- The selection procedure and criteria were generally regarded as efficient and transparent at both national and European levels; there is room to further clarify the criterion of European significance.
- The European Commission provided clear guidance to national coordinators throughout the selection process. Communication with candidate sites could be further improved to clarify why the process might take time and why it may differ between countries.
- Selection procedures were completed without delays, with the European Panel operating efficiently.
- Selection reports were generally clear, concise and followed a standard structure, providing well-justified decisions. However, the feedback provided to applicant sites within these reports – particularly for non-selected sites – was sometimes less apparent or harder to locate, possibly due to the length of these reports or by limited user-friendliness.
- Monitoring arrangements reached their capacity, underlining the need to reassess processes to ensure the EHL's long-term sustainability as the network continues to expand.

- The European Commission fostered professional networking and mutual learning by facilitating the exchange of good practices among EHL sites.

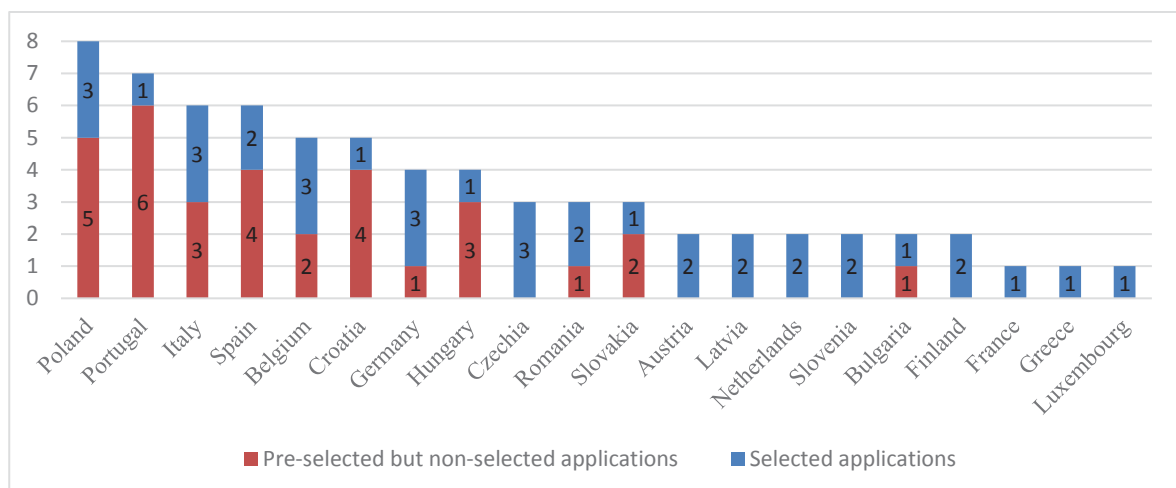
Cost-Effectiveness

The evaluation of the EHL's cost-effectiveness reveals a generally positive picture, although there are areas where administrative costs could be reduced. The EHL has brought tangible benefits in terms of increased tourism, visibility, and heritage management improvements, which outweigh the relatively modest administrative costs. However, the coordination costs between different levels of governance (EU, national, and local) could be streamlined for greater efficiency.

Administrative and Operational Costs

The administration of the EHL label involves multiple stakeholders, including the European Commission, national coordinators, site managers, and the EHL Bureau. While this distributed management model is effective in some contexts, it also creates redundancies and overlaps, particularly in the monitoring and reporting processes. Data from national coordinators indicate that over 40% of respondents believe the monitoring process is overly complex and could be simplified by reducing reporting requirements and making the process more digital.

Figure 7. Member states' involvement in the application process during 2019-2024



Source: European Heritage Label selection reports 2019, 2021, 2023.

Proportionality of Costs and Benefits

The cost-benefit ratio of the EHL initiative is considered favourable, with the benefits (increased visibility, enhanced European identity, economic impact) far outweighing the administrative costs. The intervention's overall efficiency can be improved through digitalization and streamlining governance structures.

Administrative Costs and Simplification

Stakeholders have suggested that the governance structure of the EHL could be simplified. At present, there are several layers of coordination, including national coordinators, the EHL Bureau, and the European Panel, each of which plays a role in monitoring and supporting sites. However, some stakeholders have raised concerns about fragmented communication and overlapping responsibilities, leading to inefficiencies. Data suggests that 20% of national coordinators reported difficulties in coordinating across these various levels of governance, leading to inconsistent communication and occasional duplication of efforts. The administrative burden could be alleviated by introducing digital solutions to facilitate better communication and reporting. A key opportunity for simplification lies in making the entire monitoring process fully digital, reducing the need for manual reporting and increasing real-time data sharing.

Proportionality of Costs and Benefits

In terms of proportionality, the costs of implementing the EHL are generally justifiable when considering the social, cultural, and economic benefits. Sites reported substantial increases in visitor numbers, as well as enhanced capacity for education and sustainability initiatives.

4.1.3 COHERENCE

Key findings

- The EHL demonstrated coherence and complementarity with other EU, national and international heritage initiatives, while maintaining its distinct emphasis on European significance.
- The action's inclusive approach to heritage, which encompasses both tangible and intangible heritage, sets it apart from conservation-focused programmes.

- The elements of the EHL intervention were generally coherent, although governance structures and individual objectives could benefit from improved alignment and refinement.
- The EHL demonstrated alignment with broader EU policy priorities, with opportunities to further enhance their visibility and integration within the action's framework.
- The objectives of EHL sites aligned well with the overarching objectives of the EHL, as set out in the 2011 Decision. The label serves as a motivator to enhance existing initiatives and to support the integration of a European dimension along with local heritage needs.

Coherence with Other EU, National, and International Interventions

The EHL is highly coherent with other EU, national, and international interventions aimed at promoting cultural heritage and fostering a shared European identity. At the EU level, the EHL complements several key initiatives, such as: European Heritage Day, Europa Nostra Awards and European Capitals of Culture.

These initiatives share similar goals of promoting cultural cooperation and enhancing the visibility of European heritage. Survey results indicate that 33% of EHL sites participate in the European Heritage Days, and 18% are involved in the European Union Prize for Cultural Heritage/Europa Nostra Awards, demonstrating strong alignment. At the international level, the EHL complements UNESCO initiatives, such as the World Heritage List and the Intangible Cultural Heritage List. However, the EHL maintains a distinct focus on the European dimension, emphasizing European integration and shared history. Less than 19% of surveyed sites noted overlaps between the EHL and UNESCO programs, underscoring their complementary roles in the global heritage landscape.

Coherence Between Intervention Elements

The different elements of the EHL intervention show significant coherence in their overall approach to promoting European heritage. However, there are some challenges with aligning governance structures and ensuring clear communication among stakeholders. The roles of national coordinators, the EHL Bureau, and the European Panel are broadly

defined but often lack clear operational guidelines, leading to inconsistent implementation in some areas.

Further alignment of governance structures and objectives would enhance the intervention's coherence. A clearer framework would help ensure that strategic goals are more effectively communicated and aligned across all levels.

Coherence with Wider EU Policies and Priorities

The EHL aligns well with broader EU policies, particularly in the areas of sustainability and digitalization. Many EHL sites have adopted digital tools, such as virtual tours and augmented reality, in line with the EU Digital Decade strategy. Furthermore, green management practices have been increasingly implemented across EHL sites, contributing to the European Green Deal and the EU's broader sustainability goals.

However, there is room for the EHL to more actively contribute to the EU's sustainability and digitalization priorities. National coordinators have suggested that the initiative could play a more active role in guiding sustainability efforts, particularly in aligning site-level activities with EU-wide strategies.

CONCLUSION

In conclusion, the European Heritage Label has largely succeeded in achieving its core objectives of enhancing European heritage, fostering intercultural dialogue, and contributing to socio-economic development. The intervention has proven effective in increasing visibility and promoting a shared European narrative, though there are areas for improvement, particularly in simplifying administrative processes and improving coordination between stakeholders. The intervention has been cost-effective, with benefits outweighing the costs. However, there is room for efficiency gains, particularly in digitalizing governance and reducing administrative burdens. Finally, the EHL shows strong coherence with other EU, national, and international initiatives, and its alignment with broader EU policies is commendable. The initiative continues to demonstrate the value of a shared European heritage, and future improvements could enhance its impact even further.

4.2 HOW DID THE EU INTERVENTION MAKE A DIFFERENCE, AND TO WHOM?

Introduction

The EU's intervention via the European Heritage Label (EHL) has made a significant impact on the visibility and European significance of heritage sites across Europe. By helping sites articulate their European significance, the EHL emphasized shared European values and highlighted the diverse aspects of Europe's cultural heritage. The intervention resulted in both tangible and intangible benefits for the heritage sector, especially smaller heritage sites that benefitted from new networking opportunities, funding possibilities, and enhanced cooperation. The EU intervention through the European Heritage Label (EHL) provided substantial added value to the visibility and European significance of heritage sites across Europe. The EHL empowered these sites to articulate their European significance, emphasizing shared European values and highlighting the diverse aspects of Europe's cultural heritage. The EHL brought tangible benefits to the heritage sector, particularly regarding networking opportunities and additional funding, which are especially valuable for smaller heritage sites. Furthermore, the establishment of the EHL Bureau encouraged collaboration, networking, joint projects, and best practice exchanges among the EHL sites. The EU intervention also had a profound impact on citizens' sense of belonging to the broader European community. By highlighting shared heritage, the EHL fostered a deeper appreciation of Europe's diverse cultural landscape and created opportunities for citizens to connect with their local heritage in the context of the European Union.

EU Added Value: Answers to Evaluation Questions

Key findings

- The EU's intervention via the European Heritage Label enabled label-awarded sites to better articulate their European significance across their activities as a result of participation.
- The EHL encompassed both tangible and intangible heritage, offering a more inclusive and flexible approach than many other programmes available at national or international level.

- The action facilitated the formation of pan-European networks and partnerships across heritage sites, which would be more difficult to achieve without EU-level coordination and support.
- The governance set-up of the action, and in particular the efficient operations of the EU Panel in carrying out the procedures for selection and monitoring against the criterion of European significance further amplified its EU added value.
- Participation in the EHL has enhanced sites' awareness of EU funding opportunities, yet their capacity to apply remains a challenge.

EU Added Value and Visibility of the EHL Action

The EU intervention through the EHL contributed to increased visibility for heritage sites, allowing them to better express their European significance and promote shared European heritage. Although the immediate impact on visitor numbers is hard to quantify, evidence suggests that participation in the EHL initially boosted visibility (as reflected in EQ 1 of Section 5.1.1). Over time, however, the influence of the label on visitor numbers became less pronounced. Despite this, the European dimension of label-awarded sites became increasingly evident during the evaluation period, especially when the label was effectively communicated (see EQ 7 of Section 5.1.1). The EU added visibility, particularly beneficial for smaller EHL sites, underlined the importance of the European dimension of heritage. Attention to European significance and visibility measures could further enhance the label's impact on EU-added visibility.

Key Findings from the Evaluation

- **European Significance:** The EHL has helped participating sites articulate their European significance more clearly across all their activities. This has enabled them to frame their history, values, and relevance within a broader European context, strengthening the European identity of each site.
- **Inclusive Approach to Heritage:** Unlike other programmes that tend to focus solely on tangible heritage, the EHL embraces both tangible and intangible heritage, which makes it a more inclusive and flexible initiative than many national or international programmes.
- **Pan-European Networks:** One of the most significant achievements of the EHL has been its ability to facilitate the creation of pan-European networks. These networks would be

difficult to establish without EU-level coordination and support. The sharing of knowledge and the opportunity to collaborate on joint projects have been pivotal for the development of these networks.

- **Effective Governance:** The governance of the EHL has played a critical role in its success. The efficient operations of the EU Panel in selection and monitoring have contributed to the overall added value of the initiative. The clear and transparent governance processes have ensured that the objectives of the EHL are met across various heritage sites, increasing the overall effectiveness of the action.

EU Added Value and Visibility of EHL

The EU intervention through the EHL has made a significant contribution to the increased visibility of heritage sites, allowing them to promote their European significance. Though it is challenging to directly quantify the immediate impact on visitor numbers, evidence suggests that participation in the EHL initially boosts visibility. Over time, however, the direct influence on visitor numbers has diminished. Nonetheless, the European dimension of the label-awarded sites has become more pronounced, especially when this dimension is communicated effectively. This increased visibility has been particularly beneficial for smaller sites, which often lack the resources to independently promote their European relevance. By leveraging the EHL, these smaller sites have gained access to a larger audience and established their presence within the European cultural landscape.

Access to Other EU Funding Opportunities

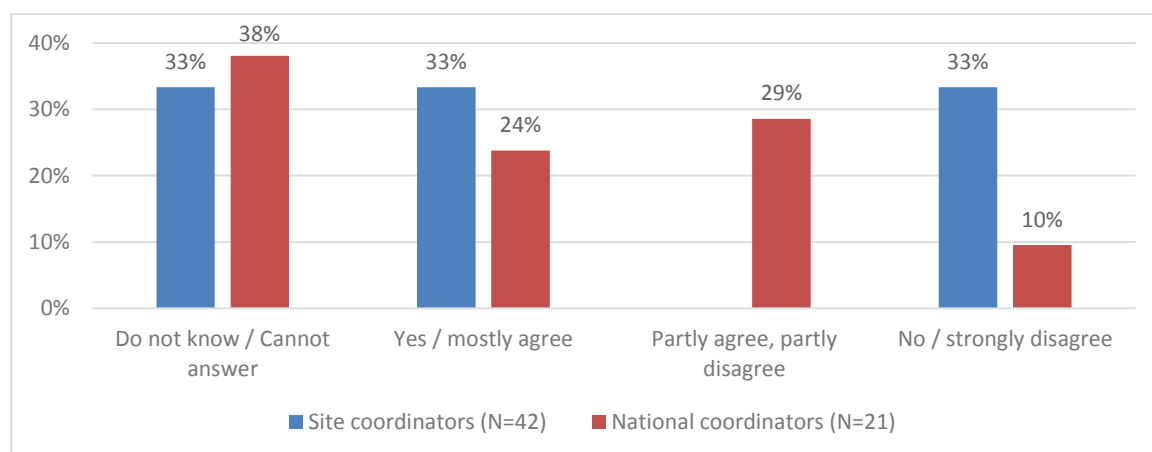
Participation in the EHL resulted in varied access to other EU funding opportunities, with survey results showing an even split between those who found EHL designation helpful for securing additional funding (33%), those who did not (33%), and those who were unsure (33%) (see Figure below). National coordinators were similarly divided on the impact of EHL designation on funding opportunities. While the EHL raised awareness of EU funding opportunities, it did not significantly enhance sites' ability to apply for such funds. However, the introduction of grants by the EHL Bureau, specifically for networking and collaborative activities, has been positively received. Smaller sites in particular leveraged the EHL designation as a credibility marker to strengthen their funding applications. Despite this, the complexity of EU funding programmes and limited resources continued to be a barrier. Among the sites that utilized EU funding, a majority

accessed Creative Europe funds (71%), with smaller percentages also engaging with other EU programmes like Erasmus+ (29%) and Horizon Europe (14%). For example:

- Finnish sites, such as The Kalevala - Living Epic Heritage, applied for Creative Europe funding.
- Italian sites, including Fort Cadine and Ostia Antica, successfully accessed funding under Creative Europe and European Heritage Days.

However, challenges such as complex application procedures and the need for co-financing persist, particularly for smaller sites.

Figure 8. Impact of participation in the EHL on accessing other EU funding opportunities



Source: PPMI survey of site coordinators and national coordinators, question 35 'Did participation in the European Heritage Label help your site / sites in your country to make use of other EU funding opportunities?' Note: For national coordinators, the question was presented on an agree/disagree scale, while for site coordinators, it was posed as a yes/no question.

Consequences of Non-EU Organised or Funded Action

Without EU-level funding and organisation of the EHL, many of the tangible benefits currently experienced by label-awarded sites would be diminished or lost. The EHL's broad definition of heritage, encompassing both tangible and intangible aspects, offers flexibility not found in other national or international programmes. The EHL supports sites in articulating their European significance, enhancing their visibility and facilitating the formation of pan-European networks and partnerships. Without EU-level support, many sites would struggle to communicate their European significance and would lack the necessary coordination to form these valuable networks. Additionally, the EHL Bureau's funding, dedicated to networking and capacity-building activities, strengthens the

initiative. Without such support, fewer opportunities for joint projects and knowledge exchange would be available. Moreover, EU funding and coordination have been vital for raising awareness of EU funding opportunities. However, without EU-level organisation, many smaller sites may struggle to navigate EU programmes and face difficulties securing funding for cultural and infrastructural projects.

Selection Procedure and European Dimension

The selection procedure for EHL, as laid out in Decision 1194/2011/EU, ensures that the European dimension of the sites is prioritized. Member States are required to adhere to the same criteria when selecting sites for the label, ensuring that all sites awarded the EHL demonstrate European significance. National variations in the selection procedure exist, with countries sometimes introducing thematic priorities that reflect their national cultural identities. For example, the Netherlands prioritised values such as tolerance and justice, while Lithuania focused on ‘roots, connections, and links’ in its 2025 pre-selection process. Despite these variations, the fundamental aim of promoting European significance remains consistent across all Member States. However, smaller countries or those not centrally involved in the formation of the EU face challenges in articulating their sites’ European significance due to differing historical and geopolitical contexts.

4.3. IS THE INTERVENTION STILL RELEVANT?

Key findings

- The objectives of the EHL remained highly relevant to the EU’s cultural heritage needs, in particular in fostering a shared European identity.
- The EHL was generally perceived as aligning well with national heritage needs; however, limited visibility at national level may hindered its ability to demonstrate its relevance effectively.
- The EHL made progress in aligning with EU policy priorities such as sustainability, digital innovation and inclusion. The alignment of the action could be further strengthened by deepening the integration and visibility of these priorities.
- The EHL’s selection criteria were relevant to the general and specific objectives of the action.

- The EHL demonstrated adaptability to unexpected developments, such as the COVID-19 pandemic, with EHL networking bodies providing support to help sites maintain their activities and foster resilience.

The **European Heritage Label (EHL)** initiative has maintained a high degree of relevance to its core objectives since its inception, with continued alignment to its aim of promoting shared European values and heritage. The selection criteria, particularly the notion of ‘**European significance**’, remain key to identifying sites that hold a special role in EU integration or represent values underpinning the Union’s identity. This criterion has proven effective in fostering sites that reflect historical, cultural, and social links that are foundational to European unity. However, some stakeholders have raised concerns about the clarity of this criterion and the operational challenges it presents. Stakeholders have expressed a desire for further explanations, supplementary documentation, and perhaps even additional workshops to clarify its application more fully. This feedback indicates that while the criterion remains relevant, there is room for improvement in its operationalisation. In terms of **continuing relevance**, the EHL has responded well to the ongoing needs of the European cultural landscape. A key characteristic of the EHL is its **project-based** nature, distinguishing it from initiatives such as UNESCO World Heritage. Sites that are awarded the EHL label commit to specific projects that disseminate European values and contribute to European integration, community engagement, and intercultural dialogue. The significance of this distinction lies in the fact that the **EHL action** is not preservation-focused but instead emphasises dynamic, project-based activities, addressing contemporary issues and providing active platforms for cross-border collaboration. This ongoing emphasis on project-based initiatives ensures the intervention stays relevant to the evolving needs of European society.

Mismatch Between Original Objectives and Current/Future Needs

While the original objectives of the EHL remain largely relevant, there have been indications of a **mismatch** between the **pre-selection phase** and the challenges that awarded sites face when implementing their projects. This discrepancy stems from the significant time lag between submitting project proposals and the eventual awarding of the EHL, which can take up to a year or more. In many cases, sites face substantial changes in their **management**, **financial capacity**, and **work plans** during this period. For example,

data collected from the monitoring phase indicates that several sites find it difficult to implement the projects initially proposed due to shifting resources and priorities over time. This presents a challenge, as the work plans and commitments made during the application process may no longer reflect the sites' current capabilities or the evolving needs of their communities. In light of these challenges, it is suggested that the EHL could consider introducing more flexibility into the selection process. This could involve allowing sites to **resubmit updated projects** and work plans upon receiving the label, or, alternatively, adopting a **two-stage selection process**. In this approach, sites could first be selected based on their '**European significance**', and then be provided support to refine and develop their work plans in consultation with the EHL Bureau. This would ensure that the awarded projects are both feasible and in alignment with the sites' current operational realities. Additionally, there is potential to adjust the **legal framework** to allow **single sites** to evolve into **national thematic sites** or **transnational sites**, which could foster broader cooperation between regions. This adjustment would allow the EHL to better address the growing need for cross-border collaboration and expand the narrative of shared European heritage to include transnational or multi-site initiatives. Currently, the absence of such provisions limits the potential for transnational cooperation, particularly in countries where national-level projects dominate the local heritage scene.

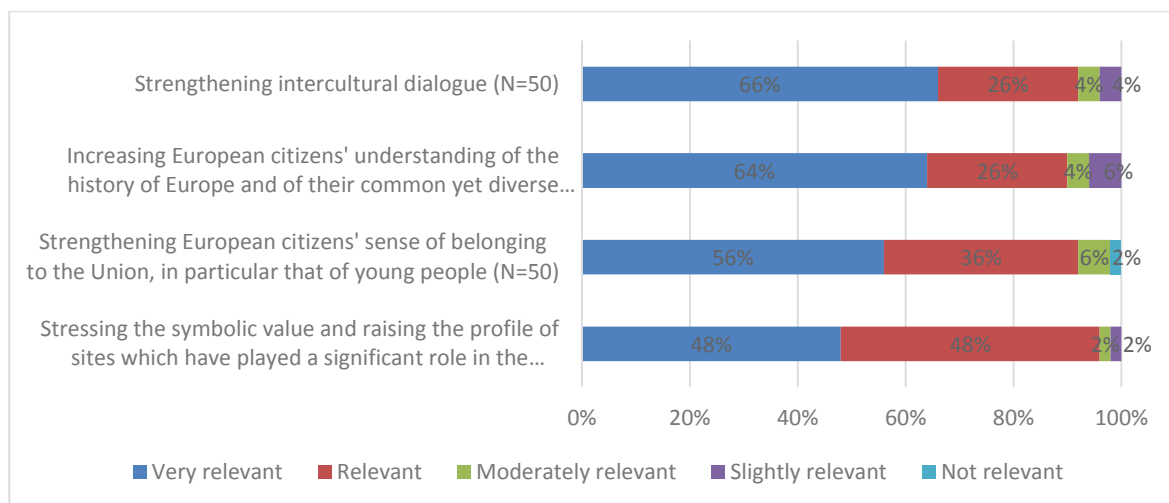
Future Relevance and Megatrends

Looking to the future, the continued relevance of the EHL will depend on its ability to address emerging trends and adapt to the evolving socio-cultural landscape. Key **megatrends** such as **digitalisation**, **demographic change**, and **sustainability** are already having an impact on European heritage practices, and the EHL can play an important role in responding to these shifts. For instance, **digital tools** have increasingly been used by sites to **engage with younger audiences**, showcase heritage in innovative ways, and create virtual experiences that transcend geographical boundaries. However, as noted in the findings, only **65% of sites** provide links to other EHL sites on their websites, suggesting that there is still considerable room for improvement in the promotion of the broader EHL network through **digital platforms**. Moreover, **sustainability** is an area that is becoming more integrated into the projects and work plans of EHL sites. Initiatives focusing on sustainable tourism, heritage preservation, and environmentally conscious project design are increasingly important in the context of global environmental challenges. Countries such as **Finland** are already exploring how the EHL can integrate **sustainability** and

inclusivity into local heritage narratives, presenting an opportunity for the initiative to position itself as a leader in promoting these values across Europe. In terms of **demographic change**, the evolving needs of European societies—especially in the context of an ageing population and increasing migration—present opportunities for the EHL to promote more **inclusive heritage**. Sites like the **Peace Palace** in the Netherlands, which engages youth in promoting historical awareness, reflect the growing importance of heritage as a tool for **intergenerational dialogue** and **social cohesion**. The EHL has the potential to play a crucial role in this context, helping to bridge divides by fostering cross-cultural understanding through shared heritage.

National Relevance and Participation Rates

Figure 9. Relevance of EHL objectives to national needs and challenges

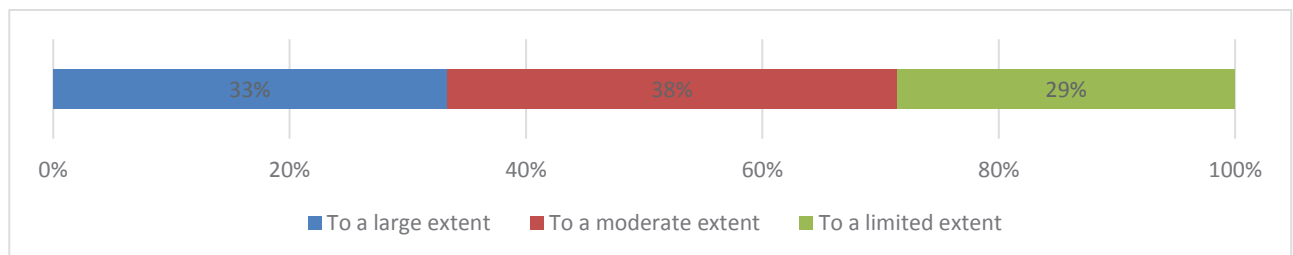


Source: PPMI survey of heritage sites, question 25 'In your opinion, to what extent are the following European Heritage Label objectives relevant to current societal challenges and needs in your country?'

The relevance of the EHL is not universally perceived in the same way across all **Member States**, with varying levels of participation contributing to some Member States being underrepresented. According to data from the evaluation, **57% of site coordinators** and **57% of national coordinators** strongly agreed that the EHL had helped raise the visibility of awarded sites in their respective countries. However, this boost in visibility has not consistently resulted in **higher visitor numbers**, indicating that while the EHL provides an important platform for heritage promotion, further efforts are required to sustain broader public engagement. From a **policy perspective**, participation rates alone do not directly correlate with the perceived relevance of the initiative. Stakeholders in countries like **Poland** and **the Netherlands** view the EHL as a key instrument for supporting European

intercultural dialogue and European integration, particularly in the context of the **Maastricht Treaty** and **youth education** initiatives. However, other countries with lower participation rates, such as **Finland**, emphasise the EHL's role in **sustainability** and the integration of local heritage into **global narratives**. This shows that while national priorities may shape the relevance of the EHL, the initiative remains an important tool for addressing different needs across Europe. A critical challenge moving forward is the **underrepresentation** of certain regions and the **geographic dispersion** of EHL sites. This lack of diversity in geographical representation risks undermining the narrative of shared European heritage, particularly in regions with fewer sites. The absence of sites in certain regions could reduce the EHL's ability to tell the full story of Europe's cultural diversity. As noted in the **cross-border effects** case studies, this imbalance in representation limits opportunities for **cross-border collaboration** and **mutual learning** between countries.

Figure 10. Alignment of the EHL with national cultural heritage priorities



Source: PPMI survey of national coordinators, question 24 'To what extent do you believe the European Heritage Label aligns with and supports the cultural heritage priorities and needs of your country?'; N=21.

Expanding the Scope of the EHL

The question of whether the EHL should expand its reach beyond the European Union to include **EFTA/EEA countries** and **candidate countries** has been met with mixed opinions. Some stakeholders advocate for the expansion of the initiative to include **non-EU countries**, citing successful models such as **Creative Europe** and the **European Capitals of Culture**, which already include non-EU participants. Expanding the EHL could strengthen European cultural cooperation and enhance its visibility beyond the EU. Sites in countries such as **Iceland** and **Norway**, as well as **EU candidate countries**, would offer significant cultural and historical value to the initiative. Conversely, others argue that the EHL should first consolidate its presence within the EU before expanding its scope. This includes ensuring that each Member State has at least one **designated site** and addressing operational challenges that could arise with an expansion. A more gradual

approach to expansion, possibly starting with transnational sites, could provide a balanced solution that does not stretch resources too thin.

CONCLUSION

In conclusion, the **European Heritage Label** continues to be highly relevant to its original objectives, promoting shared European values and heritage through the selection of sites that embody **European significance**. However, there are areas where the intervention could be further strengthened to ensure its continued relevance. These include clarifying selection criteria, introducing flexibility in project implementation, considering the inclusion of transnational sites, and leveraging emerging trends such as **digitalisation**, **sustainability**, and **inclusivity**. Moreover, the EHL's relevance would benefit from greater geographical diversity, ensuring that the full range of European cultural heritage is represented. The initiative has significant potential to contribute to Europe's cultural landscape in the future, but careful attention to these evolving needs will be critical to its continued success.

5. WHAT ARE THE CONCLUSIONS AND LESSONS LEARNED?

5.1. Conclusions

The evaluation of the European Heritage Label (EHL) has revealed both notable achievements and areas for further development, confirming its growing relevance and impact across Europe. Throughout the evaluation period, the EHL has made substantial progress in meeting its objectives, particularly in enhancing the visibility and symbolic significance of sites awarded the label. This progress is evident in the increased recognition of these sites as key representatives of Europe's shared cultural heritage, contributing to a strengthened European identity. The establishment of the EHL Bureau was a significant milestone, providing essential support for capacity-building and fostering networking among awarded sites. Despite these successes, challenges persist, especially in articulating and measuring abstract concepts like a shared European identity and integrating the European dimension more effectively into sites' activities. It is clear that clearer guidance and practical tools are needed to help sites navigate these complexities and address gaps in their European focus. Nevertheless, the EHL label has provided tangible benefits to the sites it has recognised, including enhanced communication of Europe's cultural heritage and the facilitation of international partnerships. External factors, such as the COVID-19 pandemic, had both positive and negative impacts on the EHL's development. While the pandemic disrupted traditional activities, it also accelerated innovation through the adoption of virtual tours and online workshops, demonstrating the EHL's adaptability in the face of unforeseen challenges. Moving forward, efforts to strengthen youth engagement, address resource constraints, and further improve the integration of the European dimension into sites' activities will be key to unlocking the full potential of the EHL.

The efficiency of the EHL's operational processes was largely positive, as demonstrated by the clear selection criteria, smooth procedures, and functional governance structures in place. The selection process at both national and European levels was generally effective, with sites largely perceiving the criteria as clear. However, there is room for improvement in terms of further clarifying the application of the "European significance" criterion, which continues to be a challenge for many applicant sites. Additionally, while the process was mostly timely, some stakeholders suggested that the EU-level evaluation timeline could be shortened, though legal limitations may make this difficult. A more detailed

timeline, including preliminary dates for award ceremonies, could provide additional clarity for applicant sites. Despite the application process being perceived as somewhat burdensome, many sites considered it worthwhile due to the potential benefits of receiving the EHL label. Simplifying the application form, offering more information sessions, and incorporating insights from European Panel reports into the application instructions could further streamline the process. The governance structure was largely efficient, with the European Panel ensuring that sites met the selection criteria. However, sustainability concerns arise as the number of sites continues to grow, which may challenge the capacity of the European Panel and the Commission to manage the network's expanding needs. A more strategic direction across the various procedures could further enhance efficiency, particularly as the network continues to evolve.

In terms of coherence, the EHL demonstrated strong alignment with other EU, national, and international heritage initiatives, with a clear complementarity between its goals and those of broader European cultural heritage programs. The broad definition of heritage, encompassing both tangible and intangible elements, enabled the EHL to distinguish itself from more conservation-focused programs while still contributing to the broader European heritage narrative. The EHL label provided sites with the opportunity to enhance their missions, promote European significance, and support intercultural dialogue. Evidence indicates that the EHL did not dramatically alter the missions of individual sites but rather served as a motivator to expand existing initiatives. This dynamic created a mutually reinforcing relationship between the EHL and the awarded sites, where the label's visibility helped strengthen local objectives while promoting shared European values. The EHL's role in fostering cross-border collaboration and encouraging site-to-site networking has demonstrated its capacity to bring together diverse stakeholders and support the overarching goal of increasing the visibility and recognition of Europe's shared cultural heritage. This coherence with other EU initiatives, such as European Heritage Days and the European Heritage / Europa Nostra Awards, has further emphasized the EHL's contribution to the wider cultural landscape.

The EU added value of the EHL is evident in its ability to foster cross-border networks and promote European cultural heritage at a pan-European level. By providing a common framework for collaboration, the EHL label has helped sites form partnerships, share best practices, and strengthen their capacity to engage in transnational cooperation. The establishment of the EHL Bureau and the funding it provides has been a significant driver

of this added value, offering sites opportunities for additional resources and collaborative projects. Furthermore, the EHL has facilitated access to other EU funding programs, including Creative Europe, Erasmus+, and Horizon Europe, thereby enhancing sites' ability to secure additional support for their projects. The credibility associated with the EHL label has proven to be a valuable asset for sites seeking EU funding, particularly in the highly competitive environment for grants. The EU's involvement has also played a crucial role in supporting capacity-building, especially for smaller sites that may otherwise struggle with navigating complex application processes. This added value contributes to a stronger, more interconnected European heritage sector, one that benefits from shared values and resources.

The relevance of the EHL remains high, closely aligning with the EU's cultural heritage priorities and addressing the societal need for greater social cohesion. The EHL's emphasis on promoting gender equality, accessibility, and the inclusion of marginalised groups has made significant progress, though its impact has varied across different sites. While improvements in physical accessibility were often driven by national policies, the EHL label has contributed to the adoption of more inclusive practices, such as sensory-friendly tours and the use of digital tools. National stakeholders largely recognise the relevance of the EHL's objectives, though there are differing opinions regarding its alignment with national heritage priorities. The EHL's limited visibility at the national level may hinder its ability to fully showcase its relevance in addressing these priorities, but as more sites join the network, its impact on national heritage agendas is expected to increase. The flexibility demonstrated by the EHL in adapting to challenges, such as the COVID-19 pandemic, underscores its relevance and ability to respond to evolving needs. The shift to virtual formats and the introduction of sub-granting mechanisms to support sites further exemplify the EHL's adaptability, ensuring that its objectives remain aligned with the evolving landscape of cultural heritage.

In conclusion, while the EHL has made significant strides in promoting European cultural heritage, enhancing the visibility of awarded sites, and fostering cross-border collaboration, several areas require further attention. Improved clarity in the selection criteria, enhanced guidance for sites, and stronger support for smaller sites will be essential in ensuring the continued success and impact of the label. As the initiative evolves, it will be crucial to build on its strengths while addressing existing gaps to maximise its potential

for fostering a shared European identity and supporting the broader EU cultural heritage agenda.

5.2. Lessons learned

The evaluation of the European Heritage Label (EHL) programme has provided valuable insights, highlighting areas where improvements could significantly enhance its effectiveness and sustainability. One critical aspect of the programme that warrants attention is the selection process. The European Commission has generally provided clear guidance to National Coordinators, ensuring that the process remains structured and transparent. However, there is room for improvement in communication with candidate sites. Stakeholders often expressed confusion about the time it takes for the process to unfold and why it varies between countries. While National Coordinators were well-equipped with detailed guidelines, the guidelines for candidate sites were not as comprehensive. This disparity left some sites uncertain about what to expect during the process, especially concerning the steps managed by the Panel and the Commission. Feedback given to non-selected sites was typically found in lengthy panel reports, which some stakeholders found difficult to locate or understand. A more direct and concise form of feedback would help unsuccessful applicants better comprehend why their submissions were not successful and what they could do to improve future applications. Moreover, a more streamlined and user-friendly approach to accessing relevant documents would make the process more efficient and less frustrating for everyone involved.

As the European Heritage Label grows, it is crucial to consider how to ensure its sustainability and relevance in the long term. The expansion of the programme requires an updated vision that accounts for both the growing number of sites and the evolving needs of all stakeholders. The vision of the programme has varied slightly over the years, but there is an opportunity to establish a more coherent and future-oriented strategy. This vision should be participatory, involving key stakeholders at all levels, ensuring that everyone is aligned and invested in the programme's direction. The current governance arrangements, designed for a smaller number of sites, are proving inadequate for the growing complexity of the programme. Monitoring processes have shown inconsistencies, and there are concerns about the Panel's capacity to oversee an increasing number of sites. The workload is becoming unsustainable, particularly as the number of EHL sites continues to rise. In addition, there are concerns about the consistency and long-term

tracking of sites. It is essential that the monitoring process be streamlined and adapted to the growing scale of the programme. The current variation in monitoring across cycles makes it difficult to track overall progress or evaluate the impact of the EHL in a consistent manner.

The need for a more robust and sustainable governance structure is clear. As the programme continues to grow, ensuring that the monitoring process is both effective and manageable is paramount. Streamlining data collection and focusing on key indicators of success could alleviate some of the burden. Moreover, a shift towards tailored monitoring frameworks for sites clustered thematically could offer more in-depth and meaningful feedback. The Panel's capacity to manage and monitor the growing number of sites should also be addressed. One possible solution is to conduct monitoring in cycles, with a subset of sites being monitored each year to distribute the workload more evenly.

The role of the European Panel is central to the success of the EHL, ensuring that sites meet the criteria for selection and monitoring. However, there are areas where the Panel's effectiveness could be improved. The appointment process for Panel members could benefit from greater transparency and clarity. While the current approach is aligned with the principle of subsidiarity, the process could be enhanced by providing a standardised role description for all candidates. This would ensure that all appointing bodies have a clear understanding of the Panel member's responsibilities and expectations. The current three-year term for Panel members has also been noted as too short for them to fully grasp the intricacies of the process. Extending the term to four or five years could allow members to contribute more effectively and gain a deeper understanding of the EHL's goals. Additionally, the integration of a formalised knowledge transfer process between outgoing and incoming members would ensure that institutional knowledge is preserved, contributing to a more sustainable and cohesive Panel.

Another significant area for reflection is the concept of European significance, which is at the core of the EHL selection criteria. While the notion of European significance is invaluable, it remains somewhat vague, leading to difficulties for applicant sites in demonstrating how they meet this criterion. Some sites have struggled to understand what constitutes 'European significance' and how they can present it effectively in their applications. The ambiguity surrounding this criterion has often resulted in unnecessary workloads for applicant sites, who are unsure whether their site meets the basic eligibility

requirements. Clearer guidance on what ‘European significance’ entails would help applicant sites present more targeted and relevant proposals. Furthermore, simplifying the selection process could reduce unnecessary workload. A two-step process could be introduced, where the first stage focuses solely on determining whether a site meets the European significance criterion, allowing only those sites that clearly meet the requirement to proceed to the next stage. This would help streamline the process and ensure that resources are not spent on applications that do not meet the fundamental criteria.

Finally, the EHL could benefit from greater flexibility within its legal framework. Currently, certain rigid criteria—such as the rule limiting the selection to one site per Member State—restrict the potential of the programme. This limitation can discourage eligible sites from applying, particularly in cases where competition is intense, and it may prevent sites with significant potential from being awarded the label. Introducing greater flexibility in the timeline for both submission and evaluation would also help accommodate delays and unforeseen changes that can affect a site’s ability to implement its proposed projects. The possibility of promoting joint projects between applicant sites could foster greater collaboration and resource-sharing, ultimately leading to stronger, more impactful initiatives. Additionally, the legal framework could be revised to support sites that wish to evolve or form national or transnational networks after being awarded the label. This flexibility would allow sites to scale their projects and align more effectively with the broader goals of the EHL.

In light of these reflections, it is clear that the European Heritage Label programme has made valuable contributions to the recognition of Europe’s cultural heritage, but there is significant potential for it to evolve and become even more effective in the future. By addressing the challenges related to communication, governance, the selection process, and the legal framework, the EHL can continue to thrive and support the preservation of Europe’s shared cultural identity.

ANNEX I: PROCEDURAL INFORMATION

- *Lead DG:* DG EAC, Education, youth, sport and culture. EAC D2 – Creative Europe
- *Decide reference:* PLAN/2022/1961
- *Work Programme reference:* Creative Europe Programme - 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
- *Organisation and timing:*
 - In compliance with Decision No 1194/2011/EU of the European Parliament and of the Council, the Commission is mandated to carry out an external and independent evaluation of the European Heritage Label action every six years.
 - The evaluation for the 2018-2024 period is supported by independent assessments conducted by external experts, which took place from January 2024 to January 2025, and were managed by DG EAC.
 - The main preparatory steps for the evaluation in 2023 included:
 - setting up an interservice group to accompany and steer the evaluation;
 - preparing technical specifications for supporting the external evaluation assignment (EAC/2021/OP/0004 – Multiple framework service contract).
 - The service contract was awarded to a consortium led by the PPMI Group, UAB under the DG EAC framework contract for evaluations and impact assessments and started in April 2024.
 - The external evaluation assignment interview program, targeted consultations, and focus groups. It provided the main evidence base for the staff working document. The service contractor's full final report has been published here: <https://op.europa.eu/publication-detail/-/publication/5d0688ff-fe2c-11ef-b7db-01aa75ed71a1>

DGs participated in the steering group.

An interservice group of relevant Commission departments oversaw the evaluation and met regularly throughout the evaluation process. In addition to DG EAC, the interservice group was composed of representatives of 6 Commission Directorate General.

In line with the Better Regulation Guidelines, the interservice group was involved in all the key steps of the evaluation work, including:

- (i) the evaluation mandate;
- (ii) the evaluation questions;
- (iii) the technical specifications for selecting the external contractor;
- (iv) Interim report and steering the evaluation;
- (v) providing comments on, and ensuring the quality and objectivity of evaluation reports.

In connection with the interservice group's meetings and key deliverables, consultations were carried out in a dedicated Teams channel.

The feedback periods, deadlines and arrangements for managing comments and the approval of deliverables were agreed in the meetings.

- *Evidence used together with sources and any issues regarding its quality (i.e. has the information been quality assured?):*
- **The external contractors carried out work/studies.**
 - The Commission's EHL evaluation was supported by an independent external evaluation assignment.
 - In line with the Better Regulation Guidelines, the contractor analysed the effectiveness, efficiency, coherence, added value and relevance of the EHL through a mix of different methods, including both qualitative and quantitative approaches.
 - **The external evaluation assignment was carried out between April and December 2024** and included diverse sources encompassing desk research, stakeholder consultation activities (surveys, interviews, and focus groups), and case studies.

- **The consultation strategy** for the evaluation was based on a mapping of stakeholders. This data was also mapped into a structured dataset to enable analysis by cycle and country.
 - **For the desk research:** The evaluation analysed more specifically monitoring forms submitted by EHL sites during the 2020 and 2024 monitoring cycles, along with 2020 expert assessment forms and the European Panel reports for selection and monitoring.
 - **For the survey programme,** two targeted surveys were conducted across different stakeholder groups, included national coordinators and panel members involved in the EHL.
 - **Targeted interviews** were programmed with diverse range of stakeholders from various backgrounds and regions to gain in-depth insights and expand the understanding of the programme's impact.
 - **Case studies were carried out.** There were four country-level case studies and five horizontal case studies on thematic priorities. Data were collected through desk research, selected survey questions and interviews. The national case studies were independently evaluated by external experts and subjected to the feedback of customer DGs.
- *Use of external expertise:* The expertise advise of the Commission EHL expert groups was equally used in the process as these experts were included in the consultations strategy and associated to the desk research through the consultation of the annual selection or monitoring reports. The experts of the Commission EHL expert group were thereupon associated and could draw a series of recommendations for the external experts.

– ANNEX II. METHODOLOGY AND ANALYTICAL MODELS USED

The evaluation of the European Heritage Label (EHL) Action for the period 2018-2024 employed a comprehensive methodology based on a triangulation of data from several sources. **These included desk research, stakeholder consultation activities such as surveys, interviews, and focus groups, as well as the use of case studies.** This multi-faceted approach ensured that the evaluation captured a broad spectrum of insights, providing a robust evidence base to assess the performance and impact of the programme.

Desk research was a key element of the evaluation process and was carried out through two main activities: the analysis of monitoring data and the review of relevant literature and internal documents. Monitoring data from the 2020 and 2024 cycles was collected, including expert assessment forms, and organised into a structured dataset. This allowed for a detailed analysis, enabling the team to examine data by cycle, question, and country. A quantification framework was developed to convert qualitative monitoring data into measurable formats, facilitating the assessment of how sites met label criteria, promoted European cultural heritage, and addressed key challenges. Alongside the monitoring data analysis, relevant documents such as European Panel reports, site application forms, selection reports, and policy documents were reviewed. These documents enriched the evaluation process, particularly in the development of case studies and the design of the evaluation methodology.

The consultation programme played a critical role in gathering insights from stakeholders across various levels, including site, national, EU, and international perspectives. Structured interviews were conducted with 30 stakeholders, including national coordinators, site coordinators from both selected and applicant sites, European Panel members, and representatives from DG EAC. These interviews formed the basis for horizontal and country-specific case studies, adding depth to the evaluation findings. Additionally, surveys targeting national and site coordinators were conducted from 26 September to 20 October 2024. The surveys achieved broad geographic coverage and provided valuable data on the experiences and perspectives of key stakeholders throughout the EHL programme's lifecycle.

Focus groups further contributed to the evaluation by facilitating in-depth discussions on key issues. Three focus groups were organised, addressing the intervention logic, the functioning of the European Panel, and the effects of cross-border cooperation. These discussions involved a variety of stakeholders and provided valuable insights into governance, selection processes, and the broader impact of the programme.

A core component of the evaluation was the case study programme, which examined both country-level and horizontal aspects of EHL implementation. Four country-level case studies were conducted in Finland, the Netherlands, Poland, and Italy, ensuring diverse geographic and regional representation. These case studies explored national and site-level outcomes, site-specific implementation of EHL objectives, and regional variations, providing a deeper understanding of the programme's impact. In addition, two horizontal case studies focused on

governance and cross-border effects, analysing key aspects of EHL implementation and their contributions to broader EU-level synergies.

The evaluation methodology was robust, but several limitations were acknowledged. These included the absence of the final 2024 monitoring report at the time of the evaluation, which impacted some of the analysis, as well as the lack of statistical methods for text coding validation, which would have required significant additional resources. However, the response rates to surveys were sufficiently high to ensure reliable results, and the evaluation team employed contingency measures to gather stakeholder insights even when certain participants were unavailable. Despite these limitations, the triangulation of diverse methods, strong stakeholder participation, and thorough data analysis ensured that the evaluation's findings were reliable and comprehensive.

CRITERION 1 : EFFECTIVENESS

Following the Better Regulation Guidelines and requirements set in the ToR, to evaluate effectiveness of the EHL we assess the extent to which progress has been made towards achieving its general and specific objectives. In other words, we analyse short- and medium-term results (outcomes) of the EHL expected to be achieved during the period of analysis.

Box 1. Definition of effectiveness

According to the Commission's Better Regulation Toolbox, effectiveness analysis considers how successful EU action has been in achieving or progressing towards its objectives. If the objectives have not been achieved, an assessment should be made of the extent to which progress has fallen short of the target and what factors have influenced why something has not been successful or why it has not yet been achieved. The effectiveness analysis should try to identify any unintended or unexpected effects and look closely at the benefits of the EU intervention as they accrue to different stakeholders.

Source: Better Regulation Toolbox, pp. 403-404.

Analysis of effectiveness considers how successful the EHL has been in achieving, or progressing towards, its objectives. The analysis of effectiveness is closely linked to the intervention logic developed. To evaluate this criterion, we rely on desk research, in-depth case studies, targeted consultation measures (survey, interviews and focus groups). The latter data sources are particularly important as the stakeholders were

directly engaged in the implementation of the EHL action and are in the best position to indicate the development of the action as well as factors driving or hindering its implementation.

EQ01

1.1 What have been the effects of the intervention?

1.2 To what extent were the EU-level general and intermediate objectives of the action met during the period of 2018-2024 of its implementations?

1.3 Which external factors have affected progress towards these objectives and how?

Table 1. Evaluation question 1

Operational question	Assessment parameters	Methods and sources
1.1 What have been the effects of the intervention?	<p>Evidence and extent to which the intervention had achieved the following intended effects (outcomes):</p> <p>Sites continue to comply with the criteria for the label</p> <p>Enhanced visibility of the action and the European dimension of cultural heritage</p> <p>Greater emphasis on common European values, history and culture by designated sites</p> <p>Diverse audiences, including youth, can more effectively understand and connect with the shared European dimension of the designated sites</p> <p>Sites implement more effective heritage management practices and better capitalise on international and partnership opportunities</p>	<p>Surveys:</p> <p>Title-awarded sites</p> <p>National Coordinators and Authorities</p> <p>Interview programme</p> <p>Desk research</p>

		Country-level case studies
1.2. To what extent were the EU-level general and intermediate objectives of the action met during the period of 2018-2024 of its implementations?	<p>Evidence and extent to which the intervention had progressed towards the following general objectives during the period of 2018-2024:</p> <p>Strengthening 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</p> <p>Strengthening intercultural dialogue</p> <p>Evidence and extent to which the intervention had progressed towards the following intermediate objectives during the period of 2018-2024:</p> <p>Stressing the symbolic value and raising the profile of sites which have played a significant role in the history and culture of Europe and/or the building of the Union</p> <p>Increasing European citizens' understanding of the history of Europe and of their common yet diverse cultural heritage, especially in relation to the democratic values and human rights that underpin the process of European integration</p>	<p>Survey:</p> <p>Title-awarded sites</p> <p>National Coordinators and Authorities</p> <p>Interview programme</p> <p>Desk research</p> <p>Focus groups</p> <p>Case studies</p>
1.3. Which external factors	Types and magnitude of external factors that have affected (positively or negatively) progress towards the aforementioned objectives	Survey

have affected progress towards these objectives and how?		Interview programme Desk research Focus groups Case studies
1.3.1 To what extent did Covid-19 affect the progress of the action towards its objectives?	Types and magnitude of effects to the progress towards the action's objectives that resulted from Covid-19	Survey Interview programme Desk research County-level case studies

EQ02 **2.1. What are the main issues and challenges faced by the sites when applying for the EHL and – if selected – when delivering on the EHL objectives? 2.2 What are the specific challenges that they have to manage regarding: development of cross-borders and transnational projects, the implementation of their action plans or youth-focused activities?**

Operational question	Assessment parameters	Methods and sources
2.1.1. What are the main issues and challenges faced by the sites at the application stage?	<p>The extent to which the label-awarded sites perceive the application process and forms as complex</p> <p>Evidence of any issues, including their nature and magnitude, that the sites may have experienced during the application stage</p>	<p>Survey of applicant and label-awarded sites</p> <p>Interview programme</p>
2.1.2. What are the main issues and challenges faced by the sites when	<p>Extent to which the sites continue to contribute to the achievement of site-specific objectives.</p> <p>Evidence of any issues, including their nature and magnitude, that the sites may have experienced when delivering on the following site-specific EHL objectives:</p> <p>Highlighting the European significance of the label-awarded sites</p>	<p>Survey of applicant and label-awarded sites</p>

delivering on the EHL objectives?	<p>Raising European citizens' awareness of their common cultural heritage, especially that of young people</p> <p>Facilitating the sharing of experiences and exchanges of best practices across the Union</p> <p>Increasing and/or improving access for all, especially young people</p> <p>Increasing intercultural dialogue, especially among young people, through artistic, cultural and historical education</p> <p>Fostering synergies between cultural heritage on one hand and contemporary creation and creativity on the other</p> <p>Contributing to the attractiveness and the economic and sustainable development of regions, in particular through cultural tourism</p>	<p>Interview programme</p> <p>Country-level case studies</p> <p>Desk research</p>
2.2.1. What are the specific challenges that the sites have to manage the development of cross-borders and	<p>Evidence of any challenges, including their nature and magnitude, that the sites may have had to manage regarding:</p> <p>The development of cross-border projects</p> <p>The development of transnational projects</p>	<p>Survey:</p> <p>Title-awarded sites</p> <p>National Coordinators and Authorities</p>

transnational projects?		Interview programme Desk research
2.2.2. What are the specific challenges that the sites have to manage when implementing their action plans?	<p>Evidence of specific challenges, including their nature and magnitude, that the sites may have had to manage regarding:</p> <p>Ensuring the sound management of the site, including defining objectives and indicators</p> <p>Ensuring the preservation of the site and its transmission to future generations in accordance with the relevant protection regimes</p> <p>Ensuring the quality of the reception facilities such as the historical presentation, visitors' information and signposting</p> <p>Ensuring access for the widest possible public, inter alia, through site adaptations or staff training</p> <p>According special attention to young people, in particular by granting them privileged access to the site</p> <p>Promoting the site as a sustainable tourism destination</p> <p>Developing a coherent and comprehensive communication strategy highlighting the European significance of the site</p> <p>Ensuring that the management of the site is as environmentally friendly as possible</p>	<p>Survey</p> <p>Interview programme</p> <p>Desk research</p> <p>Country-level case studies</p>

2.2.3. What are the specific challenges that the sites have to manage when implementing youth-focused activities?	<p>Evidence of specific challenges, including their nature and magnitude, that the sites may have had to manage experienced regarding:</p> <p>Organising educational activities, especially for young people, which increase the understanding of the common history of Europe</p> <p>Granting young people privileged access to the site</p> <p>Reaching out to citizens, especially young people through dedicated communication and visibility measures</p>	<p>Survey</p> <p>Interview</p> <p>programme</p> <p>Desk research</p>
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EQ03

3.1. To what extent was the European panel useful during the selection phase?

3.2. Are the appointed European panel members relevant to the criteria described in the 2011 Decision?

Operational question	Assessment parameters	Methods and sources
3.1. To what extent was the European panel useful during the selection phase?	<p>Satisfaction with the European panel's process of selecting sites for the attribution of the label</p> <p>Number of information requests and site visits</p>	<p>Survey</p> <p>Interview</p> <p>programme</p> <p>Desk research</p>

	<p>The extent to which the additional information requests and site visits were useful (integration of observations)</p> <p>Adherence to the timeline specified in the regulation for issuing a report on pre-selected sites</p> <p>Quality of the European panel's report in terms of providing recommendations and explanations for selected and non-selected sites</p>	
<p>3.2. Are the appointed European panel members relevant to the criteria described in the 2011 Decision?</p>	<p>The extent to which the appointed European Panel Members and their competences are complementary.</p> <p>The extent to which the members are drawn from a balanced geographical spectrum.</p> <p>The extent to which European panel members possess relevant expertise in evaluating the symbolic European value of sites and their roles in the history and culture of Europe and the Union.</p> <p>Demonstrated competence of panel members in evaluating the quality of projects submitted by candidate sites and ensuring they meet the EHL objectives.</p>	<p>Desk-research</p> <p>Interview programme</p> <p>Focus group on the Governance of the Action</p> <p>Horizontal case study on the Governance of the Action</p>

EQ04

- 4.1. To what extent does the two-step selection procedure help the site design a programme and action plan that is relevant to the objectives and criteria laid down for the legal Base?
- 4.2 Could the selection procedure be improved, and if so, how?

Operational question	Assessment parameters	Methods and sources
4.1. To what extent does the two-step selection procedure help the site design a programme and an action plan that is relevant to the objectives and criteria laid down for the legal Base?	<p>Evidence of improvements in proposal quality between initial submissions and final Union-level submissions.</p> <p>Feedback from National Coordinators on areas of improvement and subsequent modifications</p> <p>Alignment of final selected sites with the overarching goals of the EHL as assessed by the European panel.</p> <p>The extent to which the two-step procedure was instrumental in improving the alignment.</p>	<p>Survey</p> <p>Interview</p> <p>programme</p> <p>Focus group on the governance of the action</p> <p>Horizontal case study on the governance of the action</p> <p>Desk research</p>

4.2.1. Could the pre-selection at national level selection procedure be improved, and if so, how?	<p>Extent to which the pre-selection procedures were clear to awarded sites</p> <p>Extent to which candidate and label-awarded sites found the national coordinators to be helpful in providing guidance and support</p> <p>Extent to which candidate and label-awarded sites found the national coordinators to be effective in promoting and raising awareness of the EHL (i.e. through pro-actively encouraging sites to apply)</p> <p>Number and type of issues reported</p>	<p>Survey</p> <p>Interview</p> <p>programme</p> <p>Focus group on the governance of the action</p> <p>Horizontal case study on the governance of the action</p> <p>Desk research</p>
4.2.2. Could the selection at Union level procedure be improved, and if so, how?	<p>Extent to which the selection at Union level procedures were clear to awarded sites</p> <p>Number and type of issues reported</p>	<p>Survey</p> <p>Interview</p> <p>programme</p> <p>Focus group on the governance of the action</p> <p>Horizontal case study on the</p>

		governance of the action Desk research
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EQ05

5.1 To what extent has the EU intervention achieved (or progressed towards) its objectives?

5.2 To what extent have the EHL sites implemented by the title-holding sites succeeded in attaining the objectives of the action?

Operational question	Assesment parameters	Methods and sources
5.1.1. To what extent has the initiative successfully enhanced the range, diversity, and visibility of European shared heritages through transnational	Extent to which measures to ensure the visibility of the action were implemented Extent to which measures to enhance the diversity of the sites were implemented Number, type, scope of measures	Survey Interview programme Desk research Country-level case studies Horizontal Case study on the

cooperation and European activities?		alignment with the Horizontal priorities of the Commission
5.1.2. To what extent has the initiative successfully widened access to and increased participation in heritage experiences?	<p>Extent to which measures to ensure the provision of high-quality educational materials and activities were implemented</p> <p>Extent to which measures to promote engagement for diverse audiences, with a particular focus on youth were implemented</p> <p>Extent to which the various forms of accessibility of sites were enhanced</p> <p>Number, type, scope of measures</p>	<p>Survey</p> <p>Interview programme</p> <p>Desk research</p> <p>Country-level case studies</p> <p>Horizontal Case study on the alignment of the Horizontal priorities of the Commission</p>
5.1.3. To what extent has the initiative effectively strengthened the capacity of the	<p>Extent to which capacity-building opportunities for the designated sites were implemented</p> <p>Extent to which measures to ensure the multi-networking effects of the action were implemented</p> <p>Number, type, scope of measures</p>	<p>Survey</p> <p>Interview programme</p> <p>Desk research</p> <p>Case studies</p>

heritage sector and fostered meaningful links with other cultural sectors?		
5.1.4. To what extent has the initiative succeeded in raising the European profile of sites through heritage and culture?	Extent to which measures to enhance the European profile of the sites through heritage and culture were implemented Number, type, scope of measures	Survey Interview programme Desk research Case studies Visitor engagement experiment
5.2. To what extent have the title-holding sites succeeded in attaining the objectives of the action?	Evidence of demonstrated efforts by the sites to have highlighted their European significance Evidence of demonstrated efforts by the sites to have raised European citizens' awareness of their common cultural heritage, especially that of young people	Survey Interview programme Desk research Case studies

	<p>Evidence of demonstrated efforts by the sites to have facilitated the exchange of experiences and best practices among diverse cultural entities within the EU</p> <p>Evidence of demonstrated efforts by the sites to have increased and/or improve access for all, especially young people</p> <p>Evidence of demonstrated efforts by the sites to have increased intercultural dialogue, especially among young people, through artistic, cultural, and historical education</p> <p>Evidence of demonstrated efforts by the sites to have fostered synergies between cultural heritage and contemporary creation and creativity</p> <p>Evidence of demonstrated efforts by the sites to have contributed to the attractiveness and the economic and sustainable development of regions, in particular through cultural tourism</p>	
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EQ06

6.1. Have there been any unintended consequences of the action?

Operational question	Assesment parameters	Methods and sources
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6.1. Have there been any unintended consequences of the action?	Number and type of unintended consequences	Survey Interview programme Desk research Country-level case studies
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EQ07

7.1. Do the EHL Sites use the visibility and recognition of the label as a leverage to organise cultural activities and engage with cultural professionals?
7.2. If this is not the case, what are the reasons?

Operational question	Assessment parameters	Methods and sources
7.1. Do the EHL Sites use the visibility and recognition of the label as a leverage to organise cultural activities and engage with cultural professionals?	Number and type of cultural activities at label-awarded sites Number and type of cultural professionals working / collaborating with label-awarded sites	Survey Interview programme Desk research

7.2. If this is not the case, what are the reasons?	Type of reasons and their magnitude	Survey Interview programme Desk research
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CRITERION 2: EFFICIENCY

Under the group of evaluation questions covered by the efficiency criteria we include the questions on the extent to which the desired effects of the EHL are achieved at a reasonable cost or as the optimal balance between the resources employed and the results achieved. The concept of efficiency also concerns the adequacy of the management arrangements for the implementation of an action (governance set-up, human and financial resources, processes and procedures, tools, etc.), and the potential for simplifications of the processes.

Box 2. Definition of efficiency

Efficiency considers the resources used by an intervention for the given changes generated by the intervention (which may be positive or negative). As the way an intervention is approached and conducted can have a significant influence on its effects, efficiency analysis should

look closely at the costs of the EU intervention and identify what factors are driving these costs and how these factors relate to the EU intervention. The purpose of the assessment of efficiency is to show that resources are used to their best and therefore that the costs generated are strictly necessary to reach the policy objectives. If this is not the case, the potential for simplification is to be highlighted in this analysis. The efficiency analysis should also compare the identified costs with the benefits that were identified under the effectiveness criterion.

Source: Better Regulation Toolbox, pp. 404-405.

During the evaluation, we ensure the best use of internal monitoring data collected by the Contracting Authority and the National Coordinators and triangulate it with the results of stakeholder consultations. Additionally, the in-depth case studies are of the key importance to mapping potential differences across the Member States participating in the action.

EQ08

8.1. To what extent is the selection procedure considered fair and transparent by the sites?

8.2. Do the Sites understand the selection criteria?

Operational question	Assessment parameters	Methods and sources
8.1. To what extent is the selection procedure considered fair and transparent by the sites?	Extent to which the selection procedures were seen as transparent by the awarded sites Number and type of issues reported	Survey Interview programme

		Desk research
8.2. Do the sites understand the selection criteria?	<p>Extent to which the selection procedures were seen as clear to awarded sites</p> <p>Extent to which information on the selection procedures was easy to find</p> <p>Number and type of issues reported</p>	<p>Survey</p> <p>Interview programme</p> <p>Desk research</p>

EQ09

- 9.1. How timely and efficient is the selection process (timing, guiding documents and reports) to prepare the EHL Award Ceremony?**
- 9.2. Is the entire length of the selection procedure (3 years) relevant?**

Operational question	Assessment parameters	Methods and sources
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9.1. How timely and efficient is the selection process (timing, guiding documents and reports) to prepare the EHL Award Ceremony?	<p>Share of selection procedures completed on time</p> <p>If delays occurred, reasons and their magnitude</p> <p>Share of label-awarded sites that acknowledge the helpfulness of the guiding documents</p> <p>Feedback from the Commission on the quality and usefulness of the selection reports</p> <p>Any issues reported, their type and magnitude</p>	<p>Survey</p> <p>Interview</p> <p>programme</p> <p>Desk research</p>
9.2. Is the entire length of the selection procedure (3 years) relevant?	<p>Scope identification to streamline selection procedures</p> <p>Scope identification to expedite selection procedures</p> <p>Feedback from all concerned Stakeholders on the relevance of the entire length of the selection procedure</p>	<p>Survey</p> <p>Interview</p> <p>programme</p> <p>Desk research</p>

EQ10

10.1. Are there significant differences between years/Member States in terms of applications? 10.2.

If so, what is causing them? Have any inefficiencies been identified? 10.3. To what extent is the selection procedure sustainable over time, in particular in smaller Member States?

Operational question	Assessment parameters	Methods and sources
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10.1. Are there significant differences between years/Member States in terms of applications?	<p>Number, type and magnitude of differences between years in terms of the quantity and quality of the applications</p> <p>Number, type and magnitude of differences between the Member States in terms of the quantity and quality of the applications</p>	<p>Desk research</p> <p>Country-level case studies</p> <p>Interview programme</p>
10.2. If so, what is causing them? Have any inefficiencies been identified?	<p>Number, type and magnitude of differences between years in terms of the quantity and quality of the applications</p> <p>Number, type and magnitude of differences between the Member States in terms of the quantity and quality of the applications</p>	<p>Survey</p> <p>Interview programme</p> <p>Desk research</p> <p>Case studies</p>
10.3. To what extent is the selection procedure sustainable over time, in particular in smaller Member States?	<p>Availability of administrative resources and capacity in participating Member States (number of dedicated staff, financial resources, training and support required)</p> <p>Extent to which participation costs are seen as balanced with participation benefits</p>	<p>Survey</p> <p>Interview programme</p> <p>Desk research</p> <p>Country-level case studies</p>

EQ11

- 11.1. To what extent has the European panel been efficient and delivered a quality output during the selection procedure? 11.2. For example, has the European panel sufficiently assessed the applications against the EHL criteria and objectives?
- 11.3. Has the European panel taken other elements into account?
- 11.4. On the quality of the European panel selection reports: are they clear and precise enough?
- 11.5. Are they useful for the sites concerned, notably the parts for non-selected sites?

Operational question	Assessment parameters	Methods and sources
11.1. To what extent has the European panel been efficient and delivered a quality output during the selection procedure?	Extent of timeliness and effectiveness of their actions and processes during the selection procedure (resource utilisation, and adherence to established timelines) Level of accuracy, completeness, and relevance of the information provided, meeting the objectives of the selection activities	Survey Desk research Focus group on the governance of the action Horizontal case study on the governance of the action

11.2. For example, has the European panel sufficiently assessed the applications against the EHL criteria and objectives?	Degree of alignment between the assessment outcomes and the EHL criteria and objectives. Number, scope and magnitude of issues identified	Survey Desk research Interview programme Focus group on the governance of the action Horizontal case study on the governance of the action
11.3. Has the European panel taken other elements into account?	Evidence, number and scope of the country-level or site-level specificities of the sites that the European panel has taken into account	Survey Interview programme Desk research Focus group Case study

11.4. On the quality of the European panel selection reports: are they clear and precise enough?	Level of effectiveness of communication and coherence in presenting information Feedback from relevant stakeholders on clarity of the reports	Survey Interview programme Desk research Focus group Case study
11.5. Are they useful for the sites concerned, notably the parts for non-selected sites?	Quality and depth of feedback provided to applicants. Evidence of instances when non-selected sites were able to use the feedback to apply again	Survey of applicant sites Interview programme

EQ12

12.1. To what extent has the European panel been efficient and delivered a quality output during the monitoring exercises?

12.2. Does it deliver relevant support and guidance to the label- holding sites?

12.3. To what extent does the European panel check that the criteria are fulfilled?

12.4. Are there other elements the European panel has taken into account?

12.5. On the quality of European panel monitoring reports: are they clear and consistent enough?

Operational question	Assessment parameters	Methods and sources
12.1. To what extent has the European panel been efficient and delivered a quality output during the monitoring exercises?	Adherence to scheduled timelines for monitoring exercises. Comprehensiveness, consistency and objectivity in the monitoring process across different sites. Quality and clarity of the reports generated from the monitoring exercises.	Desk research Country-level case studies Horizontal case study on the governance of the action
12.2. Does it deliver relevant support and guidance to the label- holding sites?	Satisfaction of label-holding sites with the support and guidance received	Survey Interview programme

	Effectiveness of follow-up actions and improvements based on monitoring findings.	
12.3. To what extent does the European panel check that the criteria are fulfilled?	The extent to which the panel provides detailed documentation and justification for its decisions. Evidence and number of unfulfilled criteria	Desk research Horizontal case study on the Governance of the Action
12.4. Are there other elements the European panel has taken into account?	Evidence, number and scope of the country-level or site-level specificities of the sites that the European panel has taken into account	Survey Interview programme Desk research
12.5. On the quality of European panel monitoring reports: are they clear and consistent enough?	Comprehensiveness, consistency and objectivity in the monitoring process across different sites. Quality and clarity of the reports generated from the monitoring exercises.	Survey Interview programme Desk research

EQ13

- 13.1. To what extent has the Commission been efficient in facilitating and supporting the selection process?**
- 13.2. To what extent does the Commission set up and update regularly the EHL website?**
- 13.3. To what extent are documents prepared by the Commission to inform the bidding sites about the selection process and explain and illustrate the objectives and criteria helpful?**
- 13.4. To what extent are documents produced by the Commission to guide the title-holding in the preparation of the EHL event helpful?**
- 13.5. To what extent are the documents and actions prepared by the Commission to guide the Ministries in the management of the competition helpful?**
- 13.6. To what extent does the Commission foster the exchange of good practices?**
- 13.7. Which initiatives has it taken to that purpose?**
- 13.8. How could the Commission go further to support the applicants to the EHL?**

Operational question	Assessment parameters	Methods and sources
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13.1. To what extent has the Commission been efficient in facilitating and supporting the selection process?	Extent of timeliness and effectiveness of their actions and processes during monitoring exercises (resource utilisation, and adherence to established timelines)	Survey Interview programme
13.2. To what extent does the Commission set up and update regularly the EHL website?	Number and frequency of website updates	Interview programme Desk research
13.3. To what extent are documents (e.g. guidelines / forms) prepared by the Commission to inform the bidding sites about the selection process and explain and illustrate the objectives and criteria helpful?	Clarity and comprehensiveness of these documents in explaining and illustrating the objectives and criteria Extent of the label-awarded sites' satisfaction with the clarity and comprehensiveness of the documents	Survey Interview programme
13.4. To what extent are documents produced by the Commission to guide the title-holding in the preparation of the EHL event helpful?	Extent to which the title-holding sites found the event helpful Extent of applicability of the guidance to the title-holders' needs.	Survey Interview programme
13.5. To what extent are the documents and actions prepared by the	Extent to which by title-holding sites on the helpfulness of the documents	Survey

Commission to guide the Ministries in the management of the competition helpful?	Extent of applicability of the guidance to the title-holders' needs.	Interview programme
13.6. To what extent does the Commission foster the exchange of good practices?	Evidence of good practices fostered as a result of the Commission's initiative in the action Feedback from the label-awarded sites and the National Coordinators on the good practices fostered as a result of the Commission's initiative in the action	Survey Interview programme
13.7. Which initiatives has it taken to that purpose?	Number and types of initiatives taken as a result of the Commission's actions to foster the exchange of good practices	Survey Interview programme Desk research
13.8. How could the Commission go further to support the applicants to the EHL?	Quality and comprehensiveness of the guidance materials provided to applicants. Availability and effectiveness of support services.	Survey Interview programme Desk research

CRITERION 3: RELEVANCE

The evaluation of relevance examines the alignment between the needs and problems faced by various stakeholders and the objectives of the action, focusing on its design aspects. The assessment of relevance is crucial because if the intervention does not address current needs or problems, its appropriateness may be questioned, regardless of its effectiveness, efficiency, coherence, or EU added value. The evaluation of the relevance of the EHL action aims to determine whether the original objectives and the design of the action remain relevant, how well they align with current needs and issues, and whether they reflect broader EU priorities. It also delves into the action's design, assessing how its processes and structure still meet the intended objectives and considering possible improvements. Key sources of evidence for this criterion include desk research and the results of targeted consultations.

Box 3. Definition of Relevance Relevance examines the relationship between the needs and problems at the time the intervention was introduced and throughout its implementation. It also considers the relationship between current and future needs and problems within the EU and the intervention's objectives. Relevance analysis requires evaluating how the objectives of an EU intervention (whether legislative or a spending measure) correspond to broader EU policy goals and priorities. The analysis should identify any mismatch between the intervention's objectives and both current and foreseeable future needs or problems.

Source: Better Regulation Toolbox, p. 407.

EQ14

- 14.1. To what extent did the scope and objectives of the action remain relevant over time?
- 14.2. How did the objectives correspond to wider EU policy goals and priorities such as the Greening Strategy of the Creative Europe programme and the transversal Digital and Inclusion priorities?
- 14.3. To what extent do the needs/problems addressed by the intervention continue to require action at EU level? 14.4. Has there been adaptability to unexpected developments?
- 14.5. How relevant is the intervention to national, regional and local heritage needs?

Operational question	Assessment parameters	Methods and sources
14.1. To what extent did the scope and objectives of the action remain relevant over time?	Degree of alignment between the EHL objectives and current (national, local, regional) heritage needs and trends.	Survey Interview programme Country-level Case studies

14.2. How did the objectives correspond to wider EU policy goals and priorities such as the Greening Strategy of the Creative Europe programme and the transversal Digital and Inclusion priorities?	Alignment of EHL objectives with the Horizontal priorities of the Commission	Survey Interview programme Focus group on alignment with horizontal priorities of the Commission Horizontal case study on alignment with horizontal priorities of the Commission
14.3. To what extent do the needs/problems addressed by the intervention continue to require action at EU level?	Feedback from all concerned stakeholders of the action Feedback from experts in the field of culture and European heritage	Surveys Interview Programme

14.4. Has there been adaptability to unexpected developments?	Implementation of emergency measures or revised guidelines in response to crises. Support provided to EHL sites for crisis management and recovery. Feedback from EHL sites on the adequacy and timeliness of the response.	Survey Interview programme Desk research
14.5. How relevant is the intervention to national, regional and local heritage needs?	Degree of alignment between the EHL objectives and current (national, local, regional) heritage needs and trends.	Survey Interview programme Desk research Case studies

EQ15

15.1. To what extent do the objectives and criteria of the action promote gender equality as well as inclusion of all, in particular people with disabilities, people belonging to minorities and people being socially marginalised?

Operational question	Assessment parameters	Methods and sources
15.1. To what extent do the objectives and criteria of the action promote gender equality as well as inclusion of all, in particular people with disabilities, people belonging to minorities and people being socially marginalised?	<p>Presence of specific objectives promoting gender equality and inclusion of all in EHL documentation, including site-level action plans.</p> <p>Physical accessibility of awarded sites.</p> <p>Inclusivity and accessibility of educational and outreach programmes at awarded sites.</p> <p>Monitoring and evaluation of inclusivity and equality measures.</p>	<p>Survey</p> <p>Interview</p> <p>programme</p> <p>Desk research</p> <p>Focus group</p> <p>Case study</p> <p>Visitor engagement exercise</p>

EQ16

16.1. Have the selection and pre-selection national quotas to select the EHL affected (positively or negatively) the implementation of the EHL objectives? 16.2. What are potential consequences of making these quotas a criterion?

Operational question	Assessment parameters	Methods and sources

16.1. Have the selection and pre-selection national quotas to select the EHL affected (positively or negatively) the implementation of the EHL objectives?	Level of influence of national quotas on member states' commitment and participation in the EHL process. The impact of national quotas on the diversity and representation of heritage sites.	Survey Interview programme
16.2. What are potential consequences of making these quotas a criterion?	Level of influence of national quotas on member states' commitment and participation in the EHL process. The impact of national quotas on the diversity and representation of heritage sites. Type and magnitude of potential consequences of making these quotas a criterion	Survey Interview programme Delphi survey of experts

EQ17

17.1. Are the selection criteria laid down in the 2011 Decision relevant to the objectives of the EHL action?

17.2. To what extent are the criteria requested in the Decision for appointing European panel members relevant to carry out the selection and monitoring procedures?

Operational question	Assessment parameters	Methods and sources
17.1. Are the selection criteria laid down in the 2011 Decision relevant to the objectives of the EHL action?	<p>Level of effectiveness of the criteria in contributing to the achieving of the overarching goals and intended outcomes of the EHL action</p> <p>Feedback from the Commission, the National Authorities and label-awarded sites on the relevance of the criteria laid down in the 2011 Decision on the relevance of the EHL action</p>	<p>Survey</p> <p>Interview programme</p> <p>Focus group</p>
17.2. To what extent are the criteria requested in the Decision for appointing European panel members relevant to carry out the selection and monitoring procedures?	<p>Extent to which the criteria specified in the Decision for appointing European panel members remain pertinent and align with the requirements for effectively conducting selection and monitoring procedures</p> <p>Extent to which these criteria contribute to the successful execution of the panel's responsibilities in both selection and monitoring processes</p>	<p>Survey</p> <p>Interview programme</p> <p>Desk research</p> <p>Horizontal case study on the governance of the action</p>

EQ18

18.1. To what extent is the EHL brand visible?

- 18.2. Do EHL sites use the title in a relevant way (after their selection)?
- 18.3. Which actions do the designated sites implement to make clear that the event is an EU initiative?
- 18.4. Do people understand that it is an EU initiative?

Operational question	Assessment parameters	Methods and sources
18.1. To what extent is the EHL brand visible?	<p>Number of communication campaigns launched by the sites to ensure the visibility of the brand</p> <p>Number and types of outreach strategies the sites use to ensure the visibility of the brand</p> <p>Effectiveness of the EHL's online presence and digital outreach efforts.</p>	<p>Survey</p> <p>Interview</p> <p>programme</p> <p>Country-level case studies</p>
18.2. Do EHL sites use the title in a relevant way (after their selection)?	The level to which the sites promote their cultural heritage in a manner consistent with the objectives of the EHL initiative	Desk research
18.3. Which actions do the designated sites implement to make clear that the event is an EU initiative?	Types and scope of actions implemented by the sites to make clear that the event is an EU initiative	<p>Survey</p> <p>Interview</p> <p>programme</p>

		Case studies
18.4. Do people understand that it is an EU initiative?	Extent to which the visitors of the sites agree that they understand that the event is an EU initiative	Case studies Visitor engagement experiment

EQ19 **19.1. To what extent does the relevance of the action vary across Member States? 19.2. With a number of Member States less active in this initiative, how does this affect the EHL brand?**

Operational question	Assessment parameters	Methods and sources
19.1. To what extent does the relevance of the action vary across Member States?	Extent of variation of action's relevance among the different Member States, based on their participation rate and feedback The degree to which the action's significance and impact differ based on the specific characteristics and needs of individual Member States	Survey Interview programme Desk research Country-level case studies

19.2. With a number of Member States less active in this initiative, how does this affect the EHL brand?	Feedback from all relevant stakeholders, including experts in the field of culture and European Heritage	Survey Interview programme
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EQ20

20.1. Would the opening of the EHL action to sites in EFTA/EEA countries, candidate countries and potential candidates been relevant?

Operational question	Assessment parameters	Methods and sources
20.1. Would the opening of the EHL action to sites in EFTA/EEA countries, candidate countries and potential candidates be relevant?	<p>Extent to which the opening of the EHL action to sites in EFTA/EEA countries would be in line with the objectives of the action</p> <p>Feedback from all relevant stakeholders, including experts in the field of culture and European Heritage</p> <p>Extent, scope and magnitude of potential risks, associated with the opening of the EHL action to sites in EFTA/EEA countries</p>	<p>Survey</p> <p>Interview</p> <p>programme</p> <p>Delphi survey of experts</p>

- EQ21** **21.1. To what extent the sites selected to the label have fostered their cross regional activities and identity?**
21.2. Are they promoting cross border, regional and macro-regional cooperations?

Operational question	Assessment parameters	Methods and sources
21.1. To what extent the sites selected to the label have fostered their cross regional activities and identity?	Evidence of demonstrated efforts by the sites to have fostered their cross regional activities and identity Number and types of activities undertaken by the sites to foster cross regional activities and identity	Survey Interview programme Desk research Case studies
21.2. Are they promoting cross border, regional and macro-regional cooperations?	Evidence of demonstrated efforts by the sites to promote cross border, regional and macro-regional cooperations Number and types of activities undertaken by the sites to promote cross border, regional and macro-regional cooperations	Survey Interview programme Desk research Case studies

CRITERION 4: COHERENCE

The assessment of coherence seeks evidence of synergies or inconsistencies within the different elements of the EHL action, or between various EU, national, and international interventions with similar objectives.

Box 4. Definition of Coherence

The evaluation of coherence examines how well different interventions, EU/international policies, or national/regional/local policy elements work together. It may reveal synergies that enhance overall performance or identify tensions, such as potentially contradictory or overlapping objectives, or approaches causing inefficiencies. Internal coherence looks at how various components of the same EU intervention work together to achieve its objectives, while external coherence assesses how interventions beyond the object of analysis align (e.g., different EU interventions within the same policy field).

Source: Better Regulation Toolbox, p. 408.

In the context of the EHL action, evaluating internal coherence involves examining how different aspects of the intervention align to meet the objectives outlined in its legal base. External coherence, on the other hand, focuses on how the EHL aligns with other interventions at regional, national, and EU levels that have similar goals. The analysis of this criterion looks at overlaps and complementarities in terms of objectives, target groups, intervention areas, and expected impacts. It also considers how well the action aligns with the objectives of the label-awarded sites. As with other evaluation criteria, the coherence assessment of the EHL relies on triangulating various sources of data and methods of analysis. Key information sources include desk research, targeted consultations, and case studies.

EQ22

22.1. To what extent is this intervention coherent with other EU, national and international interventions that have similar objectives?

22.2. To what extent are the various elements of intervention coherent with one another?

22.3. To what extent is the intervention coherent with (current) wider EU policies and priorities (e.g., Commission policy priorities and other actions of the Creative Europe programme)?

Operational question	Assessment parameters	Methods and sources
22.1. To what extent is this intervention coherent with other EU, national and international interventions that have similar objectives?	Extent to which the intervention shares similar objectives with other initiatives at EU, national, and international levels Level of consistency between the goals, strategies, and outcomes of the intervention in comparison to related initiatives at different levels	Interview programme Desk research
22.2. To what extent are the various elements of intervention coherent with one another?	Evidence of cases of incoherence between the various elements of the intervention. If identified: Number, type, magnitude of incoherences between the different elements Reasons behind the incoherences	Survey Interview programme Desk research Focus group

22.3. To what extent is the intervention coherent with (current) wider EU policies and priorities (e.g., Commission policy priorities and other actions of the Creative Europe programme)?	<p>Extent to which the intervention shares similar objectives with wider EU policies and priorities</p> <p>Level of consistency between the goals, strategies, and outcomes of the intervention in comparison to other actions, in particular that of the Creative Europe programme</p>	<p>Interview programme</p> <p>Desk research</p> <p>Focus group</p> <p>Case study</p>
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EQ23

- 23.1. To what extent are the objectives of the label-holding sites supporting the objectives of the action (as specified in the 2011 Decision)?**
- 23.2. To what extent is the action supporting the sites' own objectives?**
- 23.3. Which balance do sites strike between the EU objectives and their local socio-economic objectives?**
- 23.4. Does this balance change after designation?**

Operational question	Assessment parameters	Methods and sources
23.1. To what extent are the objectives of the label-holding sites supporting the	Extent to which the objectives of the label-holding sites are in line with objectives of the action	<p>Survey</p> <p>Desk research</p>

objectives of the action (as specified in the 2011 Decision)?	Number, type and share of site-level objectives outside of the objectives of the action Number, type and magnitude of incompatibilities identified	Interview programme Case studies
23.2. To what extent is the action supporting the sites' own objectives?	Degree of alignment between EHL objectives and the individual objectives of the heritage sites.	Survey Desk research Interview programme Case studies
23.3. Which balance do sites strike between the EU objectives and their local socio-economic objectives?	Degree of alignment between EU objectives and local objectives Identification of potential conflicts between local and EU objectives, their number and scope	Survey Interview programme Desk research Country-level case studies
23.4. Does this balance change after designation?	Evidence of change of balance Extent to which the balance changes after designation	Survey Interview programme

		Country level case studies
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CRITERION 5: EU ADDED VALUE

The evaluation of EU added value focuses on the Union-wide impacts produced by the EHL and the extent to which these impacts were achieved due to the EU-scale of the action, as opposed to what could have been accomplished through national cooperation among Member States. This assessment integrates findings from other evaluation criteria, presenting arguments on causality and drawing conclusions about the action's performance. In this context, EU added value may result from factors such as coordination gains, increased effectiveness, or complementarity. To assess the EU-added value of the EHL, a triangulation of various sources of evidence is used.

Box 5. Definition of EU Added Value

EU added value refers to changes brought about by EU intervention that exceed what could have reasonably been expected from national actions by Member States. According to the principle of subsidiarity (Article 5 of the Treaty on European Union), and in areas of non-exclusive competence, the EU should act only when objectives can be better achieved through union action rather than national action. The assessment of EU added value involves comparing the performance of the EU action against a projection of how the situation would have evolved without EU intervention (sometimes referred to as the "cost of non-Europe").

Source: Better Regulation Toolbox, pp. 409-410.

EQ24

24.1. What is the EU added value and visibility of the EHL action?

24.2. Does being an EHL site facilitate access to other private and public funding opportunities, in particular EU programmes/funds, such as other actions of the Creative Europe programme (for example cooperation projects under the Culture strand) but also ERASMUS+, CERV, EU cohesion policy funds (ESF+, ERDF), and research and innovation EU financial Instrument?

Operational question	Assessment parameters	Methods and sources
24.1. What is the EU added value and visibility of the EHL action?	Feedback from stakeholders on the extent to which the EHL being a EU action enhances the opportunities for visibility	Survey
24.2. Does being an EHL site facilitate access to other private and public funding opportunities, in particular EU programmes/funds, such as other actions of the Creative Europe programme (for example cooperation projects under the Culture strand) but	Evidence of cases when being a label-awarded site enhanced the sites' opportunities to make use of other EU programmes (including Creative Europe, Cohesion Policy funds, research and innovation EU financial Instrument) and funds in terms of: Increased awareness about other opportunities Increased knowledge about EU priorities	Survey Interview programme Desk research

also ERASMUS+, CERV, EU cohesion policy funds (ESF+, ERDF), and research and innovation EU financial Instrument?	Increased skills to apply for other funds Increased capacity to make use of other opportunities	
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EQ25 **25.1. What would be possible consequences if the action were not organised or funded at EU level?**

Operational question	Assessment parameters	Methods and sources
25.1. What would be possible consequences if the action were not organised or funded at EU level?	<p>Extent to which other European, national or international schemes and programmes provide a combination of opportunities similar to EHL</p> <p>Share of label-awarded sites indicating no other regional/national or international action could meet their needs</p> <p>Hypothetical examples of alternative actions that could lead to results comparable to those of EHL</p>	<p>Survey</p> <p>Interview programme</p> <p>Desk research</p> <p>Focus group</p>

EQ26

26.1. To what extent does the selection procedure foster the European dimension of the EHL? 26.2.

Where relevant, are there differences between Member States involved?

Operational question	Assessment parameters	Methods and sources
26.1. To what extent does the selection procedure foster the European dimension of the EHL?	Share of label-awarded sites indicating that the selection procedure incentivised them to highlight: The symbolic European value of the site European dimension of the site	Survey
26.2. Where relevant, are there differences between Member States involved?	The degree to which the action's significance and impact differ based on the specific characteristics and needs of individual Member States	Survey Interview programme Case studies

1. Presentation

The synopsis report summarises the results of all stakeholder consultation activities conducted during the evaluation of the European Heritage Label (EHL) Action for the period 2018-2024. It provides both qualitative and quantitative insights into the main findings, offering an analytical overview of the consultations undertaken. The objective is to present the key outcomes and conclusions derived from stakeholder engagement, which played a crucial role in the evaluation process.

The consultation activities encompassed three primary methods: a targeted survey programme, an interview programme, and a series of focus groups. These activities were designed in alignment with the European Commission's Better Regulation Guidelines and Toolbox, ensuring a broad, high-quality, and transparent approach to consultation. The findings from these activities contribute to evidence-based policymaking by reflecting stakeholder perspectives and levels of agreement across different groups.

The report also outlines the consultation strategy, details the implementation of each consultation activity, and summarises key results. The study team ensured that data gathered through stakeholder engagement was triangulated with other sources, including desk research, case studies, and monitoring data, to provide a comprehensive and balanced evaluation.

2. Background

Stakeholder consultations serve as a fundamental tool in EU policymaking, fostering engagement with citizens, civil society, and interest groups. This participatory approach helps shape decisions while ensuring coherence and transparency in EU initiatives. In line with the Better Regulation Guidelines, consultations are an integral part of evaluations, ensuring that diverse perspectives are taken into account at every stage of the policy cycle.

The evaluation of the EHL Action followed a structured consultation strategy, involving different phases to systematically collect and analyse stakeholder input. The process was designed to be inclusive and methodologically sound, ensuring that the perspectives of key

stakeholders, including site coordinators, national coordinators, EU Panel members, and representatives from international organisations, were captured effectively.

Consultations were carried out through various channels, each contributing uniquely to the overall assessment. Surveys provided quantifiable evidence on the efficiency and effectiveness of the EHL, offering broad participation across awarded and applicant sites. Interviews complemented these findings by exploring relevance and coherence, allowing for more detailed discussions with experts, policymakers, and practitioners. Focus groups, meanwhile, facilitated in-depth exchanges on specific thematic issues, such as governance structures, cross-border cooperation, and site management. This multi-pronged approach ensured a well-rounded and thorough evaluation.

The stakeholder consultation programme was carefully structured to maximise engagement and data quality. Targeted surveys ran between 26 September and 20 October 2024, ensuring broad participation from national coordinators and site representatives. The interview phase, conducted from August to December 2024, provided deeper qualitative insights from key stakeholders, while focus groups, held between July and November 2024, brought together diverse participants to discuss critical aspects of the EHL's implementation.

3. Consultation Activities

The consultation programme was structured around three main activities: the targeted survey programme, the interview programme, and the focus groups. These complementary methods ensured a comprehensive collection of stakeholder input, supporting the evaluation's objectives of assessing the relevance, efficiency, effectiveness, coherence, and EU-added value of the EHL.

The targeted survey programme gathered data from key stakeholders, including coordinators of awarded and applicant sites as well as national coordinators. Running from late September to mid-October 2024, the survey aimed to capture insights into the application, implementation, and monitoring phases of the EHL. Robust participation across 19 out of 26 participating countries ensured a wide-ranging dataset that provided valuable perspectives on site-level experiences and national coordination efforts.

The interview programme, conducted between August and December 2024, engaged a broad spectrum of stakeholders. It included coordinators from both awarded and applicant sites, national representatives, EU Panel members, and experts from international organisations and NGOs. These structured discussions explored governance processes, site selection, and long-term impact, offering qualitative insights that complemented survey findings. Interviews also helped clarify specific challenges and opportunities faced by different stakeholders, contributing to the overall evaluation framework.

Focus groups were held between July and November 2024 to facilitate in-depth discussions on key thematic areas. Three sessions addressed critical aspects of the EHL's implementation: intervention logic, governance structures, and cross-border cooperation. The intervention logic focus group, held in July, engaged DG EAC representatives in refining the evaluation framework. The governance session in November gathered 14 participants, including EU Panel members and national coordinators, to discuss the efficiency and transparency of selection and monitoring processes. A separate session on cross-border cooperation explored the benefits and challenges of transnational site management, providing insights into how the EHL fosters networking and knowledge exchange across Europe.

Taken together, these consultation activities ensured a balanced and inclusive evaluation process. The diverse stakeholder engagement, combined with a rigorous methodology, allowed for a well-rounded assessment of the EHL Action's achievements, challenges, and areas for improvement. The results of these consultations will inform future policy decisions and contribute to the ongoing development of the EHL as an instrument for promoting Europe's cultural heritage.

4- Key results and findings of the stakeholders' consultations

4.1 Summary of the Targeted Survey Programme Results

The study team conducted two surveys targeting site coordinators (both rejected and awarded sites) and national coordinators. The surveys were designed using insights from prior data collection and feedback from the contracting authority to ensure alignment with the evaluation's objectives.

- Launched in September 2024 and closing in mid-October 2024, the surveys received responses from 50 awarded sites, 7 rejected sites, and 22 national coordinators across 19 participating countries. The study team actively engaged with stakeholders to maximise response rates, ensuring a broad geographic representation
- Data analysis incorporated both quantitative and qualitative methods, using MS Excel and R for statistical insights. The survey findings contributed to answering evaluation questions and informing horizontal and country-specific case studies.

Key Findings

- **Effectiveness:** The survey indicated that participation in the European Heritage Label (EHL) initiative significantly improved sites' ability to promote European values, history, and culture. This was acknowledged by 76% of awarded sites and 67% of national coordinators. Additionally, 71% of sites and 76% of national coordinators reported the formation of new international partnerships as a major benefit. However, fewer respondents observed increased youth engagement. Challenges included limited public awareness, insufficient collaboration, and a lack of EU-level promotion. Sites also struggled with human resource constraints and financial limitations, exacerbated by the COVID-19 crisis.
- **Efficiency:** While the application process was considered demanding, most sites (71%) viewed the effort as justified given the label's benefits. Selection procedures at national and EU levels were perceived as transparent, though rejected sites found EU-level feedback insufficiently useful. National coordinators were positively regarded for their support in guiding applicants. European panel reports were generally helpful in refining work plans, but only 36% of national coordinators believed they provided useful feedback for rejected sites. Respondents suggested clearer guidance, simplified application forms, and additional workshops to enhance the selection process.
- **Coherence:** The EHL was seen as unique in fostering networking among sites and enhancing their European dimension. While some overlap with other initiatives, such as UNESCO World Heritage and European Cultural Routes, was noted, these were generally viewed as complementary rather than duplicative.

Respondents recommended strengthening synergies between initiatives to maximise impact.

- **EU Added Value:** One-third of surveyed sites (33%) had accessed EU funding opportunities, mainly through Creative Europe actions. While 64% of sites reported increased awareness of EU funding, only 48% felt better equipped to apply for it.
- **Relevance:** The EHL's objectives were widely regarded as addressing societal challenges, particularly in increasing awareness of Europe's shared history and cultural heritage. Over 90% of respondents found the initiative relevant, though additional funding, increased visibility, and enhanced intercultural dialogue were suggested for further impact.

The survey results highlight the EHL's effectiveness in promoting European heritage and fostering collaboration, though challenges such as resource constraints, visibility issues, and limited youth engagement persist. Recommendations include refining the selection process, improving feedback mechanisms, and strengthening synergies with other heritage initiatives to enhance the label's long-term impact.

4.2 Summary of the Interview Programme Results

The interview programme adopted a structured approach, beginning with national-level stakeholders to assess engagement and key outcomes. Following this, EU-level and external stakeholders, including heritage experts and international organisations, were interviewed to refine findings and explore future directions. A total of 30 interviews were conducted across various stakeholder groups, contributing valuable insights to the evaluation.

Key Findings

- **Effectiveness:** The European Heritage Label (EHL) has successfully enhanced the visibility of heritage sites and encouraged collaboration across Europe. Many sites reported improved capacity to promote their cultural significance through joint initiatives and cross-border activities. Additionally, the EHL fostered internal collaboration, with sites engaging in structured planning, training, and coordination efforts. However, administrative and reporting requirements were seen as burdensome, particularly for smaller sites with limited resources. Some interviewees noted that a lack of direct financial support constrained the ability of sites to maximise the benefits of the label. While the EHL has been effective in promoting European identity and values, its recognition among the general public remains limited. Collaboration between sites was a key strength, though engagement varied, with smaller sites struggling to fully participate.

- **Efficiency:** National coordinators played a crucial role in guiding applicants and supporting implementation, though their effectiveness varied across Member States. Interviewees suggested that application guidelines, particularly concerning the 'European significance' criterion, should be clearer. The EHL Bureau received praise for its networking opportunities and training, though tight deadlines and feedback processes posed challenges for some sites. Monitoring and reporting requirements were considered essential but time-consuming. Many sites found the level of detail required challenging, particularly in terms of translation and formatting constraints. Suggestions included more comprehensive feedback on reports and rejected applications to improve future submissions.

- **Coherence:** The EHL was found to complement other heritage initiatives, particularly UNESCO programmes, by focusing on European values and narratives. However, some interviewees noted resource competition between different initiatives. Collaborations with programmes such as Discover EU and European Heritage Days were seen as beneficial, but stakeholders suggested establishing structured frameworks to maximise these opportunities, including joint events and targeted funding.

- **EU Added Value:** The EHL enhances the European dimension of heritage sites by aligning local initiatives with EU objectives, strengthening credibility in funding applications and collaborations. However, several sites faced challenges accessing

EU funding due to administrative complexities. The label facilitates networking and international collaboration, though some sites struggle to fully engage due to time and resource constraints.

- **Relevance:** The EHL's objectives remain highly relevant, with sites aligning activities to themes such as accessibility, intercultural dialogue, and education. Many have introduced multilingual resources, youth-focused initiatives, and improved accessibility. However, resource-limited sites struggle to fully implement the label's expectations. Awareness of the EHL remains low among both the public and the heritage sector. Stakeholders recommended targeted campaigns and partnerships to increase visibility, alongside clearer communication of the label's practical benefits. Increased financial and technical support could help sites fully realise the EHL's objectives.

4.3 Summary of the Focus Groups Results

Three focus groups were conducted to gather qualitative insights from stakeholders, facilitating discussions and knowledge exchange. These sessions contributed to evaluation questions, horizontal case studies, and refining the intervention logic.

1. **Intervention Logic (15 July 2024):** Reviewed and improved the EHL's framework, refining financial resource presentation and activity structuring.
2. **European Panel Functioning (5 November 2024):** Examined governance improvements for the EHL, informing the governance case study.
3. **Cross-Border Effects (7 November 2024):** Assessed networking activities, challenges, and benefits for transnational sites, contributing to the cross-border effects study.

Key Findings:

- **Effectiveness:** Participants acknowledged the EHL's strong networking component as a key strength, facilitating professional connections, best practice exchanges, and resource sharing. Collaborative projects like the **Comic Book project** were highlighted for their success in increasing visibility and engagement. Challenges were most prominent for smaller or resource-limited sites, which struggle to fully participate in networking and collaboration due to financial and human resource

constraints. Additionally, the diversity of EHL sites—spanning museums, libraries, and archaeological sites—makes it difficult to establish universally relevant goals.

To enhance effectiveness, participants suggested:

- A more structured approach to networking, with clear priorities and operational plans.
 - The formation of **smaller, focused working groups** to improve inclusivity and efficiency.
 - Expanded capacity-building initiatives, including immersive staff exchanges and EU funding training.
- **Efficiency:** The **EHL Bureau** was praised for effective coordination, particularly in organising networking activities and communication. Training sessions and working groups were valued for supporting collaborative efforts and EU funding access. However, smaller and under-resourced sites reported difficulties in fully engaging due to:
- **Tight deadlines** and heavy administrative burdens.
 - The **complexity of EU funding applications**, coupled with limited targeted support.

To improve efficiency, participants recommended:

- **Clearer operational plans** to prioritise networking goals and resource allocation.
 - **Smaller, thematic working groups** to address site-specific needs.
 - Streamlined administrative processes and **expanded training on EU funding applications** to reduce barriers.
- **Coherence:** The EHL was found to align well with broader **European cultural initiatives**, including **Creative Europe** and the **European Capitals of Culture**, by reinforcing shared values and fostering cultural dialogue. Participants saw great potential in further integrating EHL sites with these initiatives.

To strengthen coherence, participants suggested:

- Aligning EHL activities with **EU priorities** such as sustainability and digitalisation.

- Expanding **cross-sectoral collaborations** and partnerships with national cultural institutions.
- Improving **communication about the EHL's objectives and benefits**, particularly at the national level.

- **Relevance:** The focus groups confirmed the EHL's **ongoing relevance** in promoting **European values, intercultural dialogue, and shared heritage significance**. The label aligns with current cultural and social objectives, such as inclusivity, accessibility, and youth engagement. In today's geopolitical context, fostering a **European identity** was seen as particularly important.

To enhance relevance, participants recommended:

- Expanding **educational initiatives**, particularly targeting young audiences.
- Providing **clearer guidance** on articulating the European dimension in site activities.
- Offering **practical support** to help sites implement EHL objectives more effectively.