



# Evaluation of the European Heritage Label Action

Final Report

**PPMi**

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2018   
EUROPEAN YEAR  
OF CULTURAL  
HERITAGE  
#EuropeForCulture

Written by PPMi and EDUCULT  
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# **Evaluation of the European Heritage Label Action**

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## INTRODUCTION

This report presents findings of a study supporting the evaluation of the European Heritage Label Action. The evaluation was carried out as required by Article 18 of Decision 1194/2011/EU, which established the action.

The evaluation aimed to assess the implementation of the European Heritage Label action during the first six years of its existence (2011-2017), with a view to improving its implementation in the upcoming period. The evaluation has been executed in accordance with the principles of Better Regulation. As the action is still in its early stages of implementation, this interim evaluation assessed the impact of the action to a limited extent, and focused mainly on the operation of the action: which processes work well; which should be improved; and how this improvement might be best achieved. In addition, the evaluation sought to answer fundamental questions such as whether the action is sustainable, whether its geographical scope should be widened, and whether it should be continued.

The evaluation covers the period of 2011-2017, and focuses in particular on the period following the first selection of sites in 2013. In-depth analysis includes 29 sites that received the European Heritage Label before 2017, plus a number of sites that were not selected sites, spread across 16 Member States. In addition, some parts of the analysis include all 38 sites that have been designated with the Label to date, so as to provide a comprehensive picture of the action.

## 1. THE EUROPEAN HERITAGE LABEL ACTION

### 1.1. Origin of the European Heritage Label

The original concept of the European Heritage Label was first proposed in 2005 by the France's then-minister of Culture, Renaud Donnedieu de Vabres. The proposal formed part of a response to the growing gap between the European Union and its citizens – and in particular, young people. The initiative was officially launched in 2006 as an intergovernmental action under the leadership of France, Spain and Hungary<sup>1</sup>. Its aim was to identify and designate sites that have played a key role in building and uniting Europe, and to promote a reading of these sites that interpreted them in a European context, rather than purely national one.<sup>2</sup>

By the year 2010, the Label (shown in Figure 1) had been assigned to 68 sites across 18 EU Member States and Switzerland under these intergovernmental arrangements. The participating countries designated sites independently, based on their own judgement and interpretation of 'European-ness'.<sup>3</sup> According to a 2010 Impact Assessment, 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, and upon networking between the designated sites. Following a request from its participating Member States, the EHL was therefore 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".<sup>4</sup>

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<sup>1</sup> Support Services to Assist in the Preparation of the Impact Assessment and Ex-ante Evaluation of the European Heritage Label: Technical Annexes, p. A2.

<sup>2</sup> Declaration on the initiative for a European Heritage Label 2007.

<sup>3</sup> 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) Final 198, p. 2 [hereinafter, 'Impact Assessment'].

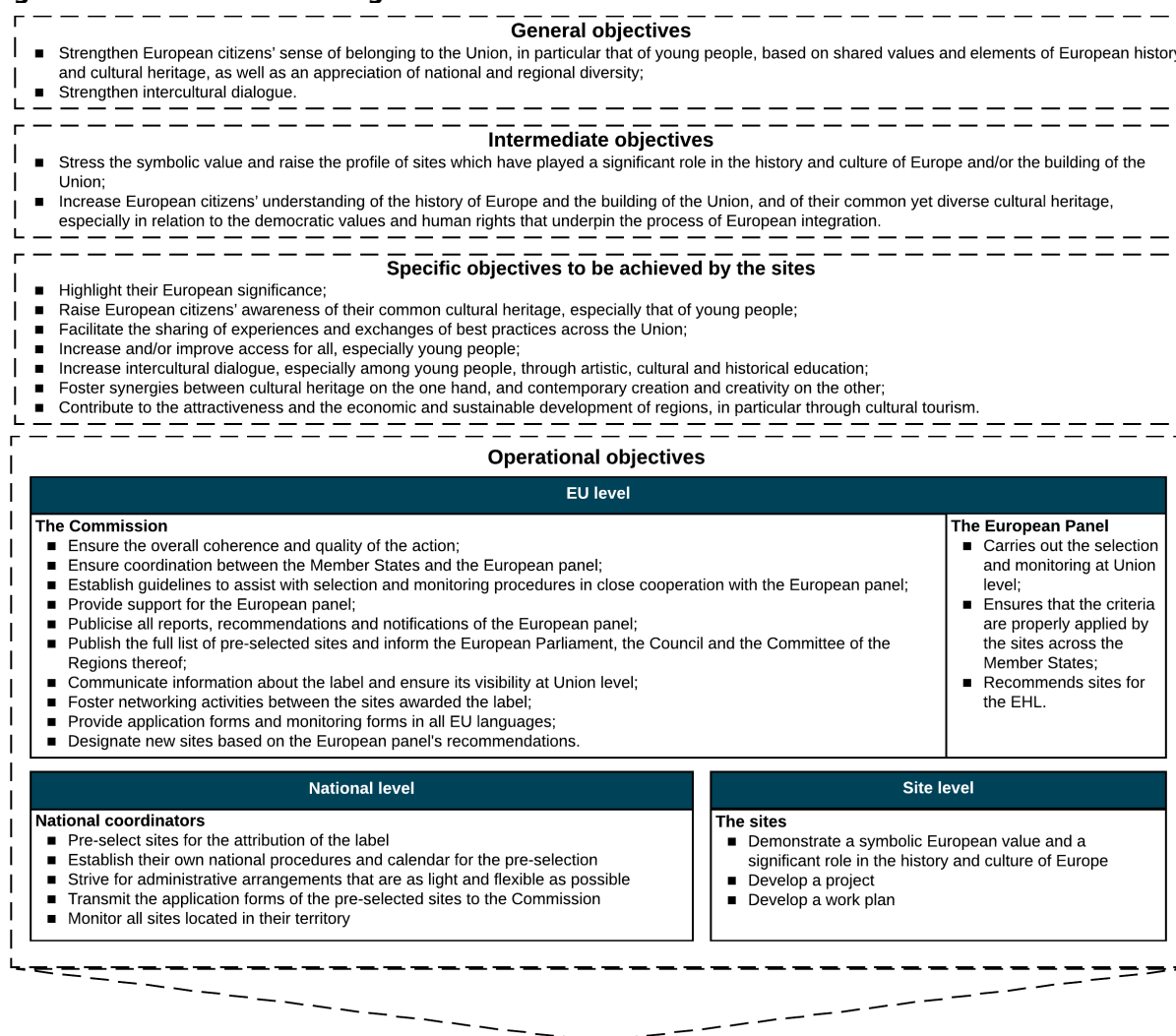
<sup>4</sup> Proposal for a Decision of the European Parliament and of the Council establishing a European Union action for the European Heritage Label, 9 March 2010, COM(2010) 76 Final, p. 3 [hereinafter referred to as the 'Proposal for the European Heritage Label'].

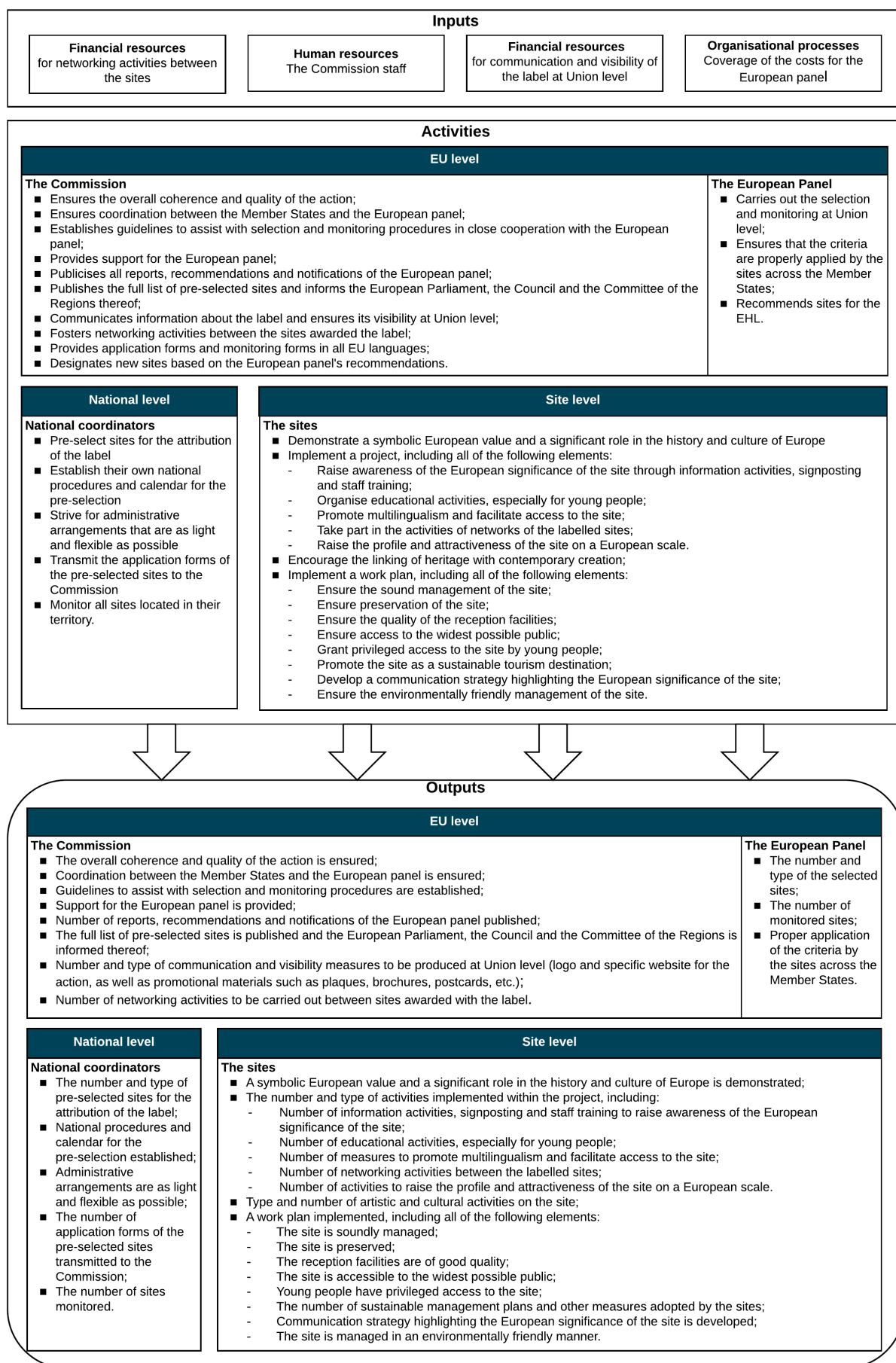


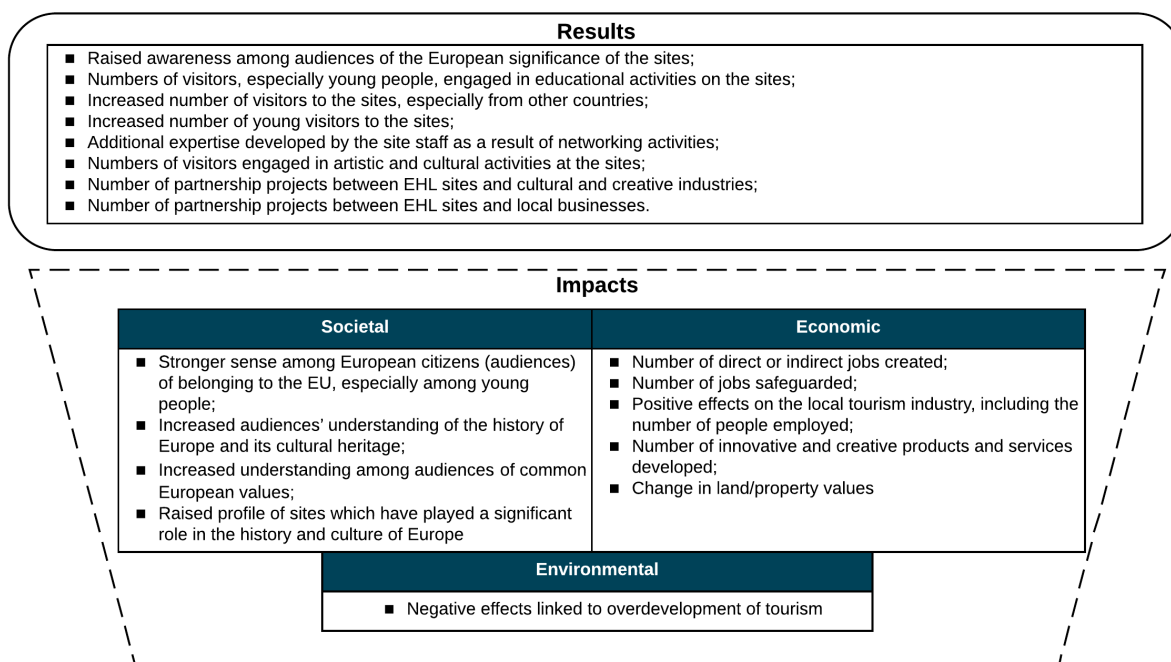
**Figure 1. The European Heritage Label logo before 2011**

## 1.2. Content and management of the European Heritage Label

The EU action for the European Heritage Label was established in 2011 by Decision 1194/2011/EU of the European Parliament and of the Council. The Decision's general objectives are to strengthen European citizens' sense of belonging to the Union, in particular that of young people, based on shared values and elements of European history and cultural heritage, as well as an appreciation of national and regional diversity; and to strengthen intercultural dialogue (see Figure 2).

**Figure 2. The intervention logic of the EHL action**





Source: PPMI consortium.

The European Heritage Label (see logo in Figure 3) is assigned to selected sites that have a symbolic European value, and have played a significant role in the history and culture of Europe and/or the building of the European Union. The sites must also offer specific activities that bring the European Union and its citizens closer together, and must possess adequate capacities to implement these activities. The action is open to the participation, on a voluntary basis, of all EU Member States. To date, 24 Member States have engaged in the action, contributing a total of 38 EHL sites.

**Figure 3. The European Heritage Label logo after 2011**

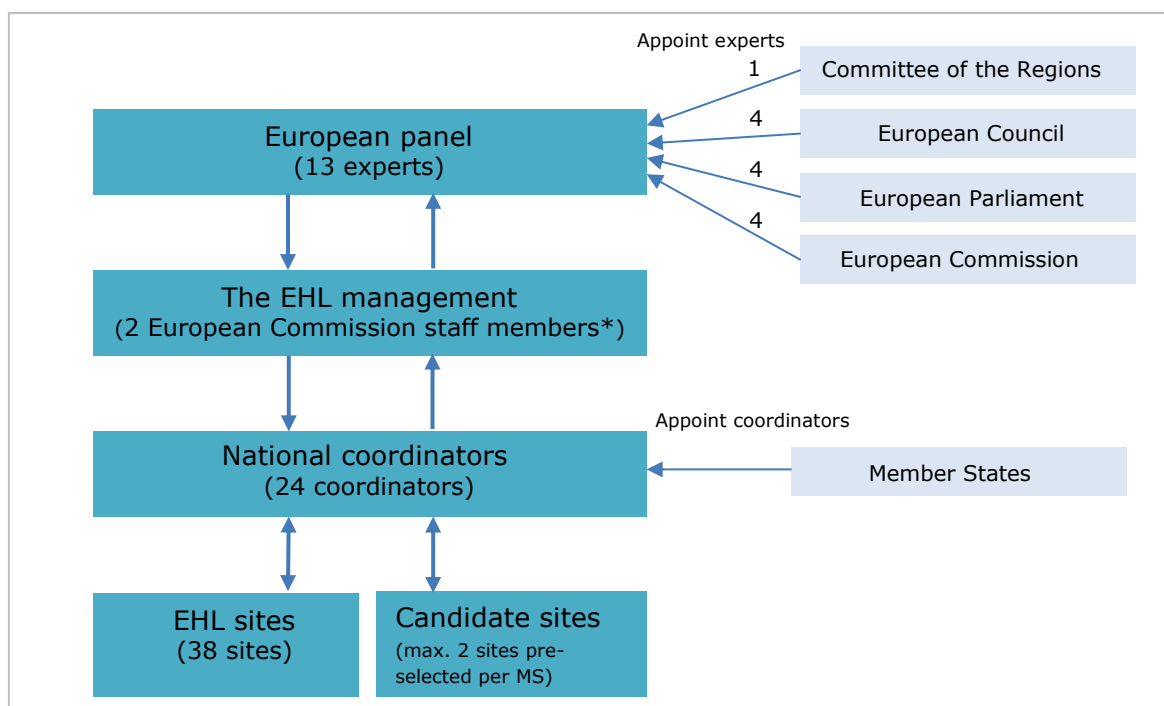


The operational structure of the action was established in 2011 (see Figure 4). The European Commission implements what it has been called upon to implement by the adopted legal basis<sup>5</sup>: a two-stage selection process (nationally, by the Member States, and at EU level); as well as monitoring and evaluation procedures to review the progress of sites and of the Label. The legal basis has created common selection criteria to prevent diverging interpretations of European significance between Member States, and

<sup>5</sup> 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. *Official Journal of the European Union L*, 303, pp. 1-9.

established an overseeing body (the European panel). These arrangements were expected to deliver a positive contribution towards a more robust implementation of the EHL's aims, the communication of the European values, and the achievement of more concrete results.

**Figure 4. Operational structure of the EHL action**



\*The two European Commission staff members responsible for the action also have other responsibilities.

Source: PPMI consortium, based on Decision No. 1194/2011/EU.

The European panel is responsible for the selection of sites at EU level, and for monitoring of labelled sites. The European Commission acts as the management body for the EHL, and is responsible for promotion of the Label, and for communication with national coordinators and with the selected sites. National coordinators are appointed by the participating Member States to disseminate information about the EHL at national level, as well as ensuring the smooth organisation of pre-selection and monitoring procedures. Candidate sites apply to receive the Label and, if successful, implement activities that contribute to the achievement of the EHL's aims and objectives.

Following the establishment of the EU-level Label in 2011, implementation began with two initial stages, preparatory and transitional.<sup>6</sup> Transition from the intergovernmental initiative occurred gradually between 2013 and 2014.<sup>7</sup> In 2013, only sites located in Member States that had not previously participated in the intergovernmental initiative could apply for the Label. In 2014, the only sites that could apply for the Label were those from countries that had participated in the previous initiative. In each of the two transition years, a maximum of four sites per Member State could be pre-selected and selected. From 2015 onwards, following the completion of the transitional stage, EHL is managed in three cyclical stages: selection, monitoring, and evaluation (see **Table 1**).<sup>8</sup> Selection occurs every two years, and only one site may be selected per Member State in each selection year. Every fourth year is dedicated to monitoring all of the labelled sites. Every sixth year is dedicated to the overall evaluation of the action.

<sup>6</sup> Decision No. 1194/2011/EU.

<sup>7</sup> EHL (2013), *European Heritage Label. 2013 Panel Report*; EHL (2014), *European Heritage Label. 2014 Panel Report*. 19 December 2014 [hereinafter 2013 Panel Report; 2014 Panel Report].

<sup>8</sup> Decision No. 1194/2011/EU.

**Table 1. Calendar of EHL operational stages**

	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025
<b>Preparatory Stage</b>	X	X													
<b>Transitional Stage</b>			X	X											
<b>Selection</b>					X		X		X		X		X		X
<b>Monitoring</b>						X				X				X	
<b>External Evaluation</b>								X						X	

Source: PPMI, based on Decision No. 1194/2011/EU.

## 2. EVALUATION QUESTIONS

Evaluation of the European Heritage Label was carried out against five criteria: relevance, coherence, efficiency, effectiveness and EU added value. **Table 2** shows the specific evaluation questions listed in the Terms of Reference

**Table 2. Evaluation questions**

<b>Relevance</b>	
EQ1	Is the EHL still relevant to the current needs of the EU?
EQ2	To what extent would widening its geographical scope be relevant?
EQ3	What were the objectives of the sites applying for the Label? To what extent were their objectives consistent with the Decision?
<b>Coherence</b>	
EQ4	To what extent was the EHL coherent with, and complementary to, other EU and international initiatives?
<b>Efficiency</b>	
EQ5	How did the selection arrangements of the European Commission – and of the participating Member States – contribute to the achievement of outputs, results and impacts?
EQ6	Were the processes involved in running the action efficient?
EQ7	How could they be improved and simplified?
<b>Effectiveness</b>	
EQ8	To what extent were the EU-level general and intermediate objectives of the action met in its first years of implementation?
EQ9	To what extent were the specific objectives defined in Article 3.3 achieved by the sites designated to date?
EQ10	To what extent were the sites' specific objectives achieved? What types of activities are typically implemented by the sites? What are the main challenges to implementing it? What are the benefits gained so far from being designated? Did some collaboration projects between labelled sites take place already?
EQ11	To what extent can the positive effects of the EHL action be considered sustainable?
EQ12	Have there been any unintended consequences of the action?
<b>EU added value</b>	
EQ13	What has been the EU added value of the EHL?
EQ14	What would happen if the EHL were to be discontinued?

## 3. EVALUATION FRAMEWORK

### 3.1. Data collection and analysis methods

In this section we present our methodological approach to the evaluation of the European Heritage Label action. During this evaluation, we employed two broad types of method for data collection: desk research, and stakeholder consultation. The latter which included an open public consultation (OPC), interviews and focus groups.

Quantitative data was collected via the OPC and desk research. Qualitative data was obtained via interviews, focus groups and also desk research.

### **3.1.1. Data collection methods**

#### **a) Desk research**

The evaluation team made extensive use of documentary evidence to gain a good understanding of the EHL action's internal operations, its performance and links with other initiatives.

Decision No 1194/2011/EU, which established the European Heritage Label action, formed the basis for our analysis of the structure and management of the action. The Impact Assessment and the 2009 Open Public Consultation report provided an assessment of the previous intergovernmental initiative, as well as of the stakeholders' expectations with regard to the EU-level action. These were also the main sources used to reconstruct the intervention logic of the EHL.

The evaluation team analysed all application forms from selected and non-selected candidates that had applied between 2013 and 2017, a total of 88 forms. The application forms contained information relevant to the evaluation, including how the sites articulate their European significance, and how they present their work plans and outline their operational capacities. The application forms of non-selected sites were also used to reflect on the difficulties candidate sites face when preparing their applications.

The Panel Reports on the 2013, 2014, 2015, and 2017 selections were also analysed. These were the main source of information used to create a general picture of selected and non-selected sites, to classify them according to different categories, and to assess their geographic distribution. In these reports, experts from the European Panel provide their assessment of the quality of the applications, the difficulties encountered by the applicants, and suggestions for further improvements.

The evaluation team analysed all monitoring forms from the 20 sites that participated in the 2016 monitoring process. In addition to this, the researchers obtained simplified monitoring forms from eight sites that were not involved in the monitoring process, but which were covered by this evaluation. Thus, a total of 28 monitoring forms were analysed. We also made extensive use of the 2016 Panel Report on Monitoring, which provided us with information on the benefits and challenges faced by EHL sites, as well as the recommendations made to the monitored sites by the European panel.

Finally, we analysed policy documents, relevant reports and EHL site data to assess the relevance and coherence of the action, as well as to supplement our analysis of data obtained from other sources. A full list of references is provided at the end of this report.

#### **b) Stakeholder consultation**

During this evaluation a mandatory stakeholder consultation was carried out, as required by the Better Regulation Guidelines. The consultation targeted the following stakeholder categories:

- Those affected by the action (citizens)
- Those who implement the action (EHL site managers, national coordinators, members of the European panel of experts, and EHL managers at the European Commission)
- Those who have an interest in the action (local, regional and national authorities, state institutions, cultural heritage sites, museums, libraries, schools, research institutes, etc.)

Different consultation methods were used to collect information and opinions from these groups of stakeholders. The open public consultation (OPC) targeted all stakeholder groups, while direct interactions such as interviews and focus groups targeted those who have an interest in the action, or are directly involved in its implementation.

The OPC contributed to the evaluation by gathering views of all interested citizens and organisations on the role of cultural heritage in bringing European citizens closer to the Union, specifically through the EHL action. The OPC also provided additional information about the operation and results of the action. The consultation was carried out via an online questionnaire, which was accompanied by a background document. The scope of the OPC covered the visibility of the Label, as well as its relevance, coherence, effectiveness, efficiency and EU added value. The questionnaire consisted of 15 questions, of which seven were targeted at the general public, and eight at those involved in the action. The questionnaire was available in three EU languages (English, French and German). It was published on a dedicated consultation webpage for 12 weeks (from 1 March 2018 to 28 May 2018). In total, the OPC received 103 responses (one of which was deemed not valid).

Interviews were a central instrument in obtaining data on the operation of the action, and for disclosing the various perceptions and attitudes of respondents towards EHL. In total, the evaluation team conducted 76 interviews with different stakeholder groups. Each interview was semi-structured, and followed tailor-made interview guidelines for each specific group of respondents. Managers or senior staff members from each of the EHL sites within the scope of this evaluation were interviewed (a total of 30 interviews). The evaluation team also interviewed managers from a few non-selected sites (5 interviews), as was determined in the research design. Because these persons were not connected to the action, some representatives of non-selected sites who were contacted declined to participate in an interview. The sample size was proposed in the Inception Report and aimed to cover different types of non-selected sites. The final sample involved a site which was part of the intergovernmental initiative, but which did not succeed in the EU-level action; two sites were not awarded the Label due to Article 11-2; and two further unsuccessful applications: one national-themed, and one transnational site. The evaluators also interviewed 21 national coordinators of the EHL action. Only three coordinators could not be reached. National coordinators provided valuable data on the action's implementation at national level, particularly regarding the processes of pre-selection, monitoring and communication. In addition, we carried out seven interviews with members of the European panel in order to understand EHL procedures at EU level. Interviews were conducted with the EHL manager at the Commission and representatives of related EU actions in the field of cultural heritage (a total of eight interviews). Lastly, we conducted interviews with external experts (two interviews) and representatives of stakeholder networks and organisations (three interviews) in the European cultural heritage sector.

A programme of site-specific and national-level focus groups provided a platform for various stakeholders to discuss the EHL action within a local or national context. Sites and countries for the focus group discussions were carefully selected, taking into account the year of selection and characteristics of the site such as size and location. The evaluation team aimed to cover a wide range of sites, representing the diversity of sites within the EHL initiative. In total, 10 focus group discussions were carried out. Six took place at selected EHL sites and involved the managers of those sites and local stakeholders, namely: *Kaunas 1919-1940* (Lithuania); *Franz Liszt Academy of Music* (Hungary); *Sites of the Peace of Westphalia (1648)*, *Münster and Osnabrück* (Germany); *Franja Partisan Hospital* (Slovenia); *Camp Westerbork* (the Netherlands); and the *Premyslid Castle and Archdiocesan Museum Olomouc* (the Czech Republic). Another four focus group discussions took place in Poland, France, Austria and Portugal, usually at the national Ministry of Culture, and involving national coordinators, managers of EHL sites located in the respective country, and national stakeholders. In total, focus group discussions covered 19 EHL sites.

Evaluation team members also attended the 2018 EHL Days in Plovdiv, Bulgaria, where they participated in the annual meeting of EHL site managers and national coordinators.

### **3.1.2. Data analysis methods**

Four methods were used to analyse quantitative and qualitative data. First, we used descriptive statistics to analyse responses to the OPC. This allowed us to compare answers from different types of respondents, e.g. those involved or not involved in the action. Second, we used content analysis to analyse qualitative data obtained via the open questions of the OPC, interviews, focus groups, and desk research. Nvivo software helped us to structure, manage and analyse the information collected, as well as to make connections between different information sources and to draw conclusions. Third, we used comparative analysis, mainly to evaluate the transition from the intergovernmental EHL to the current EU scheme, their respective operation and results. Comparative analysis could not be applied to the analysis of individual EHL sites, due to the absence of common indicators and comparable data. Finally, we used prospective analysis to formulate recommendations for the future of the action.

### **3.1.3. Weaknesses of the methods used, and how they were addressed**

No major changes were made to the process of data collection and analysis during the evaluation. However, the evaluation team carefully considered and critically evaluated the validity of data, which led us to identify the following weaknesses in the methods applied and data collected.

First, due to variations in the methodology used to monitor different EHL sites, it is difficult to compare site-specific data on progress. Since there are no common indicators to measure progress, all EHL sites use their own indicators, which are a mix of different levels of a project: activities (e.g. some specific event); outputs (e.g. a number of educational programmes); and outcomes (e.g. a number of participants in educational programmes). Whenever the data presented in monitoring forms appeared inconsistent, we sought other data sources (interviews or the websites of the labelled sites), or requested additional information in writing from the selected site(s), to triangulate our findings and ensure their validity.

Second, a few national coordinators and site managers were new to their positions and could not always provide an informed opinion about some EHL processes (e.g. selection). Therefore, not all of the originally planned questions could be answered by these respondents. Nevertheless, the majority of interviewees provided good insights into most of the evaluation criteria, and thus provided sufficient data for analysis.

Third, the evaluation drew upon interviews, focus groups and the OPC to ascertain opinions and perceptions. This data represents an important piece of evidence where an evaluation question or sub-question seeks to discover the views of stakeholders. Nevertheless, the evaluation team was careful to consider the fact that these opinions are naturally influenced by respondents' affiliation with the EHL. We therefore corroborated perception-based sources with other sources of evidence – in particular, data from desk research.

Fourth, one change was required to the original work plan, as one of the sites refused to host a focus group discussion. This site was replaced by another site with similar qualities.

Lastly, the evaluators took account of the fact that the OPC does not provide a representative view of opinion among the EU public, as respondents are self-selected. For this reason, the OPC was never used as the main data source. None of the findings, conclusions and recommendations presented in this evaluation are based on a single data source; they always stem from triangulated data.

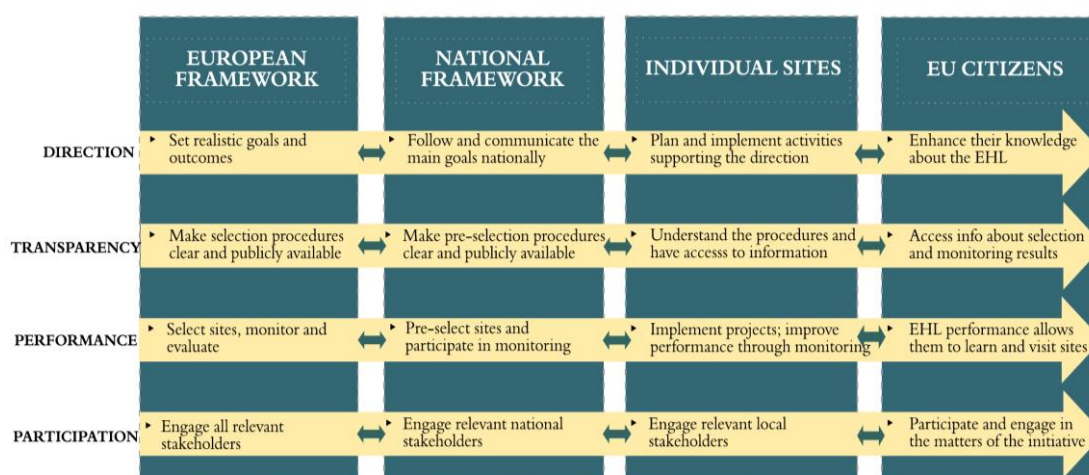


### 3.2. Good governance model for cultural heritage

As part of our evaluation, we have developed and applied a good governance model for cultural heritage, based on a number of tools and guidelines applied to the management of cultural heritage sites and initiatives<sup>9</sup>. The results of this analysis are presented in Annex IV.

After reviewing various tools and guidelines applied to the management of cultural heritage sites and initiatives,<sup>10</sup> we have identified four key principles for good governance: strategic direction; performance; transparency; and participation (see Figure 5).

**Figure 5. The good governance model for cultural heritage**



Source: the PPMI consortium.

The principle of strategic direction encompasses setting clear aims and objectives for an initiative; consistency between the initiative's aims, guidelines and the information disseminated. This principle also entails the setting of management objectives and planning priorities at both a system-wide and a site-specific level.

The principle of performance includes the activities implemented at the sites, as well as the responsiveness of institutions and the efficiency of organisational procedures. Transparency entails open communication concerning the actions taken and decisions made. Finally, the principle of participation entails the idea that all stakeholders who are affected by cultural heritage initiatives should be involved in the management processes.

Our proposed model for good governance consists of four elements, all of which are in line with the EHL's operational structure: (i) a European framework; (ii) a national framework; (iii) individual sites; and (iv) audiences/citizens. The action functions according to the principle of subsidiarity, which means that different actors operating at European, national or local level have separate roles and responsibilities.

The European framework represents those institutions and stakeholders providing strategic direction and setting outcomes/priorities; developing selection and monitoring

<sup>9</sup> UNESCO/ICCROM/ICOMOS/IUCN (2013); Shipley, R., Kovacs, J. F. (2008), 'Good governance principles for the cultural heritage sector: lessons from international experience'. *Corporate Governance*, 8(2), pp. 214-228; EENC (2015), *Participatory Governance of Cultural Heritage*. EENC Ad hoc question; Controller and Auditor-General (2015), *Effectiveness of Governance Arrangements in the Arts, Culture, and Heritage Sector*, Wellington: Auditor-General; Schmitt, T. (2011), *Cultural Governance as a Conceptual Framework*, MMG Working Paper 11-02, Göttingen: Max Planck Institute for the Study of Religious and Ethnic Diversity.

<sup>10</sup> Ibid.

procedures; promoting and communicating the EHL at European level; and ensuring the overall coordination of the initiative. The National framework represents the participating Member States and their appointed national coordinators, who are responsible for following the strategic direction, pre-selecting the sites, communicating information about the Label, and implementing monitoring procedures.

Individual sites represent those sites that have been awarded the EHL. Upon receiving the Label, these sites commit to highlighting their European dimension, carrying out educational activities, increasing multilingual access to the site, etc. The individual sites also report back to the national and European frameworks, and participate in monitoring procedures. Audiences/citizens represent those European citizens who, by visiting the sites, are expected to increase understanding of their shared European heritage, engage in intercultural dialogue, and develop a greater sense of belonging to the European Union.

## **4. EVALUATION RESULTS**

This section presents the evaluation results of the action with respect to the five criteria of relevance, coherence, efficiency, effectiveness, and EU added value.

### **4.1. Relevance**

Relevance describes the relationship between the objectives of the intervention and the needs and problems that exist in society. To assess the relevance of the EHL action, we identified and measured the needs of the EU by analysing topic-related EU documents, as well as the priorities of stakeholders and their perceptions of the current situation, with particular reference to the field of cultural heritage. In a second step, we considered the action's objectives, as well as its potential impacts in relation to those needs. According to this understanding, relevance does not refer to the actual outcomes and impacts of the EHL, but to the action's potential.

#### **4.1.1. The EHL objectives and current needs in the EU**

**EQ1** Is the EHL still relevant to the current needs of the EU?

To assess if the EHL objectives are relevant to the current needs of the EU, the following indicators are applied: the extent to which the action considers current societal and political developments; the extent to which the action's objectives are consistent with EU policy goals; the extent to which the action establishes a contemporary understanding of cultural heritage in Europe; and the extent to which the action considers the needs of EU citizens in the field of cultural heritage.

#### **a) Current needs of the EU**

The Impact Assessment identified several EU needs in relation to the EHL. The document explains the need to develop the sense of a shared European identity among Europe's diverse populations through its cultural heritage, and to develop a European reading of that cultural heritage. The first reason behind the idea of the Label was to address a growing gap between Europe's citizens (in particular, young people) and the European Union, and consequently to promote access to Europe's cultural heritage.<sup>11</sup>

The needs of the EU do not seem to have changed in nature since the Impact Assessment was carried out, but do appear to have increased – as summarised in the draft of the New European Agenda for Culture: "Emerging from a severe financial crisis, Europe faces growing social inequalities, diverse populations, populism, radicalisation, and terrorist threats. New technologies and digital communication are transforming

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<sup>11</sup> Impact Assessment, p. 5.

societies, changing lifestyles, consumption patterns and power relationships in economic value chains.”<sup>12</sup> Similar developments are described in the 2018 Annual Work Programme for Creative Europe.<sup>13</sup>

In this context, the promotion of access to cultural heritage is seen as an important objective in itself, as the 27 Member States attested to in Bratislava in 2016. The Bratislava Declaration highlights the most urgent needs of the EU, as seen by the Member States: “We need the EU not only to guarantee peace and democracy but also the security of our people. We need the EU to serve better their needs and wishes to live, study, work, move and prosper freely across our continent and benefit from the rich European cultural heritage.”<sup>14</sup>

While this statement is of interest as it is directly referring to cultural heritage, it also relates to the aforementioned “growing gap” between EU citizens and the European Union, and especially its political processes. This gap is evidenced by the decreasing participation in European Parliament elections since 1979, as well as in the trend towards EU-critical formations winning national elections in Member States. In the first four elections up to 1994, more than a half of all eligible voters participated, while the turnout in years after was a lower, eventually at 43% in 2009 and 2014.<sup>15</sup>

Consequently, there is a need to creating opportunities for European citizens to participate in societal fields, and in connection with European topics. This need was mentioned by a number of interviewees: for example, one national coordinator expressed the necessity to better connect the local sphere with the level of the EU. In terms of cultural participation, the situation could also be improved as shown in a 2017 Eurostat survey: in 2015, 43% of European citizens took part in a cultural activity at a cultural site, which includes cultural heritage sites.<sup>16</sup> To be relevant in this regard, the EHL would need to strengthen its participatory approach, as already assessed and stated in the “Council conclusions on participatory governance of cultural heritage”.<sup>17</sup>

The 2017 Leaders’ Working Lunch in Gothenburg even took the further step of emphasising the importance of culture “as a driver for EU unity”<sup>18</sup>, and of the promotion of citizenship and common values through cultural action. It must be noted, however, that the EHL focuses solely on cultural heritage and therefore represents only one aspect of a broader understanding of culture. Furthermore, the Leaders’ Working Lunch stressed the need to support digitalisation. While the need for digitalisation is mentioned briefly in the Decision establishing the EHL (raising the profile of sites using new technologies and interactive means), it is today an ever-growing concern that goes beyond the mere technological development. According to recent data, 44% of Europeans between 16 and 74 years do not have sufficient digital skills at a point in time when such skills are becoming more and more necessary, with 90% of jobs in the

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<sup>12</sup> Communication from the Commission to the European Parliament, the European Council, the Council, the European Economic and Social Committee and the Committee of the Regions. A New European Agenda for Culture, COM(2018) 267 final – SWD(2018) 167 final, p. 1.

<sup>13</sup> 2018 Annual work programme for the implementation of the Creative Europe Programme. C(2017)6002 of 6 September 2017, p. 3.

<sup>14</sup> The Bratislava Declaration. Bratislava, 16 September 2016, p. 1. Available at: <http://www.consilium.europa.eu/media/21250/160916-bratislava-declaration-and-roadmapen16.pdf> (accessed: 23 August 2018).

<sup>15</sup> European Parliament, *Results of the 2014 European elections*. Available at: <http://www.europarl.europa.eu/elections2014-results/en/turnout.html> (accessed: 23 August 2017).

<sup>16</sup> Eurostat (2017), *Culture statistics – cultural participation by socioeconomic background*. Available at: [https://ec.europa.eu/eurostat/statistics-explained/index.php/Culture\\_statistics\\_-\\_cultural\\_participation\\_by\\_socioeconomic\\_background#Cultural\\_participation](https://ec.europa.eu/eurostat/statistics-explained/index.php/Culture_statistics_-_cultural_participation_by_socioeconomic_background#Cultural_participation) (accessed: 23 August 2017).

<sup>17</sup> Council conclusions on participatory governance of cultural heritage 2014/C 463/01, Art. 7.

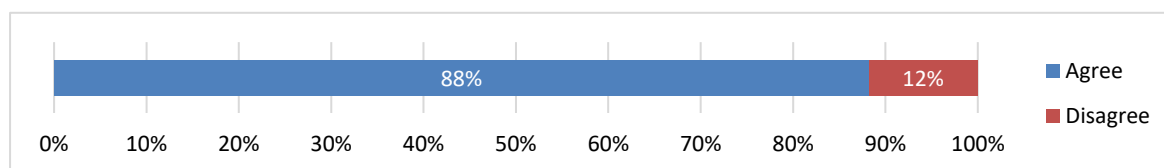
<sup>18</sup> Strengthening European Identity through Education and Culture. The Commission’s Contribution to the Leaders’ Working Lunch. Gothenburg, 17 November 2017. European Commission.

future expected to require some level of digital competency.<sup>19</sup> The EHL reflects this necessity not for the general public but for the sites' collaborators, by including staff training in the criteria for raising awareness and improving access.<sup>20</sup>

Taking these aspects into account, the main objectives of the EHL – strengthening European citizens' sense of belonging to the Union and strengthening intercultural dialogue – can be stated as highly relevant the current needs of the EU. This conclusion is confirmed by OPC respondents. A large majority thought it important for the EU to act in order to reinforce a sense of belonging to a common European space (93% agreed, of which 62% strongly agreed); to strengthen intercultural dialogue (97% agreed, of which 65% strongly agreed); and to promote cultural heritage as a resource for economic development (90% agreed, of which 57% strongly agreed).

In determining if the EHL can contribute to fulfilling these needs, our interview analysis provides evidence of stakeholders' perceptions. Panel members, national coordinators from Member States with and without selected sites, and site managers (from both selected and non-selected sites) were asked if they thought the EHL and its approach of cultural heritage could contribute towards achieving the objectives of strengthening intercultural dialogue and increasing European citizens' sense of belonging to the Union. In total, 51 interviewees answered the question, of whom 45 persons agreed, while six did not believe that the EHL could achieve change in these areas.

**Figure 6. EHL contributes to the objectives of strengthening intercultural dialogue and European citizens' sense of belonging to the Union**



Source: PPMI consortium, based on interview analysis.

Some voices perceived difficulties in strengthening European citizens' sense of belonging. One external expert opined: "For that, the Label would need to tell the European narrative. The problem is, I see the Label and I see a heterogenous mixture of sites, but I cannot discover how this tells the cultural history of Europe. There is no European narrative told." Site managers also suggested that the EHL could only reach a limited audience, and that sites cannot adequately cover and explain all issues relating to the building of a shared European identity. In contrast, others saw cultural exchange as being at the core of the initiative, with each site contributing its own values. Thus, a large majority recognised the potential of the EHL to address the current needs of the EU as stated in the action's two general objectives. At the same time, perceptions were mixed as to whether the EHL is already achieving this major impact. Thus, it remains to be clarified to what extent the potential of the EHL has been realised, and if the initiative can actually achieve change in these areas (for more on this subject, see section 4.4).

Interestingly, two national coordinators of countries without any EHL sites mentioned in their interviews that the action is an inspiration to overcome national narratives and to explain European history and culture in terms that are closer to its actual development, which has been marked by intensive cross-border and cross-national exchange and influences. Another national coordinator stated that although the EHL ranks highly in national strategies, the support that candidate sites receive from their respective Member States comes mainly in the form of expert consultations. Where applications

<sup>19</sup> Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions. Strengthening European Identity through Education and Culture. The European Commission's contribution to the Leaders' meeting in Gothenburg, 17 November 2017. Strasbourg, 14.11.2017, COM(2017) 673 final, p. 6.

<sup>20</sup> Decision No. 1194/2011/EU, Art. 7.1.b.i/7.1.c.iv.

for the EHL were successful, greater potential would exist to apply for additional support from state cultural promotion platforms.

To summarise, the European Heritage Label corresponds with the current needs of the European Union. Cultural heritage is identified as playing a potential role in citizens' participation in society, and as a driver for European unity. The EHL's goals of strengthening the sense of belonging to the Union and strengthening intercultural dialogue can contribute to these two needs. However, this potential has yet to be fully achieved.

#### **b) EU policy goals and priorities in the field of cultural heritage**

Since the Maastricht Treaty of 1992, the EU has explicitly defined cultural heritage as one of its duties and objectives by calling for the conservation of cultural diversity at local and regional levels, as well as safeguarding cultural heritage of European significance (Article 128).<sup>21</sup> Today, Article 167 of the EU Treaty of Lisbon calls upon the EU to bring its common cultural heritage to the fore, and to support the efforts of Member States to safeguard their heritage.<sup>22</sup>

The policies, actions and engagement of the EU in the sphere of cultural heritage are defined with, and in relation to, national and regional levels. This is particularly apparent in Article 167 of the Lisbon Treaty, which is characterised by the principle of subsidiarity. In practice, and in relation to specific cultural heritage sites, this means that EU policies must respect the national importance and interpretation of sites, while at the same time offering a European dimension to their interpretation that highlights their importance to a common "European" history.

Furthermore, paragraph 4 of Article 167 states that "the Union shall take cultural aspects into account in its actions under other provisions of the Treaties"<sup>23</sup>. In other words, whenever the EU acts, in doing so it must respect cultural aspects. By these means, aspects of culture and cultural heritage have been acknowledged as being of equal importance to economic and social aspects, and cultural heritage has become a central factor in defining and shaping a European (cultural) identity. The importance of cultural heritage in promoting a shared European identity was also a major factor cited by the European Commission in 2016, when it proposed the European Year of Cultural Heritage.<sup>24</sup> To sum up, Article 167 reflects the importance of culture and cultural heritage in promoting a common European identity, while at the same time defining its central parameters to include the protection and promotion of diversity in cultural expressions, and bringing to the fore the commonalities within this diversity.

By placing increasing importance on aspects of cultural heritage, the EU is also responding to the growing gap between the reality of the EU and the perceptions of its citizens – in particular to the lack of knowledge among EU citizens about the Europe's common history, a factor perceived as a major source of this gap.<sup>25</sup>

After publishing the first Agenda for Culture in 2007, the EU re-emphasised its participatory approach to cultural heritage in 2014, when the Council of the EU published the "Council conclusions on participatory governance of cultural heritage", referring to its previous statements on "cultural governance" from 2012. The conclusions stressed

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<sup>21</sup> Treaty on European Union, signed at Maastricht on 7 February 1992, 92/C 191/01, Art. 128.

<sup>22</sup> Consolidated Version of the Treaty on European Union, 2010 O.J. C 83/01, Art. 167.

<sup>23</sup> Consolidated Version of the Treaty on European Union, 2010 O.J. C 83/01, Art. 167.

<sup>24</sup> Commission Proposal for a Decision of the European Parliament and of the Council on a European Year of Cultural Heritage, COM/2016/0543 final - 2016/0259 (COD).

<sup>25</sup> 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, COM/2010/76 final - SEC(2010) 197.

the need for exchange, cooperation and networking between different actors in the field, in order to “make cultural governance more open, participatory, effective and coherent”<sup>26</sup>. This participatory approach is undoubtedly reflected in the specific aims and objectives of the EHL, since these are also concretely directed at raising awareness, sharing experiences and increasing access to cultural heritage for all, especially young people.

Current general EU policy goals in the field of culture is determined in the draft of the New European Agenda for Culture, published in 2018 and expected to be voted on in early 2019. Its strategic objectives are categorised in three dimensions:

- A social dimension, harnessing the power of culture and cultural diversity for social cohesion and well-being
- An economic dimension, supporting culture-based creativity in education and innovation, as well as jobs and growth
- An external dimension, strengthening international cultural relations<sup>27</sup>

The first of these dimensions is represented in the EHL overall objective of strengthening European citizens’ sense of belonging to the Union. In addition, the EHL’s second, site-specific, objective of “raising European citizens’ awareness of their common cultural heritage” displays similarities to the New Agenda’s objective to “protect and promote Europe’s cultural heritage as a shared resource, to raise awareness of our common history and values and reinforce a sense of common European identity”.

Not all dimensions and objectives of the New Agenda are represented in the EHL, however. In particular, the third dimension of international relations is absent. While the New Agenda explicitly calls for intercultural dialogue to include non-EU and non-European countries, to strengthen the cultural dimension of the EU’s external actions, the EHL is restricted to cooperation and exchange within the Union.

The objectives of the 2018 European Year of Cultural Heritage not only highlight its importance for cultural diversity and intercultural dialogue, but also its possible contribution to the economy and society (e.g. through its capacity to underpin cultural and creative industries and inspire creation and innovation, promote sustainable tourism, and generate long-term local employment).<sup>28</sup> Cultural diversity and intercultural dialogue are goals shared by the EHL; they are also defined as general objectives in the Decision.<sup>29</sup> The question of creativity appears on the level of individual sites through the encouragement of cooperation with contemporary arts.<sup>30</sup>

In conclusion, the EHL is in accordance with EU policy goals and priorities in the field of cultural heritage. The objectives set out in the Decision establishing the initiative are consistent with the various goals identified in the draft of the New European Agenda for Culture, and those of the European Year of Cultural Heritage.

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<sup>26</sup> Council Conclusions of 26 November 2012 on Cultural Governance, 2012/C 393/03.

<sup>27</sup> Communication from the Commission to the European Parliament, the European Council, the Council, the European Economic and Social Committee and the Committee of the Regions. A New European Agenda for Culture, COM(2018) 267 final – SWD(2018) 167 final, pp. 2-8.

<sup>28</sup> Decision (EU) 2017/864 of the European Parliament and of the Council of 17 May 2017 on a European Year of Cultural Heritage (2018).

<sup>29</sup> Decision No. 1194/2011/EU, Art. 3.3.f.

<sup>30</sup> Decision No. 1194/2011/EU, Art. 7.1.a.

**c) European cooperation in the field of cultural heritage**

This sub-section considers if the EHL is relevant in terms of cooperation in the field of cultural heritage at a European level. For a detailed analysis of the coherence of the EHL to other EU actions, see section 4.4.2.

The "Mapping of Cultural Heritage actions in European Union policies, programmes and activities" identifies cultural heritage as one of the priority areas of the Work Plan for Culture (2015-2018).<sup>31</sup> The EU aims to find innovative approaches and to map best practices for heritage professionals. Working with the Council of Europe, the EU realised several projects in the field of cultural heritage to strengthen peer-to-peer connections within Europe and beyond.

Along with the EU's partnership actions, the programme of the Cultural Routes of the Council of Europe also merits attention.

As a genuine EU action, the European Year of Cultural Heritage 2018 (EYCH) motivated many EHL sites to implement activities or otherwise be connected with activities taking place within the frame of the EYCH. The EYCH enabled the involvement of cultural actors that were not limited to heritage in a narrow sense, and so widen the field of collaboration. As an important EU programme in the field of culture, Creative Europe has at its core the promotion of European cooperation. While no special focus is placed upon them, actors within the cultural heritage sector can take part, there. In the run-up to the EYCH, Creative Europe put out a special call addressing cultural heritage. Thus, we can state the EU has a general interest in cooperation in the field of cultural heritage.

With many European scholars contributing to its establishment, the House of European History, initiated by the European Parliament, can also be understood as a European cooperation project. Both the concept and its European narratives were developed in an inclusive and collaborative way.

Considered alongside other programmes, the objectives of the EHL correspond to various objectives in general European cooperation within the field of cultural heritage. Both the EHL's network-based approach to supporting transnational cooperation among EHL sites as defined in the Decision<sup>32</sup>, as well as its site-specific objectives, which aim to develop practices for heritage professionals<sup>33</sup>, are relevant to the priorities described in "Mapping of Cultural Heritage".<sup>34</sup> Having said this, the EHL does not yet represent a broader approach of cultural heritage that refers not only to history and memory, but also includes contemporary culture.

The idea of cultural cooperation is also represented in the objectives of the Creative Europe Programme. In its 2018 Annual Work Programme, Creative Europe declared: "Cooperation projects will continue to represent the main bulk of EU support in 2018. These projects give organisations of all sizes the possibility to co-produce, cooperate and learn."<sup>35</sup> Cooperation is therefore a central issue in the field of culture and cultural heritage.

Participants in the OPC conducted for this study agreed that it was important for the EU to act to raise awareness of common European history and values (94% agreed; 64% agreed strongly); and to reinforce a sense of belonging to a common European space

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<sup>31</sup> European Commission (2017), *Mapping of Cultural Heritage actions in European Union policies, programmes and activities*. Available at: [http://ec.europa.eu/assets/eac/culture/library/reports/2014-heritage-mapping\\_en.pdf](http://ec.europa.eu/assets/eac/culture/library/reports/2014-heritage-mapping_en.pdf) (accessed: 07 September 2018), [hereinafter Mapping of Cultural Heritage actions].

<sup>32</sup> Decision No. 1194/2011/EU, Art. 2.2.

<sup>33</sup> Decision No. 1194/2011/EU, Art. 7.1.b.

<sup>34</sup> Mapping of Cultural Heritage actions, p. 5.

<sup>35</sup> 2018 Annual work programme for the implementation of the Creative Europe Programme. C(2017)6002 of 6 September 2017, p. 10.



(92% agreed, 61% agreed strongly). In addition, they regarded it as important to promote access to cultural heritage through the use of digital technologies (91% agreed; 58% agreed strongly). As mentioned above, this issue is insufficiently developed in the EHL action. All of the above objectives require cooperation in order to be achieved.

The EHL action seeks to foster a network of sites to reinforce cooperation and collaboration activities. In this respect, the action is only partly successful. In interviews, all the site managers involved, and some of the national coordinators, regarded the creation of an EHL legal network as highly important, but said that it would require support from the Commission. Previous attempts at obtaining such funding for a network had failed. Up to now, the EHL Days are the best opportunity for the managers of labelled sites and national coordinators to meet, exchange and plan new projects. EHL Days is a three-day annual conference consisting of meetings, panels and presentations, at which the awarding of new EHL site labels takes place every two years. The first conference was organised in Brussels. Since 2017, the event has been hosted in the country currently holding the Presidency of the Council of the European Union.

Aside from working in the context of the EHL network as a whole, half of the sites have also implemented (mainly bilateral) collaboration projects with other EHL sites (see section 4.4.1.c). Interviewees also mentioned transnational sites as offering a valuable opportunity for cross-border cooperation, but said that these were not yet sufficiently established within the scheme. The first transnational site, the *Former Natzweiler Concentration Camp and its Satellite Camps*, was awarded the EHL in 2017.

Overall, the EHL is relevant to the priority of European collaboration in the field of cultural heritage. The Label fosters collaboration between its sites, although this aspect requires further reinforcement via the creation of a network of sites to support the action. The relevance of contemporary approaches to cultural heritage, which can be identified in other contexts of European cooperation in the cultural field, is not yet sufficiently addressed by the EHL.

#### **d) Cultural needs of EU citizens**

According to EU citizens' surveys, the sense of a European identity is defined by cultural traditions, common history and values. In general, Eurobarometer 89 from 2018 shows that the issues which most create a feeling of community among EU citizens are culture (29%), history (23%) and values (23%).<sup>36</sup> These findings strongly support the relevance of the EHL's objective of connecting these aspects.

The Eurobarometer study on cultural heritage from 2017 provides some specific evidence on the importance of European cultural heritage. According to the study, 80% of respondents thought that cultural heritage was important for the European Union. European citizens linked cultural heritage to themselves (84% considered it important to them personally); for their local community (84%); and for their region (87%). A majority of those questioned still perceived cultural heritage as national (91%).<sup>37</sup> Interestingly, some of the citizens most likely to regard cultural heritage as important for the European Union as a whole were those from Member States without EHL-labelled sites: Cyprus (86%), Malta (85%), Ireland (85%), Sweden (85%) and Bulgaria (79%).<sup>38</sup>

The Eurobarometer study also revealed that a majority of respondents in each EU Member State wanted to know more about cultural heritage: 68% in total (23% definitely, 45% to some extent). Opinions varied according e.g. to age: it was more

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<sup>36</sup> Standard Eurobarometer 89. Public opinion in the European Union. March 2018. TNS Opinion & Social. European Union, 2018.

<sup>37</sup> Special Eurobarometer 466. Report. Cultural Heritage. September-October 2017. TNS Opinion & Social. European Union, 2017 [hereinafter Special Eurobarometer 466], p. 4.

<sup>38</sup> Special Eurobarometer 466, p. T6.



important for respondents aged less than 55 years (70-73%), and less important for those over 55 (62%).<sup>39</sup>

The values attached by respondent to Europe's cultural heritage were pride (70% felt pride in the cultural heritage of a European country other than their own); an improvement in people's quality of life (71% agreed that living close to places related to Europe's cultural heritage can improve people's quality of life); and the sense of belonging to Europe (70% agreed that living close to places related to Europe's cultural heritage can give people a sense of belonging to Europe).<sup>40</sup>

Over time, European citizens have assigned greater importance to the diversity of European culture. In 2017, 80% thought that the diversity of European culture sets it apart and gives it its particular value – 4% more than in 2007. Even so, 54% of respondents thought that no common European culture existed, because European countries are too different from one another.<sup>41</sup> For the respondents, the actors that should do the most about cultural heritage are national authorities (46%), the European Union (40%), and local and regional authorities (39%).<sup>42</sup>

Among the cultural activities in which European citizens were involved in countries other than their country of origin, visiting a historical monument or site was the third important type of activity. According to the Special Eurobarometer on cultural access and participation, 19% of respondents had done so in 2013. It must be noted, however, that the two activities which ranked above it – reading a book by an author from another European country (31%), and watching/listening a cultural programme on TV or on radio from another European country (27%) – are easier to accomplish than travelling to a site. Fewer people participated in other activities such as musical performances, festivals, exhibitions, dance, opera or theatre.<sup>43</sup>

The respondents in this study's OPC appeared very interested in EHL sites, and wanted to improve their knowledge, both about the labelled sites and the action itself. More than 90% of respondents agreed that knowing that a specific site bears the EHL would encourage them to find out more about the site, and to visit the site directly. Over 80% of respondents said they were likely to visit other EHL sites and find out more about them, as well as about the action itself. Slightly fewer people reported that knowing a site has the EHL would encourage them to share information about the site with others (79%), or to share information about the EHL with others (76%).

On the basis of the Eurobarometer results, we can infer that cultural heritage is becoming more and more relevant for European citizens. As a cultural heritage action, the EHL therefore has the potential to be one piece of this puzzle. If it wishes to react to their growing interest, however it will need to create opportunities for citizens to participate. In this regard, the EHL's site-specific objective of improving access for all is highly relevant. The basis for this participation would be to develop well-grounded European narratives.

#### **4.1.2. The geographical scope**

##### **EQ2 To what extent would widening its geographical scope be relevant?**

To answer this question, we first look at the current geographical coverage of the EHL to see what progress the EU-level action has made in reaching EU citizens, compared

<sup>39</sup> Special Eurobarometer 466, p. T34.

<sup>40</sup> Special Eurobarometer 466, p. 29.

<sup>41</sup> Special Eurobarometer 466, p. 35.

<sup>42</sup> Special Eurobarometer 466, p. T33.

<sup>43</sup> Special Eurobarometer 399. Report. Cultural Access and Participation. April-May 2013. TNS Opinion & Social. European Union, 2013, p. 38.

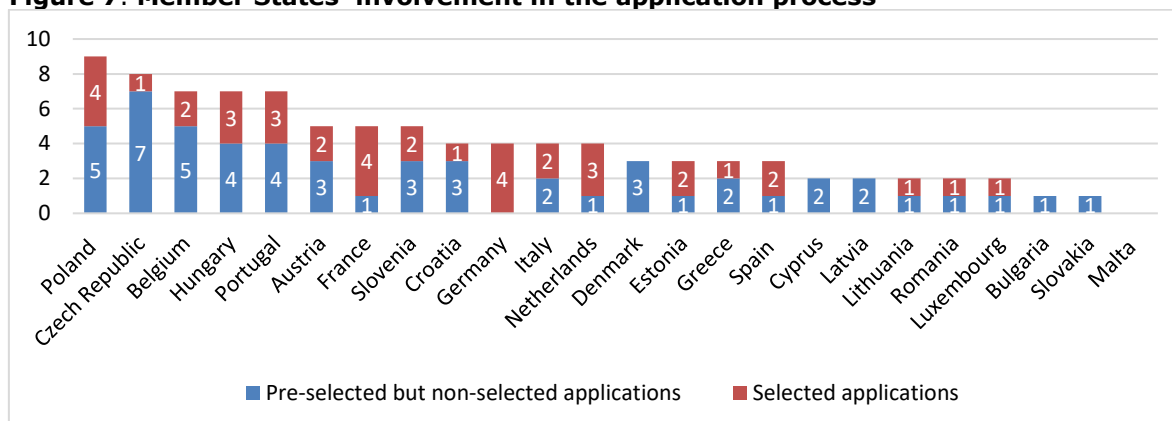
with the previous intergovernmental initiative. Then, we consider the relevance of the geographical expansion of the action in relation to its objectives, needs and capacities.

#### a) Current geographical coverage of the Label

The Impact Assessment established the fostering of “a fair distribution of Labels across the European Union” as one of the action’s operational objectives. The EU-level action was expected to broaden geographical coverage, to ensure the continuing participation and commitment of MSs to the initiative, and to provide an opportunity to reach as many EU citizens as possible.<sup>44</sup>

Our analysis reveals that in fact, the geographical scope and distribution of the labelled sites in the EU action has narrowed in comparison with the intergovernmental EHL. This has occurred for two key reasons. First, unlike the previous initiative, the EU action is open only to Member States. It has therefore “lost” Switzerland, as a non-EU country. Second, a common selection process at EU level, introduced during the transformation of the action, is another barrier to the geographical distribution of EHL sites. As a result, Bulgaria, Cyprus, Latvia and Slovakia, each of which had at least one EHL site in the previous initiative, have no EHL sites under the current action, since none of their pre-selected sites passed the EU-level selection. Likewise, Denmark, which was not involved in the previous initiative, tried to enter the EU action with three pre-selected applicant sites, none of which qualified at EU level (see **Figure 7**).

**Figure 7. Member States' involvement in the application process**

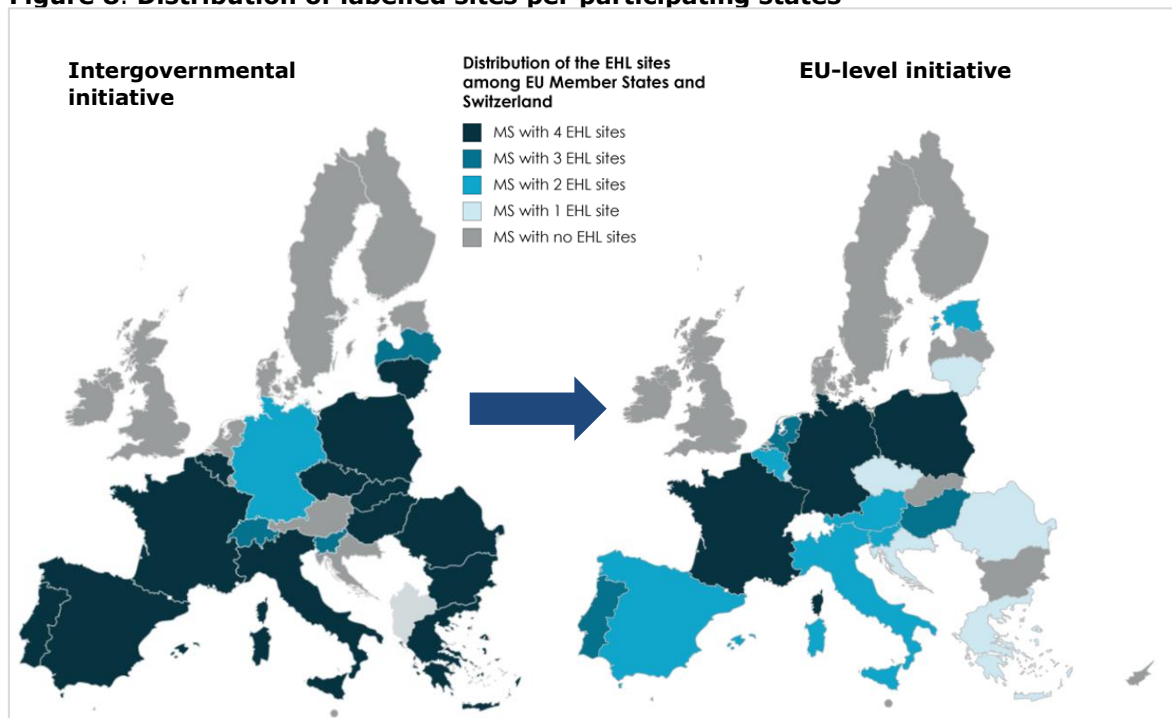


Source: PPMI consortium, based on 2013, 2014, 2015, and 2017 Panel Reports.

But while overall geographical coverage may have shrunk slightly, the EU-level action has succeeded in attracting some Member States that were not previously involved. These include Austria, Croatia, Estonia, Luxembourg and the Netherlands. Thus, although the total number of sites involved is smaller, the EU-level action includes EHL sites in 18 countries, only one fewer than in the intergovernmental initiative. During an equivalent five-year period of activity, the intergovernmental EHL was given to 68 sites (2006-2011), while the EU-level EHL was awarded to 38 sites (2013-2017). This demonstrates that EU action has evolved more slowly than its predecessor.

In comparison with the intergovernmental EHL, the geographical location of EHL sites in the EU action has become more centralised, with more sites in bigger states (see **Figure 8**). At present, these EHL sites are more sparsely distributed than in the previous initiative, and therefore reach fewer citizens.

<sup>44</sup> Impact Assessment, p. 12, 23, 30, 34-35.

**Figure 8. Distribution of labelled sites per participating states**

Source: PPMI consortium.

The transformation of the EHL into an EU action has not, as expected, ensured the participation and commitment of all Member States since the participation of Member States is on a voluntary basis. Finland, Ireland, Sweden and the United Kingdom have not participated in either action. In Ireland and Sweden, such participation has to be discussed and approved – which has not happened since the start of the EHL. In our interviews, national coordinators from some Member States without selected sites (Slovakia, Latvia) confirmed that their countries would participate in the future. The difficulty experienced in finding a national coordinator in some Member States (Malta, Denmark), or arranging an interview, might indicate that these countries have lost interest in the EHL.

To summarise, due to eligibility restrictions and the introduction of EU-level selection, the evolution of the EHL has slowed, and its geographical scope has narrowed. Some assumption made during the Impact Assessment with regard to the involvement and commitment of Member States have so far not materialised.

#### **b) Widening the geographical scope of the EHL**

Bearing in mind the EHL's current situation and the trend in its development, we can consider whether it is reasonable and feasible to widen the geographical scope of the action. Would it help to achieve the EHL's objectives? Is there a need for it among the participants? What are the capacities of the action to expand?

Widening the EHL's geographical scope in terms of participation would mean that cultural heritage sites in non-EU countries would become eligible for the Label. An EHL site in a non-EU country could contribute to strengthening intercultural dialogue, assuming that it develops its European narratives from a different cultural and historical perspective. However, the contribution of countries to strengthening European citizens' sense of belonging to the Union might be complicated. At this point, the matter of the EHL's identity becomes central.

Among site managers, national coordinators, panel members and experts, opinions are mixed with regard to geographical scope of the action. The main argument in favour of widening it is that it would connect the narratives of European history and culture with

those of other countries, regions, continents, and with world history. Another argument is that widening geographical scope would open up opportunities for transnational sites spanning EU and non-EU countries to apply for the Label. Lastly, EHL could be a useful learning tool for accession countries. The main argument against widening the geographical scope of EHL is that the action should first include all Member States before it expands to involve non-EU states. The EHL's development trend shows that it has not yet fulfilled its potential within the EU, and it is therefore too early for the action to expand further. Another argument is that EHL uses cultural heritage sites as its action territory: a variable geography of EHL sites would therefore lead to a blurred identity for the action.

We found no evidence of real interest among EHL sites to cooperate with sites outside the EU, and only few examples of such potential cooperation (for instance, a special type of textile used in the Ottoman Empire and therefore connecting Romanian and Turkish sites). Besides, no obstacles could be identified that would prevent EHL sites from developing and expanding their European narratives and strengthening intercultural dialogue through their existing activities such as exhibitions, lectures and films. In addition, the Creative Europe programme, which supports transnational cooperation projects involving cultural and creative organisations from different countries, not just from the EU, could contribute to this end. As for awarding the label to transnational sites spanning both EU and non-EU countries: the likelihood that this potential would actually be used is very low, since only one transnational EHL site has thus far been labelled, and transnational cooperation among EHL sites is still fairly weak.

In conclusion, widening the geographical scope of the action could contribute to developing narratives concerning European history and culture from different perspectives and, thus, strengthen intercultural dialogue. However, this could also be achieved without widening the existing base of countries participating in the EHL. Expanding the action, which is still in the early stages of development, appears premature at this moment.

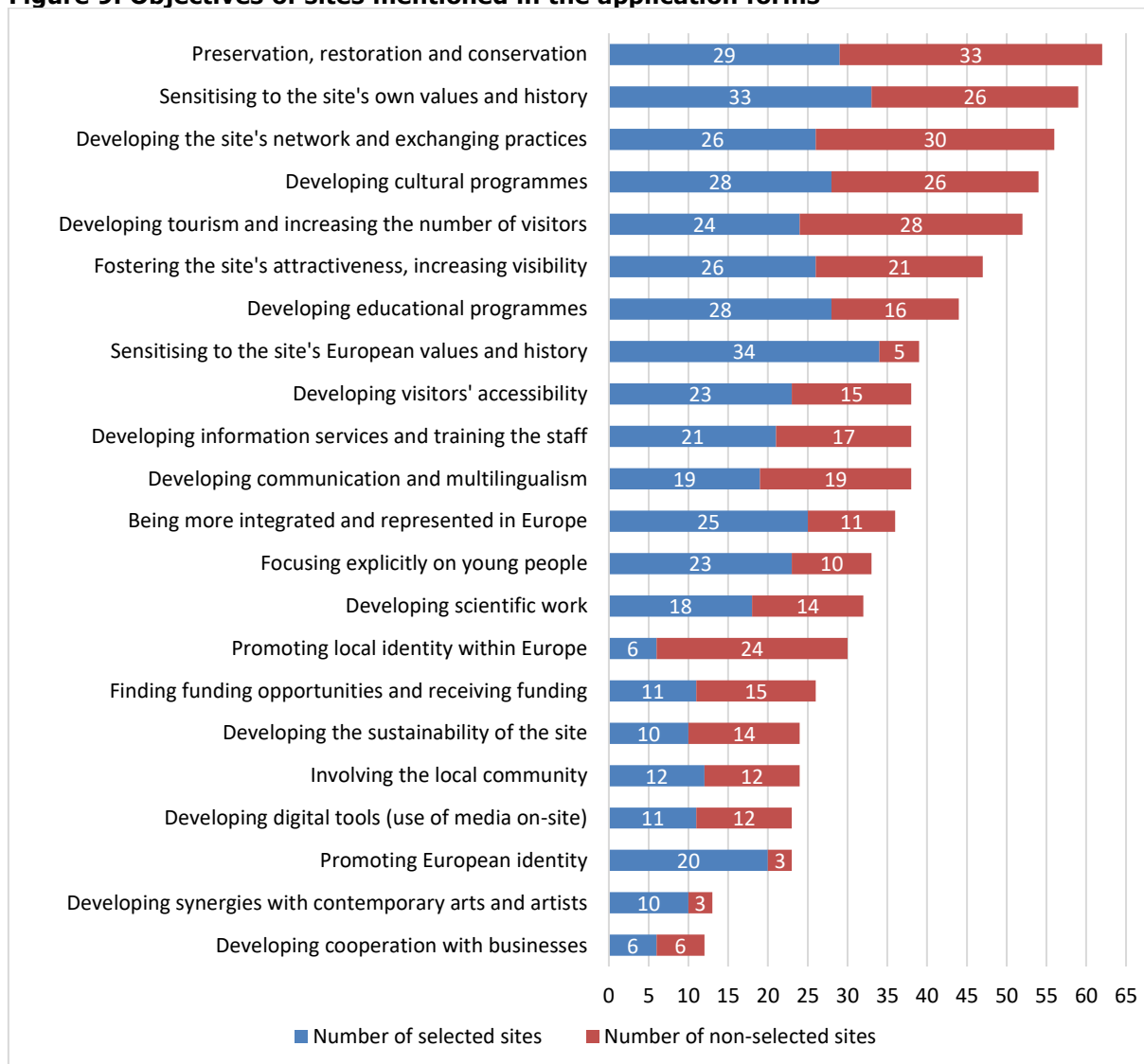
#### **4.1.3. The objectives of sites applying to the EHL**

**EQ3** What were the objectives of the sites applying for the Label? To what extent were the objectives consistent with the Decision?

By examining the extent to which the sites' own objectives are consistent with those of the EHL, we can reveal the action's relevance to the sector of cultural heritage and to its sites. This relevance can be indicated by the motivation of sites to participate, and in the benefits they expect to gain. In particular, we analyse the extent to which candidate sites intend to contribute to the EHL's overall objectives.

Analysing the application forms and the interviews provided evidence about the objectives of the individual sites when applying for the Label. It must be noted that the objectives described by the sites in their applications are not always complete, and Q questions relating to objectives are often answered briefly. In addition, the application forms used have changed during the first years of the action.

In all, three selected sites could not explain their own objectives. In at least one country, individual site-related objectives appear non-existent, as one national coordinator told us in an interview: "It is hard to say whether the sites are achieving their goals, because their goals are not specified." In another country, the national coordinator identified a disparity between the objectives of the EHL and of a site: "The site needs to coordinate its objectives with the ones of the Label." Taking into account these limitations, the objectives mentioned in 88 applications (38 successful, 50 unsuccessful) are shown in **Figure 9**.

**Figure 9. Objectives of sites mentioned in the application forms**

Source: PPMI consortium, based on EHL applications.

The most important finding here is that the biggest differences between the objectives of selected and non-selected sites concern the topic of the European dimension. While 89% of selected sites describe 'sensitising to the site's European values and history' as one of their objectives, only 10% of the non-selected sites do so. Also, 'promoting a European identity' is mentioned as an objective by 53% of the selected sites, but by only 6% of the non-selected sites. These findings confirm the relevance and the defining role of the first selection criterion for the EHL action. In contrast, 'promoting a local identity within Europe' is a goal of 48% of non-selected sites, but only 16% of selected sites.

Furthermore, to assess the relevance of the action, it is necessary to analyse the extent to which the individual sites' own objectives are consistent with the site-specific objectives defined in the Decision establishing the EHL (see **Table 3**).

**Table 3. Consistency of EHL site-specific objectives and selected sites' own objectives**

EHL site-specific objectives	Sites' own objectives
Highlighting the sites' European significance	Sensitising to the site's European values and history (89%)

EHL site-specific objectives	Sites' own objectives
	Fostering the attractiveness of the site and increasing its visibility (68%) Being more integrated and represented in Europe (66%) Developing tourism and increasing the number of visitors (63%) Developing communication and multilingualism (50%)
Raising European citizens' awareness of their common cultural heritage, especially that of young people	Developing education programmes (74%) Focusing explicitly on young people (61%) Promoting European identity (53%)
Facilitating the sharing of experiences and exchanges of best practices across the Union	Developing the site's network and exchanging practices with other sites (68%) Developing scientific work (47%)
Increasing and/or improving access for all, especially young people	Focusing explicitly on young people (61%) Developing visitors' accessibility (61%) Involving the local community (32%) Developing digital tools (29%)
Increasing intercultural dialogue, especially among young people, through artistic, cultural and historical education	Developing education programmes (74%) Focusing explicitly on young people (61%)
Fostering synergies between cultural heritage on one hand, and contemporary creation and creativity on the other	Developing synergies with contemporary arts and artists (26%)
Contributing to the attractiveness and the economic and sustainable development of regions, in particular through cultural tourism	Developing tourism and increasing the number of visitors (63%) Developing cooperation with businesses (16%)

Source: PPMI consortium, based on Decision Art. 3.3, application forms, interview analysis.

Even though the dataset is insufficient, the differences between the extent to which the EHL site-specific objectives are consistent with the sites' own goals provide an important indication of tendencies.

In the applications of selected sites, the objective mentioned most often is that of 'sensitising to the site's European values and history', as reported by 34 of the 38 sites. When it comes to the question of explicitly promoting a European identity, 20 of 38 sites define this as one of their own objectives. Here, consistency can be observed with the EHL's second site-specific objective of 'raising European citizens' awareness of their common cultural heritage'. Fostering the attractiveness of the site and increasing its visibility, as well as becoming more integrated and represented in Europe, is likewise pursued by around two-thirds of selected sites. Highlighting the site's European significance can therefore also be seen as a relevant objective for the sites.

It must also be noted that no application form explicitly mentioned any intercultural dialogue going beyond networking and exchanging experiences. In interviews, such dialogue was mentioned only by two site managers of selected sites. Nevertheless, three-quarters of selected sites described educational and cultural programmes as an important issue. While general cultural programmes were developed by a large majority of the sites, only one-quarter aimed to foster synergies with contemporary arts and artists.

As young people are the focus of some EHL site-specific objectives, we have analysed whether sites mention young people explicitly as one of their main target groups. More than a half of all selected sites describe such a focus as part of their objectives.

In interviews, two site managers explicitly mentioned the objective of reducing visitor numbers, due to the endangerment of the site itself. This appears somewhat contradictory to the first and the last site-specific objectives of the EHL. In this context, an objective which is not considered by the EHL but was mentioned as a goal by more than half of all selected sites, is the preservation, restoration and conservation of the site.

To conclude, various objectives of the individual sites can be noted in relation to the Label. The greatest difference identified between selected and non-selected sites is in the terms of the European dimension as one of the selection criteria. With regard to the consistency of the selected sites' objectives with the site-specific objectives of the EHL, an apparent hierarchy exists between those objectives relating to the European dimension, and other goals (local focus, contemporary creation, intercultural dialogue).

#### **4.2. Coherence**

Coherence is defined as the synergy and complementarity of an action with other initiatives, from the perspective of increasing its impact. Synergy is achieved when different actors cooperate to use mutually complementary resources and deliver results that are greater than the sum of their parts. By 'actors', we mean stakeholders involved in the implementation of the EHL and in other national, European and international initiatives or funding programmes. Complementarity is achieved when different actors carry out activities that are distinct from and complementary to one another, either by accident or design. Coherence also looks at potential overlaps between different initiatives and actions. Duplications can occur when different initiatives replicate activities, leading to inefficiencies from an EU perspective.

This section analyses the EHL's coherence with, and complementarity to, other EU and international initiatives. It presents the findings of desk research and of our mapping of the objectives of EU initiatives in the field of cultural heritage and their synergies, as well as overlaps with the EHL. In a broader context, the evaluation assesses the EHL's synergies and complementarities with cultural tourism programmes and initiatives, such as the Cultural Routes of the Council of Europe, as well as the coherence of the EHL with UNESCO programmes in the field of cultural heritage.

##### **4.2.1. Coherence of the EHL with other EU and international initiatives**

**EQ4** To what extent was the EHL coherent with and complementary to other EU and international initiatives?

The 2010 Impact Assessment stated that the EHL differs from other initiatives and has the potential to add value in terms of a European dimension, pedagogy and networking.<sup>45</sup> To validate the assumptions laid out in the Impact Assessment, we conducted an in-depth mapping of the aims and objectives of other EU and international initiatives, which revealed a more nuanced picture of the synergies, complementarities and potential overlaps between the EHL and other initiatives in the field of cultural heritage.

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<sup>45</sup> European Commission, Commission Staff Working Document, 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, Brussels, 2010 March 9, SEC(2010) 197, p. 90 [hereinafter: Impact Assessment].

The mapping demonstrated that the general and intermediate objectives of the EHL are mostly shared by other EU and European initiatives, namely the Cultural Routes of the Council of Europe, European Capitals of Culture (ECOC), Europe for Citizens, and European Heritage Days (see **Table 4**). However, the substantial similarities between the EHL's objectives and the Cultural Routes of the Council of Europe also indicate a risk for future overlap, which is further assessed in the sub-section on potential duplications.

Meanwhile, the mapping indicated only minor similarities between the EHL and programmes operating under UNESCO in the field of cultural heritage (the UNESCO World Heritage List, the UNESCO List of Intangible Cultural Heritage, the UNESCO Memory of the World Register and the UNESCO Creative Cities Network).



**Table 4. Similarities between the objectives of the EHL and those of other initiatives (on a scale of low, medium and high)**

Initiative	UNESCO WORLD HERITAGE LIST	UNESCO LIST OF INTANGIBLE CULTURAL HERITAGE	UNESCO MEMORY OF THE WORLD REGISTER	UNESCO CREATIVE CITIES NETWORK	EUROPEAN CAPITALS OF CULTURE	EU PRIZE FOR CULTURAL HERITAGE/ EUROPA NOSTRA AWARD	CULTURAL ROUTES OF THE COUNCIL OF EUROPE	EUROPE FOR CITIZENS	EUROPEANA	EUROPEAN HERITAGE DAYS	HOUSE OF EUROPEAN HISTORY
GENERAL FOCUS	Safeguarding of individual built and natural heritage sites	Safeguarding intangible cultural heritage	Preservation of the world's documentary heritage	Promoting cooperation between cities	Fostering contribution of culture to the development of cities	Celebrating and promoting best practices in the heritage field	Developing a shared European cultural space	Strengthening remembrance of European history and enhancing civic participation in the EU	Developing a digital cultural heritage platform for Europe	Raising awareness of Europe's cultural diversity	Encouraging citizens to reflect on history of Europe and European integration
SCALE	1,073 sites in 167 state parties in 2017	399 elements in 112 state parties in 2017	301 documentary heritage items in 107 countries in 2013	Network of 180 sites	58 cities have held the ECOC title between 1985 and 2018	485 award-winning projects from 34 countries since 2002	31 Cultural Routes in 53 states in 2017	Many projects funded under the European remembrance strand	Over 3,500 data partners (cultural, heritage institutions)	Takes place in 50 countries party to the European Cultural Convention	The House of European History museum opened in Brussels in 2017
EHL OBJECTIVES											
<b>Strengthening European citizens' sense of belonging to the Union</b>	No	No	No	No	Medium	Low	Medium	High	High	High	High
<b>Strengthening intercultural dialogue</b>	Low	Medium	Medium	Medium	High	Low	High	High	Medium	High	Medium
Highlighting the European significance of cultural heritage sites	No	No	No	No	Low	Low	High	Low	Medium	High	Low
Increasing citizens' understanding of European history and the building of the Union	No	No	No	No	Medium	Low	High	High	High	High	High

## Evaluation of the European Heritage Label

Initiative	UNESCO WORLD HERITAGE LIST	UNESCO LIST OF INTANGIBLE CULTURAL HERITAGE	UNESCO MEMORY OF THE WORLD REGISTER	UNESCO CREATIVE CITIES NETWORK	EUROPEAN CAPITALS OF CULTURE	EU PRIZE FOR CULTURAL HERITAGE/ EUROPA NOSTRA AWARD	CULTURAL ROUTES OF THE COUNCIL OF EUROPE	EUROPE FOR CITIZENS	EUROPEANA	EUROPEAN HERITAGE DAYS	HOUSE OF EUROPEAN HISTORY
Facilitating the sharing of experiences and best practices across the EU	No	No	No	No	Low	High	High	Medium	Medium	Low	No
Fostering synergies between cultural heritage and contemporary creation	Low	Medium	No	Low	Low	Low	High	Low	No	Low	No
Contributing to the economic and sustainable development of regions through cultural tourism	Medium	Low	No	Medium	High	Low	High	No	Low	No	No
Increasing access to cultural heritage	Low	Low	High	Medium	High	Low	Medium	Low	High	High	No
OVERARCHING DIMENSION REOCCURRING IN SEVERAL OBJECTIVES											
Targeting the needs of young people	Medium	Medium	No	No	Medium	Low	High	Medium	Low	Medium	Low

*Source:* PPMI consortium, based on: UNESCO Convention of 16 November 1972 Concerning the Protection of the World's Cultural and Natural Heritage. Adopted by the General Conference at its 17th Session, Paris; UNESCO World Heritage Centre (2008), *World Heritage Information Kit*, UNESCO World Heritage Centre: Paris; UNESCO Convention of 2003 for the Safeguarding of the Intangible Cultural Heritage, Paris; UNESCO Memory of the World Programme (2017), *UNESCO Memory of the World Programme. General Guidelines*. Approved Text, December 2017. MoW Guidelines Review Group; UNESCO (2002), *Memory of the World. General Guidelines to Safeguard Documentary Heritage*. Revised Edition, February 2002; UNESCO Creative Cities Network, *Mission Statement*; UNESCO Creative Cities Network, *UNESCO Creative Cities Network 2017 Call for Applications. Designation Procedure*; UNESCO Creative Cities Network (2017), *UNESCO Creative Cities Network (UCCN). "Building a Collective Vision for the Future". Strategic Framework*; Decision No 445/2014/EU of the European Parliament and of the Council of 16 April 2014 establishing a Union action for the European Capitals of Culture for the years 2020 to 2033 and repealing Decision No 1622/2006/EC. *Official Journal of the European Union L*, 132/1; The Council of the European Union Regulation (EU) No 390/2014 of April 2014 Establishing the "Europe for Citizens" Programme for the Period 2014-2020, *Official Journal of the European Union, L* 115/3; DG HOME and EACEA (2018), *Europe for Citizens Programme 2014-2020. Programme Guide for Actions Grants*; Council of Europe Resolution CM/Res(2013)66 of 18 December 2013 Confirming the Establishment of the Enlarged Partial Agreement on Cultural Routes (EPA); Council of Europe Resolution CM/Res(2013)67 of 18 December 2013 Revising the Rules for the Award of the "Cultural Route of the Council of Europe" Certification; European Commission (2012), *Frequently Asked Questions: European Union Prize for Cultural Heritage/ Europa Nostra Awards*. Available at: [http://europa.eu/rapid/press-release\\_MEMO-12-398\\_en.htm?locale=en](http://europa.eu/rapid/press-release_MEMO-12-398_en.htm?locale=en); Europeana, *We transform the world with culture, Europeana Strategy 2015-2020*. Available at: <http://strategy2020.europeana.eu/>; European Heritage Days (2018a), *EHD Strategy 2017-2020*. Available at: <http://www.europeanheritagedays.com/EHD-Programme/EHD-Strategy/>; Committee of Experts (2008), *Conceptual basis for a House of European History*. European Parliament: Brussels.

### **a) Complementarities between the EHL and other initiatives**

The mapping demonstrated complementarities between the EHL and other EU initiatives that pursue similar objectives in terms of raising awareness of European history and culture, and increasing citizens' sense of belonging to Europe – specifically, the ECOC, Europe for Citizens, and Europeana. In addition to these complementarities in the cultural field, the evaluation team also sees potential for establishing closer links between EHL and other EU programmes targeting education and mobility.

The EHL is complementary to the ECOC, as the EHL's activities can be viewed as further enhancing the European dimension of cultural heritage sites, which receives less coverage in the ECOC action. The ECOC is an all-encompassing cultural development strategy under the authority of an applying municipality, or of a cluster of cities applying together. Cultural heritage, although important, is only one aspect of the ECOC title. The EHL and the ECOC have little overlap, since they seek common objectives via different measures. Although coordination between the ECOC and the EHL is not ensured on a legal basis, some organic cooperation does take place between them.

The data collected revealed some examples of complementary activities between the EHL and the ECOC at the national level. The ECOC title has been awarded to Mons, Belgium (2015) and Kaunas, Lithuania (2022). The EHL-listed *Mundaneum*, a historical archive of knowledge located in Mons, participated in events organised as part of the ECOC year. The *Mundaneum* reported in its 2016 EHL monitoring form that the ECOC had helped it to develop a dialogue with artists. Also, the application by the city of Kaunas for ECOC designation placed a significant emphasis on its interwar modernist architecture (labelled the *Kaunas 1919-1940* site under the EHL). During the designation year, Kaunas foresees the implementation of activities in relation to its EHL site.

The EHL and Europeana actions can also offer mutual complementarities. Europeana aims to develop a digital cultural heritage platform for Europe. Meanwhile, the EHL also seeks to increase access to cultural heritage and encourages labelled sites to employ digital tools to communicate their European dimension to the public. Both actions carry out distinct activities that can complement each other, as they operate in the same European sphere.

Another important complementarity was observed between the EHL and the Europe for Citizens programme. The topics covered by the European Remembrance strand of the Europe for Citizens programme focus on 20th century history, giving special attention to projects reflecting on the causes of totalitarian regimes. Our mapping of historical coverage demonstrates that the majority of EHL sites labelled up to 2018 represent the 20th century (see section 4.3.1. c). Thus, increased cooperation between the programme and the initiative could enhance opportunities for EHL sites that deal with modern history to access funding through the European Remembrance programme.

For example, one of the European Remembrance priority areas for 2018 is the Schuman declaration of 1950. Meanwhile, the Robert Schuman house is a labelled EHL site. This and other existing links between the programmes could be explored in order to develop further complementarities and synergies, as the Robert Schuman house could potentially qualify, at least thematically, to receive funds from the European Remembrance action. Importantly, if such opportunities remain unexplored, they could lead to accidental duplications. This could occur if both actions support similar projects without coordinating between themselves, since most of the sites labelled to date reflect 20<sup>th</sup> century history.

Besides EU actions in culture, history and heritage, further complementarities can be explored and encouraged with programmes that focus on education, as the EHL also has a very strong educational dimension. For example, EHL sites could benefit from the mobility opportunities provided by Erasmus+. Key Action 1 of the Erasmus+ programme provides mobility opportunities for students to undertake traineeships in other EU states. Labelled sites could use this opportunity to host trainees with relevant skills such as translation, conservation or education, – thus increasing their operational capacity, as well as engaging youth in their activities. Key Action 2 of Erasmus+ provides opportunities for cooperation projects under Strategic Partnerships, which could also be explored by EHL sites.

EHL sites can also potentially benefit from an increasing number of mobility opportunities planned to be established from 2019 onwards. As part of the new European Agenda for Culture, the Commission plans to “develop specific actions for social inclusion through culture, through Creative Europe and Erasmus+”, as well as to “propose a mobility scheme for professionals in the cultural and creative sectors under Creative Europe (2018-2019)”.<sup>46</sup> In line with the latter aim, an open call was launched by the Commission to prepare the ground for a mobility scheme in the creative and cultural sectors from 2021 onwards in the next generation of EU programmes.<sup>47</sup>

In summary, the evaluation findings indicate that some complementarities already exist between the EHL and ECOC, Europeana, and Europe for Citizens actions. Moreover, due to the transversal nature of cultural heritage and the strong educational and cross-border dimensions of the EHL, the evaluation team recognises that potential complementarities could be further exploited between the EHL and EU educational or mobility programmes.

### **b) Synergies between the EHL and other initiatives**

The evaluation findings suggest that moderate synergies exist between the EHL and other EU or Council of Europe’s actions. During the evaluation period (2011-2017), some synergies were established at local and national levels. Synergies at EU level during this period were more limited. However, further EU-level synergies were established in 2018, and will be developed from 2019 onwards.

As mentioned above, few synergies were found between the EHL and other actions at EU level during the evaluation period (2011-2017). However, the EHL is a recent initiative, and it may take time to develop such synergies. Improvements in this respect are, in fact, evident from 2018 onwards. For example, Creative Europe placed cultural heritage among the key orientations for its 2018 work programme, as it coincided with the European Year of Cultural Heritage. As a result, one of the key objectives of the 2018 programme is to reinforce the scope and visibility of other heritage-related actions, such as the European Heritage Label, via cooperative projects.<sup>48</sup>

In addition, two calls were launched in 2018 that could potentially benefit the EHL and its labelled sites. The first was a call for European Heritage Stories, launched by the Council of Europe in cooperation with the EU and EHD national coordinators. European Heritage Stories is a pilot initiative that aims to identify the European dimension of heritage sites and heritage work undertaken by communities in Europe. It focuses on “past or existing ‘stories’ that communities would like to share and potentially develop into a project to further contribute to their communities. The call for European Heritage Stories is associated with the European Year of Cultural Heritage (EYCH) 2018”.<sup>49</sup> The call was open to the winners of the EU Prize for Cultural Heritage/Europa Nostra Award as well as EHL sites. The total budget of this action is EUR 100,000, which allowed for 10 grants of EUR 10,000 to be awarded to different projects.<sup>50</sup> In total, nine EHL sites participated in the call, of which five were awarded with grants.<sup>51</sup> The five successful sites were: *Heart of Ancient Athens* (Greece); *Camp Westerbork* (the Netherlands); *Historic Ensemble of the University*

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<sup>46</sup> European Commission, Communication from the Commission to the European Parliament, the European Council, the Council, the European Economic and Social Committee and the Committee of the Regions, A New European Agenda for Culture, Brussels, 22 May 2018, COM(2018) 267 final, p.3 [hereinafter: A New European Agenda for Culture].

<sup>47</sup> European Commission, Mobility Scheme for Artists and/or Culture Professionals. Available at: [https://ec.europa.eu/programmes/creative-europe/calls/eac-18-2018\\_en](https://ec.europa.eu/programmes/creative-europe/calls/eac-18-2018_en) (Accessed: 22 August 2018)

<sup>48</sup> 2018 Creative Europe work programme, p.12.

<sup>49</sup> European Heritage Days, Call for European Heritage Stories. Terms and Conditions, p.2. Available at: [http://www.europeanheritagedays.com/App\\_Documents/Uploads/files/JEP\(2018\)02EN%20Call%20for%20European%20Heritage%20Stories%20TCs%2012Apr18%20a.pdf](http://www.europeanheritagedays.com/App_Documents/Uploads/files/JEP(2018)02EN%20Call%20for%20European%20Heritage%20Stories%20TCs%2012Apr18%20a.pdf) (Accessed: 21 August 2018).

<sup>50</sup> Ibid., p.14.

<sup>51</sup> European Heritage Days (2018b), *European Heritage Stories*. Available at: <http://www.europeanheritagedays.com/Story/> (accessed: 02 November 2018).

of Tartu (Estonia); and a joint application by the *Peace Palace* (the Netherlands) and *Mundaneum* (Belgium).

The second call was launched in September 2018 through the Creative Europe programme, and was dedicated to the design and management of networking and capacity building activities for EHL sites.<sup>52</sup> The Commission will fund one project within the designated EUR 500,000 budget. Applications may be submitted either by a consortium including a minimum of 10 EHL-awarded sites, or by a single legal entity with at least 10 EHL sites as stakeholders.

From 2019 onwards, the Commission is also seeking to improve complementarities and synergies between cultural policy activities and various projects at EU level, within the framework of the New European Agenda for Culture.<sup>53</sup> Under the New Agenda, the Commission plans to further promote the principles of the participatory governance of cultural heritage, including the involvement of stakeholders in the governance of cultural heritage at local, national and EU levels.<sup>54</sup> To implement this, the Commission launched an open call in 2018 aimed at enhancing structured dialogue in the field of culture.<sup>55</sup> The possible themes suggested in the tender included cultural heritage (its governance, quality, skills, building on EYCH); cultural diversity; cultural and creative industries (including skills, finance, innovation capacity); and cultural professionals (their mobility, employment and working conditions). The New Agenda envisions closer cooperation between the Commission and EU Member States in implementing joint projects in the field of cultural heritage, as well as the scaling-up of culture and heritage projects supported by EU programmes.<sup>56</sup> EHL sites may therefore benefit from the New Agenda and its implementation at EU and national levels.

While synergies at EU level were less evident during the evaluation period (2011-2017), they could be found at local level between the EHL and European Heritage Days. European Heritage Days aim to stimulate citizens' interest in and provide access to Europe's cultural heritage.<sup>57</sup> The Days take place every September in the 50 countries that are signatories to the European Cultural Convention. EHL sites have reported participating in a number of European Heritage Days activities. Nine participated in the call for European Heritage Stories, and four out of the 10 stories selected involved EHL sites. In addition, some sites (e.g. the *Krapina Neanderthal site*, the *Mundaneum*, the *European District of Strasbourg*) reported taking part in annual European Heritage Days events. These examples demonstrate the ways in which European Heritage Days can contribute to achieving the EHL's aims through its annual series of local events focusing on cultural heritage, and raising awareness among European citizens of the cultural diversity of Europe.

Even so, interviews with national coordinators and the managers of labelled sites suggest that sites are not fully exploiting potential synergies by carrying out joint activities with other cultural heritage initiatives at local or national level, or have not reported this in their monitoring forms. Analysis of those EHL sites which are part of other initiatives reveals that most of them are located in the European Capitals of Culture, or are designated/part of UNESCO sites (for example, the *Franz Liszt Academy* is not itself listed, but is part of the Budapest Old Town World Heritage Site). Five EHL sites are currently listed on the UNESCO Tentative List, indicating that the share of labelled sites that are also part of the UNESCO World Heritage List may increase in the future. Only one site (the *Franz Liszt*

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<sup>52</sup> Creative Europe, *Design and management of networking and capacity building activities for European Heritage Label sites. Call for Proposals –EAC/S39/2018*. Available at: [https://ec.europa.eu/programmes/creative-europe/sites/creative-europe/files/2018-s39-specifications\\_en.pdf](https://ec.europa.eu/programmes/creative-europe/sites/creative-europe/files/2018-s39-specifications_en.pdf) (accessed: 11 October 2018).

<sup>53</sup> A New European Agenda for Culture, p.10.

<sup>54</sup> A New European Agenda for Culture.

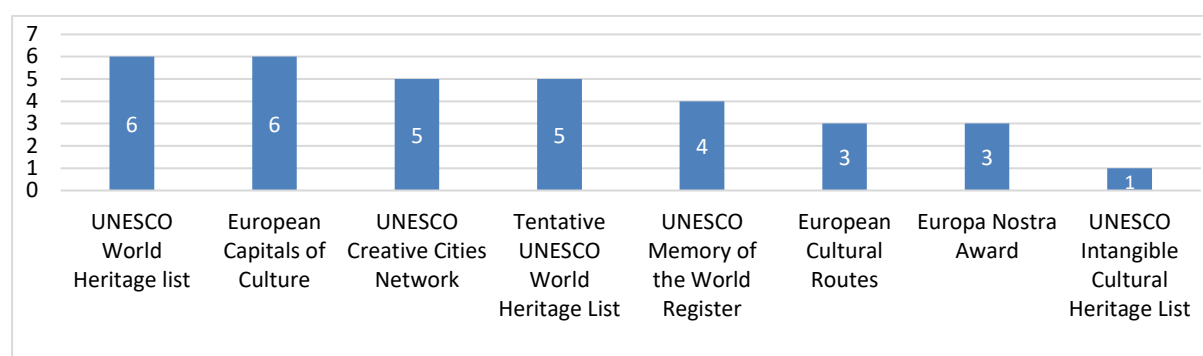
<sup>55</sup> European Commission, *Structured Dialogue in the Field of Culture*, EAC/26/2018. Available at: <https://etendering.ted.europa.eu/cft/cft-display.html?cftId=3888> (Accessed: 22 August 2018)

<sup>56</sup> A New European Agenda for Culture, p. 9.

<sup>57</sup> European Commission, *Creative Europe, European Heritage Days*. Available at: [https://ec.europa.eu/programmes/creative-europe/actions/heritage-days\\_en](https://ec.europa.eu/programmes/creative-europe/actions/heritage-days_en) (Accessed: 03 August 2018).

Academy) was linked to an intangible heritage practice included in the UNESCO Intangible Cultural Heritage List (the *Kodály method for safeguarding folk music heritage*) (see **Figure 10**).

**Figure 10. Number of labelled sites that are part of other programmes/initiatives**



Source: PPMI consortium, based on application forms.

In conclusion, the evaluation team found that although some synergies had been developed between the EHL and EU actions in the cultural field during the evaluation period (2011-2017), such synergies were mainly observed at local rather than EU level. Given the EHL action's short history, however, it may be inappropriate to expect greater synergies to have been developed during its first six years. It is important to note that the action has developed further synergies in 2018, with the launch of two different calls offering potential benefits to the EHL action and its sites (namely, the call for European Heritage Stories, and the call to support networking and cooperation activities among EHL sites). These developments suggest that the EHL action is making progress in establishing synergies with other EU actions.

### c) Possible redundancies and overlaps between the EHL and other initiatives

The evaluation reveals no duplications between the EHL and other EU actions in the field of history, culture and heritage, indicating that the EHL is a distinct initiative in the field of EU actions. Broader mapping of international initiatives does, however, reveal substantial similarities between the objectives pursued by the EHL and the Cultural Routes of the Council of Europe programme. Due to the considerable similarities between their objectives, there is a risk that overlaps can occur – something we assess further below.

The legal basis for the Cultural Routes of the Council of Europe programme places considerable emphasis on objectives that are similar to those of the EHL. The Council of Europe's programme promotes the values of human rights, cultural democracy and diversity, and mutual understanding. It also seeks to enhance European cultural cooperation and promote European identity in its unity and diversity, to encourage intercultural dialogue and facilitate conflict prevention and reconciliation, and to raise awareness of European citizenship and create a sense of belonging.<sup>58</sup> It differs in placing less emphasis on the aspect of European and EU integration. Both actions deal with a European interpretation of cultural heritage in Europe, and some of the Cultural Routes cross EHL sites, as is the case with the Cultural Route of *Cluniac Sites in Europe* and the EHL site of the *Abbey of Cluny*.

EHL and Cultural Routes actions employ some similar processes to attain their goals (see **Table 5**). Candidates for the Cultural Routes – and, likewise, EHL applicants – must develop a project, as well as highlighting their European dimension by defining a theme that represents European values. In addition, both actions are foreseen as functioning as

<sup>58</sup> Council of Europe Resolution CM/Res(2013)67 of 18 December 2013 Revising the Rules for the Award of the "Cultural Route of the Council of Europe" Certification.

networks of sites/routes, and conduct annual networking meetings. However, the Cultural Routes of the Council of Europe has an established official network, while the EHL network is still developing. Cultural Routes are also subject to regular monitoring and a three-year evaluation procedure involving an independent expert report and recommendations. Another difference lies in the fact that the Cultural Routes programme awards routes consisting of multiple heritage sites. While the EHL's transnational sites can to some extent also be perceived as routes, this might pose the risk of duplication in the future.

**Table 5. Comparison between the features of the EHL and the European Cultural Routes of the Council of Europe**

	European Heritage Label	Cultural Routes of the Council of Europe
<b>Eligible entities</b>	Cultural heritage sites, institutions located in EU Member States	Multidisciplinary networks formed by heritage sites, institutions, and tourism agencies that are located in several Council of Europe Member States
<b>Selection process (e.g. two-level or one-level)</b>	Two-level (national and EU level)	Single-level
<b>Open call for selections</b>	In some Member States	Yes
<b>Quotas for the number of selected sites</b>	Max. two sites per MS pre-selected and one site per MS selected	No quotas
<b>Selection criteria</b>	<ol style="list-style-type: none"> <li>1) European significance</li> <li>2) Project</li> <li>3) Work plan</li> </ol>	Projects must deal with a theme that complies with the eligibility criteria (part I). They must also involve indicated priority actions (part II), and be presented by a single network meeting the criteria (part III).
<b>Geographic eligibility</b>	Only EU Member States	Council of Europe Member States
<b>Monitoring procedures</b>	Monitoring of sites every four years, evaluation of the programme every six years	Regular monitoring and a three-year evaluation of routes
<b>Facilitating networking</b>	One meeting per year	Training and other events, annual meeting and an established Network for Cultural Routes Studies
<b>Financial support</b>	No	No, but provides access to information on funding opportunities (European, national, local)
<b>Duration of the award</b>	Indefinite	Indefinite

Source: PPMI consortium, based on Decision No 1194/2011/EU; Council of Europe Resolution CM/Res(2013)66 of 18 December 2013 Confirming the Establishment of the Enlarged Partial Agreement on Cultural Routes (EPA); Council of Europe Resolution CM/Res(2013)67 of 18 December 2013 Revising the Rules for the Award of the "Cultural Route of the Council of Europe" Certification.

While some similarities exist in terms of processes, differences are evident with respect to the actions' respective outputs. First, the sites recognised by the two initiatives differ thematically; our evaluation identified a trend within the EHL to award the Label more frequently to sites that focus on the 20<sup>th</sup> century. Cultural Routes, meanwhile, display little focus on this historical period. Second, the EHL has awarded more individual sites than national-thematic or transnational sites that could to some extent be regarded as routes. The design of the EHL, in contrast to that of the Cultural Routes action, allows the recognition of those sites that are important to European integration, culture or history, but which do not possess many thematic connections with other places in Europe.

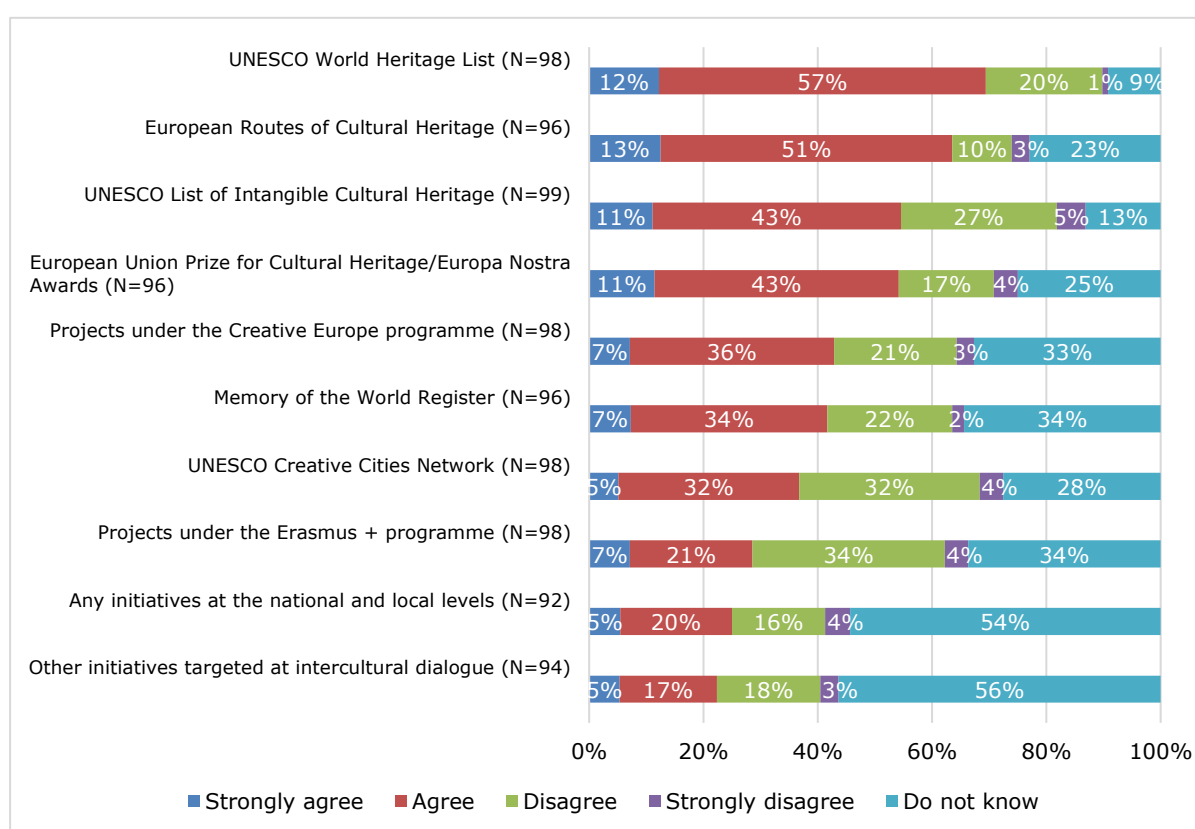
It is worth noting that proactive cooperation has been already established between the EU and the Cultural Routes of the Council of Europe through a number of different projects.



For example, the Council of Europe (Directorate General of Democracy) and the European Commission (DG-REGIO) launched a joint Routes4U project in 2017, covering the period 2017-2020.<sup>59</sup> This programme aims to foster regional development through the identification and drafting of guidelines for transnational regional policies on Cultural Routes for local authorities and operators, as well as the development of new competencies and skills through e-learning modules, and the development of tourism tools and products such as a Cultural Routes card and trip planner.

In terms of duplications with the broader field of cultural heritage actions, some interviewees and OPC respondents highlighted similarities between the EHL and some UNESCO programmes (see **Figure 11**). However, our mapping of the objectives of these programmes in fact revealed little overlap between the EHL and the UNESCO World Heritage List, UNESCO List of Intangible Cultural Heritage, UNESCO Memory of the World Register and UNESCO Creative Cities Network.

**Figure 11. OPC respondents' opinions regarding overlaps between the EHL and other initiatives**



Source: PPMI consortium, based on the Open Public Consultation.

The focus of the UNESCO World Heritage List differs from that of the EHL, as the UNESCO programme is more concerned with the preservation of the designated sites. The UNESCO World Heritage List awards sites based on their Outstanding Universal Value (OUV) and thus promotes a pan-human approach to cultural heritage.<sup>60</sup> Meanwhile, the EHL places less emphasis on the preservation of sites but focuses instead on raising European citizens' awareness of European history and culture. Compared with the UNESCO Representative List of Intangible Cultural Heritage, the EHL is more concerned with the remembrance and

<sup>59</sup> Council of Europe, 2017-20, Joint Programme with the European Commission (DG-REGIO), "Routes4U". Available at: <https://www.coe.int/en/web/cultural-routes/eu-jp-2017-20> (Accessed: 22 August 2018).

<sup>60</sup> UNESCO Convention of 16 November 1972 Concerning the Protection of the World Cultural and Natural Heritage. Adopted by the General Conference at its Seventeenth Session, Paris.



interpretation of physical cultural heritage rather than with intangible cultural heritage such as traditions, local knowledge, cultural practices and their transmission to future generations.<sup>61</sup>

The mismatch between the findings of our desk analysis and the opinions of the OPC respondents may be attributed to the fact that UNESCO initiatives enjoy significant visibility in the field of cultural heritage. For this reason, they may often be taken as a benchmark by the general public, despite having different aims or dealing with a different heritage category. The answers of some OPC respondents may also be based on a limited knowledge of the aims and objectives of cultural heritage actions, as those respondents who were more involved with the EHL were less likely to state that the EHL was similar to UNESCO programmes.

Also, our evaluation findings show that some sites perceived the EHL award as a stepping stone towards designation under UNESCO's World Heritage List (or its other programmes). Some other sites perceived the EHL as a substitute for the UNESCO designation, which highlights a need to further stress and explain to EHL stakeholders the distinction between the EHL and UNESCO programmes, especially to candidate and existing labelled sites.

Overall, the finding that no duplications exist between the EHL and other EU actions in the field of European history and culture indicates that the EHL is a distinct initiative in the field of EU actions. However, some risk of overlap remains between the EHL and the Cultural Routes of the Council of Europe, which is important to address. Although the latter programme was launched by the Council of Europe, it is important to coordinate the implementation of the two actions, as the geographic scope within which both actions operate overlaps to a certain extent.

### **4.3. Efficiency and governance**

Efficiency can be defined as the extent to which the desired effects are achieved at a reasonable cost, or as the relationship between the resources employed and the results achieved. Efficiency also requires the employment of adequate management arrangements in the implementation of the action (institutional structure; human resources; processes and procedures; tools). This evaluation focuses on the assessment of the EHL's implementation processes, with a view to its improvement in the upcoming period.

This section first discusses the extent to which the selection arrangements of the EHL have contributed to the achievement of its outputs, results and impacts. It then addresses the efficiency of the EHL's processes, including selection, monitoring and communication.

#### **4.3.1. Selection arrangements and their contribution to the achievement of outputs, results and impacts**

**EQ5** How did the selection arrangements of the European Commission – and of the participating Member States – contribute to the achievement of outputs, results and impacts?

The selection arrangements are provided in the legal basis of the EHL action. They include criteria governing the eligibility of candidates, the attribution of the Label, and certain aspects of the implementation of the selection process at national and EU levels (e.g. Article 11-2).

##### **a) Eligibility**

The EHL is open to all heritage properties, organisations or other stakeholders, who can submit applications for the attribution of the Label either individually or in collaboration

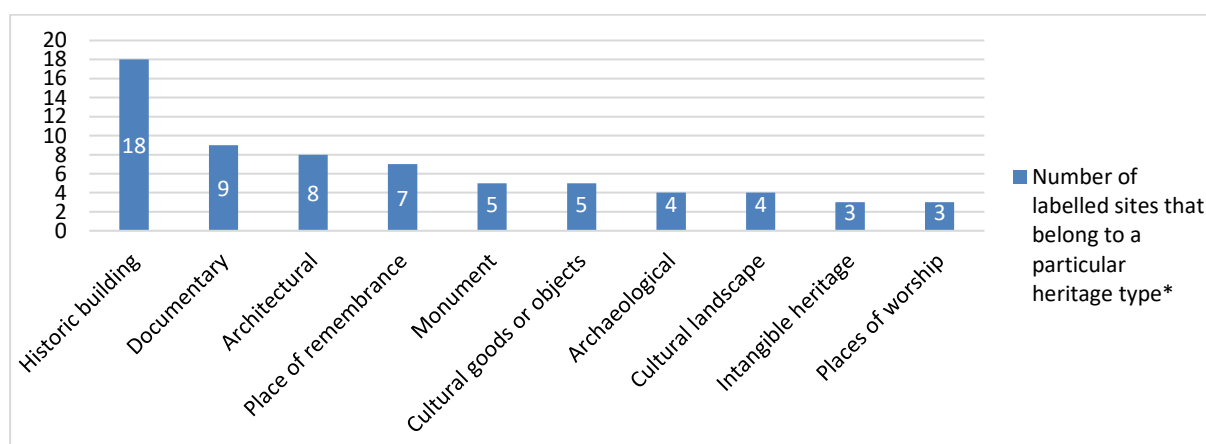
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<sup>61</sup> UNESCO Convention of 2003 for the Safeguarding of the Intangible Cultural Heritage, Paris: UNESCO.

with other parties.<sup>62</sup> Aside from single sites and national thematic sites, the EHL action offers an opportunity for transnational sites to apply for the Label.<sup>63</sup> Transnational sites that are situated in more than one Member State are expected to improve cooperation between EU countries within the frame of the EHL. However, up to the year 2018, most Labels were awarded to individual sites. Only one transnational site (the *Former Natzweiler concentration camp and its satellite camps* in France and Germany) and one national thematic site (the *Sites of the Peace of Westphalia (1648)* in Germany) were labelled.

Our analysis of the sites labelled between 2013 and 2017 demonstrates that the action has attracted applicants of diverse types (see **Figure 12**). We have classified the labelled sites by the type(s) of cultural heritage they represent.<sup>64</sup> Our analysis shows that most of the sites labelled up to 2018 were historic buildings (e.g. castles, former residences of prominent historical figures etc.), followed by documentary, and architectural heritage (ensembles of buildings labelled for their architectural features, town areas etc.). Sites representing places of worship, intangible heritage, and cultural landscapes were among the least labelled sites. The variety of heritage sites labelled shows that the action is universal, and that different cultural heritage sites can find a place within the action and demonstrate their European significance.

**Figure 12. Types of sites awarded the EHL during the period 2013-2017**



\* One site could be attributed to several categories

Source: PPMI consortium, based on the 2013, 2014, 2015, and 2017 Panel Reports.

The EHL distinguishes from other initiatives in the field of cultural heritage by its broad focus. In contrast, some cultural heritage organisations classify heritage properties and elements according to their features (intangible, tangible, documentary, etc.).<sup>65</sup> UNESCO, for example, operates separate lists for different heritage categories, allowing it to focus on diverse activities and priority areas that are most needed by and appropriate to the nature of the specific cultural heritage concerned.<sup>66</sup> By separating cultural heritage sites into categories on the basis of their nature, these initiatives are able to focus more closely and to establish selection, monitoring and other procedures that are most efficient in relation to their specific cultural heritage sector. Meanwhile, the EHL's eligibility categories

<sup>62</sup> Decision No. 1194/2011/EU.

<sup>63</sup> Decision No. 1194/2011/EU, Art. 2.2.

<sup>64</sup> The classification was adapted to the EHL based on ICOMOS (2004), *The World Heritage List: Filling the Gaps – an Action Plan for the Future. An Analysis by ICOMOS*. Paris: ICOMOS.

<sup>65</sup> ICOMOS (2004), *The World Heritage List: Filling the Gaps – an Action Plan for the Future. An analysis by ICOMOS*, February. Paris: ICOMOS.

<sup>66</sup> For example, the Memory of the World Register focuses on increasing the accessibility and digitisation of documentary heritage; the Representative List of the Intangible Cultural Heritage of Humanity stresses the need for education and the transmission of local knowledge; the UNESCO World Heritage List focuses on the conservation of built heritage and cultural or natural landscapes. Based on: UNESCO Convention of 16 November 1972 Concerning the Protection of the World Cultural and Natural Heritage. Adopted by the General Conference at its Seventeenth Session, Paris; UNESCO Convention of 2003 for the Safeguarding of the Intangible Cultural Heritage, Paris; UNESCO (2002), *Memory of the World. General Guidelines to Safeguard Documentary Heritage*. Revised Edition, February 2002.

(sites, national thematic sites and transnational sites) are based mainly on the organisational structure of the heritage properties, and do not differentiate cultural heritage sites on the basis of their characteristics (e.g. memorials, natural landscapes, archaeological sites or intangible traditions).

Our analysis yields no evidence of negative effects stemming from the EHL's current eligibility categories, although a few interviewees expressed concerns that the sheer diversity of sites might present a challenge for the selection process. As we will discuss later, the reasons for non-selection relate to an application's compliance with the selection criteria. The current EHL eligibility criteria make the action universal by ensuring it is open to all types of sites and heritage properties (institutions representing documentary, natural, intangible heritage; remembrance sites; etc.).

#### **b) National thematic and transnational applications**

The legal basis of the EHL provides the opportunity to attribute one Label to a number sites that are located either in a single Member State, or in several Member States, and which are united by a common theme.<sup>67</sup> National thematic sites involve several sites in a single Member State that share a common theme. Transnational sites, meanwhile, involve sites that are located in different Member States and are connected by the same theme. The current legal basis does not allow the submission of transnational applications in which one of the applicant sites is located in a non-EU country.

The Impact Assessment anticipated that moving the action from an intergovernmental to an EU-level initiative would increase the involvement of transnational sites.<sup>68</sup> In fact, only one national thematic and one transnational site were labelled in the period between 2013 and 2017. National thematic and transnational sites also constitute a small share of those sites which are pre-selected at national level, but not selected to receive the EHL. In total, two national thematic and four transnational sites were pre-selected but not selected. The question of the participation of national thematic and transnational sites has been raised repeatedly at the annual meetings of national coordinators.

The data collected during this evaluation makes it difficult to determine the reasons behind this low level of participation by national thematic and transnational sites. Several factors may potentially influence this trend. First, some sites may lack understanding in how to prepare a national thematic and transnational application. During their 2015 meeting, the national coordinators underlined that stronger support and guidance is required from the European Commission to foster proposals from transnational sites. Although transnational cooperation could be encouraged by national coordinators, potential sites should first establish good bilateral relations to prepare for the execution of a joint project.

Second, the application form for national thematic and transnational sites is more complex than that used for single sites. All entities applying for a single national thematic or transnational designation must fill in information on their sites individually (including a description of the site and its European significance, etc.). A revised application form was introduced in 2017, but some room still exists for improvement. For instance, not all national thematic and transnational site candidates participating in the 2017 selection process used the most recent version of the application form; consequently, instead of describing a shared project or European significance, they described each site separately. The application form could be further unified and simplified, as some national thematic and transnational applications still included overlaps between parts of their applications explaining the European significance of the parties applying.

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<sup>67</sup> Article 2 of the Decision No 1194/2011/EU.

<sup>68</sup> The Impact Assessment.

By labelling more transnational sites, the EHL could better fulfil its aim of boosting cooperation between Member States in the field of cultural heritage. Transnational cooperation is an already-established practice in other cultural heritage initiatives. For example, the Cultural Routes of the Council of Europe programme requires every application for a cultural route to be representative of European values, and common to at least three countries of Europe.<sup>69</sup> Likewise, individual sites labelled under the EHL could be formed into networks based on the European values they represent, or their role in European history.

In summary, the small number of national thematic and transnational sites labelled within the EHL action shows that possibilities for cooperation between sites have not yet been fully exploited, in terms of submitting joint applications to the EHL. Our findings suggest that selection arrangements play a role in achieving cooperation between sites, since the application forms for national thematic and transnational sites were reported to be more complex. At the same time, the underrepresentation of national thematic and transnational sites within the action may be linked to the level of cooperation between EHL national coordinators from different Member States. Fostering the active involvement of national coordinators in suggesting ideas to candidate sites is important, since encouraging more transnational and national thematic sites to apply to the Label could considerably increase the effects of the action. An active EHL network within the participating Member States is necessary for the action to be visible, effective and sustainable.

### **c) The selection criteria**

As part of the process of transforming the EHL into an EU-level action, common selection criteria were developed for the attribution of the Label. The Label is given to sites on the basis of three criteria: 1) the symbolic European value of a site; 2) the project; and 3) the operational capacity/work plan.<sup>70</sup>

#### *Symbolic European value*

The European value of a site is a distinctive feature of the action when compared with other programmes or initiatives in the field of cultural heritage. To meet this criterion, candidate sites must develop a narrative that goes beyond national or regional borders, and thus demonstrates one or more of the following:

- (i) their cross-border or pan-European nature
- (ii) their place and role in European history and European integration
- (iii) their place and role in the development and promotion of common values that underpin European integration

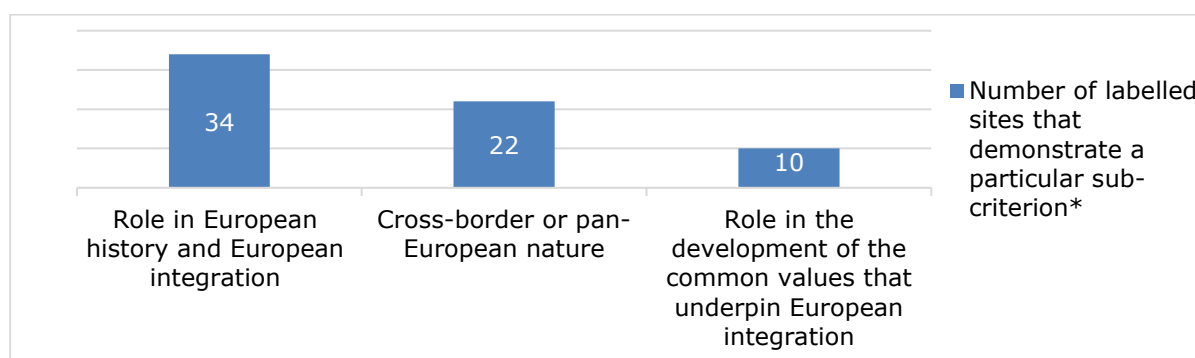
Our analysis shows that most sites labelled in the period 2013-2017 demonstrated their European significance in terms of their place and role in European history and European integration (34 out of 38). More than half of sites exhibited some cross-border or pan-European nature, while a minority share of them played a role in the development and promotion of the common values that underpin European integration (see **Figure 13**). These sub-criteria are closely interlinked, so some sites comply with two or three of them. A table listing all sites and the sub-criteria they demonstrate is provided in Annex X.

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<sup>69</sup> Council of Europe Resolution CM/Res(2013)67 of 18 December 2013 Revising the Rules for the Award of the "Cultural Route of the Council of Europe" Certification.

<sup>70</sup> Decision No 1194/2011/EU.

**Figure 13. The ways in which sites labelled in the period 2013-2017 demonstrate their European significance**

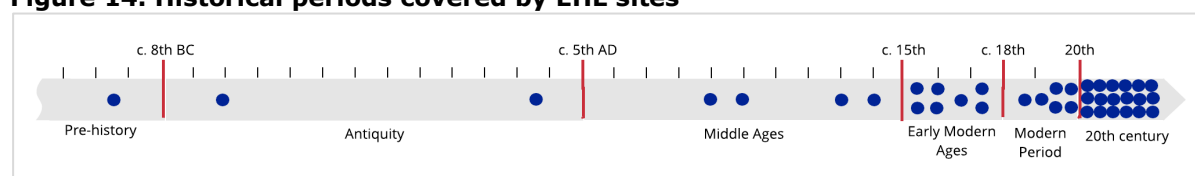


\* One site could be attributed to a few categories

Source: PPMI consortium, based on the 2013, 2014, 2015, and 2017 Panel Reports.

With respect to their role and place in European history, the basic classification of all EHL sites according to historical periods shows that the currently labelled sites cover nine periods. The majority of sites represent the Early Modern period, the Modern period, and the development of the EU in the 20<sup>th</sup> century (see **Figure 14**). Overall, the 20<sup>th</sup> century is represented by around 45% of EHL sites. Only one labelled site covers the prehistoric period; two sites cover antiquity; and three sites represent the Middle Ages.

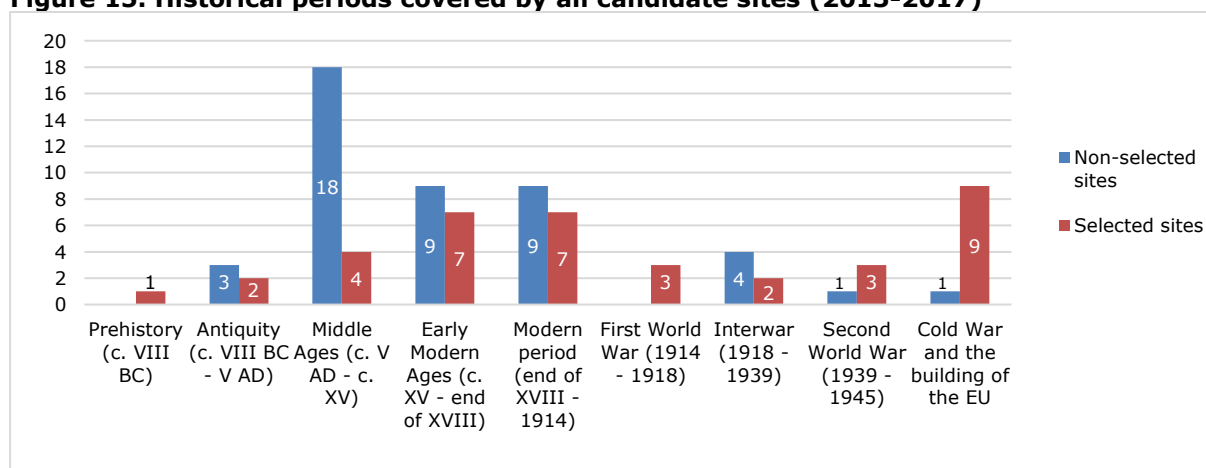
**Figure 14. Historical periods covered by EHL sites**



Source: PPMI consortium, based on application forms and the 2013, 2014, 2015, and 2017 Panel Reports.

The historical classification of *all* sites that have applied for the EHL presents a different picture (see **Figure 15**). Although the ratio of sites selected to non-selected applications is more or less balanced in other periods, imbalances exist for the Middle Ages and the 20<sup>th</sup> century. The Middle Ages represent the largest single share of all applicant sites; however, this period achieved the lowest selection rate. The Early Modern period and Modern Period represent the second-largest share of applicant sites, and also suffer from a low selection rate. Sites representing the 20<sup>th</sup> century, especially the period after 1945, show the highest selection rate. However, the data gathered during this evaluation does not allow us to provide an explanation for such disparities during the selection process.

**Figure 15. Historical periods covered by all candidate sites (2013-2017)**

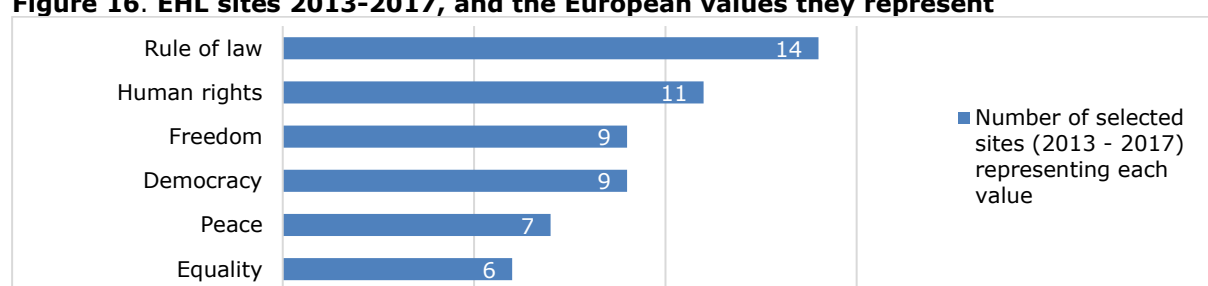


Source: PPMI consortium, based on the 2013, 2014, 2015 and 2017 Panel Reports.

Aside from their role in European history, sites can also be awarded the Label for their cross-border or pan-European nature. This sub-criterion encompasses the way in which a site's past and present influence go beyond the national borders of the Member State in which it is located. Examples of such sites labelled during the evaluation period include the *Archive of the Crown of Aragon* (Spain), *Sagres Promontory* (Portugal), *Fort Cadine* (Italy), *Bois du Cazier* (Belgium), *Village of Schengen* (Luxembourg), *Maastricht Treaty* (the Netherlands), etc. These sites contribute to emphasising the historical and contemporary links between Member States.

Ten sites demonstrated their role in the development and promotion of the common values that underpin European integration. Yet, other labelled sites may also contribute to the promotion of the European values established under Article 2 of the Lisbon Treaty (respect for human dignity, freedom, democracy, equality, the rule of law, respect for human rights, non-discrimination, tolerance, justice, solidarity and equality).<sup>71</sup> Our analysis indicates that the European values most commonly conveyed by sites are the rule of law, human rights, freedom, democracy and peace (see **Figure 16**).<sup>72</sup>

**Figure 16. EHL sites 2013-2017, and the European values they represent**



Source: PPMI consortium, based on the 2013, 2014, 2015, and 2017 Panel Reports.

An increase in the number of sites might be expected to allow the action to provide a better view of the ways in which European values have evolved throughout the centuries. It would also help to incorporate multiple aspects of European history and integration. The overall historical coverage of the action is also important in conveying a coherent narrative of the story of European integration, and the values it represents. As demonstrated by the case of the House of European History (HEH), analysed in the Platform of European Memory and Conscience report, exclusively focusing on a specific period (in the HEH's case, the 19<sup>th</sup> century onwards) can provoke the criticism that it provides a poor reflection of the development of European history. The Platform of European Memory and Conscience report criticised the HEH for not incorporating significant events that took place before the 19<sup>th</sup> century, but which shaped the development of later movements, events, values and ideas.<sup>73</sup>

Again, it is important to note that the EHL action is still a recent initiative, and it may be too early to determine its over- or underrepresentation of historical periods, since the historic coverage provided by the current list is more accidental than created by specific selection arrangements. Nevertheless, in order to avoid such a historical imbalance in the future (and thus create a coherent narrative of European integration), at every selection year specific selection criteria could be applied, or priority calls for applications could be introduced, which focus on a particular historical period, theme or anniversary.

Our analysis also shows that the notion of European significance can have different focuses, all of which might contribute to the achievement of the EHL' objectives (see **Figure 17**). Applicant sites can convey their European narrative by focusing on one or a few of three

<sup>71</sup> European Commission, Treaty of Lisbon amending the Treaty on European Union and the Treaty establishing the European Community, signed at Lisbon, 13 December 2007, *OJ C 306*, 17.12.2007, pp. 1–271.

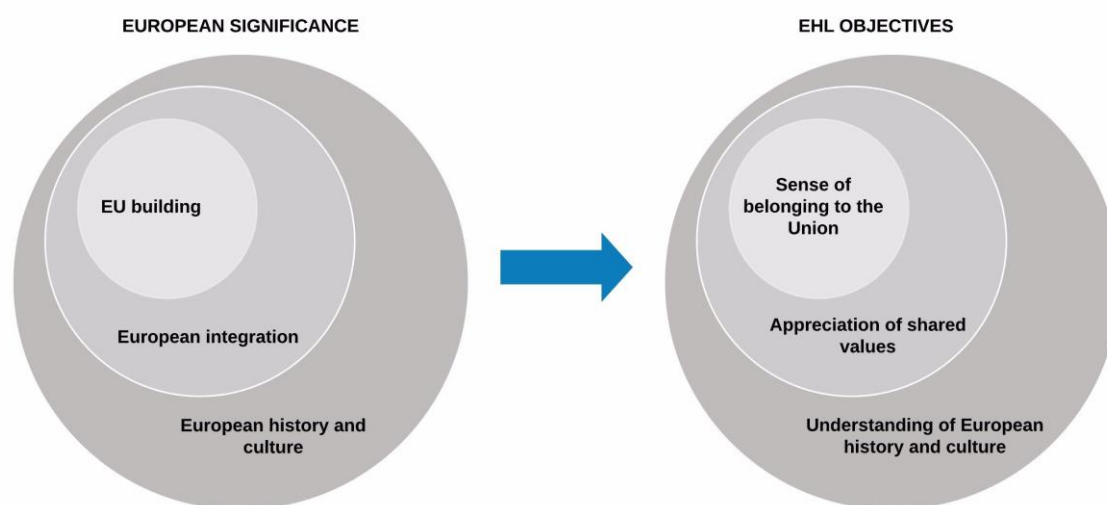
<sup>72</sup> 2013, 2014, 2015 and 2017 Panel Reports.

<sup>73</sup> Platform of European Memory and Conscience (2017), *The House of European History. Report on the Permanent Exhibition*. Prague: Platform of European memory and Conscience.



different layers: European history and culture; European integration; and the building of the EU. Since these three layers are interconnected, selected sites may convey narratives from different perspectives and still contribute to the common objectives.

**Figure 17. The relationship between “European significance” and EHL objectives**



Source: PPMI consortium, based on the Decision No. 1194/2011/EU.

To sum up, the first criterion for the attribution of EHL to candidate sites – their symbolic European value – contributes to the achievement of EHL objectives as a tool for selecting those sites which demonstrate a European dimension. It provides a framework and main categories within which the European significance of a given site can be defined. However, as our further analysis shows, many candidate sites find it difficult to articulate their European dimension (if such a dimension exists), and the perception of a European narrative among stakeholders is still vague. This means that a general definition of ‘European significance’ as a selection criterion is not enough for candidate sites to develop their European narratives, and additional measures should be sought to help both candidate and existing EHL sites in this respect, and thus make progress towards the EHL’s objectives.

### *The project*

Although it is the most important criterion in the selection process, the European significance of a site is not *per se* enough to warrant the attribution of the Label. This significance must be communicated to audiences through the implementation of a number of activities. Candidate sites must therefore develop and submit a project that covers informative, educational and networking activities, among others. Of the activities provided in the legal basis of the action, all are obligatory parts of the project, except one – the organisation of artistic and cultural activities that foster the mobility of European culture professionals, artists and collections, stimulate intercultural dialogue and encourage linkages between heritage and contemporary creation and creativity.

Our analysis shows that all activities of the project correspond to the action’s site-specific, and even to its general and intermediate, objectives. This means that by complying with the second qualifying criterion for the EHL (the project), candidate sites commit to achieving EHL goals. In fact, 86% of EHL sites implement their projects, although their progress varies (see more in section 4.4.2. on progress towards site-specific objectives).

### *The work plan*

Finally, to ensure the implementation of the project, candidate sites must submit a work plan, which demonstrates their organisational capacity. The operational capacity and

motivation of the sites to participate in the action are pre-conditions for the implementation of individual EHL projects.

Significant differences exist between sites in terms of their administrative mechanisms, financial capacity, human resources and stakeholder cooperation networks, and these certainly affect the achievement of EHL results and impacts. By 2016, a few sites already appeared to have reached the limits of what they could reasonably achieve with their existing resources.<sup>74</sup> A great deal of creativity and support is required for sites to overcome the administrative and financial obstacles to pursuing the EHL's goals.

Although Article 7-2 establishes that an applicant's project and work plan must be evaluated according to the characteristics of that site,<sup>75</sup> a few members of the European panel and Commission officials have expressed concerns that developing the project and work plan may be too demanding for smaller sites. In its 2013 report, the European panel also highlighted the fact that most candidate sites do not possess the resources to prepare complex applications.<sup>76</sup>

In general, the common selection criteria may have had an impact on clarifying the types of sites represented by the action, and contributed towards the action's identity. During the four selection cycles between 2013 and 2017, 30 sites that were previously involved in the intergovernmental initiative applied for the EHL and were pre-selected. However, only one-third of these (N = 13) were awarded the Label. In total, only 19% of all sites that were involved in the intergovernmental EHL have carried across to the current EU-level action. Some applications from sites labelled under the intergovernmental initiative failed to demonstrate their European significance; others exhibited difficulties in developing a project and work plan. These factors contributed to the selection of sites under the EU-level action that have both the capacity and concrete plans to work on the Label, and to promote their European significance.

Our analysis leads to the conclusion that the application of selection criteria to candidate sites is a pre-condition for the achievement of the action's objectives. In contrast to EU expenditure programmes, the EHL does not offer any direct financial support other than recognition and promotion of the labelled sites at European level. This means that the action's success relies foremost upon the relevance of the selected sites to the action's objectives, and upon their capacity and willingness to participate in and exploit the opportunities offered by the action.

#### **d) Limitation of one site per Member State per selection year (Article 11-2)**

Article 11-2 of the Decision establishing the action specifies that the European panel shall select a maximum of one site per participating Member State in each selection year.<sup>77</sup> Up to 2018, Article 11-2 was applied twice, and applications from the *Congress Hall*, Austria and the *Coudenberg Palace*, Belgium, were not selected despite meeting the selection criteria. The *Coudenberg Palace* applied twice to receive the Label and was not selected, even though its second application met the selection criteria.

Two aspects are unclear, with regard to the application of Article 11-2. First, the legal basis does not establish *how* the decision should be made in the case of two pre-selected sites from one Member State both meeting the criteria. As one interviewee reported, it is difficult for the European panel to choose between the two sites, since the panel works with "yes/no" answers and not quantitative points that can be compared at a later date. Second, the Decision does not stipulate whether or how Article 11-2 should be applied to

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<sup>74</sup> 2016 Panel Report on Monitoring, p.10.

<sup>75</sup> Article 7-2 of the Decision No 1194/2011/EU.

<sup>76</sup> 2013 Panel Report, p. 11.

<sup>77</sup> Decision No 1194/2011/EU, p.5.



transnational sites. As a result, in 2017 two sites rather than one were selected in Germany (*Leipzig's Musical Heritage Sites*, Leipzig; and the *Former Natzweiler concentration camp and its satellite camps*, France and Germany) due to a successful transnational application.<sup>78</sup>

This lack of clarity as to the article's application hinders the transparency of selection decisions. A staff member from one of the sites that was not selected due to Article 11-2 underlined that the selection decision explained in the Panel Report was unclear, and that this could have further implications. For example, the interviewee expressed the concern that local authorities might be reluctant to support their application in the future, due to the possibility that it may once more be unsuccessful. The interviewee also said that a site that meets all the criteria should not be asked to re-apply and draft a new application, because this demands time and human resources. Instead, an opportunity should be available to receive the Label in the following year.

Furthermore, the application of Article 11-2 can discourage some Member States from submitting more than one application, as has been reported by some national coordinators and one of the panel members. The preparation of two applications is regarded as a waste of resources; thus, the submission of one "strong" application is considered a better alternative. The European panel also highlighted this issue in its 2015 and 2017 Panel Reports, stating that, if the legal basis is reviewed, consideration should be given to abolishing the maximum limit of one site per Member State per selection year.<sup>79</sup>

While some interviewees expressed concerns regarding Article 11-2, one national coordinator perceived it positively. This interviewee claimed that Article 11-2 increases the action's prestige, adding that as the EHL list expanded, the overall number of sites selected should be correspondingly reduced at each selection year. A few interviewees also noted that the provisions of Article 11-2 relate to the broader question of the size of the EHL. Some respondents discussed the idea that the action needs to set a clear vision regarding its expansion and the number of sites it plans to Label in the future.

In conclusion, the national quotas have not, as expected, ensured the equal distribution of Label across Member States. Based on our evaluation findings, we can see that Article 11-2 is perceived by many stakeholders in a more negative than positive light, as it hinders the transparency of selection decisions, as well as discouraging non-selected sites from re-applying, and Member States from pre-selecting two sites. With regard to the Label's prestige, this is not just achievable by making quotas smaller. It could be accomplished through other methods such as applying the selection criteria in a more rigorous way, or by raising the visibility of the action.

#### **e) Geographic scope and distribution of the Label**

Geographic location itself does not play a role in the selection process, as eligible sites are assessed solely on the basis of the three selection criteria. However, different pre-selection arrangements in Member States may have an impact on the participation of candidate sites (for further analysis, see section 4.3.2.).

The selection arrangements could contribute to a more balanced distribution of EHL sites across Europe by introducing some additional measures such as priority calls, which are already applied by other initiatives. For example, the Remembrance Strand of the "Europe for Citizens" programme selects a few topics or historic events to be highlighted by applicants each year.<sup>80</sup> The ECOC, meanwhile, works according to a schedule that dictates which Member States will have the title in a specific year, thus allowing all Member States

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<sup>78</sup> 2017 Panel Report.

<sup>79</sup> 2015 Panel Report; 2017 Panel Report.

<sup>80</sup> The Council of the European Union Regulation (EU) No 390/2014 of April 2014 Establishing the "Europe for Citizens" Programme for the Period 2014-2020, *Official Journal of the European Union*, L 115/3.

to host the ECOC.<sup>81</sup> At the same time, an even geographical distribution of sites may be difficult to combine with some of the values and themes of the EHL, such as EU integration. Since some countries (e.g. the EU founding states) were more deeply involved in the process of building the Union, they might possess more heritage sites that are directly associated with the EU, and which transmit the narrative of European integration.

#### **4.3.2. The efficiency of processes involved in running the action**

##### **EQ6** Were the processes involved in running the action efficient?

This sub-section of the report covers the extent to which the overall processes involved in running the action (selection, monitoring and communication) are sound and efficient. It also examines the extent to which the strategic direction of the action is perceived equally by all actors involved, and the extent to which its selection and monitoring procedures are transparent.

The evaluators also took into account the fact that some of the administrative and financial provisions of the EHL are funded through the Creative Europe mechanism. The 2014, 2015, 2016 and 2017 annual work programmes for the implementation of the Creative Europe programme allocated funds to launch calls relating to the EHL.<sup>82</sup> The procurement contracts dedicated to the EHL focused on two areas: communication activities for the EHL, and support activities for the ECOC and the EHL.

Contracts relating to communication activities were aimed at supporting the implementation of the action and/or carrying out a series of communication activities on the Label to ensure its visibility at EU level. The subject matter of the contracts included studies, technical assistance, evaluation, surveys, IT and communication services. The budget allocated to the communication of EHL has decreased since 2014: in 2014, it was EUR 300,000; in 2015, EUR 200,000; in 2016, EUR 15,000; and in 2017 it was EUR 200 000.<sup>83</sup>

Contracts focusing on support activities for the ECOC and the EHL were aimed at providing assistance to the European panel in charge of the selection of sites. The budget allocated to support the work of the panel of experts for both the ECOC and EHL has also declined since 2014: in 2014, it was EUR 500,000; in 2015, EUR 350,000; in 2016, EUR 300,000; and in 2017, it was EUR 350,000.<sup>84</sup>

Funds earmarked for EHL communication and support activities in 2018 are the same as for 2017.<sup>85</sup>

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<sup>81</sup> Decision No 445/2014/EU of the European Parliament and of the Council of 16 April 2014 establishing a Union action for the European Capitals of Culture for the years 2020 to 2033 and repealing Decision No 1622/2006/EC. *Official Journal of the European Union L*, 132/1.

<sup>82</sup> European Commission, 2014 annual work programme for the implementation of the Creative Europe Programme, C(2013)8314 of 28 November 2013 [hereinafter: the 2014 Creative Europe work programme]; European Commission, 2015 annual work programme for the implementation of the Creative Europe Programme, C(2014)5313 of 30 July 2014 [hereinafter: the 2015 Creative Europe work programme]; European Commission, 2016 annual work programme for the implementation of the Creative Europe Programme, C(2015)5490 of 5 August 2015 [hereinafter: the 2016 Creative Europe work programme]; European Commission, 2017 annual work programme for the implementation of the Creative Europe Programme, C(2016)5822 of 16 September 2016 [hereinafter: the 2017 Creative Europe work programme].

<sup>83</sup> 2014 Creative Europe work programme, p.78; 2015 Creative Europe work programme, p.71; 2016 Creative Europe work programme, p.73; 2017 Creative Europe work programme, p. 39.

<sup>84</sup> 2014 Creative Europe work programme, p.79; 2015 Creative Europe work programme, p.72; 2016 Creative Europe work programme, p.74; 2017 Creative Europe work programme, p. 40.

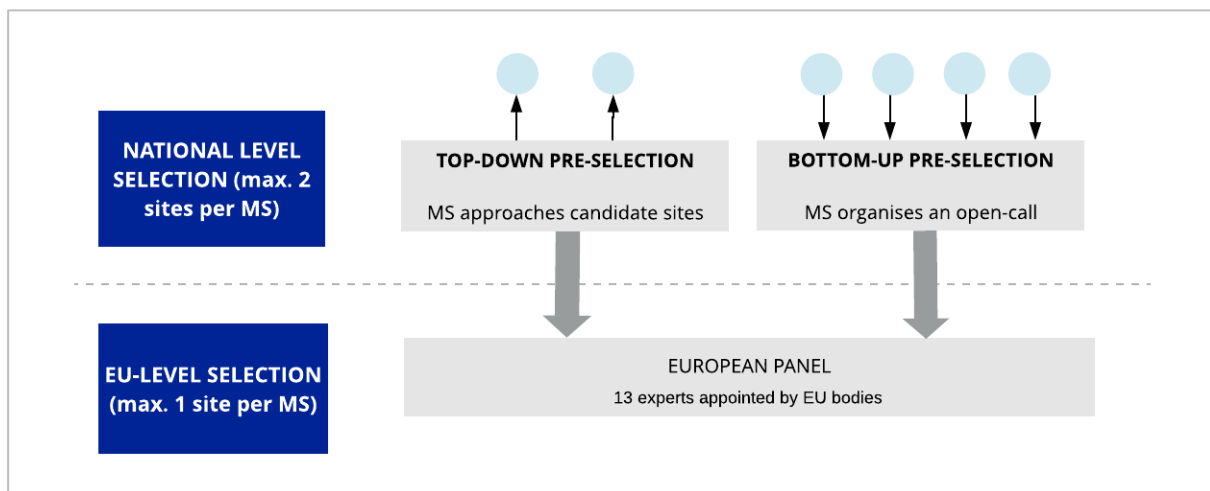
<sup>85</sup> European Commission, 2018 annual work programme for the implementation of the Creative Europe Programme, C(2017)6002 of 6 September 2017, pp. 90-91 [hereinafter: the 2018 Creative Europe work programme].

### a) The efficiency of national pre-selection process

#### *Different approaches to pre-selection*

The pre-selection of sites for the attribution of the Label falls within the responsibility of the Member States, which establish their own procedures and calendar for pre-selections.<sup>86</sup> Our analysis shows that two types of pre-selection are applied by Member States: top-down and bottom-up (see **Figure 18**). In the case of top-down, national coordinators approach some sites with a proposal to apply for EHL; in the case of bottom-up, an open call is organised. Among the national coordinators interviewed, the bottom-up approach was slightly more common: 10 reported following this model. The top-down method, meanwhile, was implemented by nine national coordinators.

**Figure 18. Scheme for selecting the sites**



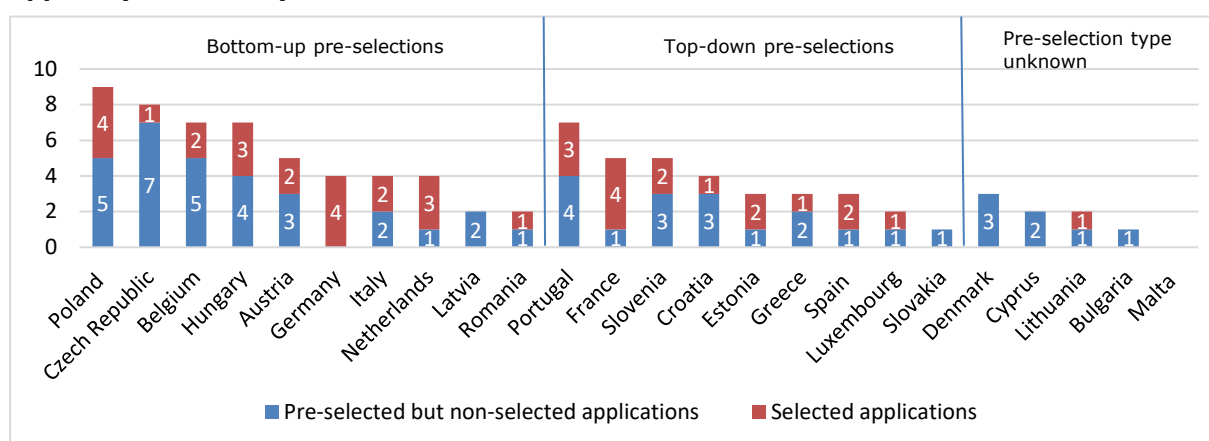
Source: the PPMI consortium, based on the Decision No 1194/2011/EU.

The reasons given for choosing the top-down approach were diverse. Some national coordinators preferred it because it is simpler, requiring less time, effort and money. A few coordinators stated that they first wanted to submit applications from those sites that had participated in the intergovernmental initiative. Other coordinators expressed concerns that an open-call could demotivate unsuccessful candidates and cause their dissatisfaction. Therefore, they preferred to approach only those sites which they deemed to manifest European significance, and which directly possessed the capacity necessary to be selected for the Label. They also did not wish to create competition among heritage sites. However, such top-down pre-selections can be less transparent because they exclude other sites that could be interested in applying. In this respect, the top-down pre-selection process is less democratic and does not comply with the principles of participatory governance of cultural heritage, which are actively promoted by the EU.

Bottom-up pre-selections carried out via an open call are more transparent and inclusive of all sites that are willing to participate. In most of the Member States in which an open-call is organised, applications are reviewed by a national panel of experts. Almost all Member States apply the criteria outlined in the Decision for the pre-selection of the sites. Two exceptions were noted, however: these Member States focused not only on the European significance of the sites, but also on their national importance. In these two countries, the candidate sites were also expected to cover some aspects of their state's history and culture, in order to better help their citizens to identify with the pre-selected sites. Our analysis also reveals that Member States that initiated open calls were among those that submitted the greatest number of applications and participated most actively in the action (see **Figure 19**).

<sup>86</sup> Article 10 of the Decision No. 1194/2011/EU.

**Figure 19. Participation of Member States in the action based on the types of pre-selection applied (2013-2017)**

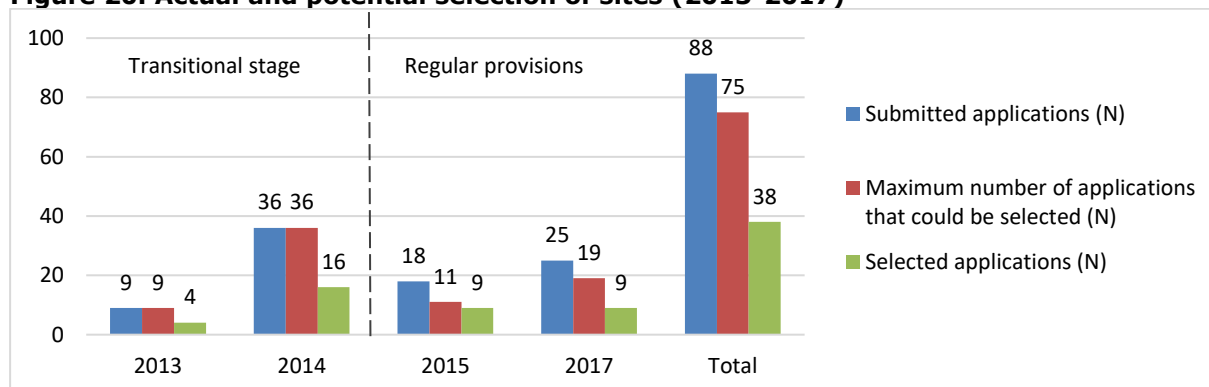


Source: PPMI consortium, based on the Panel reports 2013, 2014, 2015 and 2017.

### Efficiency of pre-selection

National pre-selections serve as a filter to identify those candidate sites that are most relevant to the attribution of the Label. Their efficiency can therefore be determined by the extent to which nationally pre-selected sites meet the selection criteria at EU level. Each Member State has the potential to have one site labelled in each selection year. However, our analysis shows that during the evaluation period, half of all nationally pre-selected sites did not qualify at for selection at EU level. Between 2013 and 2017, the EHL was awarded to 38 out of a potential 75 pre-selected sites. This indicates a total selection rate 51% (see **Figure 20**).

**Figure 20. Actual and potential selection of sites (2013-2017)**<sup>87</sup>



Source: PPMI consortium, based on 2017 Panel Report.

It can be expected that if the selection criteria are applied adequately at national level, the applications of pre-selected sites should meet the selection criteria at EU level and receive the Label, unless Article 11-2 is applied. In this regard, the role of national coordinators is central.

<sup>87</sup> This figure is based on the *Panel Report 2013; 2014; 2015; and 2017* and may require additional explanation. It presents the results of the four EHL selection cycles, including the maximum number of sites that could have been attributed with the Label. In 2013 and 2014, a maximum of four sites per country could have been awarded because these were the transition years from the intergovernmental initiative. This explains why all applications submitted in 2013 and 2014 could have been selected. In 2015, 11 Member States submitted applications, meaning that a maximum of 11 sites could have been selected.

### *The role of national coordinators*

The Decision establishing the action does not define the role of national coordinators. Our evaluation shows that the involvement of national coordinators in the pre-selection process differed between Member States, with some coordinators being more engaged in disseminating information about pre-selections and helping candidates to finalise their application forms. However, the high rate of pre-selected sites that are not eventually selected sites shows that some sites may require greater support from their national coordinators in preparing their applications, or that that national coordinators themselves need a better understanding of the selection criteria.

Due to different national pre-selection arrangements, cultural heritage sites in different Member States have unequal opportunities to become engaged in the action. The top-down approach to pre-selection is simpler but less transparent, while the bottom-up approach requires greater effort, but ensures a more transparent and participatory process. Despite this approach, however, national pre-selections have not yet fulfilled their potential for efficiency – a fact which may be linked to the role of national coordinators and their understanding of the selection criteria.

#### **b) The efficiency of European level selection**

##### *Description of the process*

The selection of sites for the attribution of the Label is carried out by a European panel of experts under the responsibility of the Commission.

The legal basis stipulates that the European panel consist of 13 members, four of whom shall be appointed by the European Parliament; four by the Council; four by the Commission; and one by the Committee of the Regions, in accordance with their respective procedures.<sup>88</sup> The first members of the European panel were appointed in 2012, with different durations of service (ranging between one and three years) to ensure that all panel members were not rotated at once.<sup>89</sup> Since 2012, new members of the European panel have been appointed for a duration of three years. The panel has established its own procedures for evaluating the applications submitted by pre-selected sites against the selection criteria, discussing them and recommending which of the sites should be awarded the Label.

On the basis of interviews with the European panel members, we conclude that its operation is generally smooth. The European panel carries out its work independently and possesses sufficient tools to evaluate the sites and make impartial selection decisions. Members of the panel are not in direct contact with the national coordinators or the sites, but where necessary communicate with them via the Commission. Most members of the panel interviewed were satisfied with communication between the panel and the Commission.

Panel members indicated a number of improvements that could be made to the selection process. First, the appointing authorities should ensure that all panel members are fully proficient in English, which is the language of the discussion. Second, a few members of the panel suggested that it would be useful to visit applicant sites before making final decisions. Some of the labelled and non-labelled sites also supported the idea of the panel visiting applicant sites during the selection. However, given the EHL's limited budget, visits to all sites would be not be infeasible at present.

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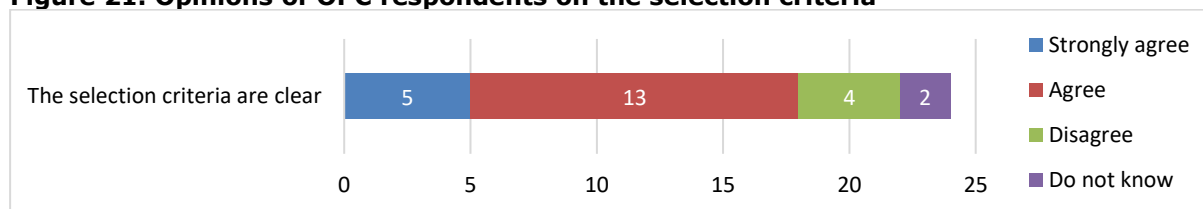
<sup>88</sup> Article 8 of the Decision 1194/2011/EU.

<sup>89</sup> In 2012, four experts were appointed by the European Parliament for two years, four by the Council for three years, four by the Commission for one year and one by the Committee of the Regions for three years.

### *Clarity and application of the selection criteria*

The selection criteria, and the way in which they are perceived by the site managers, national coordinators and members of European panel, play a crucial role in the selection process. In general, the selection criteria are perceived as clear. Almost half of the managers of the selected sites (47%) deemed the selection criteria to be clear, with only a minor share (10%) perceiving them as unclear. Others either did not express an opinion with respect to the clarity of the selection criteria, or did not work on the application themselves. Four out of five managers of non-selected sites also deemed the selection criteria to be understandable. A similar opinion was shared by respondents to the OPC (see **Figure 21**).

**Figure 21. Opinions of OPC respondents on the selection criteria**



Source: PPMI consortium, based on the open public consultation.

However, the European significance of a site is often regarded as an ambiguous term. Data from interviews and focus groups shows that some stakeholders find it difficult to localise the notion of symbolic European value, and even admit that they are not aware of the common values that underpin European integration. Meeting the criterion of European significance is a challenge for the majority of non-selected sites, since it requires the site not only to possess and generally understand its European significance, but also to articulate this significance clearly to the audience, i.e. to develop a narrative that goes beyond national and regional borders.

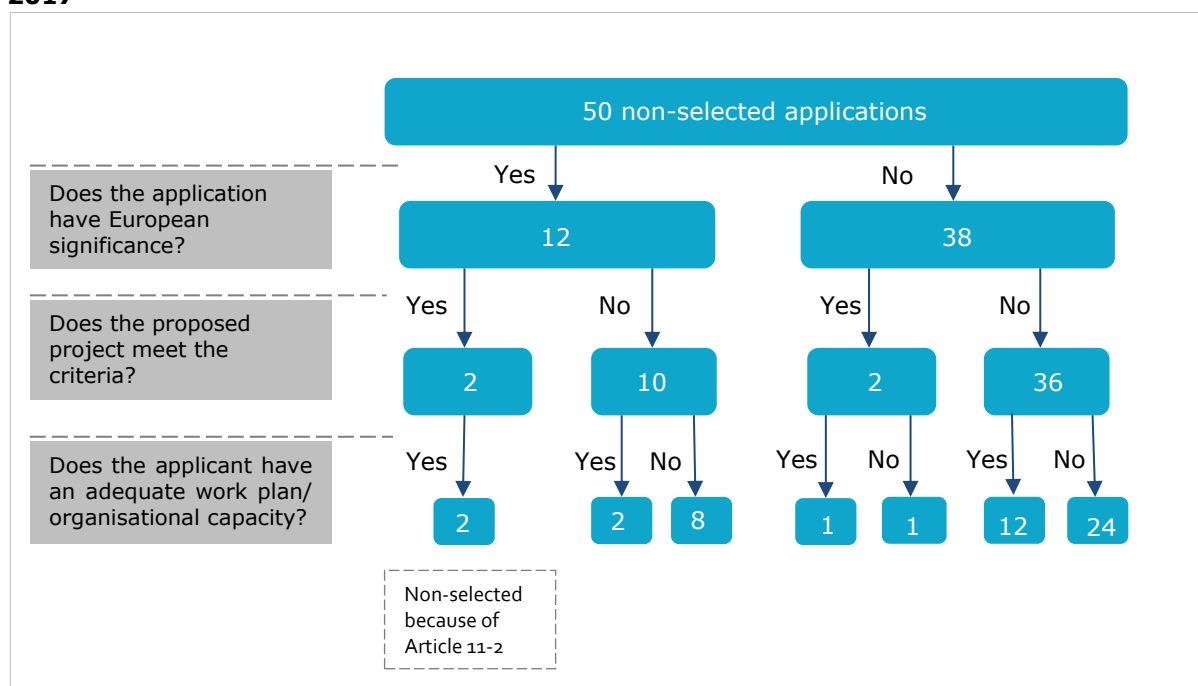
A few members of the panel also noted that selection decisions are based on their personal understanding of the criteria, and that similar projects are sometimes evaluated differently. At the same time, some members indicated that the panel has developed an understanding of what to expect from applications over the years. They also noted that the number of sites has increased, and a comparative element has now been developed. It is therefore likely that the understanding of the definition of European significance within the frame of the EHL will improve in the long term, in line with the diversity of sites to which the Label is attributed.

Based on these findings, we can see that the application of the criterion of European significance poses a challenge to the panel, in terms of balancing a common understanding of the notion "European significance" with subjective interpretations of the term that are inevitable in practice. On the one hand, establishing a clear definition of European significance could be difficult and even harmful. As one EHL manager put it, when you know "EU language", it is easy to fill in the application form. As a result, a gap may appear between application forms and the real situation of the sites they describe, thus jeopardising the achievement of the EHL's objectives. On the other hand, it is necessary for applicants, national coordinators and panel members to share a common understanding of what European significance entails, so that selection decisions can be justified. We therefore recommend that a number of measures should be taken to help both applicants and existing EHL sites to develop narratives which highlight their role in European history and integration. In the long term, this storytelling approach to common European culture, history and values could evolve into intercultural dialogue, which is one of the general objectives of the EHL.

## Compliance with the selection criteria

During the four selection cycles between 2013 and 2017, the European panel evaluated a total of 88 applications submitted by 83 pre-selected sites (five sites applied twice). Out of this number, 38 sites were labelled. Our analysis of European panel reports reveals that three-quarters of non-selected sites (38 out of 50) failed to meet the criterion of a European dimension, as their narratives did not extend beyond a national or regional scope.<sup>90</sup> The project criterion was not met by 46 out of 50 non-selected applications, most often because they lacked an emphasis on multilingual activities, as well as on how the European dimension of the site would be communicated at local, national and European levels. Some applications also failed to present specific activities that could realistically be implemented, or lacked a consideration of the virtual media tools that could increase the site's accessibility to interested audiences abroad. The work plan criterion was not met by 33 out of 50 non-selected sites, who failed to demonstrate their operational capacity to carry out the project (e.g. due to a lack of human resources, expertise, finances). The share of applicant sites that did not meet the work plan criterion decreased over time, which may indicate that the action now attracts operationally stronger and more established sites. The analysis of non-selected applications is summarised in **Figure 22**.

**Figure 22. Compliance of non-selected sites with the selection criteria in the period 2013-2017**



Source: PPMI consortium, based on the 2013, 2014, 2015, and 2017 Panel Reports.

To be attributed with the EHL, a candidate site must meet all three selection criteria. Although the action's legal basis does not establish any hierarchy of the selection criteria, it can reasonably be argued that European significance is the core criterion, compared with the other two criteria. This means that without demonstrating symbolic European value and a significant role in the history and culture of Europe, a candidate site would not be in a position to achieve the action's objectives, even though it has a plan and capacities to implement it. Therefore, the evaluation process, during which the European panel evaluates the projects and work plans of candidate sites even when those sites do not demonstrate their European significance, could be regarded as inefficient.

To increase the efficiency of the evaluation process, it may be beneficial to establish a two-stage evaluation, in which applications that do not demonstrate European significance are

<sup>90</sup> 2013, 2014, 2015 and 2017 Panel Report.



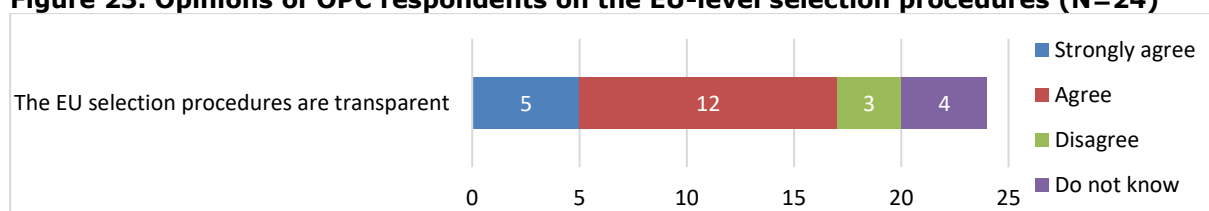
not evaluated further, since the project and the work plan are supposed to communicate this significance. Some EHL site managers even suggested that European significance should be evaluated first, before the project and work plan are submitted, so as to save application and evaluation costs. Such a change might be possible with the consent of the panel and national coordinators, since the current legal basis does not establish in detail how the selection and evaluation should be carried out.

### *Transparency and feedback*

The transparency of the European-level selection process is ensured via the publication in each selection year of the Panel Reports on selection, as required by the legal basis of the EHL<sup>91</sup>. In the reports the European panel communicates its assessment of candidate sites against the three selection criteria, as well as its recommendations with regard to the attribution of the EHL to candidate sites. Communication of the selection decision to candidate sites is carried out by national coordinators.

In general, the managers of selected sites were satisfied with the selection process, and most OPC respondents who had been involved in the action perceived the EU-level selection procedures to be transparent (see **Figure 23**).

**Figure 23. Opinions of OPC respondents on the EU-level selection procedures (N=24)**



Source: PPMI consortium, based on the Open Public Consultation

However, the managers of non-selected sites whom we interviewed perceived feedback about their non-selection to be insufficient and, thus, decreased perceptions of the transparency of the selection process. They argued that feedback consisting of a few sentences is not commensurate with the work they invested in compiling the application. Moreover, they felt that feedback was generic, containing very little detail. For some of these managers, it was not even clear that the panel had understood their application. They regarded the lack of feedback as the most disappointing aspect of the application process.

Our analysis of the Panel Reports shows that the assessment of the project and work plans of candidate sites was reasonably detailed, while the assessment of their European significance was fairly general. Comparing similar candidate sites reveals that the differences are not always obvious between those sites which demonstrate their European significance, and those which do not. The use of general terms like “science knows no state borders”, “a truly international character”, “a beacon of progressive ideas” and “a notable place” gives only a vague idea of what the European significance of a site is (see **Table 6**).

**Table 6. Examples of the assessment of the European significance of a selected and a non-selected applicant**

Historic Ensemble of the University of Tartu	Vilnius University Architectural Ensemble
The buildings of Tartu University along with the park and the collections embody the concept of a new university during the Age of Enlightenment, both in terms of planning --- a university in the city, a university in the park --	The architectural ensemble of the Vilnius University is a living architectural and academic heritage site and an architectural monument where European architecture of the XVIth – XIXth centuries is preserved, in continuous use

<sup>91</sup> Article 8-6 of the Decision No. 1194/2011/EU.



and in terms of the new concepts related to education linking learning and science. Science knows no state borders: based on the ideas of the Enlightenment, Tartu University became part of a pan-European network of scientists and participated in cultural exchanges. The university and its collections have a truly international character. In addition, the University of Tartu has remained a beacon of progressive ideas. The combination of its commendable institutional history and its unique buildings, collections and landscape make the University of Tartu a notable place.

The candidate site meets the criteria for European significance required for European Heritage Label.

and open to public. The central administration, library and several faculties still reside in the original buildings. The application states that the architectural ensemble reflects the development of national and confessional tolerance, especially between Western and Eastern European cultural regions and that it has enabled the country to spread European values throughout ages. However, the information included in the application does not convey these arguments and the European significance of the candidate site in a convincing way.

The application does not demonstrate a level of European significance as required under the criteria for the European Heritage Label.

Source: EHL 2014 Panel Report, EHL 2015 Panel Report

The commonly used phrase “the application does not demonstrate a level of European significance as required under criteria for the European Heritage Label” is confusing, since it implies that different degrees of European significance exist, which are not specified in the legal base of the action. In order to make the panel’s feedback on European significance to both selected and non-selected sites more specific, we recommend the use of the sub-criteria for symbolic European value, provided in the legal basis of the action. For example:

- what is the cross-border or pan-European nature of the site?
- what is the site’s past and present influence that goes beyond national borders?
- what was the site’s role in European history and integration?
- what were its links with key European events, personalities or movements?
- what values that underpin European integration does it represent?
- what was the site’s role in developing and promoting these values?

In some instances, the panel indicates that a site has European significance, but that it is not well articulated in the application. This could be regarded as a guiding message to the applicant with regard to re-application. Such a guiding approach should be encouraged, as well as the understanding that the European significance of a site can be revealed through its European narrative, which connects peoples and places, past and present events, as well as transferring values from past to new generations of Europeans.

It can be expected that, as the action evolves, certain benchmark indicators will be developed to distinguish a good project and work plan, and that the assessment of European significance will become more concrete and detailed. Developing common indicators to evaluate the quality of applications could ensure that recently appointed members of the panel share a similar understanding with more experienced members, with regard to what constitutes a good application. This could benefit the action and increase its transparency.

All candidate sites are evaluated solely on the basis of the information provided in their applications. Some scholars have argued that the EHL application process displays poor transparency, as applications from labelled sites are not made public or rendered accessible to other heritage professionals, managers, policy-makers, researchers, or public audiences.

<sup>92</sup> To increase the transparency of the action, these scholars recommend making successful applications either fully or partly public, as is done with the ECOC action and the UNESCO Heritage Lists. However, this suggestion cannot be implemented under the existing

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<sup>92</sup> Lähdesmäki, T., Turunen, J., Kaasik-Krogerus, S., Mäkinen, K., Ceginskas, V. (2018), *Increasing the Benefits and Transparency of the European Heritage Label. Policy Brief*. Jyväskylä: University of Jyväskylä, p.2.

arrangements of the action, because selected sites do not currently agree when submitting their application forms to have their applications made public.

To conclude, the EU-level selection process is smooth, but its efficiency could be increased through the use of a two-stage evaluation. The selection criteria, especially that of European significance, are the main tools employed in the selection process, and should therefore be elaborated and a common understanding of them pursued among all actors. While providing feedback on the selection process and its results via the public Panel Reports can be regarded as a sufficient measure to ensure the transparency of the selection at present, this feedback could be made more detailed and concrete, especially with regard to the European significance of a site.

### **c) The application form**

The application form, along with the selection criteria, is the basis for selection at Union level. The Commission prepared a common application form with a view to keeping procedures as streamlined and light as possible. The form is based on the selection criteria, and must be used by all candidate sites at both national and European selections.<sup>93</sup> The European panel makes its award decisions solely on the basis of the information provided in the application forms.<sup>94</sup> This makes the selection procedure more transparent, and establishes an equal chance for sites to be selected. Although the all candidate sites used the application form, some applications that were submitted in the period 2013-2014 altered the visual appearance and structure of their application forms (e.g. the *Dybbøl Hill* and *Carlsberg* applications). Such instances were not observed in subsequent selection years.

Since the launch of the Label in 2011, the Commission has reviewed and improved the application form several times. The forms used in the 2013-2015 selections were quite complex. Two-thirds of the site managers interviewed who had filled out the application form in the 2013-2015 selections (8 out of 12) reported that the application form was long, repetitive and time-consuming. While the most recent version of the application form was introduced in 2017, the scope of our evaluation focuses on sites that were labelled between 2013 and 2015, which used previous versions of the application forms. A more in-depth analysis of the application forms used in the period 2013-2015 would not be valuable, as these application forms are no longer in use – therefore, we have analysed the 2017 application form to identify points for improvement.

The 2017 application form is structured into a number of sections. These include the summary of the application; background information on the site; and sections detailing the ways in which the site meets the three selection criteria. To comply with the criterion of European significance, candidate sites must highlight either their cross-border or pan-European nature; their role in the history and culture in Europe; or the European values they represent. For the second criterion of the project, the applicants need to describe in detail the project they will implement, and answer seven sub-questions. For the last criterion of organisational capacity, the applicants must explain the current state of the site and its organisation, and answer ten sub-questions.

The 2017 Panel Report underlined that although the new application form was shorter and easier for candidate sites to fill in, it could be further improved.<sup>95</sup> Our analysis also reveals some overlap between the project and work plan sections. Repetitions exist, such as references to the communication activities the site is planning to undertake to highlight its European significance in both project (question II.B.1.) and the work plan (question II.C.5.) sections. Less significant repetitions were also observed in other parts of the project (question II.B.2) and work plan (question II.C.3.) sections, both of which focus on

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<sup>93</sup> Article 9 of the Decision 1194/2011/EU.

<sup>94</sup> Ibid.

<sup>95</sup> 2017 Panel Report, p. 20.

information activities and signposting. These overlaps occur because the project questions first ask the sites to describe the current situation at the sites, and then to describe the future activities they plan to implement.

Also, an unclear formulation was found regarding sustainable development, which did not match its definition as established by international organisations like UNESCO or ICOMOS.<sup>96</sup> The operational capacity question that focuses on sustainable tourism is phrased as follows: "Present the marketing plan for the site as a tourist destination." The formulation of this question does not correspond to the principles of sustainable tourism, which are set out in international conventions such as the ICOMOS convention or UNESCO guidelines.<sup>97</sup> The international guidelines on sustainable tourism in relation to cultural heritage focus not on the promotion of tourism itself, but on local communities and the ways in which their rights and needs are taken into account in light of increasing tourism.

The application form may also have an impact on the ability of national thematic and transnational sites to clearly communicate how the efforts of different sites/institutions will be co-ordinated. Lack of clarity regarding the coordination of the designation was among the challenges faced by those national thematic and transnational sites that were not selected. Notably, sites that consist of separate buildings that are privately owned or governed by different institutions, usually apply as a single site (e.g. the applications of *Kaunas of 1919-1940* or *Union of Lublin*). The administrative arrangements for such single sites are considerably lighter, as each building does not need to fill in a separate form explaining its European significance and operational capacities, unlike in the case of national thematic or transnational sites.

To sum up, the application forms used in the 2013-2015 selections were quite complex and time-consuming to fill in. Although these have been improved on a number of occasions, some overlaps and inconsistencies still exist, which should be eliminated.

#### **d) The efficiency of monitoring process**

##### *Description of the process*

Monitoring provisions were first established in 2011 when the EHL became a European-level action. No monitoring system existed while the action was run on an intergovernmental basis. It was assumed that the new monitoring system would ensure that labelled sites continue to meet the selection criteria, promote their European dimension and implement their projects as outlined in their original application forms. Member States are responsible for the monitoring of all sites located in their territory and must submit a monitoring report every four years to the European panel, via the Commission.<sup>98</sup> We refer to this reporting as EU monitoring, and consider the specific recommendations provided to the sites by the panel as an input of the action.

During the first monitoring year in 2016, the performance of all 20 sites that had received the Label in 2013 and 2014 was reviewed.<sup>99</sup> The first monitoring process in 2016 was report and dialogue-based, and required sites to report on the progress they had made in implementing the EHL activities proposed in their application forms, as well as setting out new activities for the 2016-2020 period. Sites were also required to deliver a presentation to the panel and other EHL sites about their EHL activities, as well as participate in a discussion with panel members (see **Figure 24**).<sup>100</sup>

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<sup>96</sup> ICOMOS (1999), *International Cultural Tourism Charter. Managing Tourism at Places of Heritage Significance*. Mexico, October; UNESCO, *UNESCO World Heritage and Sustainable Tourism Programme*. Available at: <https://whc.unesco.org/uploads/activities/documents/activity-669-7.pdf> (Accessed: 27 August 2018).

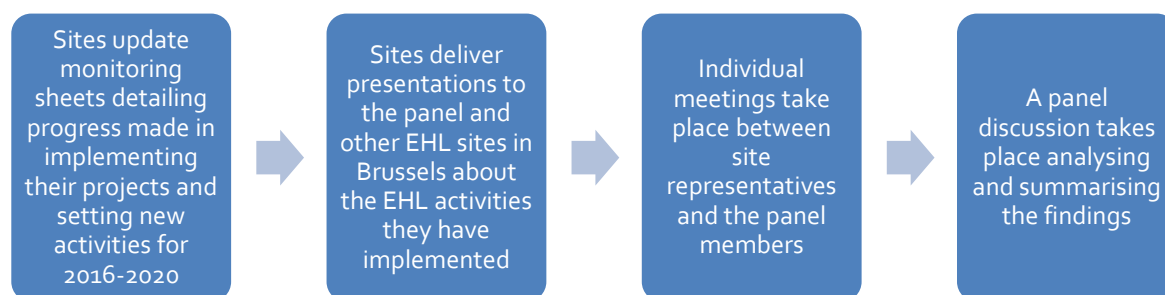
<sup>97</sup> Ibid.

<sup>98</sup> Article 14-2 of the Decision No. 1194/2011/EU.

<sup>99</sup> 2016 Monitoring Report.

<sup>100</sup> 2016 Monitoring Report, p. 45.

**Figure 24. Steps involved in the 2016 monitoring process**



Source: PPMI, based on 2016 Monitoring Report.

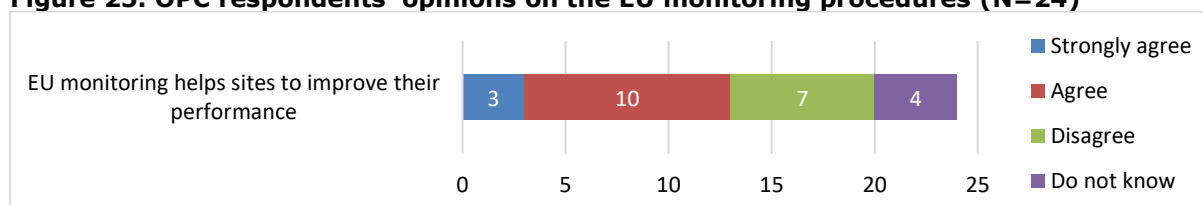
In its current form, the monitoring process is appropriate to the current, relatively small number of sites; however, it might become less practical if the EHL fulfils the vision outlined in the 2017 Panel Report and expands to 100 sites.<sup>101</sup> In this event, the European panel would need to review a large number of individual monitoring sheets and listen to presentations from each site. This would be time-consuming. Since monitoring procedures are not specified in the legal basis of the action, the European panel could consider altering its report and dialogue-based approach. For example, monitoring could include reports and presentations by national coordinators on all sites within their Member State, or could consist solely of reports.

#### *Perception of the process*

Overall, the 2016 monitoring process was perceived positively by the sites and panel members who participated in it. Based on our interview findings, 14 of the 20 sites monitored in 2016 perceived EU monitoring to be useful. Representatives of these sites highlighted the fact that EU monitoring provided an opportunity to take stock of their achievements. It allowed the sites to discuss challenges and future plans; it reminded them of the EU values they needed to represent; and helped them to develop their strategies. The monitoring process was also perceived as a moral incentive for some sites. As one manager of an EHL site noted: “Our experience with EHL monitoring in 2016 was highly relevant and offered us a sense of moral reward due to our distinction and related comments.”

The active participation of site representatives, and their positive evaluation of the monitoring process, indicates their willingness to evolve towards a culture of a community of practice focused on learning possibilities. The OPC results support these findings, as most respondents engaged in the action perceived EU monitoring as helpful in improving sites’ performance (see **Figure 25**).

**Figure 25. OPC respondents’ opinions on the EU monitoring procedures (N=24)**



Source: PPMI consortium, based on the Open Public Consultation.

#### *Efficiency of the process*

The aim of monitoring within the action is to ensure that each EHL site continues to meet the selection criteria, and that each site respects the project and work plan submitted in

<sup>101</sup> 2017 Panel Report.

its application. If a site no longer meets the criteria, the European panel will initiate a dialogue with the Member State concerned via the Commission, with a view to facilitating the necessary adjustments to the site.<sup>102</sup> If a site does not respond to the recommendations of the panel and the European Commission, its Label may be withdrawn.

To date, no EHL site has lost its Label. The panel members highlighted that, as the action was still in its early stage in 2016, it was understandable that some sites labelled in 2013 and 2014 had not yet had sufficient time to implement most of the activities provided in their project and work plan. However, some members of the European panel noted that during the 2016 monitoring, the panel had expressed concerns about several sites and their commitment to following their projects and work plans.

The Monitoring Report specifies that the criterion of European significance must be lost at the sites, hence when assessing whether the labelled sites still meet the criterion of European significance, the panel considered whether the European significance was fully understood, well-articulated and conveyed by the sites.<sup>103</sup> Based on the monitoring, the panel concluded that the majority of EHL sites display a good understanding of their European significance, and that it is well-articulated in their narratives. With regard to projects and work plans, the main areas for improvement identified by the panel included increasing sites' communication of their European significance, as well as improving the multilingual activities and web presence of the sites.

Recommendations provided by the panel to the sites can be regarded as a significant input to the action that may improve its performance at site level. Therefore, the efficiency of the monitoring process relies on the extent to which the labelled sites take into account the recommendations made by the panel. Our analysis demonstrates that by 2018, half of these recommendations had been fully or partially implemented by the sites. Although the sites had not yet implemented all of the panel's recommendations yet, it can be expected that these will be implemented before the next round of monitoring in 2020.

#### *The role of national coordinators*

With respect to the monitoring processes, the roles played by national coordinators in 2016 were mainly communicative and advisory. They sent the monitoring sheets to the sites, and then made suggestions for their improvement. A few national coordinators mentioned that they had met with the site(s) face-to-face, or had made a visit to the site(s). Three national coordinators stated that they had conducted national-level monitoring, although this was less formal and aimed at understanding whether the sites faced any challenges or problems.

#### *Monitoring form*

The monitoring form used in 2016 was made up of four parts: I) an updated original monitoring sheet; II) a feedback sheet on benefits and challenges; III) a monitoring form for the next monitoring period (2016-2020); and IV) a communication and network sheet. The major part of the form – the monitoring sheet – is based on the monitoring sheet submitted by an applicant site, together with its original application form. This includes all obligatory elements of the project and its work plan. Thus, the selection and monitoring processes are closely connected, and any attempts to improve them should be coordinated.

Our analysis of monitoring data shows that most EHL sites demonstrated adequate capacities to participate in the monitoring process, as they submitted monitoring sheets of good quality. The monitoring tasks did, however, pose difficulties for some sites, especially in defining indicators to measure progress.

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<sup>102</sup> Article 16 of the Decision No. 1194/2011/EU.

<sup>103</sup> The 2016 Monitoring Report.

In its 2016 Monitoring Report, the panel highlighted that the monitoring form should be revised for 2020 to make it simpler and more user-friendly.<sup>104</sup> This opinion was supported by some of the site managers, who reported difficulties in uploading information on the monitoring sheet, as well as indicating that the form was rather lengthy and time-consuming to fill in. In addition, the national-thematic site that participated in the 2016 monitoring had to fill-in two separate monitoring forms. It has been suggested that this be revised, and likewise the application forms, to lighten the administrative burden posed by the EHL upon national thematic and transnational sites. These sites could be required to fill in one monitoring form instead of several, since some information on the forms will be duplicated.

#### *Data needs*

The data collected during the monitoring year was an important information source for this evaluation of the action. We have made extensive use of the information provided in the monitoring forms regarding the activities implemented by the sites, their comments on the benefits gained and challenges faced, as well as the communication measures implemented. All of this information has benefited our analysis of the action, and in particular its effectiveness. At the same time, a lack of common indicators and differences in the data provided by sites made it difficult to assess the overall progress of the action.

To conclude: reviewing the achievements of the labelled sites every four years is important for the development of the action, and should be continued. The first round of monitoring in 2016 was perceived positively by most of the site managers and panel members involved. Half of all recommendations provided to the sites by the panel had been fully or partially implemented by 2018. Some improvements could be made to the process: by developing common indicators for the activities included in the project and work plan, the process could be made lighter and more streamlined. Also the number of EHL sites increases in the future, greater involvement of national coordinators may be required.

#### **e) The efficiency of communication processes**

The framework for the EHL communication process was initiated at the beginning of the EU-level action in 2011. One of the main arguments for establishing the EHL as an EU-level initiative was the need to improve its visibility and raise its profile.<sup>105</sup> The communication of the EHL can be viewed as a three-level process. This includes: 1) the visibility and branding of the Label; 2) the communication of the European significance of labelled sites to the public; and 3) communication within the action itself. The EHL's communication process is based on the principle of subsidiarity, and involves the European Commission, the Member States and the labelled sites. The roles of the various actors in communication processes are summarised in **Table 7**.

**Table 7. Communication processes of the EHL action**

Communication processes	Roles of the main actors		
	European Commission	Member States	EHL sites
<b>Visibility and branding of the EHL</b>	<ul style="list-style-type: none"> <li>Prepares a communication toolbox, including the EHL logo, website, promotional materials, etc.</li> </ul>	<ul style="list-style-type: none"> <li>Use the EHL communication toolbox nationally</li> </ul>	<ul style="list-style-type: none"> <li>Use EHL the communication toolbox locally</li> </ul>
<b>Communication of the EHL and the European</b>	<ul style="list-style-type: none"> <li>Supports EHL sites in communicating</li> </ul>	<ul style="list-style-type: none"> <li>Support EHL sites in communicating</li> </ul>	<ul style="list-style-type: none"> <li>Develop the site's European narrative</li> </ul>

<sup>104</sup> 2016 Panel Report, p.33.

<sup>105</sup> Impact Assessment.



<b>significance of labelled sites to the public</b>	their European significance by providing promotional materials	their European significance	<ul style="list-style-type: none"> <li>• Develop a communication strategy as part of their work plan</li> <li>• Communicate their European significance locally, nationally and internationally</li> </ul>
<b>Communication within the action</b>	<ul style="list-style-type: none"> <li>• Organises annual meetings with EHL sites and national coordinators</li> <li>• Organises awards ceremonies for new EHL sites</li> <li>• Supports networking between sites at EU level</li> </ul>	<ul style="list-style-type: none"> <li>• Participate in annual meetings at the EU level</li> <li>• Communicate with the Commission and EHL sites</li> <li>• Support networking between sites nationally</li> <li>• Communicate with candidate sites</li> </ul>	<ul style="list-style-type: none"> <li>• Participate in annual meetings at the EU level</li> <li>• Communicate with the national coordinator</li> <li>• Network with each other</li> </ul>

Source: PPMI consortium, based on the interviews, Panel Reports and Decision No. 1194/2011/EU.

### *Branding and visibility*

At the first level – branding and visibility – the aim of the EHL’s communication strategy is to create a strong and high-profile Label that encompasses relevant meanings, symbols and status, so that it is visible, recognisable and appealing to target audiences. Responsibility for communication is shared among the three parties to the EHL: the Commission, the Member States, and the labelled sites themselves. The Commission is responsible for the visibility and branding of the Label. This is achieved via a specific website, a logo for the action, and provision of EHL plaques and creation of videos and postcards. The Commission has also created an exhibition showcasing the EHL sites that is currently travelling around Europe. Member States and labelled sites make use of this communication toolbox at national and local levels.

The data collected during our evaluation shows that sites employ a wide range of measures to communicate the Label and raise its visibility. For example, 28 sites distributed a press release when the official Decision of the European Commission announced their designation; 23 sites also produced a press release when they attended the awards ceremony in Brussels; 21 sites organised a local event to celebrate their designation. Aside from these communication measures, most sites display either a small and large EHL plaques (26 sites, small; 23 large), which significantly contributes to the branding and visibility of the Label.

Almost all sites (N=27) disseminated the generic EHL flyer to their stakeholders and the general public. In general, these flyers were perceived positively: 23 sites thought that the flyer was relevant to helping them communicate about the EHL; 20 sites wished to receive even more flyers. Similarly, 18 sites disseminated the general EHL poster to their stakeholders and to the general public; 13 sites thought that the poster was relevant for communicating about the EHL. In addition, 16 sites reported producing other promotional materials or goodies bearing the EHL logo, signalling that some sites produce their own inputs into the overall branding and visibility of the Label.

However, our analysis indicates that the materials provided by the Commission to communicate the Label (e.g. videos or the logo) were not fully exploited on the internet by all labelled sites (see 4.4.2. a). Also, the EHL plaques provided to the sites to

communicate their Label may be not fully efficient in increasing the visibility of the Label and in raising awareness of the action among the general public. The small plaque is only produced in the site's local language(s), and features no explanatory text about the Label. It may therefore be difficult for international visitors to understand what the plaque communicates. Some sites comprise a number of buildings and do not place a plaque on all of them, while other sites were found to feature several plaques bearing the Label on their buildings. Inconsistencies regarding the presentation of the EHL plaque at different sites may point to unequal communication of the EHL brand in different Member States.

Certain aspects of the Label's branding and visibility were also emphasised by the European panel, which also assessed the scope and effectiveness of promotional activities during the 2016 monitoring procedures.<sup>106</sup> The panel put forth recommendations<sup>107</sup> for strengthening the visibility and profile of the Label and advised sites to:

- Place a 60-word statement detailing their European significance on the front page of their website
- Add the EHL logo to their homepage, and link it to the European Commission website
- Link their homepage to a subpage containing more information about their EHL designation
- Ensure that their webpage is easy to retrieve, regardless of the language in which the search is made
- Update the site's description in a free online encyclopaedia

Our analysis reveals that not all of the recommended measures have been fully implemented (see Section 4.4.2.)

The clear communication of the EHL brand may also be hindered by the fact that a few sites still use the logo of the earlier intergovernmental label. The decision establishing this EU-level action does not prescribe that the use of the intergovernmental logo should be terminated; however, its continuing use may have some implications on the overall branding and visibility of the EU action. Our analysis shows that some sites that were part of the intergovernmental EHL still use its logo (e.g. the *Franja Partisan Hospital*, Slovenia)<sup>108</sup>. The earlier logo is also still used by some sites that were labelled under the intergovernmental basis, but which are not part of the EU-level initiative (e.g. the *Hospice of St Gotthard*, Switzerland<sup>109</sup>; the "Iron Curtain" Network<sup>110</sup>).

Overall, the data collected during the focus groups and interviews suggests that the Label is not widely recognised among the general public, and even among some cultural heritage professionals. This indicates that a stronger emphasis is required on the branding and visibility of the Label. Diverging perceptions were observed among the various actors, regarding the division of communication roles. A significant share of labelled sites expected the Commission to play a greater role in communicating the action and increasing its visibility. At the same time, it was apparent that the communication tools developed by the Commission are not yet fully exploited. The Commission resources dedicated to this action are limited; thus, it is not in a position to communicate the EHL across Member States. A good example of cooperation between EC and MS is the touring EHL exhibition, organised in 2018. Here, the Commission produces various sets of exhibition materials, while the Member States ensure that the exhibition tours around their country, as they are better placed to know how and where to organise such exhibitions.

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<sup>106</sup> 2016 Monitoring Report, p. 9.

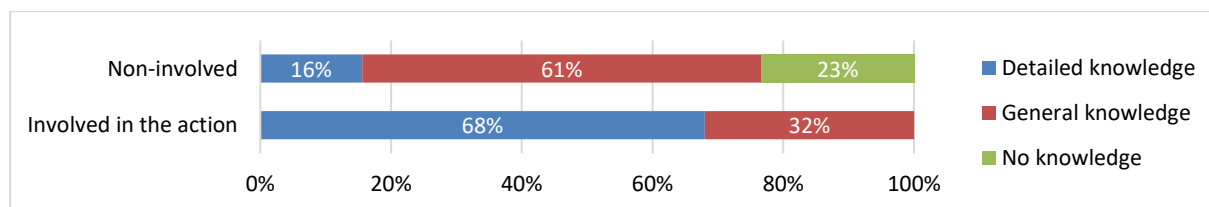
<sup>107</sup> 2016 Monitoring Report, p. 9.

<sup>108</sup> Mestni Muzej Idrija (2018), *Franja Partisan Hospital*. Available at: <http://www.muzej-idrija-cerkno.si/index.php/en/locationsexhibitions/permanent-exhibitions/franja-partisan-hospital.html> (accessed: 12 September 2018).



The OPC results demonstrate that the EHL is less known among stakeholders that are not involved in the action. Although most respondents who reported involvement with the action had detailed knowledge of the EHL, only 16% of those that were not involved in the action shared the same level of understanding (see **Figure 26**). Nevertheless, 15 out of 17 OPC respondents involved in the action agreed that the transformation of the intergovernmental EHL into the Union action had improved its functioning and visibility.

**Figure 26. Respondent familiarity with the EHL among stakeholders involved and not involved in the action (%)**



Source: PPMI consortium, based on the open public consultation, all respondents, N=102.

To sum up, EHL sites have not made extensive use of the communication tools prepared by the Commission. Visibility of the EHL is still low, but the majority of actors involved in the action perceive that it has improved in comparison with the previous intergovernmental EHL.

#### *Communication of the European significance of EHL sites to the public*

The main actors in this process are the labelled sites themselves, which communicate their European significance to local, national and international audiences. Member States and the Commission provide support to the labelled sites, if required.

The first step in this process involves the sites developing their European narrative. This occurs during the application process, when candidate sites present their symbolic European value. Next, they must develop a coherent and comprehensive communication strategy highlighting their site's European significance, which they present in the work plan and project submitted at the application stage. Finally, once the site is designated with the EHL, it must implement its planned communication activities using its own resources.

The monitoring data reveals that all sites implemented communication activities as part of their projects, and displayed the EHL plaque on site. However, as observed by the panel, "presenting the European significance is not synonymous to using the *European Heritage Label* logo in communications: the logo may be used extensively whilst the European significance of the site is not well presented."<sup>111</sup> A site's narrative is therefore crucial in communicating its European significance.

Interview data shows that some EHL sites are active in developing their European narrative (e.g. at conferences, celebratory events, staff training etc.), while others report no changes in their narrative after EHL designation. For example, 43% of the site representatives interviewed explained that their sites have not changed their narrative from a national to a more European one after receiving EHL designation (for further analysis, see Section 4.4.2. a).

Finally, OPC data reflects the fact that visitors to EHL sites acknowledge their European significance, and the majority of respondents involved in the action agreed that progress had been made in highlighting the European significance of EHL sites. Interestingly, OPC respondents perceived real-life communication measures (e.g. exhibitions, guided tours etc.) as the most effective way to reach target audiences, while also viewing web

<sup>111</sup> 2016 Monitoring Report, p. 8.

communication and social media as effective (for a more detailed analysis, see Sections 4.4.2. a and b).

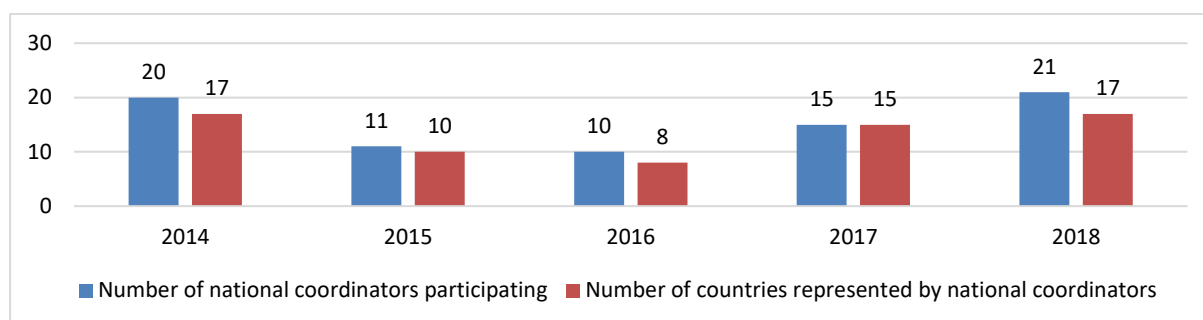
In conclusion, during the evaluation period all EHL sites implemented communication activities as part of their EHL project, but only around half developed their European narrative. A mix of live and online communication measures should be used to reach target audiences effectively.

#### *Communication within the action*

The Commission has established a communication framework within the action, which includes three-day annual meetings with national coordinators and the EHL sites (called EHL Days). These EHL Days also incorporate award ceremonies for newly-labelled sites. Meanwhile, the principal responsibilities of Member States revolve around communicating with candidates and labelled sites. Labelled sites, meanwhile, communicate with both the Commission and the national coordinator, participate in EHL Days, and network with other sites.

The Commission organised five EHL Days meetings during the period 2011-2018. The first three annual meetings were held in Brussels. From 2017 onwards, these meetings have been organised each year in the country that currently holds the EU presidency. Our analysis shows that not all Member States that confirmed interest in the initiative were represented at these meetings by national coordinators; thus, the meetings did not fully exploit communication opportunities provided by the Commission (see **Figure 27**).

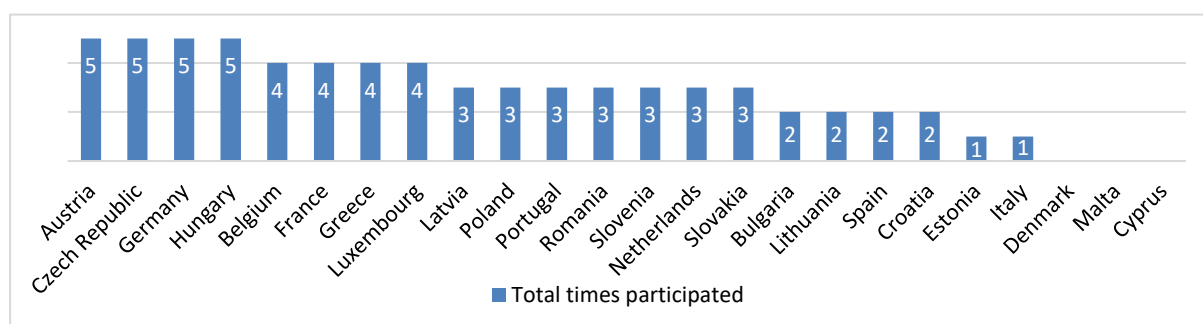
**Figure 27. Participants in the annual national coordinator meetings**



Source: PPMI consortium, based on the 2014, 2015, 2016, 2017, and 2018 minutes of the annual national coordinator meetings held during the EHL Days.

Moreover, some correlation was observed between the participation of national coordinators in annual meetings and the participation of their respective Member States in the pre-selection process. For example, Austria, the Czech Republic, Germany and Hungary participated in all annual meetings organised by the Commission between 2014 and 2018 (see **Figure 28**). These countries were also among the most active in pre-selecting sites (see section 4.3.2. a). However, active participation and commitment do not necessarily result in an increased number of EHL-labelled sites, as the case of the Czech Republic shows.

**Figure 28. Number of times national coordinators from each participating Member State took part in EHL annual meetings organised between 2014 and 2018**



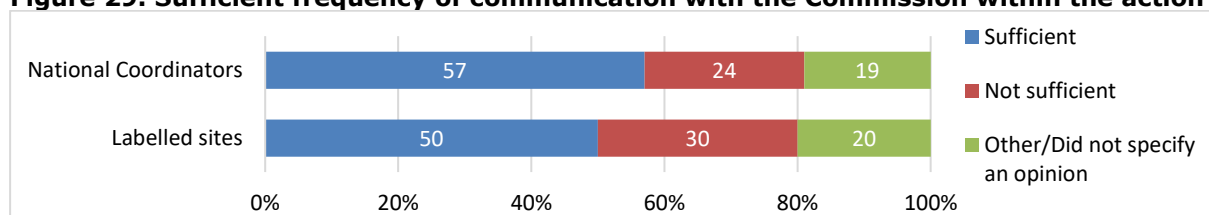
Source: PPMI consortium, based on the minutes of the annual EHL national coordinator meetings.

In general, interviewees and focus group participants perceived the annual EHL meetings as useful. The meetings were praised for providing the sites with an opportunity to meet with other sites, share knowledge, establish new connections and plan potential joint projects. A few site managers underlined that the EHL Days, including the award ceremonies, are particularly significant for newly-labelled sites. During these meetings, new sites form their first impressions of the EHL network, and can begin to establish contacts with other EHL sites. Some interviewees and focus group participants highlighted that the 2016 meeting in Tartu, Estonia was especially useful for networking. The site representatives emphasised the need to use these meetings for networking between sites.

Site managers mentioned some ways in which the EHL Days could be improved. These included earlier notice of upcoming meetings; funding travel costs for more than one representative of sites managed by more than one institution; and opportunities for participants to provide feedback about the event.

Around half of interviewees perceived communication within the action as sufficient in terms of frequency (see **Figure 29**). Most of them appreciated effective communication with their EHL manager at the Commission. However, some interviewees reported that although communication with the Commission was smooth, it could be more frequent, and could endorse new communication measures among the sites (e.g. newsletters or shared online platforms). They also expressed a desire to receive more information from the European Commission about existing funding opportunities and potential partnerships.

**Figure 29. Sufficient frequency of communication with the Commission within the action**



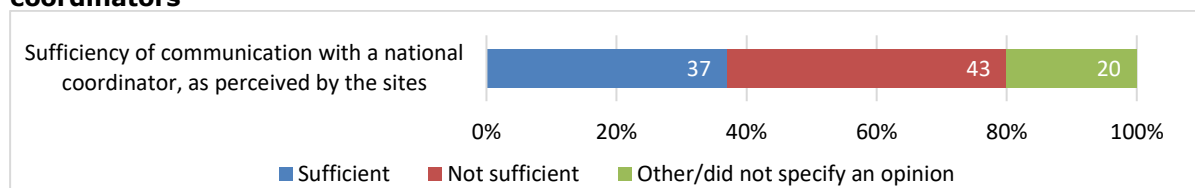
Source: PPMI consortium, based on the interviews.

Communication at national level varies between Member States, and depends largely on the national coordinator. Our data show that communication between national coordinators and sites differed in intensity, ranging from a few times per month to a few times per year. For example, the national coordinator in Croatia reported that they invited the *Krapina Neanderthal Site* to a workshop organised through Creative Europe and to other events organised by their Ministry of Culture, as well as holding meetings and info days together.

National coordinators and labelled sites differed in their opinions of the sufficient frequency of communication between them. Only 37% of site managers perceived communication with their national coordinator as sufficient (see **Figure 30**), while around half (48%) of

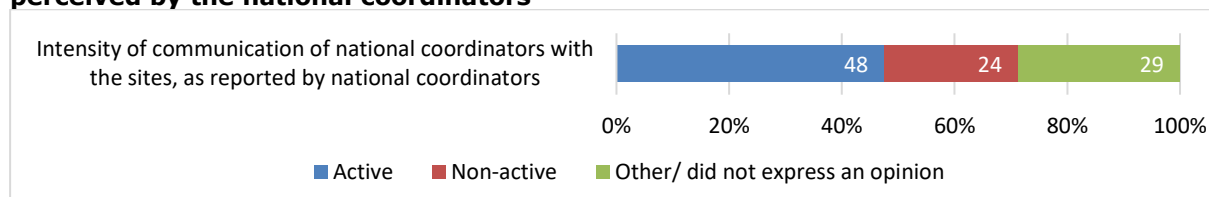
national coordinators reported active communication with the sites (see **Figure 31**). Importantly, three sites in different Member States reported that they were unaware of who their national coordinator was.

**Figure 30. Perception of the sites regarding the sufficiency of communication with national coordinators**



Source: PPMI consortium, based on interviews.

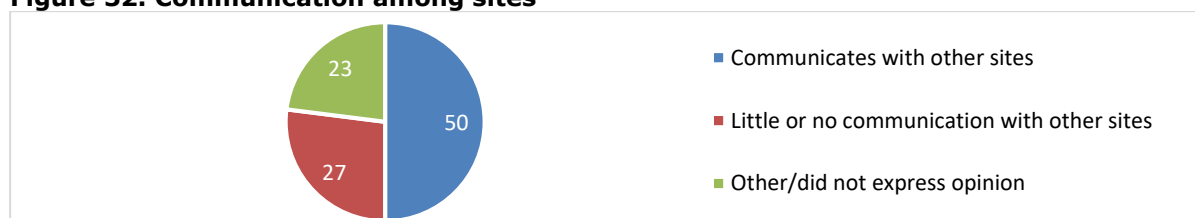
**Figure 31. Intensity of communication between national coordinators and sites, as perceived by the national coordinators**



Source: PPMI consortium, based on interviews.

Another important aspect of communication within the action is networking among the sites. Half of sites reported communicating with other sites beyond the annual EHL meetings (see **Figure 32**). Communication among sites differs in intensity, with some reporting that they were very active and established common projects, while others limited their communication to sharing information about their events (for further analysis of collaboration projects between EHL sites, see section 4.4.1.c).

**Figure 32. Communication among sites**



Source: PPMI consortium, based on interviews.

The main issues hindering the development of cooperation between labelled sites, as perceived by EHL managers, are a lack of human and financial resources, language barriers, and the lack of potential partners for collaboration projects that share the same topics (e.g. the Hanseatic League and trade), or which represent a similar type of heritage (e.g. archives and documentary heritage). Most site managers expressed the need to strengthen the network and establish a permanent initiative with a small secretariat in order to ensure the sustainability of their cooperation.

Some of these issues can be addressed by providing EU funding for EHL networking activities (which is already the case), and awarding more sites on common European topics. The latter may occur naturally as the number of EHL sites increase, or could be facilitated by launching priority calls. Nevertheless, an expert who was interviewed as part of this evaluation observed that the main prerequisite for the development of a network is the motivation of sites. According to the expert, the Commission and Member States should only play a supportive role in enhancing collaboration among sites, as otherwise any network formed may be unsustainable.

To sum up, the annual EHL Days are generally perceived as useful for meeting other sites, sharing knowledge, and planning common projects. Communication at national level varies greatly between Member States, and depends largely on individual national coordinators. While half of EHL sites communicate with each other beyond the annual EHL meetings, the need was observed for more intensive communication within the action.

At the moment, communication of the Label to the public is only moderately effective. One obstacle to achieving more efficient communication about the EHL action appears to be the diverging perceptions among EHL sites, national coordinators and the Commission regarding the division of communication roles. Since the Commission's resources dedicated to the action are limited, it is not in a position to spread the EHL message across Member States. National and local actors are better suited to communicating about the Label at national and local levels, as they can respond to current needs more efficiently, and provide information effectively in other languages. Communication between the Commission and the EHL sites and national coordinators was perceived to be mainly smooth. However, communication between the sites and national coordinators could be considered an area for improvement. Networking among EHL sites is emerging, and could be further reinforced through EU funding and thematic clustering.

#### 4.3.3. Potential improvements

### EQ7 How could the processes be improved and simplified?

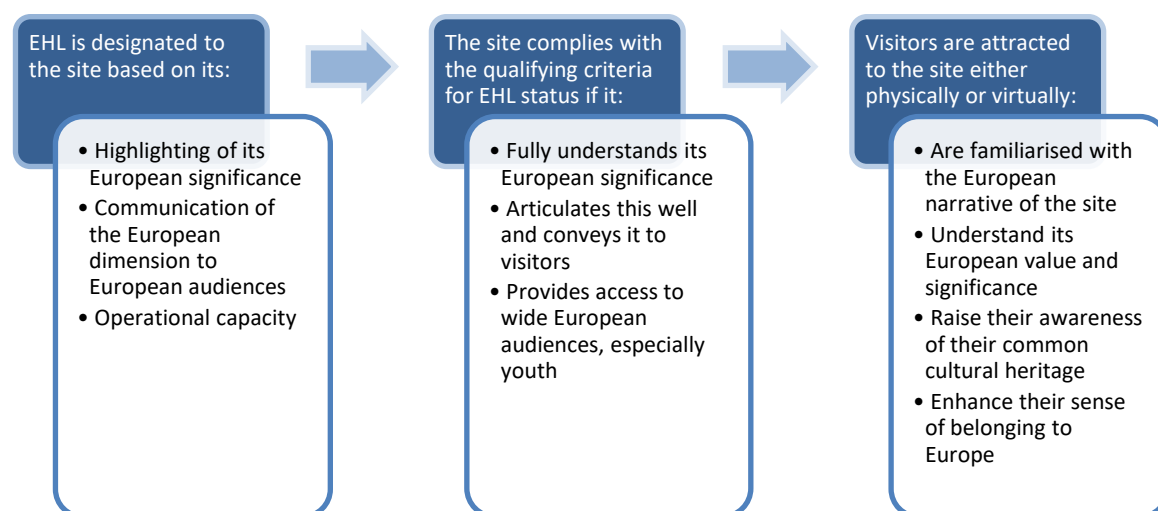
Suggestions as to how the EHL's selection, monitoring and communication processes could be improved and simplified are provided in the section "Conclusions and recommendations".

#### 4.4. Effectiveness

Effectiveness is defined as the extent to which the objectives set for the action and their intended results are achieved. In this section of the report, the effectiveness of the EHL action is discussed by assessing its progress towards general, intermediate and specific objectives. The assessment follows the intervention logic of the action (see section 1.2).

Two levels of effect for the EHL can be distinguished: an individual level and a site level. It was assumed during the Impact Assessment of the action that most direct effects would be achieved first on the sites, and only then on their visitors (see **Figure 33**).<sup>112</sup>

**Figure 33. Mechanisms of influence of the EHL**



<sup>112</sup> Based on Impact Assessment report, p. 27.

Bearing in mind the EHL's mechanisms of influence, we will focus first on the activities of EHL sites and the achievement of site-specific objectives, and go on to review the action's general, long-term effects.

#### 4.4.1. The sites' activities

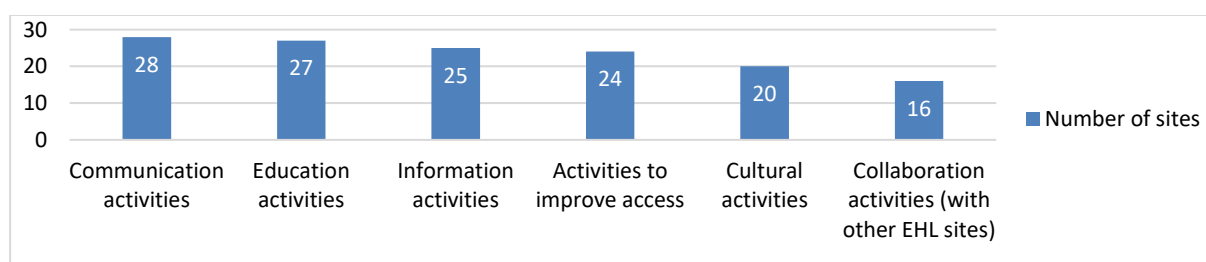
**EQ10** To what extent were the sites' own objectives achieved? What types of activities are typically implemented by the sites? What are the main challenges to implementing them? What are the benefits gained so far from being designated? Have some collaboration projects between labelled sites already taken place?

To evaluate the effectiveness of the action, it is necessary to look at what has been done concretely by the sites to achieve their own objectives. Indicators of the achievement of these objectives include evidence of activities implemented by the sites, their challenges, the benefits gained so far, and collaboration projects between the labelled sites. Our analysis is based on data gained from the monitoring in 2016, as well as from the interviews and focus groups.

##### a) Types and range of activities

Activities that are expected to deliver the results of the action are included in the site's project and work plan, which must be submitted by candidate sites in their application for the Label, and later implemented by those sites which are selected. These are summarised in **Figure 34**.

**Figure 34. Number of sites implementing activities of different types**



Source: PPMI consortium, based on monitoring data.

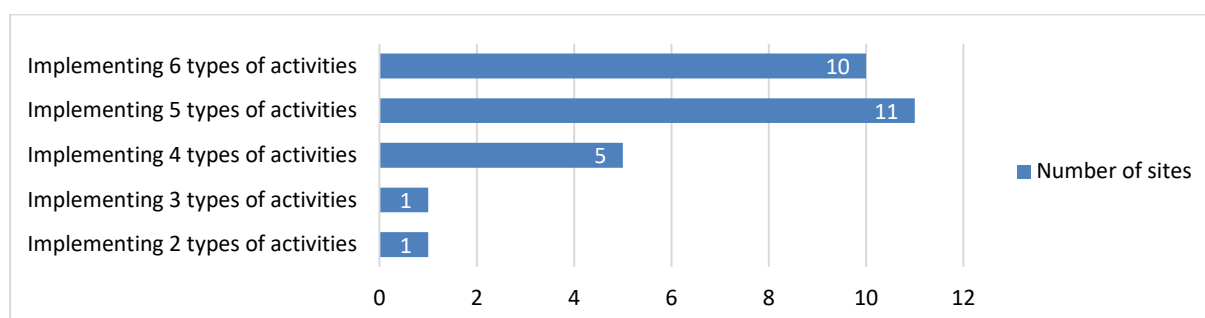
Among the activities to be carried out by EHL sites, only one is optional: the organisation of artistic and cultural activities that foster the mobility of European culture professionals, artists and collections, stimulate intercultural dialogue and encourage linkages between heritage and contemporary creation and creativity. Nevertheless, fostering synergies between cultural heritage and contemporary creation remains one of the EHL's site-specific objectives.<sup>113</sup>

On the basis of monitoring forms, information and communication activities can be divided into two separate categories. Information activities include signposting, staff training and web resources. Communication and awareness-raising activities on the European significance of the site include public relations (press, social media, etc.), using the EHL plaque and the EHL logo, and multilingual measures.

Most sites implemented five or six different types of activities, while a minor share of sites implemented two, three or four types (see **Figure 35**). It must be noted here that the sites differ greatly in size, operational capacities and structure – thus, variations exist in the quantity and complexity of the activities that the sites can implement.

<sup>113</sup> Decision No. 1194/2011/EU, Art. 3.3.f.

**Figure 35. Range of activities implemented by the sites**



Source: PPMI consortium, based on monitoring data.

In the interviews, site managers provided an insight into their sites' own objectives they hoped to achieve by implementing these activities. Most often, they mentioned the goal of highlighting the site's European significance, next to presenting the site to a European audience. In this sense, it is logical to focus on the way that communication activities are actually carried out. Based on the findings in 4.4.2.a, we can state that this goal is mainly achieved.

In the same way, sites aim to educate and provide access to young people. This is reflected in the large number of sites implementing educational activities. Also, in this case and compared to the findings in 4.4.2.b, the sites mainly achieve this objective.

A recurring theme mentioned by site managers is the rising number of activities implemented. As one site manager reported: "Our activities have grown a lot in recent years, and this happened also thanks to the Label, but not only. The Label has given us the awareness that we are on the right track."

Other site managers point out that the relevant question is not whether sites implement additional activities because they have been awarded the EHL, or whether they would have organised them in any case. It is rather the extent to which the sites' ongoing activities are connected with the objectives of the EHL. For some sites, e.g. the *Peace Palace* or the *Archaeological Park Carnuntum*, EHL activities are closely connected with their usual activities, so the implementation of their EHL project has not created many new demands (at least in the beginning). For other sites, such as the *Archive of the Crown of Aragon*, EHL project activities are not typical of their institution, so they demand additional efforts and resources, which might compete with their usual activities. In both cases, however, the EHL project demands both planning and targeted activities.

#### **b) Benefits and challenges**

The results of the monitoring process in 2016 show that some sites reported tangible outcomes from being labelled, while others mentioned limited operational capacities as an obstacle to the effective communication of the Label and to organising European-focused activities (see **Table 8**). The experiences of the EHL sites are as diverse as the sites themselves. This is also noted by the European panel, which recognises that some monitoring results are not *per se* comparable.<sup>114</sup>

<sup>114</sup> Panel Report 2016, p. 6.



**Table 8. Benefits and challenges of being an EHL site**

BENEFITS OF BEING AN EHL SITE	CHALLENGES OF BEING AN EHL SITE
<ul style="list-style-type: none"> <li>• Media attention at local, national and international levels</li> <li>• Strengthened local support and evoking of the European dimension</li> <li>• Greater integration into Europe and becoming part of a European network, exchange with other EHL sites</li> <li>• Increased visibility for the site and awareness about the site among the local population, especially young people</li> <li>• Increased visitor numbers and social media followers</li> <li>• The Label as a sign of quality</li> <li>• Support for the protection/preservation of the site</li> <li>• Additional funding sources</li> </ul>	<ul style="list-style-type: none"> <li>• Insufficient funding from other bodies (national and EU institutions, non-governmental institutions etc.)</li> <li>• Insufficient financial assistance from the EHL for the implementation of the project, increasing of multilingual tools and staff training</li> <li>• Low visibility of the EHL</li> <li>• Insufficient human resources to implement activities</li> <li>• Undeveloped infrastructure in the region may hinder accessibility to the site</li> <li>• Developing the EHL network</li> <li>• Increasing number of visitors</li> </ul>

Source: PPMI consortium, based on the Panel Report 2016 and interview/focus group analysis.

It should be noted that the number of sites reporting particular benefits and challenges differs widely. The monitoring data shows that 16 of the 20 sites that provided feedback noted the difficulty of receiving no additional financial support for EHL activities. Analysis of the interview data supports this analysis, with 20 site managers noting that the implementation of activities was demanding or even unsuccessful due to a lack of finances. In contrast, only one interviewee reported that being awarded the Label had helped the site to gain extra funding. In another case, a new part-time job was created for managing the site's EHL activities. The reasons most often cited by sites for needing additional funds were to implement transnational projects (which must be prepared in advance without secure funding), and to implement their EHL work plan. During the monitoring, six sites mentioned a lack of financial assistance from the action directly; 10 sites mentioned a lack of funding from other bodies; and six mentioned a lack of human resources.

Considering the challenges mentioned in terms of financial and human resources, it must be asked why the selected sites – which were also chosen because of a valuable work plan – have difficulties in this regard. Eleven selected sites mentioned the allocation of additional funding as a motivation to apply for the EHL (see section 4.1.3). As this hope did not turn into reality for most of them, insufficient financial and human resources have arisen as a challenge. Nevertheless, the great majority of the sites describing such a challenge have been able to deal with it and somehow implement their work plan. In the other cases, it could explain why the selection procedures do not allow an absolute examination of a site's real capacities; thus, some sites may have been selected that could not successfully deal with these challenges.

As analysed in section 4.4.3.c, one-quarter of the sites linked a rise in visitor numbers to being awarded the EHL. At the same time, two sites described the increase of visitors as a challenge and a threat to the preservation of the site.

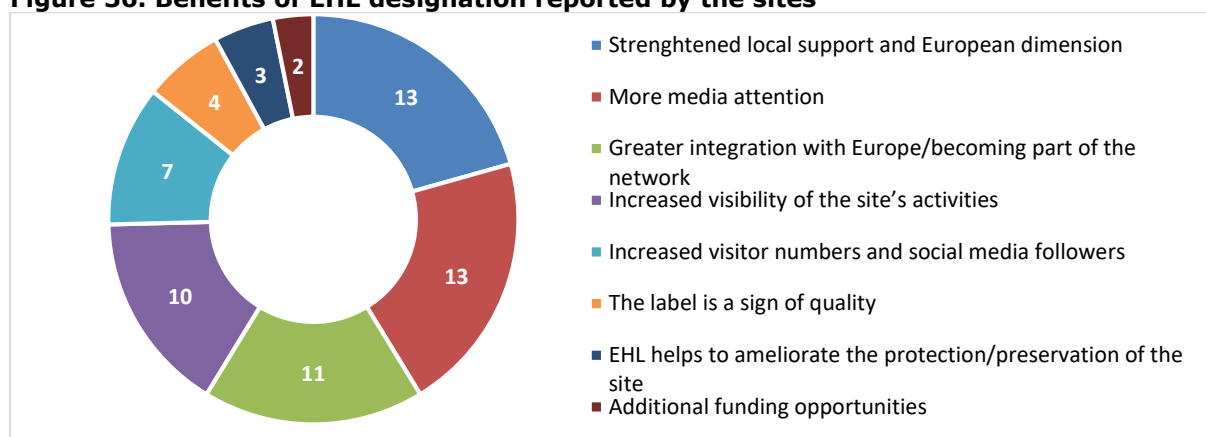
Some sites benefit from increased media attention at local, national and international levels; others, meanwhile, mention the EHL's lack of visibility as one of the challenges they face in promoting their site. This was reported by 7 of 20 sites in the monitoring, and also by 17 of the 29 site managers interviewed. Nevertheless, the limited visibility of the EHL itself to the general public is not necessarily regarded as a problem, as long as EHL activities are visible and the European narrative is told to a greater public.

Among the potential benefits offered the Label, 13 sites listed strengthened local support and European dimension; 13 mentioned greater media attention; 11 perceived greater integration with Europe and becoming part of the EHL network; 10 sites noted an increase in visibility of the site's own activities, including greater awareness among the local



population; four sites described the Label as a sign of quality, and three sites reported that the EHL had helped to ameliorate the protection/preservation of the site (see **Figure 36**).

**Figure 36. Benefits of EHL designation reported by the sites**

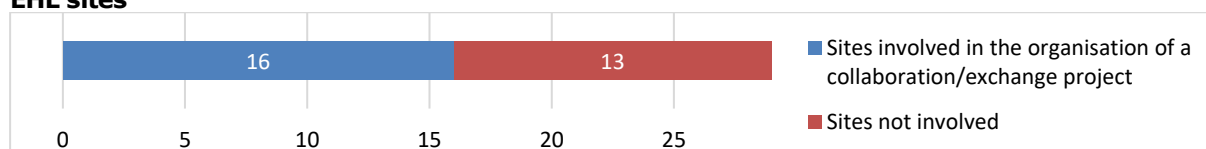


Source: PPMI consortium, based on the Panel Report 2016 and interview/focus group analysis.

### c) Collaboration projects between labelled sites

Our analysis of the monitoring data reveals 13 collaborations and three exchange projects between EHL sites from different Member States. As reported in the interviews, two of these projects have not yet been implemented. Two other collaborative projects mentioned in the interviews had actually taken place. In all, 16 out of 29 sites<sup>115</sup> were involved in the organisation of these collaboration and/or exchange projects (see **Figure 37**).

**Figure 37. Sites involved in the organisation of collaboration/exchange project(s) with other EHL sites**



Source: PPMI consortium, based on interview/focus group analysis.

Collaboration/exchange activities that had taken place by 2018 include:

- Travelling orchestras (the *Franz Liszt Academy of Music*, with the *Franja Partisan Hospital* and with the *Peace Palace*)
- A joint exhibition on a common theme (*Mundaneum* and the *Peace Palace* on the theme of peace)
- Exhibitions at other EHL sites (*3 May 1791 Constitution* at the *World War I Eastern Front Cemetery No. 123 Łużna-Pustki*, at the *Mundaneum*, and at *Hambach Castle*)
- A promotional project (the *Residencia de Estudiantes* with *Kaunas of 1919-1940*);
- Common workshops (the *Pan-European Picnic Memorial Park* with the *Historic Gdańsk Shipyard*);
- Common events (*Alcide De Gasperi's House Museum* with the *Robert Schuman House*)
- Conferences to which other EHL sites were invited as the only multilateral exchange projects (at *Camp Westerbork*, annually at the *Imperial Palace Vienna*, and at the *Union of Lublin*).

<sup>115</sup> The 16 sites were: *Franz Liszt Academy of Music*; *Franja Partisan Hospital*; *Mundaneum*; *Peace Palace*; *Hambach Castle*; *World War I Eastern Front Cemetery No. 123*; *3 May 1791 Constitution*; *Historic Gdańsk Shipyard*; *Pan-European Picnic Memorial Park*; *Residencia de Estudiantes*; *Kaunas of 1919-1940*; *Alcide De Gasperi's House Museum*; the *Robert Schuman House*; *Camp Westerbork*; *Union of Lublin*; *Imperial Palace Vienna*.

The collaboration of the *Franz Liszt Academy of Music* and the *Peace Palace* deserves particular mention, as it was not a one-time event. Within the frame of Bartók Year 2016, the two sites found a common theme in Béla Bartók as a peace campaigner. An original cooperation between the *Franz Liszt Academy of Music* with the Hague Music Academy was expanded to the *Peace Palace* after the two site managers met at an EHL meeting. At the event, a teacher from the *Franz Liszt Academy of Music* and the *Peace Palace's* director held a joint lecture. A concert also took place, with both Dutch students and students from the *Franz Liszt Academy* playing together at the *Peace Palace*. Because the cooperation was perceived by both partners as a success, another common project was conducted within the frame of Kodály Year 2017. The *Robert Schuman House* and *Alcide De Gasperi's House Museum* even committed to organising an annual joint event. This took place in France in 2017, while in 2018 it was planned in Italy.

In interviews, four sites explicitly mentioned difficulties in finding suitable partners among the other EHL sites, as their approaches did not fit. Instead, they preferred to cooperate or collaborate with other sites in Europe that work on the same topic and/or have a similar structure. As these findings show, identifying common themes is a crucial pre-condition for sites to make efforts in terms of cooperation. In focus groups, this is described as an important task for the EHL to pursue in the future. A common network structure could be one solution, as already mentioned in section 4.4.1. As a common cooperation project, the application for network funding was submitted by a group of EHL sites under the leadership of the *Imperial Palace Vienna*. As the application was unsuccessful, site managers, national coordinators, panel members as well as Commission officials expressed the hope of finding other possibilities to establish a legal network.

Besides the network idea, 15 of 29 sites mentioned that they would like to improve collaboration and work more closely with other EHL sites on concrete projects. Some even mentioned plans for the future, e.g. *3 May 1791 Constitution* having an exhibition at the *European District of Strasbourg* in 2019.

Collaboration between EHL sites can occur not only at a European level, but also within a country. The four EHL sites in Poland cooperate at the national level by developing a common presentation of the country's EHL-labelled sites. In focus groups, other sites report good exchanges with each other on the significance of EHL, such as in the Netherlands, where common meetings take place. Sites in other countries, such as Hungary or France, reported being confronted with difficulties in communicating with each other at a national level.

In conclusion, the EHL has been effective in motivating collaborations between labelled sites. Most of these events have resulted in bilateral partnerships. Nevertheless, some difficulties were mentioned in relation to these projects, such as finding suitable partners or a common theme. The creation of a network of labelled sites could ease the collaboration process.

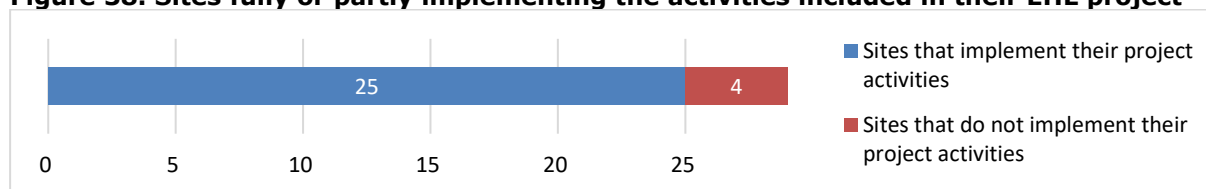
#### **4.4.2. The action's site-specific objectives**

**EQ9** To what extent have the specific objectives defined in Article 3.3 been achieved by the sites designated to date?

In this section, we analyse to what extent the specific objectives defined in the Decision establishing EHL have been achieved by the designated sites. The methods used for this assessment were desk research (analysis of monitoring, site-specific data, and the Panel Report 2016), interviews, and focus groups. The indicators used to assess the sites' progress towards these objectives are: the visibility of the site (web, information, communication); the activities designed by the sites which are aimed at achieving specific goals such as intercultural dialogue, cultural activities and the development of cultural tourism; the evolution of visitor numbers; and the measures developed to increase access to the site.

In interviews, 25 out of 29 managers of selected sites reported that they could fully or partly implement the activities included in their EHL project, or even additional ones. One site manager saw good opportunities to go on with the project plan because internal coordination problems had been solved. Three others declared that they had not implemented any of their planned activities.

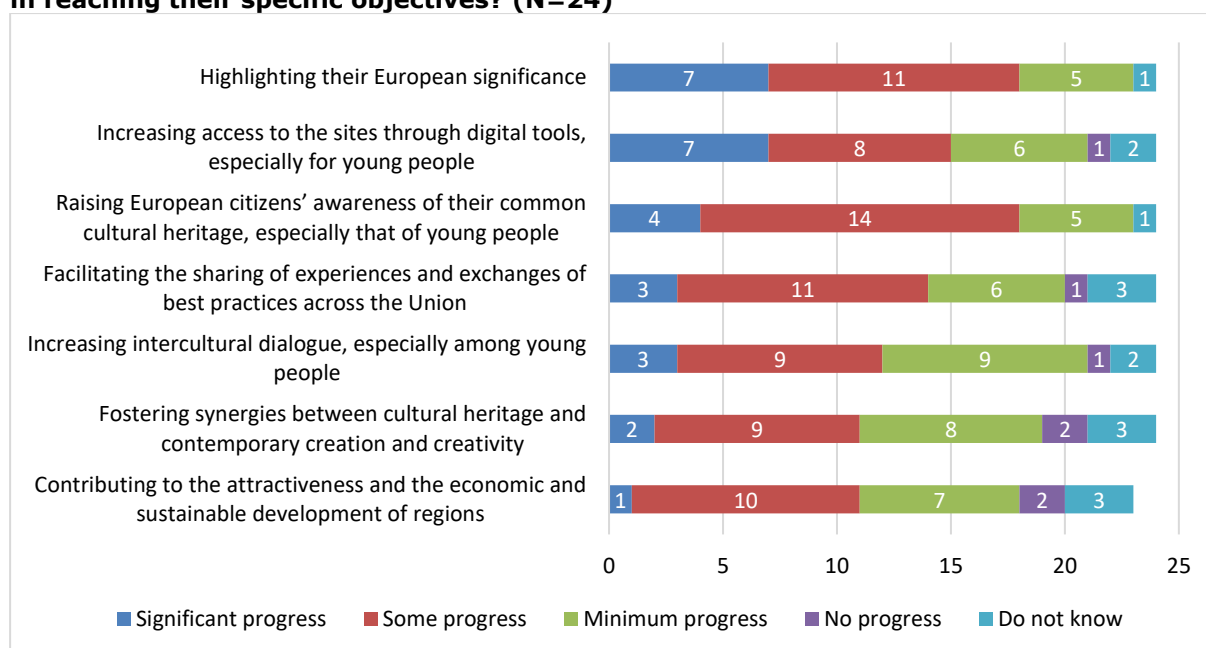
**Figure 38. Sites fully or partly implementing the activities included in their EHL project**



Source: PPMI consortium, based on interview analysis.

Overall, the OPC respondents involved in the action had a mixed view of progress made by the EHL sites towards their specific objectives (see **Figure 39**). More progress is perceived towards highlighting the European significance of the sites, increasing access through digital tools, raising European citizens' awareness, and facilitating the sharing of experiences. Less progress is perceived towards increasing intercultural dialogue, fostering synergies between heritage and contemporary creation, which is an optional activity, contributing to the attractiveness and the development of regions.

**Figure 39. For the site(s) you are familiar with, do you think that they have made progress in reaching their specific objectives? (N=24)**



Source: PPMI consortium, based on the Open Public Consultation.

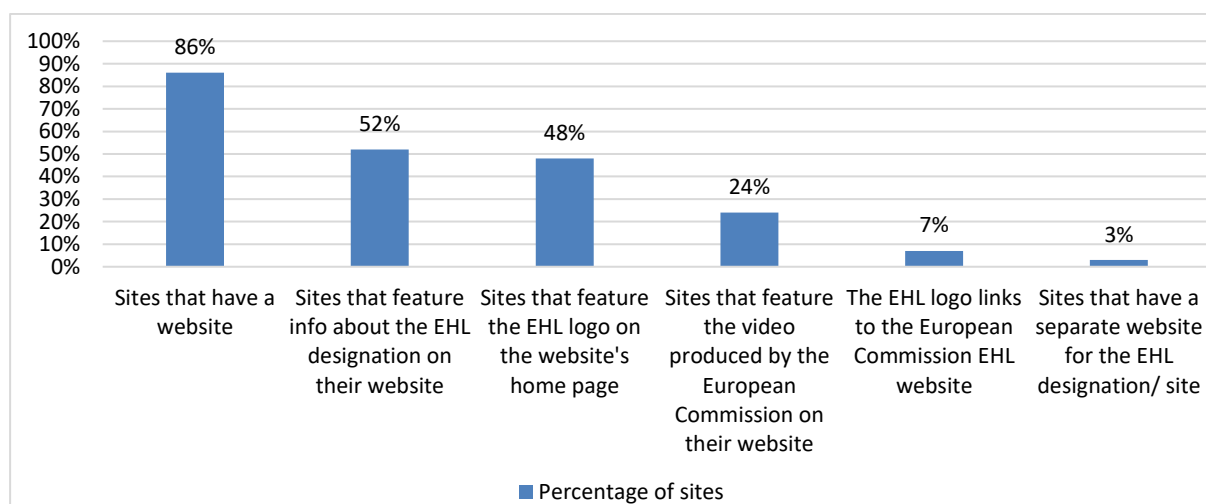
#### a) Highlighting the European significance of EHL sites

The monitoring data shows that all sites have implemented communication activities as part of their projects, and all display the EHL plaque on-site. Out of 28 sites, 25 provided detailed information, including signposting and web resources. Most of the sites developed staff training in order to adapt to a more international audience, or to the new exhibitions displayed. However, only half of the sites featured information about the EHL designation on their website, and even fewer placed the EHL logo on their website's homepage (see **Figure 40**).

Promotional materials produced by the European Commission, including the EHL logo, are not fully exploited by the sites. Less than one-quarter of sites featured the video produced

by the European Commission on their website, while a few sites do not possess a separate website at all, due to financial reasons. Only a few sites make use of the map created by the *Peace of Westphalia* site in Osnabrück, which presents all 29 sites awarded with the EHL up to 2016.<sup>116</sup> Some instances of successful branding were reported, however: according to our interview analysis, during the celebration of the Union of Lublin, even the main street in the city centre was decorated with EHL and EU flags.

**Figure 40. Online communication about the EHL by sites labelled in 2013, 2014 and 2015**



Source: PPMI consortium, based on an analysis of the websites of EHL sites conducted in January 2018. For the purposes of this analysis, the *Peace of Westphalia* site (Munster and Osnabruck) was counted as two separate sites, making a total of 30 sites.

The Panel Report 2016 only explicitly recommended that three out of the 20 sites selected in 2013 and 2014 should ameliorate their communication of their European significance.<sup>117</sup> In interviews, one of these sites explained that it had already outlined its European dimension in a better way (see section 4.4.3.c). Of the other 17 sites, two said that they could not implement their projects at the moment due to a change of director. As the monitoring data leads to the presumption that these two sites had already put in place measures to highlight their European significance, 18 out of the 20 sites had achieved the objective at the time of evaluation.

Nine sites selected in 2015 did not participate in the 2016 monitoring process. Additional data was requested from these sites about their achievements up to 2017. The documents indicate that these sites vary in their current presentation of their European significance. By the end of 2017, one had not implemented any of the activities planned to stress the symbolic European value of the site. Four other sites had not yet placed any special focus on communicating their European dimension on their websites. These findings could not be verified in our interview analysis. In total, 22 out of the 29 sites articulate their European significance in their communication.

Some good practices were identified in the interviews and focus group discussions. The three-day festival “Siamo Europe” (“We are Europe”) in Trento was explicitly dedicated to European integration. It was designed and launched by the *Alcide De Gasperi’s House Museum*.<sup>118</sup> *Kaunas of 1919-1940* organises annual European Heritage Days events. The

<sup>116</sup> City of Osnabrück (2018b), *European heritage sites*. Available at: <http://geo.osnabrueck.de/ehl/EN/map> (accessed: 23 August 2018).

<sup>117</sup> EHL (2016), *European Heritage Label. Panel Report on Monitoring*. 19 December 2016, pp. 15, 18, 30.

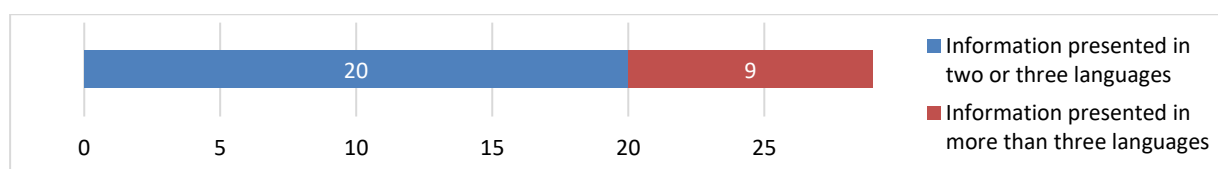
<sup>118</sup> Fondazione Trentina Alcide de Gasperi (2018a), *Siamo Europea Festival 2018*. Available at: <http://www.degasperitn.it/it/progetti/Siamo-Europa/> (accessed: 23 August 2018).

*World War I Eastern Front Cemetery No. 123 Łużna-Pustki* organises, for example, “Weekends under the EHL sign”, which takes place every September.

When it comes to direct promotion, some other examples can be mentioned. The *Peace of Westphalia* site in Münster projects its EHL video in the citizens’ hall in Münster on a regular basis, together with a video about the European significance of the site’s recent history. The *Olomouc Premyslid Castle and Archdiocesan Museum* organises an exhibition of EHL sites at the Archdiocesan Museum. The *Residencia de Estudiantes* includes promotional videos from the other EHL sites (with Spanish subtitles) on its online video channel, and at the same time promotes the *Residencia de Estudiantes* (videos with English subtitles). At the *Union of Lublin* site, there is an international centre in the Dominican monastery where events take place that are open to everyone. According to its interview, the centre talks about the EHL at every occasion (workshops, guided tours). The participating museums also repeatedly stress the European symbolic value of the site. The employees and freelancers who conduct the guided tours and workshops at *Hambach Castle* express the European idea through their communication, and visitor groups at the *Franz Liszt Academy of Music* are told about the site’s EHL selection and its European dimension.

At least one site could be identified which explicitly stopped dealing with its European narrative after being awarded the EHL.

**Figure 41. Multilingualism in the presentation of information among the selected sites**



Source: PPMI consortium, based on interview analysis and monitoring data.

All of the sites provide multilingual information, not only to communicate with audiences of different nationalities, but also to highlight the linguistic diversity of Europe. The number of languages used by the sites varies: 20 present information in two or three languages, while nine sites use more than three languages. For example, *Franja Partisan Hospital* offers information in four languages. The use of languages also differs within the sites, e.g. the *Union of Lublin* offers EHL leaflets in nine languages, but its information boards are only in two languages. The *Franz Liszt Academy of Music* offers two languages on the exhibition’s display panels, but provides guided tours in 11 languages. The website of *Sagres Promontory* is only accessible in Portuguese, although tours are offered in more languages.

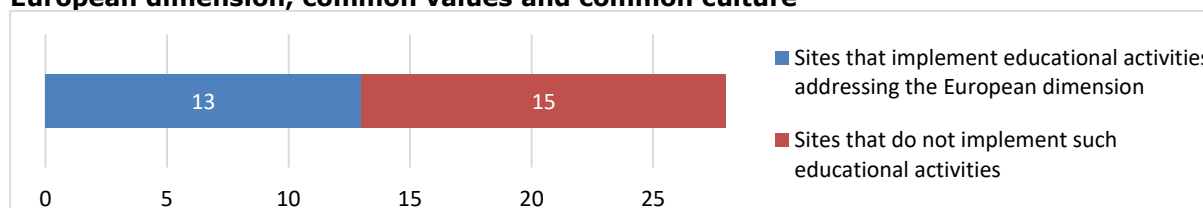
In general, some progress has been made in highlighting the European significance of the labelled sites. This is visible in communications by the sites, in the creation of events, and in the integration of the EHL into the sites’ activities (guided tours, communication material, etc.). The majority of those respondents in the OPC who were directly involved in the EHL action regarded the sites’ progress in highlighting their European significance as one of their major achievements (see **Figure 39**).

#### **b) Raising European citizens’ awareness of their common cultural heritage**

Through our interview analysis, it became obvious that no tool exists at site level that can adequately measure visitors’ and participants’ awareness of their common cultural heritage. Nevertheless, a small number of sites regularly implement visitor surveys. On the basis of these surveys, the sites deduce that visitors’ understanding of European history and common heritage has increased as a result of the site being awarded the EHL. Some sites implement surveys allowing at least some kind of qualitative conclusions to be drawn, i.e. at the *Charter of Law for the Abolition of the Death Penalty*, 87% of the young visitors value the EHL as very important.

By 2020, all sites plan to have implemented educational activities which will help to achieve this site-specific objective. Educational activities can be meaningful tools for conveying the idea of a common European cultural heritage. Thirteen out of the 28 sites explicitly address not just a specific part of European history, but a general European dimension, common values and a common cultural heritage. The monitoring data from 2016 reveals, for example, that the *Heart of Ancient Athens* implemented “educational activities promoting the Pan-European character of the site”; and that the educational activities of the *Archive of the Crown of Aragon* were aimed at “fostering a sense of belonging to the European Union among its citizens and, particularly, among young people, based on shared values and elements”.

**Figure 42. Number of sites planning educational activities that specifically address the European dimension, common values and common culture**



Source: PPMI consortium, based on monitoring data.

Some good practices can be identified in terms of conveying Europe’s common cultural heritage. Most of the sites implemented special workshops for young people, as well as specially adapted guided tours. The *European District of Strasbourg* implements guided tours explaining the different European institutions and their values, as well as other events and conferences on European values. The site also works with the European school to develop a brochure in three languages explaining the European institutions and European values. Each month, the *Archive of the Crown of Aragon* publishes online the “Documents for the History of Europe”. The *Olomouc Premyslid Castle and Archdiocesan Museum* organises activities dedicated to the museum’s heritage and the role of the Archdiocese of Olomouc in shaping Central European history. The *Sites of the Peace of Westphalia* annually organise a Pupils’ Academy, which also considers the European dimension of the sites’ history.

Several sites created partnerships with universities – for example, the *Residencia de Estudiantes* collaborated with the University of Madrid and the University of Exeter. At *Camp Westerbork*, students studying to become history teachers are taken to different camps to show them how to teach about these topics, and why it is relevant in today’s Europe. They also organise Holocaust Education Days at which 150 history teachers visit the site and learn about Holocaust education. There, speakers from different countries are invited to demonstrate the cross-border aspect of the site’s history. The *Heart of Ancient Athens*, among other sites, is also active in employing scientists to research audiences.

Another good practice is the creation of work packages for schools carried out by the *Historic Gdańsk Shipyard*. In co-operation with local schools, the *World War I Eastern Front Cemetery No. 123 Łużna-Pustki* helps to implement photo and history competitions relating to the period of World War I, and to the political events in Europe.

Cooperation and collaboration are other important measures for reaching different societal groups. During the monitoring process, 13 sites explained clearly that they had implemented activities in collaboration with the local community. By ‘local community’, we refer to collaboration with local associations and local government. The following sites are (co)managed by municipalities which *de facto* collaborate with local government:

- the *European District of Strasbourg*
- the *Heart of Ancient Athens*
- the *Historic Gdańsk Shipyard*
- the *Kaunas of 1919-1940*



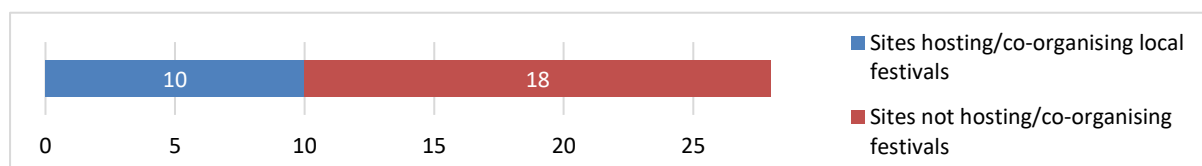
- the *Pan-European Picnic Memorial Park*
- the *Sites of the Peace of Westphalia*
- the *Union of Lublin*

Most of the time, this collaboration appears to be limited to financing (activities, restoration) and local tourism. Cooperation with associations is rarer, and is often limited to a single event. For example, the cultural activities implemented by the *Historic Gdańsk Shipyard* include local associations (e.g. amateur theatre); and *Alcide De Gasperi's House Museum* organised a public awareness event dedicated to rural alpine development. According to our interviews, local communities were also engaged by the *Kaunas of 1919-1940* site, and these communities initiate their own activities. For example, a group of art historians and architects established the "Ekskursas" initiative, which organises guided tours of the interwar architecture of Kaunas, to which the EHL designation is dedicated to celebrating.

Recurring events also take place that involve local communities. For example, on 19 August each year, the *Pan-European Picnic Memorial Park* commemorates the first brief opening of the Hungarian-Austrian border in 1989 by celebrating together with the local community. The previously mentioned "Weekends under the EHL sign" and other local events implemented by the *World War I Eastern Front Cemetery No. 123 Łużna-Pustki* also include the local community. In interviews, the opinion was expressed that, due to these EHL activities, the local community "feels more European".

Besides these examples, and according to the monitoring data, 10 out of the 28 sites either host or co-organise local festivals which are mainly cooperation projects between different partners, and more than one kind of partner. The level of such cooperation cannot be determined from the monitoring data.

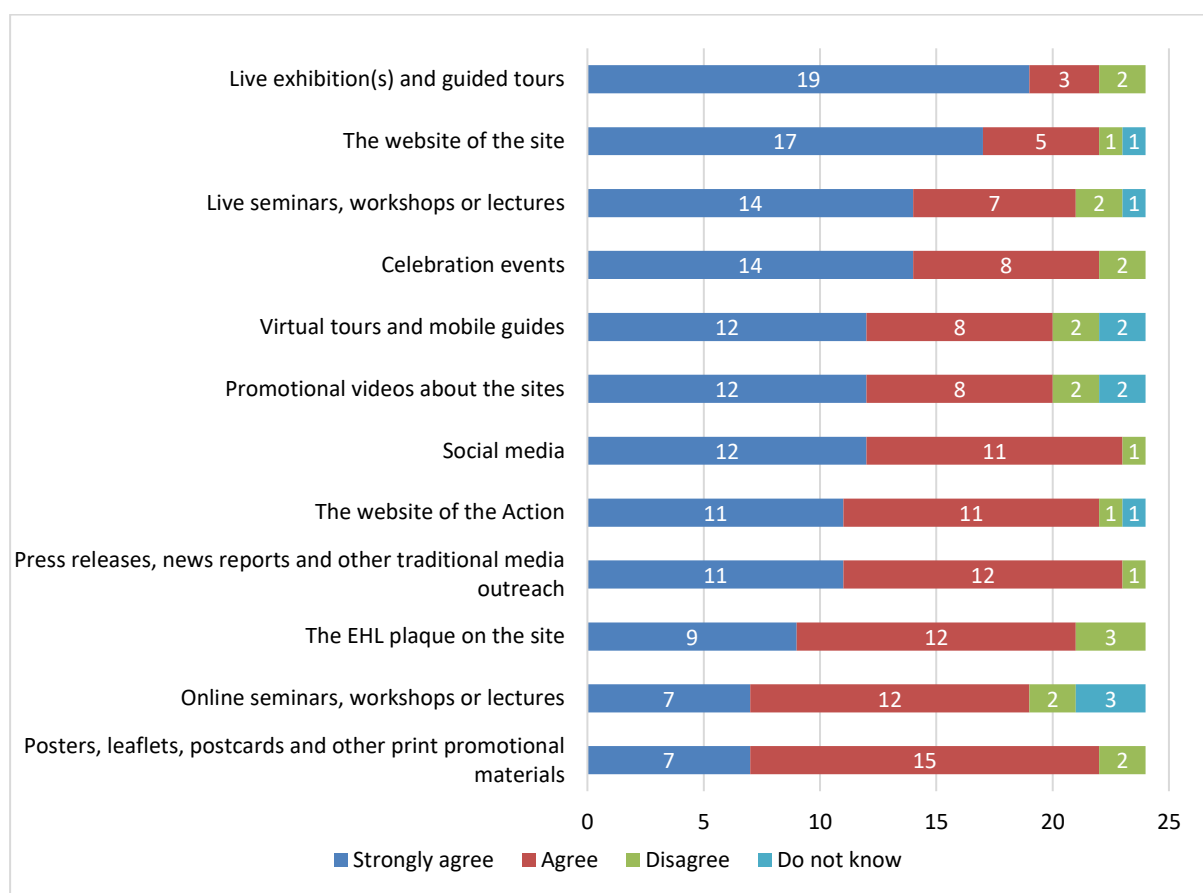
**Figure 43. Number of sites hosting or co-organising local festivals**



Source: PPMI consortium, based on monitoring data.

The majority of those OPC respondents who were directly engaged in the EHL acknowledged that some progress had been made by the action in raising European citizens' awareness of their common cultural heritage (see **Figure 39**). Most respondents agreed that the sites used efficient measures to reach the target audiences and communicate their European narrative to them (see **Figure 44**). OPC respondents perceived the following as being the most efficient means to reach the audiences: live exhibitions and guided tours; the website of the site; live seminars and workshops; as well as celebration events. This indicates that individual connections and physical visits to a site are crucial in transmitting the message of the labelled sites to visitors.

**Figure 44. Respondents' perceptions of which measures were most efficient in reaching target audiences and communicating the European narrative to them (N=24)**



Source: PPMI consortium, based on the Open Public Consultation

The use of visual materials is important in raising the visibility of the Label and its recognition as a brand, especially in online communications. OPC respondents indicated that sites' websites were among the most efficient tools in reaching the target audiences. However, some labelled sites do not have their own separate websites (e.g. the *Union of Lublin* or the *3 May 1791 Constitution*). In other cases, information about the labelled site is not clearly communicated. For example, one link on the EHL website, which should lead to a separate website with more information about the *Charter of Law for the Abolition of Death Penalty*, leads instead to the archive's database, which does not include any information about the EHL. Also, the *Franja Partisan Hospital* in Slovenia still features the logo of the intergovernmental initiative alongside the new EHL logo, which might confuse the identity of the Label. These findings are important, given that 65% of OPC respondents expressed a desire to learn more about the EHL action. Information about the EHL action and sites should therefore be readily available, not only on the Commission's website, but also on the websites of the labelled sites.

To summarise: although the sites do not measure European citizens' awareness of a common cultural heritage, most sites implement activities that aim to increase this awareness. A minority of sites created educational activities explicitly addressing the European dimension, or organised/co-hosted local festivals. In general, awareness of common cultural heritage was developed via online communications.

### **c) Facilitating the sharing of experiences and exchange of best practices across the Union**

The European Commission provides opportunities for sharing experience among EHL sites through the annual EHL Days. Although this platform is welcomed, EHL managers regard it as insufficient in terms of its frequency and the exchange formats provided at the meeting



itself. Site managers acknowledge the added value of the EHL in terms of the opportunity to share experiences and best practices, and to learn with and from other sites. "I think it is very important to see how others manage their sites. It brings different perspectives on a topic", explained one interviewee. Some interviewees expressed ideas for possible cooperation.

On the one hand, transnational cooperation between EHL sites occurs that can be understood, at least in part, as the sharing of experience and best practices. These kinds of cooperation activities are implemented by nearly half of the selected sites, as noted in section 4.4.1.c. For example, the *Imperial Palace Vienna* annually invites attendees to a congress on cultural heritage. In 2018, the topic of this congress was "Cultural Heritage – Its Economic Value". The programme offers a networking stream for EHL sites and national coordinators.

In this context, establishing a network of EHL sites is a desire expressed by many interviewees. Creating a network would appear to be the first step in encouraging sites to implement transnational cooperation projects. A first application to receive network funding from the European network strand of the Creative Europe programme was unsuccessful, leading to disappointment among some sites, as mentioned in section 4.4.1.c.

Also worthy of consideration are the activities of EHL sites to facilitate exchange with other non-EHL cultural heritage sites in Europe. Such activities are implemented by a large majority of the sites, as long as they are already internationally active, and are always connected with the topic or idea with which a site is concerned. For example, the *Archaeological Park Carnuntum* engages in scientific partnerships with Romania, Italy, United Kingdom and Norway through the Ludwig Boltzmann Institute. In the context of World Heritage, the site also has partnerships with German, Swiss and Slovak partners. The *Residencia de Estudiantes* collaborates with eight institutions in seven European countries as a part of an alliance of European Poetry Houses. To develop exchange in the music sector, the *Franz Liszt Academy of Music* co-operates with other European music centres. The *Neanderthal Prehistoric Site Krapina* is involved in an exchange as part of the Ice Age Network; and the *Peace of Westphalia* site in Osnabrück works together with Dutch municipalities in the Euregio network. Like the implementation of collaboration projects between EHL sites, the development of these sites' general networks is similarly dependent on common topics or common interests, as mentioned in section 4.4.1.c.

More than half of OPC respondents who were engaged in the action acknowledged that progress had been made by the sites in facilitating the sharing of experiences and exchanges of best practice across the Union: three out of 24 respondents saw significant progress; 11 saw some progress.

To conclude, the EHL's existing annual meetings help in sharing experience and exchanging best practice. Still, this could be strengthened by new formats in these meetings to address this issue, and by the creation of a network between labelled sites.

#### **d) Increasing and improving access for all**

On the one hand, providing access for all implies that a site should be generally accessible in the real world, as well as virtually. On the other hand, it also involves catering to the varying needs of different target groups.

In a virtual sense, not all sites provide access. As shown in **Figure 40**, only 86% of them have their own website.

The monitoring data shows how many people paid a physical visit to the sites during the year 2015 (except as otherwise indicated). These numbers clarify the dimension of 'real-world' access to the sites, but not its improvement. Moreover, they should be approached

with caution, as they include various sites of different sizes and do not identify the percentage of visitors who took part in guided tours and special activities.

**Table 9. Numbers of 'real-world' visitors at selected sites**

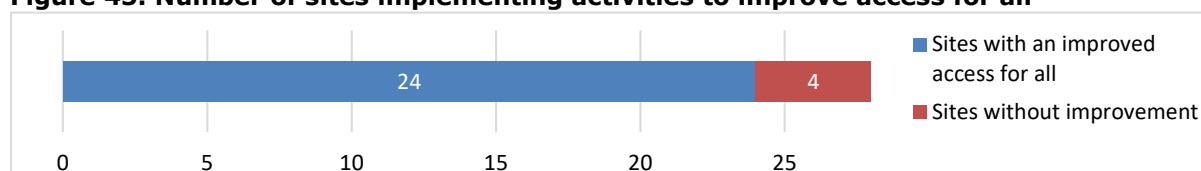
Site name	Number of visitors in 2015 (except differently mentioned)
<i>Imperial Palace Vienna</i>	between 5 and an estimated 20 million (2017)
<i>Heart of Ancient Athens</i>	around 2 million
<i>Archive of the Crown of Aragon</i>	more than 1 million
<i>Historic Gdańsk Shipyard</i>	430,000
<i>Sagres Promontory</i>	400,000
<i>General Library of the University of Coimbra</i>	355,000
<i>Franz Liszt Academy of Music</i>	200,000 (2017)
<i>Camp Westerbork</i>	178,500
<i>Archaeological Park Carnuntum</i>	160,000
<i>Hambach Castle</i>	150,000
<i>Abbey of Cluny</i>	133,000
<i>Peace Palace</i>	100,000
<i>Residencia de Estudiantes</i>	100,000
<i>Neanderthal Prehistoric Site Krapina</i>	80,000 (2017)
<i>Kaunas of 1919-1940</i>	75,271
<i>Olomouc Premyslid Castle and Archdiocesan Museum</i>	over 50,000 (2017)
<i>Great Guild Hall</i>	43,510
<i>Charter of Law for the Abolition of the Death Penalty</i>	26,186
<i>Franja Partisan Hospital</i>	20,791
<i>Robert Schuman's House</i>	11,280
<i>Alcide De Gasperi's House Museum</i>	8,000

Source: PPMI consortium, based on the monitoring data.

Some sites did not or could not provide visitor numbers (*Sites of the Peace of Westphalia*; the *Union of Lublin*; the *3 May 1791 Constitution*; the *Pan-European Picnic Memorial Park*; *World War I Eastern Front Cemetery No. 123 Łużna-Pustki*; the *Mundaneum*; the *European District of Strasbourg*; the *Historical Ensemble of the University of Tartu*).

According to the monitoring data and additional site-specific data, 24 out of 28 sites implemented activities to improve access for all. Most sites offer reduced entry fees for young people, while some sites are already free of charge (as explicitly mentioned by the *Charter of Law for the Abolition of the Death Penalty* and the *Pan-European Picnic Memorial Park*). Also, as noted in an interview, two-thirds of visitors to *Hambach Castle* come to visit the free-of-charge area around the castle.

**Figure 45. Number of sites implementing activities to improve access for all**



Source: PPMI consortium, based on monitoring and site-specific data.

To communicate with particular audiences, most of the sites have implemented specific guided tours. Only one site made no mention of specific activities in this field (in either monitoring or interview analysis). Examples of this type of activity include those at the *Olomouc Premyslid Castle and Archdiocesan Museum*, which has developed different educational activities for pre-school, elementary, secondary school children and seniors. The number of young people accessing the *Residencia de Estudiantes* has slightly increased because the site implements a number of activities specifically aimed at young people, e.g. week-end activities, contemporary concerts performed by young musicians, creative writing workshops, etc.

Special target groups are considered by the *Historic Ensemble of University of Tartu*, for example, which is dealing with the accessibility of disabled people. The site is also developing an interactive tablet application. The *Archaeological Park Carnuntum* informs users online that the site is accessible to people with disabilities. The *Kaunas of 1919-1940* site has installed notice boards beside nine interwar buildings around the city, providing information not only in Lithuanian and English but also in Braille. In addition, low-impact self-guided tours have been developed by school pupils for less able individuals. These can be accessed using mobile devices via QR codes, by any citizen or tourist who passes by. The *Franja Partisan Hospital* places emphasis on audience development, paying particular attention to reaching young and older people. The *Franz Liszt Academy of Music* organises the project "Explore Europe" for pupils from the countryside.

General accessibility sometimes also requires improvement. The *World War I Eastern Front Cemetery No. 123 Łuźna-Pustki* and the *Pan-European Picnic Memorial Park* have therefore ameliorated general access by providing parking places or cycle paths.

A majority of OPC respondents engaged in the action noted progress in increasing access to the sites through digital tools: 7 out of 24 saw "significant progress"; 8 saw "some progress".

In summary, the EHL sites have been effective in improving access to their sites, with most sites implementing activities in this regard. However, we do not observe a specific increase in visitor numbers linked to being awarded the EHL.

#### **e) Increasing intercultural dialogue**

The European Commission defines intercultural dialogue as "the exchange of views and opinions between different cultures. It seeks to establish linkages and common ground between different cultures, communities, and people, promoting understanding and interaction"<sup>119</sup>. Our further analysis will refer to this basic definition in relation to the outcomes of the European Year of Intercultural Dialogue in 2008, upon which the EHL can build. In order to find evidence of the EHL putting intercultural dialogue into action, it is necessary to identify the explicit activities of the initiative that support these types of intercultural processes.

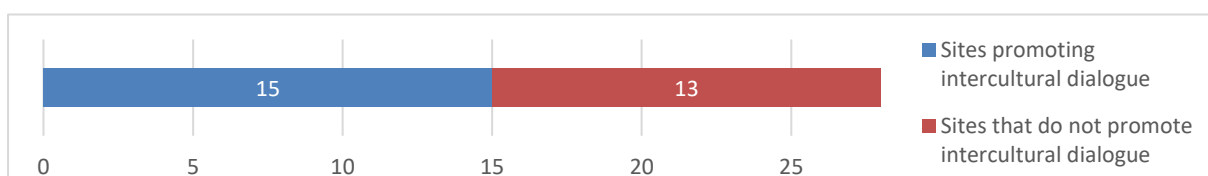
Monitoring data shows that 22 sites implemented activities aiming at intercultural dialogue. However, some of the experts interviewed questioned whether multilingualism alone could

<sup>119</sup> European Commission – Culture, *Intercultural dialogue*. Available at: [https://ec.europa.eu/culture/policy/strategic-framework/intercultural-dialogue\\_en](https://ec.europa.eu/culture/policy/strategic-framework/intercultural-dialogue_en) (accessed: 23 August 2018).

already be classified as intercultural activity, and whether it supports the aim of strengthening intercultural dialogue. During the interviews, it was noted that the definition of intercultural dialogue was not clear for all site managers, leading to diverse interpretations.

Hence, a further analysis provides the following results: by analysing the monitoring data in combination with the interviews, 15 sites can be identified as implementing or planning to implement educational activities that directly promote intercultural dialogue according to the definition given above.

**Figure 46. Number of sites promoting intercultural dialogue through educational activities**



Source: PPMI consortium, based on monitoring data and interview analysis.

According to the interviewees, activities for strengthening intercultural dialogue include meetings, conferences and debates with people from different countries or with diverse religious faiths. At least three projects support the integration of refugees and/or migrants. In two cases, a site tour for pupils from different ethnic backgrounds broaches the issue of diverse societies.

One activity of this kind of is the project “Lab Europe” organised by the *Peace of Westphalia* site in Osnabrück.<sup>120</sup> Implemented in August 2018, it invited 51 young people (18-25 years old) from other cities with EHL sites and from other European countries to come to Osnabrück for 10 days to exchange and work creatively with each other on different European topics. The project also supported co-operation between different EHL sites and promoted the Label itself. *Alcide De Gasperi’s House Museum* also implements educational activities to increase intercultural dialogue, e.g. the site participated with a group of students in the European Youth Event 2018. *World War I Eastern Front Cemetery No. 123 Łuźna-Pustki* organises an International Youth Meeting once a year. The *Franja Partisan Hospital* implements a yearly arts contest for children. Participants from six different nationalities took part in the last contest.

The *Olomouc Premyslid Castle and Archdiocesan Museum* celebrated the Days of Jewish Culture, while the *Union of Lublin* created a new periodic event to celebrate the Union of Lublin, to which Catholic, Orthodox and Jewish believers from Poland, Croatia, Italy, Belgium, Austria and the Netherlands were invited. Another cultural centre in Lublin which is included in EHL activities is dedicated to the Jewish history and culture, Muslims and Roma. Both *Sites of the Peace of Westphalia* organise a religious community meeting every year. Different religious groups are invited to the town hall for intercultural dialogue.

*Camp Westerbork* connects its own intercultural history with former and current challenges to integration. The site receives school visits from children with many different backgrounds, and addresses this topic in its guided tours. Furthermore, the site has recruited a new colleague for German policies to work on the increase in German tourists and to organise summer schools. The *Historic Gdańsk Shipyard* co-operates with non-governmental organisations to support the integration of refugees, and the *European District of Strasbourg* organises events for International Refugee Day on 20 June.

“Hambach! The Democracy Festival” is organised by the *Hambach Castle* site and takes place every September in cooperation with partners from the region; the project is

<sup>120</sup> City of Osnabrück – The Lord Mayor (2018), *Lab Europe*. Available at: <https://www.lab-europe-osnabrueck.de/> (accessed: 23 August 2018).

transnational. There is a focus on German-French exchange among interns and volunteers. The *Residencia de Estudiantes* collaborates with centres and institutions across the whole of Europe through exchanges with artists, writers, etc., and implements conferences with the participation of international artists and scientists. For the French sites, the Label is a useful reminder to be proactive and to implement transnational and intercultural projects, as mentioned in the country-level focus group.

In their interviews, four sites explicitly linked intercultural dialogue with their objectives. One site manager, for instance, stressed that “intercultural dialogue is one of the main areas of the site’s general activities”. A great number of site managers described their activities as part of an intercultural dialogue, but indicated that this was not a core part of the site’s mission.

The respondents in the OPC were doubtful about sites’ progress in increasing intercultural dialogue: nine out of 24 respondents involved in the action recognised some progress, nine respondents saw minimal progress.

Even if little progress is perceived, the EHL network is a platform via which intercultural dialogue already takes place between sites in different co-operation events or projects. All interviewee groups stressed the importance of establishing a structure for the network of EHL sites. A next step would be to think about the fields of intercultural dialogue to which the EHL could contribute. One expert who was interviewed saw potential not only to address exchange between nations and religions, but also between different social groups – an aspect which has not yet been realised.

In summary, several sites implement activities aimed at increasing intercultural dialogue (15 out of 28), and further sites declared that they had this objective. Nevertheless, little progress has been observed in increasing intercultural dialogue. The development of these activities is hindered by a lack of understanding among site managers as to what is meant by intercultural dialogue.

#### **f) Fostering synergies between cultural heritage and contemporary creation and creativity**

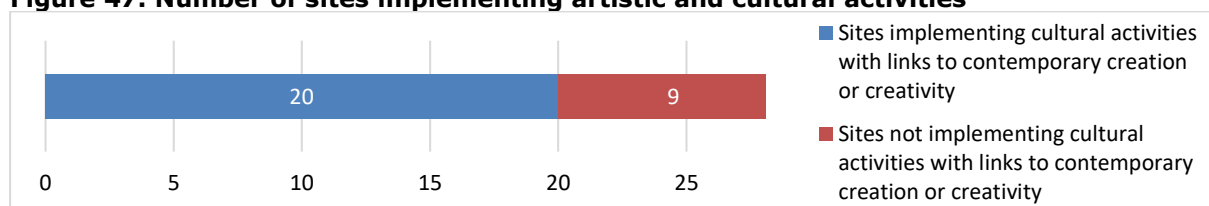
The EHL’s optional criterion for sites – activities that foster synergies between cultural heritage and contemporary creation and creativity, including artistic and cultural activities which foster the mobility of European culture professionals, artists and collections – could also stimulate intercultural dialogue, and encourage other types of link between these fields.<sup>121</sup>

Monitoring data shows that 20 sites implemented at least two artistic and cultural activities as part of their EHL projects. Most sites organised exhibitions or hosted festivals (often featuring theatrical or musical performances). Aside from these two types of cultural activity, some sites edited books and comic strips; others promoted contemporary creation by working with artists, e.g. the *Mundaneum*, with an artist residency within the frame of the project “Ideographies of Knowledge”. To celebrate the border opening, the *Pan-European Picnic Memorial Park* always invites musicians and artists. The *European District of Strasbourg* implements contemporary arts exhibitions, concerts and movie screenings. Sites also frequently serve as space for cultural events, such as at the *Archive of the Crown of Aragon*, where cultural activities take place in the exhibition room.

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<sup>121</sup> Decision No. 1194/2011/EU, Art. 7.1.b.

**Figure 47. Number of sites implementing artistic and cultural activities**



Source: PPMI consortium, based on monitoring data.

In total, 18 sites created partnership projects between the site and creative industries that provides some link between these fields. Most of these projects consisted either of a single event or a festival, such as projects at the *Union of Lublin*, which was a partner in the Festival of Art in Public Space; Open City; the Festival of Traditional and Avantgarde Music Codes KODY; and the Central European Theatres Festival.

Our interview analysis confirmed the results of the assessment of the monitoring data. The following paragraphs provide examples of sites implementing artistic or cultural projects, and engaging in collaborations with creative entities.

Each summer, the *Archaeological Park Carnuntum* becomes the setting for the World Theatre Festival "Art Carnuntum". This festival seeks to deal with topics relating to the Roman Empire. By doing so, it directly connects its cultural heritage with art. The site is part of local initiatives such as "Open Studio Days", at which artists are invited to exhibit; it also cooperates with the Landestheater Niederösterreich.

The *Neanderthal Prehistoric Site Krapina* takes part in a local music festival in Krapina each September, during which the museum implements an exhibition and workshops for children.

The "Matchbox – The Wandering Arts and Culture Festival" takes place at the *Hambach Castle* and the nearer region. The festival brings international artists in contact with people living in the region.

To commemorate 150 years since the death penalty was first abolished in Portugal, the *Charter of the Law for the Abolition of the Death Penalty* fosters more than 40 partnerships, some with cultural centres.

The *Olomouc Premyslid Castle and Archdiocesan Museum* always organises three or four activities relating to drama/theatre during the Night of the Museum and European Heritage Days, and in doing so collaborates with theatre groups of young people. Alongside its dramatic arts activities, the museum also organises a film screening in its main hall twice a month, and in April 2018, a photography exhibition opened.

The *Historic Ensemble of University of Tartu* implemented a theatre project in cooperation with a local theatre.

The *Kaunas of 1919-1940* site is often approached by film producers or designers looking to rent locations for filming or photo shoots. The site uses its modernist architecture to promote itself to the Lithuanian film industry. Via the aesthetics of film, this cultural heritage site plays an important role in artistic activity.

Some sites also support exchange between artists and creatives from different countries. Fostering synergies between the site and contemporary creation is part of the everyday work of the *Franz Liszt Academy of Music*. This includes exchange programmes for musicians in Europe.



The *Residencia de Estudiantes* implements cultural activities such as contemporary concerts performed by young musicians, creative writing workshops, etc., but also an artists-in-residence programme for creative exchanges, supported by Creative Europe.

The *Peace of Westphalia* site in Osnabrück launched a new cultural exchange project via the Euregio fund, under which Dutch and German artists realise projects together. Artists also exhibit in the Citizens' Hall.

OPC respondents engaged in the EHL action were doubtful with regard to the progress made by EHL sites in fostering synergies between cultural heritage and contemporary creation and creativity: nine out of 24 respondents saw some progress, eight saw progress as minimal.

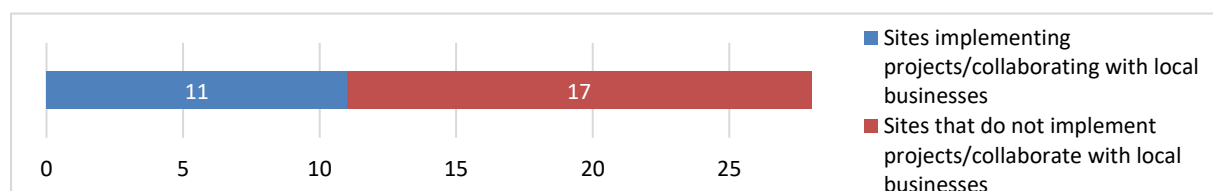
In conclusion, while field research shows that most EHL sites implement activities that are linked to contemporary creation, respondents in the OPC observed little progress in this regard. In general, these activities rarely appear to be linked to the EHL, and rarely provide a space for the interconnection of contemporary creation and cultural heritage.

#### **g) Contributing to the attractiveness and the economic and sustainable development of regions**

Large sites exert a greater influence on the space around them than smaller sites. For instance, the *Imperial Palace Vienna* wants to develop a "city in the city". Also, *Kaunas of 1919-1940*, the *Union of Lublin*, the *European District of Strasbourg* and the *Heart of Ancient Athens* are not only greater parts of cities, but also cooperate with local communities and actors in and around their areas. Our focus group analysis shows that *Kaunas of 1919-1940* exerts a greater influence on local communities. As one focus group participant put it: "The information about the interwar heritage benefited small business and individual citizens – conservators, antique sellers. Citizens started to value this heritage and decorate their houses with details from the interwar period. It has become a level of prestige to live in [the suburb of] Žaliakalnis." Smaller sites do, however, collaborate with local businesses, etc., as shown by the monitoring data and interview analysis.

According to the monitoring data, 11 sites implemented projects with local businesses. Most of these can be defined as collaborations rather than projects. A large number of these sites work together with local tourism agencies: for example, the *Franz Liszt Academy of Music* is part of a local walking tour. The site also collaborates with a tourism organisation to coordinate the capital's cultural offer. The *Olomouc Premyslid Castle and Archdiocesan Museum* works together with tourism fairs, and the *Pan-European Picnic Memorial Park* collaborates with several tourist companies to organise cultural events. Because of its proximity to the border, the *Archaeological Park Carnuntum* has tourism partners not only in Austria but also in Slovakia.

**Figure 48. Number of sites implementing projects/collaborating with local businesses**



Source: PPMI consortium, based on monitoring data.

In the case of the *Franja Partisan Hospital*, connections to local businesses developed even without the site taking an active role. As the focus group analysis shows, a nearby restaurant informs guests about the site and about the EHL. In the same way, the *Hambach Castle* site connects with local tourist companies and with a local restaurant. As part of civil society, local businesses are explicitly invited to discussion events. For gastronomic

reasons, the *European District of Strasbourg* also collaborates with a newly launched catering facility.

Other sites cooperate with marketing companies, as is the case with the *Sites of the Peace of Westphalia*, where departments of Münster Marketing that are not involved in the management of the site are nevertheless part of the site's projects. The *Heart of Ancient Athens* collaborates with local cafés, shops, a restaurant, and so on. After its EHL designation, other local municipalities that also host cemeteries felt somehow obliged to cooperate with *World War I Eastern Front Cemetery No. 123 Łuźna-Pustki*. Together, they organised local interconnected events. As a result, a series of small events now exists in the area. One site manager mentioned experiencing difficulty in establishing cooperation with local partners, as they did not prioritise working at a European level or in English.

Of all aspects of their activities, OPC respondents engaged in the action acknowledged that EHL sites had made the least progress in contributing to the attractiveness and the economic and sustainable development of regions: 10 out of 24 respondents saw some progress; seven saw minimal progress, and two saw no progress.

In general, EHL sites are active in the field of cultural tourism and contribute to the cultural tourism development of their regions to a certain degree, although this differs from site to site. A large number of sites are already well integrated into a regional tourism network. Other sites aim to increase their value by developing their connections to regional networks, as declared in interviews. Yet, on the basis of the research data, it is impossible to draw quantitative conclusions on this topic. One site manager explained their own perception in this respect, which represents that of the majority of the interviewees: "Quantitatively speaking I did not see it, but perhaps qualitatively. Cultural heritage may play a bigger role than before."

In general, only a minority of the sites collaborate with local businesses. This often depends on the size of a site, as it appears to be easier for larger sites. Still, several situations have been observed in which sites contribute to the attractiveness and development of a region. As most of the sites are already part of a local/regional tourism network, no impact of the EHL can be observed in this regard.

#### **4.4.3. The action's general and intermediate objectives**

**EQ8** To what extent were the EU-level general and intermediate objectives of the action met in its first years of implementation?

This section will answer the questions if, and to what extent, the general and intermediate objectives of the action have been achieved. The methods used to identify evidence for this are desk research (analysis of monitoring and site-specific data, and the Panel Report 2016); interview and focus group analysis, as well as analysis of the OPC. Here, the interconnection of general/intermediate and site-level objectives is crucial. Thus, effectiveness in terms of general and intermediate goals can mainly be assessed by analysing the achievement of site-level objectives. Consequently, the findings illustrated in section 4.4.2 contribute to the findings below.

A great majority of interviewees, as well as focus group participants, mentioned that the EHL goals needed time to be achieved. One reason given is that they have a qualitative focus, and consider societal aspects. One national coordinator stated: "The society and the public opinion cannot be changed so fast." The general and intermediate objectives of the EHL aim to achieve effects on a larger scale, while the action has only existed for a few years. Furthermore, it must be acknowledged that the sites were not selected at the same time, but have had different opportunities to contribute to the EHL's goals. Thus, the opportunity to generate effects differs from country to country, and from site to site.

Analysis of the OPC provides an overview of the progress made by the action to achieve its general and intermediate goals. More than half of respondents in the OPC who were

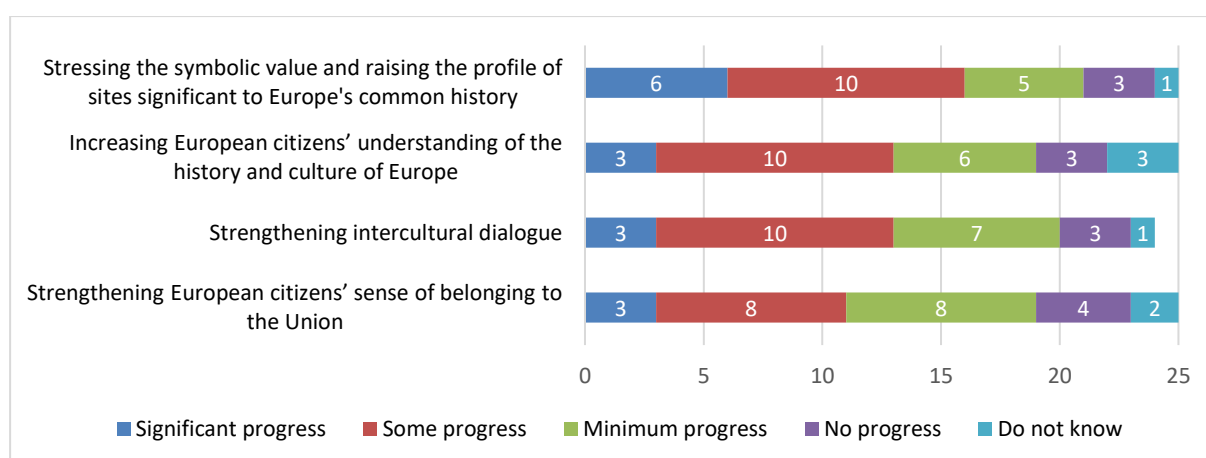


involved in the action acknowledged some, or even significant, progress by the EHL in reaching its overall goals (see **Figure 49**). Slightly more progress was perceived in stressing the symbolic value and raising the profile of the sites, while slightly less progress was perceived in strengthening European citizens' sense of belonging to the Union.

In all, 92% of OPC respondents agreed that a visit to any of the EHL sites had improved their understanding of European history and culture, and had encouraged them to learn more about it. Likewise, a majority of respondents (71%) agreed that a visit to an EHL site had strengthened their sense of belonging to Europe.

According to our analysis of the OPC, the action's progress in reaching the general and intermediate objectives is perceived differently, although the majority of respondents saw some progress. However, when it comes to the personal impact of a visit to any EHL site, the perception of both general public and those involved in the action is much more positive.

**Figure 49. The European Heritage Label was launched in 2011. Do you think that it has made progress in reaching its overall goals and objectives since then?**



Source: PPMI consortium, based on the Open Public Consultation.

#### **a) Strengthening European citizens' sense of belonging to the Union**

The ultimate goal of the EHL is to change the individual attitudes of European citizens. It aims to do so not just in terms of their increased understanding of the history of Europe and the building of the Union, but at a very deep-rooted level – namely, their sense of belonging to the Union, i.e. their European identity. Identity building is a complex process and subject to multiple influences. The extent to which a visit to an EHL site affects someone's identity depends not only on the site's qualities and its European narrative, but also on the personal background of the visitor (age, nationality, ethnic origin, religion, personal values and political views, stereotypes, etc.) and social factors (the education systems of different countries, communication and media, linguistic policies, geographical mobility, the issues of multi-ethnicity and multiculturalism, pan-European networks, European and national policies, etc.). Consequently, it is extremely difficult to attribute someone's "change of mind" to a single effect.

Our interview analysis shows that nearly all national coordinators acknowledge the first overall objective of the EHL as important. Some of them expressed doubts concerning the instruments used to achieve the goal, or the coherence of the sites' objectives to this general aim. National coordinators also try to contribute to achieving the objective: at least seven national coordinators mentioned that they had organised info days, workshops, games events, conferences and round tables. These activities should help to communicate the EHL to a wider public by connecting cultural heritage topics to Europe.

With regard to the question if the objectives are seen as having been achieved, some interviewees felt that more research would be required to find this out. Nearly all respondents did not observe a great effect in terms of strengthening citizens' sense of belonging to Europe/the EU. Two national coordinators perceived the overall objective as having been reached by the sites in their country. Also, all of the panel members interviewed who commented on this objective agreed that it is difficult to detect a change in the sense of belonging.

The sites contribute to this overall goal by achieving site-specific objectives. As discussed in section 4.4.2.b, the sites have made progress in raising European citizens' awareness of their common cultural heritage. According to these findings, 13 sites and seven national coordination offices had developed knowledge about how to achieve the objective, and explicitly try to strengthen citizens' sense of belonging to Europe via different types of activity. This is an important pre-condition for achieving the general goal of strengthening European citizens' sense of belonging to Europe.

In conclusion, even though the strengthening of European citizens' sense of belonging to the Union is not quantified, the EHL has contributed to it on a qualitative scale. This has occurred through the implementation of the sites' specific actions, and in some cases via the organisation of specific EHL events on a national level.

#### **b) Strengthening intercultural dialogue**

Strengthening intercultural dialogue is the second general objective of the action. Progress towards this will be assessed by analysing whether the objective is fully acknowledged by the actors involved in the action, and if knowledge has been developed on how the action can strengthen intercultural dialogue. In addition, it is necessary to take into account that activities stimulating intercultural dialogue are optional for EHL sites, and are only implemented by a minority of sites (see section 4.4.2.e).

While the first general objective aims to change the perspective of individuals, the second describes interaction and communication between persons. Here, we refer to intercultural dialogue as defined by the European Commission (see section 4.4.2.e).

A large majority of the national coordinators emphasised that the EHL provides an opportunity to increase intercultural dialogue. Depending on each specific situation, they understand the necessity of strengthening intercultural dialogue in different ways. For example, one national coordinator said that EHL sites in Central Europe need to help "overcome the long-lasting split between the so-called western and eastern European countries, and to remind [people] that this region has been an integral part of the European cultural space for centuries".

A majority of EHL site managers acknowledged the objective as crucial, and mentioned an improvement in the presentation of information in more European languages. Four site managers said that intercultural dialogue was one of the main areas of their site's general activities.

When describing possible or actual activities, it becomes obvious that the term is understood in different ways. Mostly, the presentation of information at the sites in different languages is perceived as supporting intercultural dialogue. According to the definition of intercultural dialogue used herein, these achievements cannot be regarded as intercultural dialogue *per se*.

A majority of site managers and national coordinators emphasised that developing exchange between EHL sites would be an important added value. In this respect, they support the idea of intercultural dialogue between sites in Europe.

In all, 98% of OPC respondents agreed that the EU needs to put efforts into strengthening intercultural dialogue. OPC respondents who were involved in the action did perceive that

intercultural dialogue had actually been strengthened. A narrow majority of people distinguished some progress by the EHL in reaching this goal: 13 out of 24 respondents saw some progress (three saw “significant progress”; 10 saw “some progress”).

OPC respondents strongly supported the potential for visiting EHL sites in other countries. Knowing that a specific site had been awarded the EHL would encourage them to find out more about other labelled sites (88%), and even to visit them (82%).

Even though the Label is recognised as having the potential to strengthen intercultural dialogue on a wider scale, this objective has not yet been fulfilled. It is optional for the sites, and not implemented by all. It could be further developed through an emphasis on exchange between EHL sites, which already happens to some degree.

### **c) Stressing the symbolic value and raising the profile of sites**

This is one of the two intermediate objectives of the action. Any progress in achieving this will be assessed as the extent to which European significance has been fully understood, well-articulated and conveyed by the sites; the extent to which the recommendations of the European panel with regard to the European significance of sites have been considered; and evidence on increased attention on the EHL sites from the public.

The European panel explained that the focus of the EHL lies on the European dimension of a site’s characteristics and historical specificities, “thus going beyond national borders and audiences”<sup>122</sup>. Nevertheless, in some focus groups at both national and site level, participants agreed that it was difficult to understand what the EHL symbolises, and what a common European narrative could be, as there is a great heterogeneity of sites. Confusion exists as to whether there should be a common European narrative (“As long as the common sense does not exist or is not known enough, I have problems to communicate it.”) or not (“[At] the moment, EHL shouldn’t be limited to one common sense. Diversity is a value itself, which is important to stress.”). In interviews, national coordinators and site managers expressed the hope of gaining a clearer picture of what European narratives and European identities could mean. Five panel members supported this idea by emphasising the need for a critical discussion on this topic – not only to support sites that were applying as well as those that had already been selected, but also to develop the basic understanding of the EHL in general.

A large majority of site managers agreed with what one articulated as follows: “We understand ourselves as a significant site in European history. The values such as the rule of law, democracy, human rights, pluralism, civil liberties, freedom of religion and expression, etc. have taken place, and have been shaped in the sites, we see ourselves as disseminators for these ideals and the European values.”

In its monitoring report of 2016, the panel offers recommendations to some sites on the development of their European dimension.<sup>123</sup> The *Great Guild Hall* aims to cover the role of the Guild Hall in the Hanseatic League as an important historic European trade and defence organisation, as recommended by the panel, but has not yet achieved this aim, as the opening of the new exhibition dealing with this topic is planned for 2020/21. Consequently, the site’s European dimension is currently not sufficiently communicated. It can be stated that the *Sites of the Peace of Westphalia* do communicate their European significance in terms of peace achieved through negotiations at a European level. Both sites describe themselves as a symbol for these processes of negotiating peace in Europe, and implement projects to promote this narrative as mentioned in the interviews with site managers and the focus group. For example, in spring 2018, the project “Peace. Europe”

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<sup>122</sup> EHL (2017), *European Heritage Label. 2017 Panel Report. 5 December 2017.*

<sup>123</sup> EHL (2016), *European Heritage Label. Panel Report on Monitoring. 19 December 2016*, pp. 11-30.

began in Münster<sup>124</sup>, linking these two terms directly with each other. The panel's recommendations for the *Pan-European Picnic Memorial Park* are challenging to implement, as better communication of its European narrative would require greater financial resources, as was explained at interview. While the site's European significance is clear, its promotion is still to be improved.

Site data shows that visitor numbers increased at all of the sites after they were attributed with the EHL. No site reported a decrease in attendance. However, it is hard to quantify this data, or to link it directly to the fact of being labelled, since a number of external conditions have both positive and negative influences on the flow of visitors. For example, the establishment of a site as a tourist destination prior to the designation of the EHL is a significant determinant. Likewise, the site's geographical location, artistic value, access and marketing strategy might be conducive to the site's attractiveness for visitors.

Most of the monitoring data provides no comparative data on visitor numbers before and after receiving the Label. For the sites themselves, it is not easy to figure out what percentage of an increase in visitors is connected directly or indirectly to the fact of being labelled. Some site managers link this evolution to the Label, while others do not. In the 2016 monitoring process, six sites with smaller visitor numbers (not more than 100,000), and one site with more than 100,000, visitors directly connected the increase of visitors with EHL selection. Only three of these sites confirmed this perception in the interviews. As assessed in the focus group analysis, *Robert Schuman's House* started a visitor survey, which reveals that visitors do not know about the EHL when coming to the site. Other site managers mentioned in the interviews that they planned to implement visitor research in 2018/19, in which they will explicitly ask about the perceptions of the EHL. Thus, more valuable data can be expected in future, at least for a certain share of sites. No difference can be observed in increases in visitor numbers between sites that also bear other labels, compared to those that are only awarded the EHL.

Among the sites that quantified their increases in visitors were the following:

- The *Residencia de Estudiantes* observed an increase of 2% in attendance between 2014 and 2015, to reach 100,000 visitors.
- *Alcide De Gasperi's House Museum* doubled its number of visitors between 2014 and 2015, reaching 8,000 visitors.
- *Kaunas of 1919-1940* identified an increase of 5.11% between the third quarter of 2014 and the third quarter of 2015 (2015: 75,271 visitors in total).
- For the *Franz Liszt Academy of Music*, the number of visitors (including concerts) increased by 10% between 2015 and 2017.
- The *Franja Partisan Hospital* observed an increase in visitors of 34% between 2014 and 2015 (2015: 20,791 visitors in total).

The *General Library of the University of Coimbra*, the *Imperial Palace Vienna*, the *Neanderthal Prehistoric Site Krapina*, the *Olomouc Premyslid Castle and Archdiocesan Museum* and the *Sites of the Peace of Westphalia* also reported a general increase in visitors, without linking it to the EHL.

Alongside these figures, it should be noted that each site that implemented additional visitor/participant-related activities in the course of being newly awarded the EHL, experienced an increase in attendance due to these EHL-specific events. This is reported by these sites in the monitoring data.

With regard to the quality of visits, a majority of respondents in the OPC agreed that a visit to an EHL site has improved their understanding of European history and culture, and encouraged them to learn more about it. They also agreed that it had also improved their

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<sup>124</sup> City of Münster (2018b), *Frieden.Europa*. Available at: <https://www.friedensblog.eu/?lang=en> (accessed: 23 August 2018).

knowledge about the building of Europe and its integration, and strengthened their sense of belonging to Europe (see **Figure 51**). This shows that the European significance of EHL sites is acknowledged.

In terms of internationalisation, larger sites such as the *Heart of Ancient Athens*, the *Archive of the Crown of Aragon*, the *Imperial Palace Vienna* and so on, already had an international profile, and thus no change in this respect can be seen after they were awarded the EHL, as site managers confirm in interviews ("We do not need the Label to get more visitors. Most facilities are at the limit of capacity."). By contrast, being labelled had a greater effect on sites that had previously been perceived mainly as local or national cultural heritage, or which were somewhat unknown, as explained by their site managers in interviews. Through being selected, they became visible to a European audience, even if not all have yet been visited by many people from other countries (e.g. *Alcide De Gasperi's House Museum*). For example, *Robert Schuman's House* has noticed a rise in requests on behalf of groups from various European institutions, and the *Franja Partisan Hospital* has observed an increase in its international visitors since being selected. The *Residencia de Estudiantes* perceived a clear advantage in raising the European profile of the site for the Spanish audience and increasing the site's presence in other European countries.

Although no effect in terms of internationalisation can be observed for sites that were already well known, with a great number of visitors, even these larger sites mentioned a change in recognition at European level. Thus, for the *Imperial Palace Vienna*, for example, "the European dimension of the Imperial Palace or the Burghauptmannschaft was certainly influenced by the Heritage Label, because the perception had suddenly changed."

Field research shows that general progress has been achieved in stressing the symbolic value of the sites. Even though some sites still appear unclear as to how to deal with common European narratives, the monitoring of the Label in 2016 provided specific recommendations for their development. In general, no direct increase in the number of visitors can be linked to the EHL, but the action has developed the quality of visitors as some sites report a more international audience.

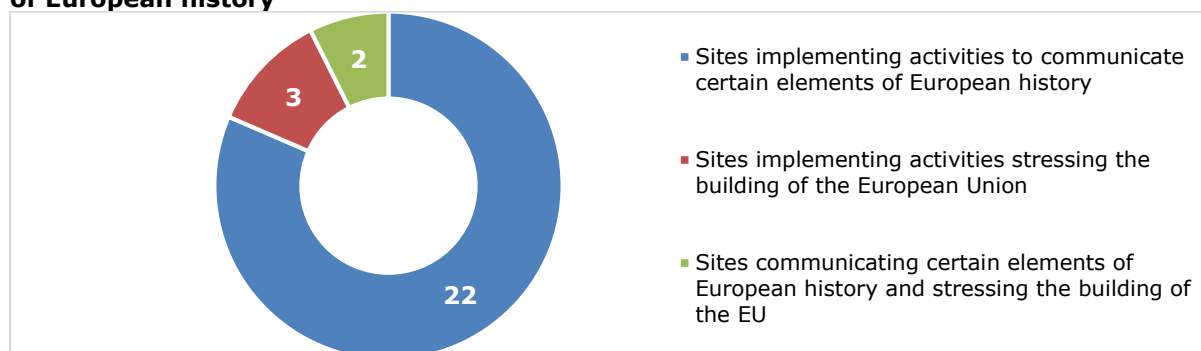
#### **d) Increasing European citizens' understanding of the history of Europe and the building of the Union**

This is the second intermediate objective of the action. Progress towards this is assessed as progress made by the sites in strengthening the communication of the European dimension to European audiences; in providing relevant services and activities for visitors; and by the extent to which the recommendations of the European panel with regard to communication and operational capacity of the sites have been considered.

By awarding more sites which represent a crucial part of the EU building process (especially in 2017; currently six such sites are selected), the Label now has an increased potential for raising European citizen's understanding of the building of the Union. Before 2017, only three of these sites were part of the EHL, and no increased effect was perceived by interviewees.

Many national coordinators and site managers perceived that through visiting the sites, visitors increased their understanding of the history of Europe. Also, the monitoring data and additional data from the sites shows that 22 out of 29 sites implemented activities to communicate certain elements of European history; three out of 29 sites stressed the building of the European Union in their activities, and two sites focused on both (see **Figure 50**).

**Figure 50. Number of sites implementing activities aimed at increasing the understanding of European history**



Source: PPMI Consortium, based on monitoring and additional site data.

In its Panel Report 2016, the European panel provided many recommendations in terms of improving the communication of the sites.<sup>125</sup> Half of these recommendations were fully or partly implemented by the sites, as shown below. It must be noted that the next round of monitoring will take place in 2020, and thus more time remains to consider these recommendations.

The *Heart of Ancient Athens* planned a new website and an increase in multilingualism. In the year of the evaluation, the new website is online and includes the whole site with its main monuments. It is accessible in Greek, English, French, German, Italian and Spanish (although the last three languages are missing translated navigation titles).<sup>126</sup> The *Abbey of Cluny* was also asked to communicate its European significance to online visitors in several languages. In 2018, access is possible in French, English and Spanish, although the European dimension is not yet explicitly promoted.<sup>127</sup> The *Archive of the Crown of Aragon* would benefit from a more forceful communication of its European dimension through its multilingual website, which is now accessible in six languages (Spanish, Catalan, English, Portuguese, Italian and French).<sup>128</sup>

As with most other recommendations, the *Great Guild Hall* should also be better promoted via a multilingual web presence and more actions for European audiences. The website is online in Estonian, English and Russian.<sup>129</sup> Special additional actions for European audiences could not be identified. The *General Library of the University of Coimbra* planned to complete its 'virtual visit', and to improve its multilingual presence on the web. When accessed, the website was still in a beta version and only available in Portuguese and English.<sup>130</sup> For the *Union of Lublin* a coherent web presence on the subject was recommended, supported by all three organisations (the municipality, the museum and the Dominican church). Such a website could not be found, while the website of the City

<sup>125</sup> EHL (2016), *European Heritage Label. Panel Report on Monitoring*. 19 December 2016.

<sup>126</sup> City of Athens (2018), *The Heart of Ancient Athens*. Available at: <http://www.theheartofancientathens.gr/en/> (accessed: 18 January and 23 August 2018).

<sup>127</sup> Centre des Monuments Nationaux (2018), *Abbaye de Cluny*. Available at: [www.cluny-abbaye.fr/](http://www.cluny-abbaye.fr/) (accessed: 18 January and 23 August 2018).

<sup>128</sup> Ministerio de Educación, Cultura y Deporte (2018), *Archivo de la Corona de Aragón*. Available at: <https://www.mecd.gob.es/archivos-aca/portada.html> (accessed: 23 August 2018).

<sup>129</sup> Ajaloomuseum (2018), *Great Guild Hall. Discover History*. Available at: <https://www.ajaloomuseum.ee/visiting/buildings/great-guild-hall> (accessed: 23 August 2018).

<sup>130</sup> Universidade de Coimbra (2018), *Biblioteca Geral*. Available at: <http://www.uc.pt/bguc> (accessed: 23 August 2018).



of Lublin<sup>131</sup> also holds information about the other organisations, and the website of the museum<sup>132</sup> includes information about the inauguration event.

*Sites of the Peace of Westphalia* were asked to target a wider range of audiences in Europe to communicate the site's European significance; to increase its number of educational activities and publications for school classes; and to strengthen the coordination and development of a common strategy. In interviews and in the relevant focus group, the site's managers and other involved persons maintained that topics are coordinated between the sites and that they cooperate on individual projects such as the meeting of religious communities. However, no coordinated strategy concept exists. The European dimension is presented in the site's educational activities. The recommendation for the *3 May 1791 Constitution* was to communicate its European dimension to a larger audience and in more languages; young people and a Lithuanian audience in particular were mentioned. As yet, the website is still only accessible in Polish and English.<sup>133</sup> The site explicitly targets young audiences annually on 3 May and at special exhibitions e.g. in Belgium in 2017. In October 2017, a special presentation was held in Vilnius to focus on the Polish-Lithuanian dimension. For *Hambach Castle*, the panel recommended that the site point out its European dimension online and provide access to the exhibition in more languages. In 2018, the European dimension is emphasised on the first page of the website. There, information about the exhibition is presented in German, English, French, Polish, Italian, Spanish and Dutch.<sup>134</sup>

The *Charter of the Law for the Abolition of the Death Penalty* was recommended to present the document on the website in more languages. In 2018, the web presence is still only available in Portuguese (and partly in English), while the document itself is provided for downloading in English.<sup>135</sup> Also, the *Residencia de Estudiantes'* website was asked to become accessible in more European languages. The website is currently only available in Spanish and English, with information about the EHL provided additionally in French.<sup>136</sup> Improved access for online visitors and the use of more languages was planned by the *Franja Partisan Hospital*, enabling the website to be read in Slovenian, English, Italian and German.<sup>137</sup>

For *Alcide De Gasperi's House Museum*, the panel looked forward to the development of a mobile app in four languages to promote the site to European audiences. As told in the interview, the site indeed acquired equipment in Italian, English, German and French to reach an increasingly international audience. The website is still only available in Italian.<sup>138</sup> The *Historic Gdańsk Shipyard* proposed to depict the site's complex history better for a mixed audience, but the data provides no evidence on any changes with regard to this. As mentioned above, the *Pan-European Picnic Memorial Park* was recommended to renew its focus to reach out to national and European audiences, and to strengthen trans-border

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<sup>131</sup> Muzeum Lbelskie w Lublinie (2018), *Znak Dziedzictwa Europejskiego*. Available at: [https://www.muzeumlubelskie.pl/Aktualnosci/Znak\\_Dziedzictwa\\_Europejskiego-2-474-20.html?font\\_scale=default](https://www.muzeumlubelskie.pl/Aktualnosci/Znak_Dziedzictwa_Europejskiego-2-474-20.html?font_scale=default) (accessed: 23 August 2018).

<sup>132</sup> City of Lublin (2018), *Projects. The European Heritage Label*. Available at: <https://lublin.eu/en/what-to-see-do/projects/> (accessed: 23 August 2018).

<sup>133</sup> The Central Archives of Historical Records in Warsaw (2018), *Konstytucja 3 maja / The Constitution of May 3 / Die Verfassung vom 3. Mai (1791) / La Constitution du 3 mai (1791)*. Available at: [http://agad.gov.pl/?page\\_id=1675](http://agad.gov.pl/?page_id=1675) (accessed: 23 August 2018).

<sup>134</sup> Stiftung Hambacher Schloss (2018), *Hambacher Schloss*. Available at: <https://hambacher-schloss.de/index.php> (accessed: 23 August 2018).

<sup>135</sup> Arquivo Nacional Torre do Tombo (2018), *150 Anos da Abolição da Pena de Morte em Portugal*. Available at: <http://150anosdaabolicaodapenademorteemportugal.dglab.gov.pt/charter-of-law-of-abolition-of-the-death-penalty-lisbon-portugal/> (accessed: 23 August 2018).

<sup>136</sup> Fundación Residencia de Estudiantes (2018), *Residencia de Estudiantes*. Available at: <http://www.residencia.csic.es/> (accessed: 23 August 2018).

<sup>137</sup> Mestni muzej Idrija (2018), *Partizanska bolnica Franja*. Available at: <http://www.muzej-idrija-cerkno.si/index.php/sl/lokacijerazstave/stalne-razstave/partizanska-bolnica-franja.html> (accessed: 23 August 2018).

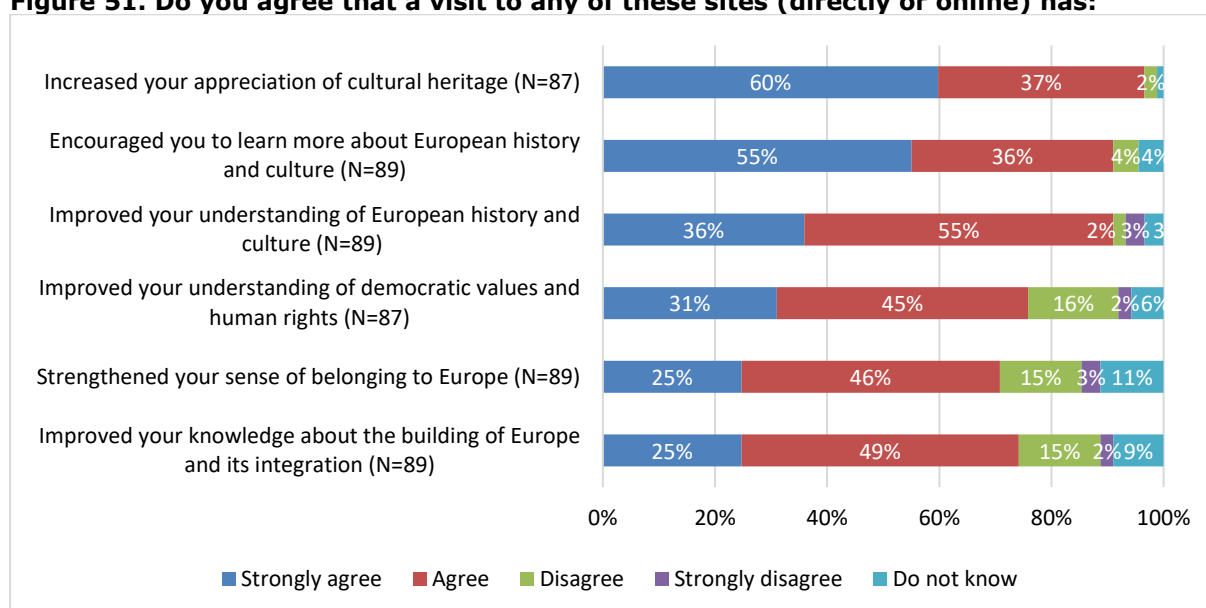
<sup>138</sup> Fondazione Trentina Alcide de Gasperi (2018b), *Museo Casa De Gasperi*. Available at: <http://www.degasperitn.it/it/museo-de-gasperi/> (accessed: 23 August 2018).

cooperation. In the interview, the site manager mentioned the site's inclusion in a regional tourism strategy to target Hungarian as well as Austrian visitors.

OPC data shows that a visit to any of the EHL sites (either directly or online) has an effect of some kind on the great majority of visitors (see **Figure 51**). The effect most commonly perceived is an increased appreciation among visitors of cultural heritage (97% of respondents agrees). Also mentioned were an increased understanding of European history and culture (91%), as well as an increased understanding of democratic values and human rights (86%). Up to 91% of respondents were encouraged to learn more about European history and culture, while 74% noticed an improvement in their knowledge about the building of Europe and its integration.

In general, we observe that most sites have increased their European-oriented communication. This development is achieved by promoting multilingualism and by implementing other activities aimed at an international audiences. We conclude that the Label is effective in increasing EU citizens' understanding of European history.

**Figure 51. Do you agree that a visit to any of these sites (directly or online) has:**



Source: PPMI consortium, based on the Open Public Consultation.

#### 4.4.4. Sustainability of the positive effects

**EQ11** To what extent can the positive effects of the EHL action be considered to be sustainable?

As the first EHL sites were selected in 2013, it is not yet possible to analyse the sustainability of the positive effects created by the action. Still, our analysis of interviews and focus groups indicates a certain likelihood of sustaining project results, based on the intervention logic. Therefore, the assessment focuses on the necessary pre-conditions for the sustainability of the action's effects, which in particular could include: the status of the Label; the operational capacity of the labelled sites; the expertise needed to achieve the objectives of the action; and networking with partners. Besides, the presence of these pre-conditions is assessed.

In interviews, national coordinators and European panel members mentioned pre-conditions they regarded as necessary to ensuring the sustainability of the effects created by the EHL. Our analysis shows that a large proportion of the national coordinators perceived funding for the EHL sites as a key element in securing long-term effects and in raising the impact of the action. As one national coordinator put it: "Those who do not have a good organisation, a good staff, are unlikely to continue having a long-lasting effect."



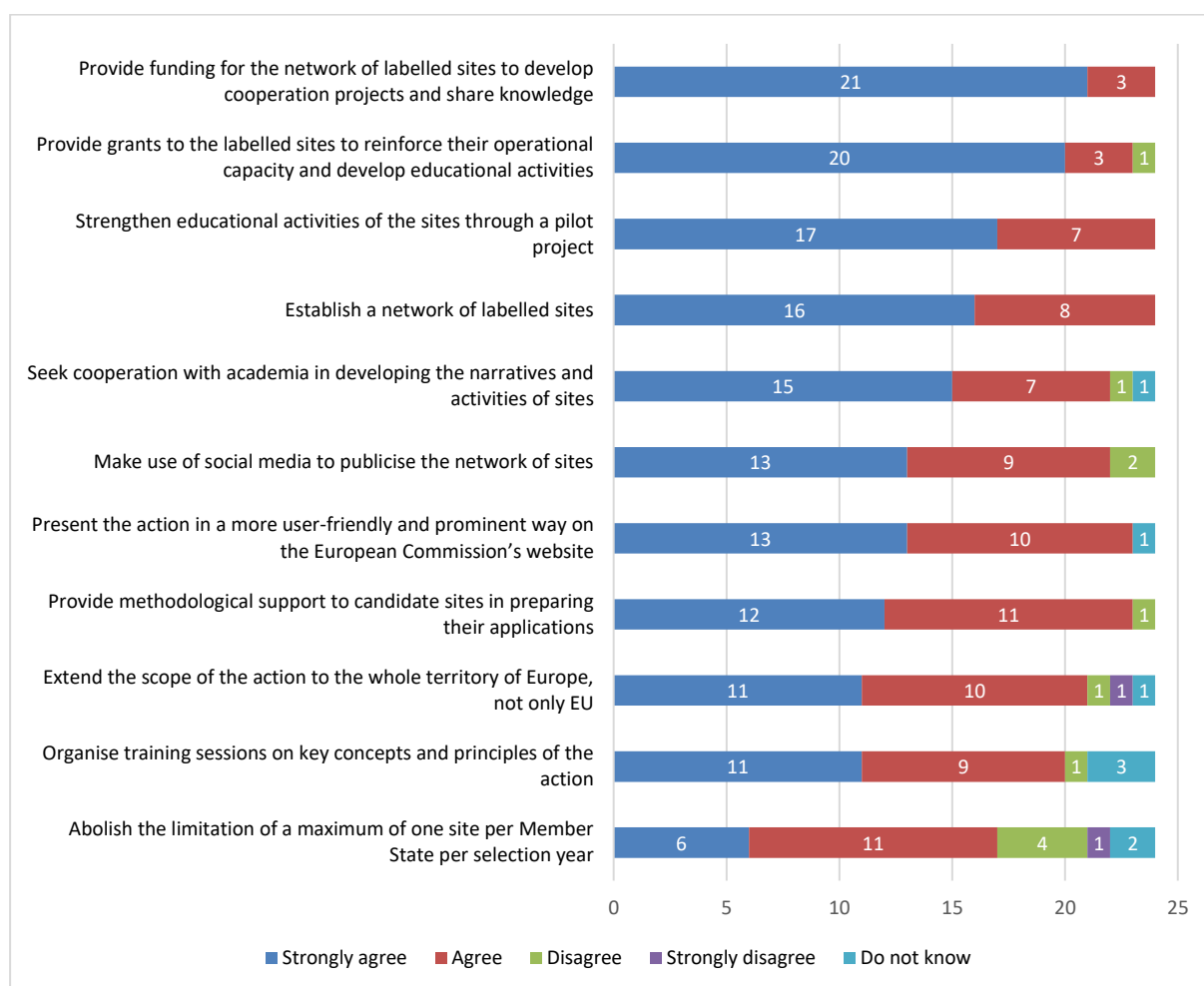
Some voices in the European panel expressed a more relative opinion, saying that only a good embedding of a site in its local environment, together with capacity building, could ensure sustainability, while top-down funding could only be a start. This perspective expresses a certain understanding of sustainability which includes the notion of self-sustainability.

Others repeatedly suggested better coordination of the sites' objectives with those of the Label through the development of an overall strategic plan. At the same time, communication improvements are mentioned by both national coordinators and European panel members as important measures to make the EHL's effects sustainable. In the view of the panel members, a regular and well-constructed monitoring process can also assure the sustainability of the action. European panel members and national coordinators agree that educational activities are another important measure which still needs to be widened.

One panel member even believed that the EHL should be integrated into school programmes. Aside from regional development initiatives started by the EHL sites, they also pointed to the importance of building links to other culture programmes and actions such as Creative Europe, saying: "At the moment, there is a dialogue about the future of Europe. I would like the European Commission maybe to use labelled sites in each country to discuss the future of Europe. In that way, there should be crossroads with other initiatives." Coordination and cooperation can therefore be seen as another important but as yet insufficiently created pre-condition to ensure the sustainability of the Label's positive effects.

Our analysis of the OPC data provides findings in terms of necessary pre-conditions. All 24 respondents believed that funding would help to develop cooperation projects and to share knowledge; 23 out of 24 respondents supported the idea of grants to the sites to reinforce their operational capacity and to develop educational activities. Educational activities are seen as a crucial aspect in improving future performance in general. All OPC respondents agreed that a pilot project in this field would be a valid measure. Besides financial and educational issues, establishing a network is consistently perceived as a key factor for a successful future of the action (see **Figure 52**).

**Figure 52. Respondents' opinions regarding what measures could improve the performance of the EHL**



Source: PPMI consortium, based on the Open Public Consultation.

To summarise, we identified several pre-conditions to the sustainability of the Label's effects which would have to be ensured and developed: funding, communication measures, educational activities, and collaboration in an EHL network.

#### 4.4.5. Unintended consequences

##### EQ12 Have there been any unintended consequences of the action?

Any unintended consequences of establishing the EHL at an EU level can be assessed by comparing the actual impacts with the potential impacts defined in the Impact Assessment in 2010. So far, we can only refer to the impacts based on the results of the analysis of the first period of the Label's existence, which do not include any long-term effects. Thus, some of the presumptions made in the Impact Assessment cannot be addressed here. In general, impacts were mainly expected to be social or societal, while some other presumed impacts concern the economic as well as the environmental sphere.<sup>139</sup>

Among the societal impacts, the establishment of the EHL at EU level was expected to lead to:

“Increased access to cultural heritage resources.  
Increased access to heritage for young people.

<sup>139</sup> Impact Assessment, p. 5-6.

Increased interest in and knowledge of common European heritage.  
Increased understanding of European cultural diversity.  
Increase in intercultural dialogue.  
Greater sense of belonging to the European Union.  
Stronger participation in the democratic process."<sup>140</sup>

Apart from a general increased interest in, and knowledge of, a common European heritage in societies as an expected impact, we can observe a raised scientific interest in the cultural heritage sector. This explicitly includes the EHL as an academic research object in relation to European identities, as addressed by the research project "Euroherit" of the University of Jyväskylä in the scheme Horizon 2020.<sup>141</sup> While this is still a marginal impact in quantitative terms, it refers to the important contributions scientific knowledge can provide for the development of the EHL. A stronger connection to the scientific field appears necessary, especially when it comes to the question of European narratives and identities.

It was not possible to predict how other the EHL could be influenced by other initiatives in the field of cultural heritage. There is increased interest in cultural heritage in general, expressed in particular through activities at EU level. For example, the European Year of Cultural Heritage had an impact on the overall discussion of cultural heritage. While the coherence of the EHL with other initiatives, especially on EU level, was addressed when establishing the initiative, certain interdependencies could not be foreseen. For example, some sites see the EHL as an alternative to UNESCO World Heritage, while others think of one initiative as a step towards another form of labelling. This must be addressed more intensively by communicating the distinctive qualities of the EHL in comparison to, for example, UNESCO World Heritage.

An impact that was implicitly expected (but not explicitly stated) is the transformation of the internal organisation of the participating sites. This includes a change of mentality, as well as organisational changes. At one site, the extent of this transformation is reported as surprisingly high. The same can be observed at national level. In one case, the mere existence of the EHL has changed the perspective of the cultural heritage sector in the country.

Second, the following economic impacts were presumed in the Impact Assessment:

"Positive effects on the local tourism industry, including number of people employed.  
Development of links with cultural and creative industries.  
Development of innovation and creativity."<sup>142</sup>

It is clearly stated that these effects should be considered as secondary benefits in the first stage.

Third, the environmental impacts of the EHL mentioned in the Impact Assessment include not only the protection of cultural heritage, but also negative effects linked to the over-development of tourism. These environmental impacts are not expected to be substantial, and no increase in these areas has been observed.<sup>143</sup> Neither are there expected to be any unintended consequences in the economic sphere.

Overall, we can state that all major potential impacts have already been foreseen in the Impact Assessment. Thus, no major unintended consequences of the EU action can be identified. On a lesser scale, actual scientific interest was not assessed at the stage of the

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<sup>140</sup> Impact Assessment, p. 5.

<sup>141</sup> University of Jyväskylä (2017), *EUROHERIT – Legitimation of European cultural heritage and the dynamics of identity politics in the EU*. Available at: <https://www.jyu.fi/hytk/fi/laitokset/mutku/en/research/projects2/euroherit> (accessed: 19 October 2018).

<sup>142</sup> Impact Assessment, p. 6.

<sup>143</sup> Impact Assessment, p. 6.

EHL's establishment. In addition, interdependencies with other cultural heritage initiatives was not extensively assessed.

#### **4.5. EU added value**

The evaluation of EU added value seeks to identify changes that are due to the EU intervention (as it can be reasonably argued), and which exceed what could be reasonably expected from Member States in terms of national actions. The criterion of EU added value assesses whether the action continues to be justified at EU level, and answers the questions: a) if the EHL has enhanced the role of cultural heritage in the process of European integration; and b) if the assumptions made during the Impact Assessment of the action have materialised; and c) if the action has brought any additional gains to the selected sites.

##### **4.5.1. Added value in substance and organisation**

#### **EQ13** What has been the EU added value of the EHL?

There are two dimensions to the action's EU added value. On the one hand, it is a question of substance and content. Added value may be observed in terms of a European dimension of cultural heritage in general; a common heritage specifically; and an intercultural dialogue. On the other hand, EU added value is manifested in processes and organisation. As an EU action, the EHL has the potential to reach all Member States and it can profit from being organised by a single administration.

The indicators used to answer the first part of the question, therefore, are the perceived extent to which the action highlighted the European dimension of cultural heritage and the enhanced the role of cultural heritage in the process of European integration. The answer to the second part of the question is indicated by the changes achieved by the action, also in comparison with the previous intergovernmental initiative. A further indicator is the extent of any additional gains for the selected sites.

##### **a) Substance: enhancing the role of cultural heritage in the process of European integration**

Whether or not the EU action has promoted the European dimension of cultural heritage indicates if the EHL has supported the process of European integration. Furthermore, the perceived extent to which it has promoted the European dimension of cultural heritage also forms an indicator to answer the question of an EU added value.

The meeting of the first criterion by selected sites is most relevant for highlighting the European dimension of cultural heritage: having a symbolic European value and playing a significant role in the history and culture of Europe, and/or the building of the Union. By defining such a criterion, the first step was achieved.<sup>144</sup>

Second, the promotion of the sites' European values is expressed as an objective by selected sites in their application forms. It is mentioned as an objective by 39 sites (see **Figure 9**). For example, in the application of the *Charter of Law of Abolition of the Death Penalty* there is a passage which strongly demonstrates this:

"We intend to contribute to the promotion of the values of European Citizenship, focusing particularly on Human Rights, starting from the Charter of Law of Abolition of the Death Penalty (1867). The goal is to contribute to the construction of an identity based on the values of tolerance and respect for the Human Life, present in the European Convention on Human Rights, as a result of an historical process for which the new conceptions of crime, of its perpetrators and of the penal justice based on philosophical and political

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<sup>144</sup> Decision No. 1194/2011/EU, Art. 7.1.a.

doctrines of the European humanist and rationalist thought of the 18th and 19th centuries greatly contributed.”

The interviews conducted provided a detailed insight into what site representatives understand by the European significance of cultural heritage – or the significance of cultural heritage for European integration. Representatives from selected and non-selected sites, as well as national coordinators, possess a good general understanding on the relevance of the action for European integration. Common values and common European identity are thereby understood as the main components and means for strengthening European integration. In their view, EHL sites can provide something tangible that fills the abstract notion of values with concrete content. Concrete examples of a common history can avoid what one site manager described as “staying in one’s own identity bubble”. The abolition of the death penalty is cited as one example: “This is what makes us European. It is essential to Europe. We are presently in Europe, we have just one country that is still applying death penalty, this is a common value for European people.” (Site manager)

Aside from fostering European values and identity, other aspects of the significance of cultural heritage for European integration were highlighted in the interviews. Specifically, a range of interviewees emphasised the importance of cultural heritage in connecting the European level to the local level. Not only does the EHL ensure that “the direct environment gets more appreciation” (focus group participant); “It proves on a local scale that the European Union has a reason to exist, and it shows their values in local history.” (National coordinator) This means that by showing an appreciation towards local history, the EU also demonstrates an appreciation of its citizens on a local level. It is a way of connecting the EU to its citizenry through local heritage sites. In this way, the sites can also function as “cultural agencies far from the main centres of Europe” (site manager).

This aspect of connecting to the citizenry is influenced by the types of culture and history that the EHL seeks to emphasise. From the perspective of one panel member who was interviewed, history has been considered differently in recent years, with more consideration given to everyday life and “simple people”. By adopting such an understanding of history, the EHL may help to support the process of European integration in the future, by connecting the EU with its citizens and strengthening intercultural dialogue, if this comprises the dialogue between different social groups.

Third, the sites are perceived as implementing the objective of supporting the process of European integration. Thus, the sites highlight their European significance, and consequently the European significance of cultural heritage. This perception can also be witnessed among the responses in the OPC: 18 out of 24 respondents said that the sites with which they were familiar highlighted their European significance. Furthermore, 24 out of 27 sites have implemented information activities; all carried out communication as part of their project, and displayed the EHL plaque (see section 4.4.2.a). Specifically, site representatives emphasised in interviews that the EHL resulted in greater commitment to developing audiences; to being open to different age groups and to people from different national, social and cultural backgrounds; and to the sites trying to attract a wider audience, beyond national borders. Sites specifically emphasise and display the EHL when communicating with the media; however, references to the EHL are sometimes limited to EHL-related activities.

Wide variations exist in the extent to which individual sites formulated and communicated the European dimension to their cultural heritage in their applications. This view is supported by responses from a panel member who emphasised that many sites did not try to formulate the European dimension of their cultural heritage at all. Furthermore, other interviewees explained that it was difficult for sites to understand the concept of European narrative due to its vagueness, and that it was challenging to articulate a historical national narrative to a new European narrative. In addition, 43% of those site representatives who were asked said that EHL labelling had not changed their site’s narrative. This may also derive from the fact that the narrative of some sites already centred on the European meaning of their history. Even, the EHL is still implicated in major changes in the narratives

of some sites. Representatives from the Library of the University of Coimbra, for instance, highlighted that before the EHL, the library was more of a “curiosity in Portugal”. With the EHL, the presentation of the library’s narrative changed from “something odd in the Portuguese 18th century”, to something meaningful in the history of the European Enlightenment.

Examples of the ways in which the European dimension of sites’ narratives become an alternative to, or a broadening of, national history-telling include seeking to attract audiences beyond national borders and telling the story of the site in a more international manner; and revealing the importance of the location for other nations too. The results of our interview and focus group analysis, however, show that national policies play an important role in determining the ratio according to which a site’s national and European significance are stressed. National policies can support EHL sites in their efforts to emphasise the European dimension; they can be neutral; or they can hinder these efforts, as described in one case.

The implementation of the EHL is also influenced by political developments at EU level, and by its interdependence on national political contexts and policies. One national coordinator directly related the importance and potential ascribed to the EHL with the current national political context – specifically, with the national president’s “work and support to the EU project.” In contrast to this, other representatives emphasised that their government did not wish to share European values within the country and, given the scope of current national policy, it was difficult to promote them via the EHL.

The national political context therefore determines whether the national commitment goes beyond a mere declaration of support for European values, or if it is reflected in concrete support for the (candidate) sites by the state. However, as panel members pointed out, this is a dialectic process in which national policies and commitment can be enhanced through successful and prestigious EHL projects. As one panel member said: “If the participants see that a prestige is created, if something is developed which is more than the involved single interests, then this reflects back on the national level.” By these means, the EHL has the potential to develop standards and to define what good European narratives should look like. These may then reflect back on national cultural heritage policies. In addition, the monitoring and evaluation of the Label may help to foster the dissemination of European culture at the level of Member States.

Overall, as an EU action, the EHL enhances the role of cultural heritage in European integration. The existence of the Label at EU level (rather than as an intergovernmental initiative) has allowed objectives to be set that better address its European dimension. Thus, the EHL provides a tangible manifestation of abstract European values and ideas. In practice, the communication of a European narrative is not implemented by all sites, and is influenced by national priorities that could be developed by strengthening special projects, monitoring and evaluation.

#### **b) Organisation: materialisation of assumptions**

In the course of the transformation of the EHL into an EU action, the Impact Assessment detailed assumptions about the added value that would be delivered by this change. It was expected that the EU’s involvement would improve the functioning and visibility of the EHL; strengthen networking among its sites; enhance coordination between Member States and strengthen their commitment; develop clear and transparent selection criteria; and establish monitoring procedures.<sup>145</sup> By these means, EU involvement should materialise in the achievement of the action’s objectives. As one panel member put it in an interview: “Having the EHL on EU level gives the great chance to promote the European dimension. If there is only an intergovernmental initiative, national or bilateral narratives will be told, not European ones. It is about the whole European idea.” The way in which the EHL

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<sup>145</sup> Impact Assessment, p. 11.



functions; how visible it is; how coordination between Member States is implemented; and how monitoring procedures function, therefore, directly reflect on the EHL and its objectives as an EU action. At a general level, interviewees highlighted that the EHL is already understood as adding value to the EU, as no similar initiative exists at EU level, and culture and cultural heritage receive only limited attention when compared with other EU policy fields.

Section 4.4.2 of this report reveals that the EHL still suffers from a general lack of visibility, as do the relevant websites – and 65% of OPC respondents said that they would like to learn more about the action. Our interview analysis also shows that the EHL “brand” is perceived as weak and too ‘niche’. If enhanced, however, this may show potential for the EU. In order to fully unlock its potential for fostering and promoting European integration, interviewees perceived a need for the EHL to become more visible. For instance, one site representative said that they had not observed any references to the EHL in the official communications on the European Year of Cultural Heritage (EYCH). As the EHL has played an integral role of the EYCH, one might presume that its communication channels had not reached all stakeholders as planned. Furthermore, a national coordinator suggested that a common way to communicate about the Label might help to support its objectives. Other interviewees recommended pro-actively approaching sites that fulfil the criteria of the EHL, and which may help to support its objectives. Consequently, the existence of the Label at an EU level allows a common communication strategy, inspired by new modes of communication at this level, to lobby for the Label at country level. In this regard, it may also encourage national coordinators in the communication of the EHL at the level of Member States.

The interview and focus group analysis furthermore shows clear added value in terms of increased cooperation between Member States. Interviewees and focus group participants perceived great potential in the networks that are built within the context of the EHL. The majority of sites emphasise that they have already established valuable networks as a result of the EU action. One-half of sites had already implemented collaboration projects (see section 4.4.1.c), and hope to strengthen and intensify these networks in the future. As one national coordinator noted: “I think it is only the beginning. There should be more and more stronger links.” One panel member emphasised that through these networks, the perspectives of responsible persons and of important sites in Europe can be changed, by increasing their knowledge and understanding of the European dimension of cultural heritage.

Up to now, the annual EHL Days have been identified as the main instrument for building the EHL network. National coordinators, as well as site managers, perceived the EHL Days as an important opportunity to meet representatives from other countries and consequently strengthen European cooperation. These meetings have already resulted in cooperation between Member States that would not otherwise have occurred. Without the opportunities provided by the EHL, such cooperation would also not be possible. These EHL networks also enable transnational applications – something that one national coordinator identified as “really what makes the EU and the Label special”.

Site managers, national coordinators, European panel members and Commission officials all mentioned the necessity for more networking and communication between the sites. Increased networking and communication could be used to exchange stories and strengthen European narratives, as well as to enhance coherence in the communication of the Label. As an example, an interviewee mentioned that it would be useful for sites to receive a newsletter with information on the activities planned by other sites. From the perspective of a range of interview partners, greater organisation and financing would be needed in order to establish a strong EHL network. This topic was also discussed in the national coordinators’ meeting at the EHL Days in Plovdiv 2018, at which the necessity for such a network was proclaimed. Furthermore, since the aim of ensuring Member States’ participation in and commitment to the action has only been partially fulfilled (as shown

by the mapping of the current EHL sites in **Figure 8**), the EHL network should be enlarged to all Member States.

The selection process has materialised as foreseen in the Impact Assessment: one main selection exists at EU level, which all applying sites must pass on an equal basis. As one panel member put it: "It is important that it is created out of the whole community, and that it is not done by some Member States with unclear criteria." This EU added value is limited to some extent by the fact that pre-selections in Member States are implemented non-coherently and in different ways. In this context, the role of Member States can be described as that of "gate keepers". Finding a common or additional method of pre-selection could help to ensure that the action's objectives are achieved.

As shown in section 4.3.2., the selection criteria were described as clear and transparent by the majority of site managers and national coordinators interviewed. Even among persons who had been responsible for site applications that had not been selected at the EU level, the criteria were perceived as feasible. In contrast, the panel members interviewed reported that many applicant sites demonstrate difficulties in describing their European significance. Many also failed to adequately consider intercultural dialogue. According to both national coordinators and panel members, the limitation of one selected site per Member State per application round also represents another difficulty. In some instances, the European panel has chosen between two pre-selected sites from the same Member State, both of which fulfilled the defined selection criteria. Two national coordinators perceived these decisions to be non-transparent. In general, however, our analysis of the interviews and focus groups reveals a general perception of increased transparency in the EHL's procedures since it has become an EU action. This was reflected in one answer from a site representative: "It is a much more clear process, much more transparent – the whole process, including the selection. Now you know why some sites are designated EHL sites in a clear way, and this is good."

Increased transparency of procedures is also understood as supporting the European dimension and the objectives of the action. As mentioned by one applicant, the application process is now more demanding and "applications are now better presented, conceptualised and they answer to bigger and larger objectives of the EHL". Similarly, a manager from one selected site which had also been part of the former intergovernmental initiative, emphasised that the EU action is more demanding: "In 2006 the site had no demands of any kind. The Label was only a distinction. Now the Label has some norms of development, and is therefore, more demanding. For this reason [...] the European dimension and collaboration with other European institutions has become one of the crucial points of its activity. The present EHL is clearly more visible than the previous action." When a site is awarded the Label, the monitoring of the EHL's criteria and objectives can be used to determine if the site highlights its European value, and implements the other plans presented in the application. In addition, some interviewees also pointed out that the established monitoring procedures can ensure the ongoing dissemination of European culture and history. In order to further profit from these special feedback processes, they must be optimised and adapted as the number of EHL sites increases over time.

Although the increased transparency in procedures of the EHL is generally perceived as a positive development, some interviewees mentioned a danger of rigid bureaucracy. From the perspective of some initiating countries and their national coordinators, the EU action created a rigid administrative framework "that felt like it was detrimental to the Label" and felt "more bureaucratic" than before. For the "older" EHL participants, the intergovernmental initiative had established networks that are not yet replaced by similar ones in the EU action. However, the same voices see a new and promising dynamic at the moment, due to the good management on the EU level.

The possibility to apply as a transnational site is an important advantage of the EHL, designed to support cooperation between Member States and to strengthen intercultural dialogue. Thus far, this opportunity has not been fully taken up. In interviews, national coordinators mentioned that the EHL's application forms were unsuitable for applications

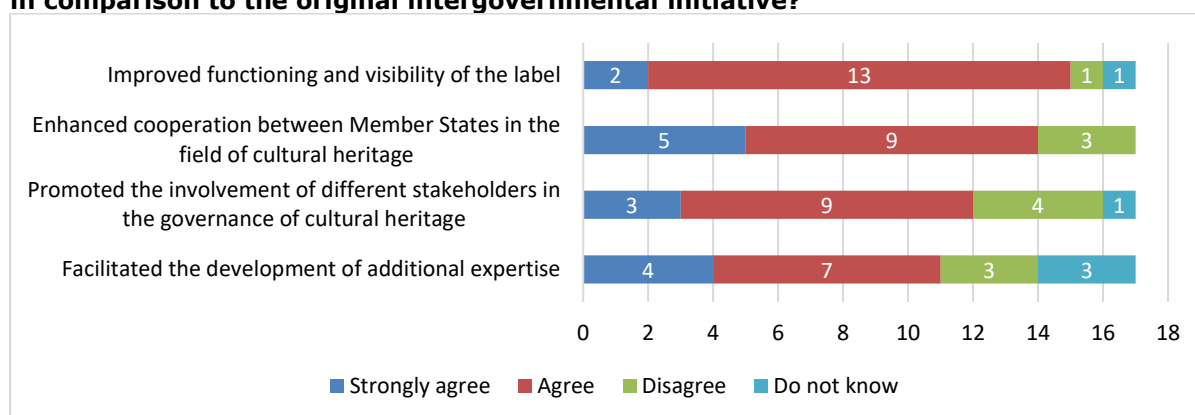


from transnational sites. For the new selection process 2018/19, the forms have been adapted to improve the procedure.

In terms of promoting the involvement of different stakeholders in the governance of cultural heritage, the respondents in the OPC perceived some progress. Twelve out of 17 participants agreed (of whom, three strongly agreed) that the EU action provides added value in this matter. Nevertheless, because the EHL aims to encourage the participation of citizens in achieving stronger European integration by raising awareness of a common history, some national coordinators proposed during their interviews that EHL sites should be connected more strongly with other EU programmes, especially with Europe for Citizens.

In general, respondent to the OPC who were engaged in the action perceived that it had changed positively since being transformed into an EU-level initiative in 2011 (see **Figure 53**). In terms of the functioning and visibility of the EHL, a clear majority (15 out of 17) of the participants who answered this question agreed or strongly agreed that the action had made an improvement in this regard. One respondent disagreed, and another did not know. Fourteen respondents also perceived enhanced cooperation between Member States in the field of cultural heritage; three disagreed.

**Figure 53. Before 2011, the European Heritage Label functioned as an intergovernmental initiative. Do you think that its transformation into an EU action in 2011 has added value in comparison to the original intergovernmental initiative?**



Source: PPMI consortium, based on the Open Public Consultation.

To conclude, the transformation from an intergovernmental to an EU initiative should have brought greater visibility to the action, while improving its processes. In practice, the potential to increase the visibility has not yet been fulfilled. At the same time, important improvements have been observed in terms of management and similar processes, e.g. the organisation of the EHL Days; the selection and monitoring procedures; the involvement of different stakeholders in the action, etc.

### c) Additional gains for the selected sites

The EU added value provided by the EHL action also materialises in the additional advantages enjoyed by EHL sites through their participation in the action. The results of our analysis of the benefits and challenges for the sites are presented mainly in sub-section 4.4.1.b, to answer how effective the action is. **Table 8** summarises the main additional gains to the selected sites, as mentioned (by at least two sites) in the monitoring data, as well as in the interviews and focus groups.

All sites except one mention a certain gain from being awarded the EHL. We can therefore declare an added value for a large majority of sites. The extent to which these gains are materialised also indicates the relevance of this added value. Here, we observe greater relevance for an increase in media attention. Interestingly, many sites reported strengthened local support at the same time as the European dimension was evoked. Greater integration into Europe, also through being part of the EHL network, as well as

increased visibility – especially among the local population – are also important gains mentioned by the sites.

#### **4.5.2. Consequences of a hypothetical discontinuation**

##### **EQ14** What would happen if the EHL were to be discontinued?

This evaluation question is intended to determine the hypothetical effects of terminating the EHL, as these would demonstrate stakeholders' perceptions of the added value of the action.

In the analysis of interviews and focus groups, we can see that the majority of site managers, national coordinators and European panel members would not expect drastic consequences if the action were terminated. The main reason given for this is that the EHL is a young action, and has not yet led to greater changes or causalities. Because the action is still in its early stages, however, the majority of interviewees would consider its termination premature. A national coordinator for the EHL emphasised: "Honestly, I think it's way too early to give up, even if things are not going well. I think you have to give the Label a certain amount of time and a few more rounds." Other national coordinators highlighted the need for more time: "It needs more time to grow. I believe all of the ingredients to be successful at one point. The results cannot be expected soon, it has to be built in time." Other interviewees voiced similar perspectives, referring to a return on investment. As one site manager put it: "I think the European Commission would be ill-advised to end it because it has invested so much and is still in the early stages of profiling the Label. You have to be patient and try to get the whole thing on a higher level."

Hence, even though the majority of interviewees would not expect to see great changes at the sites in case of termination, most interviewees would like to see the action continue. According to the great majority, termination would send the wrong signal to the sites and to the cultural heritage sector in general.

Termination might also have a negative effect on the perception of European values. Against the background of the current crisis the EU is perceived to be in, "terminating now would be the wrong signal", as one national coordinator put it. "I think that at the moment, everything that is going against Europe and against common things is in the wrong direction." Specifically, termination might be interpreted as "a failure to identify a common European heritage", as another national coordinator put it. The European narratives that have been built up slowly through the EHL sites would lose many stories, as would the idea expressed by one site manager, that "Europe is made out of many stories and territories united by something deeper than their identifications proposed by national rhetoric".

Due to the fact that the EHL has only recently become an EU action, a termination would also be considered a direct failure of European institutions. From the interviewees' perspective, this failure would suggest that "the European community is not able to face its history", according to a site manager. Other interviewees expressed strong words concerning the negative perception of EU institutions that might result from a cancellation. One national coordinator said: "That would send a bad message like that the culture is dead or that the EC does not care about culture and heritage anymore." A negative perception of EU institutions, and specifically of the Commission, could be expected in particular from citizens who are connected with the sites.

The most concrete impacts of termination that were mentioned also relate to the work already carried out at site level. The site managers interviewed said that a termination of the action would result in a discontinuation of their efforts in the following fields:

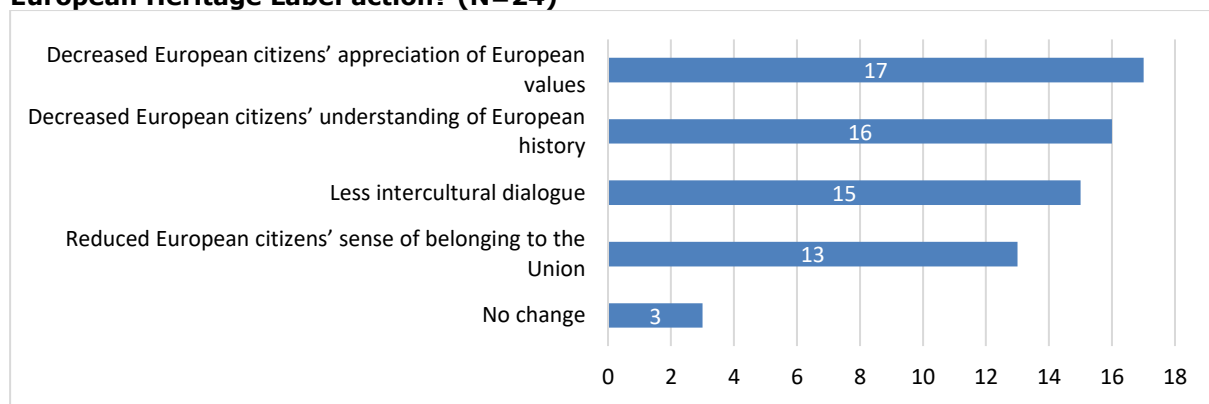
- The network of sites
- Collaboration projects with other EHL sites
- The step-by-step building and planning of EHL projects
- The perception of the European context

- Stressing the European dimension
- Communicating the EHL (logo, etc.)

Apart from interrupting certain efforts and already-commenced projects, termination would result in cancelled networks and meetings between sites that would be missed. One concrete negative consequence cited by a range of interviewees was that sites would no longer meet once a year, which “is usually a very enriching experience”, according to a site manager. In particular, those who anticipated negative effects at a site level associated the EHL with opportunities for partnership, learning and reflection.

In the OPC, only 3 of 24 participants answered that a discontinuation would not lead to any changes (see **Figure 54**). A majority of respondents (17) expected a decrease in European citizens’ appreciation of European values; 16 expected a decrease in European citizens’ understanding of European history; 15 anticipated less intercultural dialogue; while 13 expected a reduction in European citizens’ sense of belonging to the Union.

**Figure 54. In your opinion, what would be the potential impact of terminating the European Heritage Label action? (N=24)**



Source: PPMI consortium, based on the Open Public Consultation.

To summarise, stakeholders who are involved in the EHL describe the action as too young to be cancelled. Correspondingly, more time would be needed before any major consequences would be seen in the event of its termination. Negative outcomes would mostly be seen at European level, where termination would be interpreted as a failure to maintain a cultural heritage-related action. At site level, it would endanger the selected sites’ efforts to develop their European dimension.

## 5. CONCLUSIONS AND RECOMMENDATIONS

### Relevance

The main objectives of the EHL – strengthening European citizens’ sense of belonging to the Union, and strengthening intercultural dialogue – are relevant to the current needs of the EU. They are also in line with the objectives of the New European Agenda for Culture to raise awareness of our common history and values, to reinforce a sense of common European identity, and to promote culture and intercultural dialogue for peaceful inter-community relations.

Closely connected with the objective of increasing intercultural dialogue, the need for European cooperation in the field of culture and cultural heritage becomes obvious. In this context, the site-level objective of establishing “communities of practice” – the exchange and collaboration of people, experts and stakeholders who are active in the field of cultural heritage – is very relevant. It also represents the most promising road to develop professional understanding and practice, while also strengthening peer-to-peer connections within Europe. However, this potential has not yet been fulfilled, and so far not all Member States are involved in the action. The question of widening the action’s geographical scope beyond the borders of the EU is therefore premature at the moment, and would not be relevant until the action becomes more vibrant and well-established within the EU. Developing a European narrative that also connects with non-EU countries, regions, continents and world history might be possible without widening the participating country base, by including sites that relate to such fields and topics.

**Recommendation 1:** Continue to develop the action, but in the current phase do not expand its geographical scope beyond the EU.

The EHL has, to some extent, proved relevant to a rising interest in culture and cultural heritage among EU citizens. The data from the open public consultation shows that the respondents are very interested in EHL sites, and want to learn more about the labelled sites and about the action itself. The action addresses this need among the public.

However, the objectives of the sites applying for the EHL are not always congruent with the goals of the Label. The most common objectives pursued by sites applying for EHL are preservation, restoration and conservation, which are not the main objectives of the EHL. The analysis of selected and non-selected applicants shows that the main difference between their objectives is the topic of the European dimension. While a large majority of the selected sites describe sensitising the public to the site’s European values and history as one of their objectives, only a minor share of non-selected sites do so. Major differences are also perceived in the promoting a European identity, as an objective. Some selected sites also struggle with developing their own European narrative and with connecting it to the narratives of other EHL sites. These sites in particular are unsure if they should seek common understandings with other EHL sites as to how these European narratives should be defined.

**Recommendation 2:** Maintain a focus on the European dimension of cultural heritage sites and the common values they represent as a distinctive feature of the action, and the basis for its development and the achievement of its objectives. This could be done, for example, by:

- Highlighting the European dimension of the EHL in the communication of the action
- Explaining differences between the EHL and world heritage programmes to candidate sites

## Coherence

In terms of objectives, the EHL displays greater similarities with other EU initiatives and programmes in the cultural field than it does with global UNESCO programmes. The EHL places less emphasis on the preservation of sites, and instead focuses on raising European citizens' awareness of European history and culture. The highest level of similarity in objectives was found between the EHL and Cultural Routes of the Council of Europe. The EHL's aims of strengthening European citizens' sense of belonging to the Union, and increasing their understanding of European history and culture, were shared with other initiatives of the European Commission (the Europe for Citizens programme, Europeana); the EU and the Council of Europe (European Heritage Days); and the European Parliament (the House of European History).

Although the EHL is a new initiative, and it takes time to establish cooperation mechanisms, some synergies between the EHL and other EU actions in the cultural field were developed during the evaluation period (2011-2017) at a local level. These included the engagement of EHL sites in annual European Heritage Days, and in the European Capitals of Culture. Synergies at EU level during the evaluation period were more limited; however, recent initiatives and calls for proposals that were launched in 2018 indicate that such synergies have begun to develop after the evaluation period. In 2018, a call for European Heritage Stories was launched in cooperation with the Council of Europe; four out of 10 stories awarded involved EHL sites. The EHL is also likely to benefit from the legacy of the 2018 European Year of Cultural Heritage. Specifically, the initiatives of a forthcoming Action Plan for Cultural Heritage, and the call launched in September 2018 by Creative Europe, to support the networking and cooperation activities of EHL sites, should result in further synergies.

No duplications were found between the EHL and other European actions in the field of European history and culture. Although these other actions seek common objectives, they do so through different measures. This demonstrates that the EHL is a distinct initiative in the field of EU actions. Some risk of overlap may exist between the EHL and the Cultural Routes of the Council of Europe programmes, as these initiatives share similar objectives. At the moment, however, these initiatives differ in respect of their outputs, as most EHL sites represent the 20th century, while the awarded Cultural Routes have little focus on this historical period. Nevertheless, the similarities between the two initiatives should be taken into account when developing the action further, since EHL transnational sites, which are currently underrepresented within the action, could to some extent be perceived as routes.

Due to the transversal nature of cultural heritage, the EHL has some potential for synergies with social, economic and international policy areas. These might be achieved as a result of more active policy collaboration under the New European Agenda for Culture, as well as a forthcoming Action Plan for Cultural Heritage. Some synergies could also be achieved between the EHL and EU education and training programmes such as Erasmus+.

**Recommendation 3:** Exploit the points of coherence identified between the EHL and other EU actions in the fields of cultural, educational and citizenship (e.g. Europe for Citizens programme, Erasmus+, ECOC etc.) and avoid any duplications in the future. This could be achieved through different activities, including some of the following examples:

- Establishing a structured co-operation panel to develop areas for synergies
- Presenting any opportunities for cooperation and funding to EHL sites and national coordinators, possibly within the framework of their annual meetings
- Collecting and publishing good practice examples of synergies between EHL site activities and other European initiatives such as the European Heritage Days, possibly within the framework of EHL monitoring

## Efficiency and governance

The introduction of common selection criteria was one of the key changes introduced when the EHL transitioned from an intergovernmental initiative to an EU initiative. These common selection criteria ensure the relevance of sites to the EHL's objectives, because the designated EHL sites must clearly define their European significance and commit to implementing activities which lead to the achievement of the EHL's objectives. Moreover, the common selection criteria have contributed to clarifying the types of sites represented by the action and, thus, to shaping its identity. Out of 38 EHL sites labelled so far, the majority demonstrate their European significance in terms of their place and their role in European history and integration. More than half of them are also of a cross-border or pan-European nature, and almost one-quarter focus specifically on the common values that underpin European integration. EHL sites cover nine historical periods, with around 45% of them representing the 20th century. The dominant common values conveyed by the sites are the rule of law, human rights, freedom and democracy.

The criterion of European significance is a distinctive feature of the action when compared with other programmes or initiatives in the field of cultural heritage. It is also *de facto* the core criterion for the attribution of the Label, in the sense that it cannot be created but only revealed, unlike the work plan or the project, which can be developed and reworked. Yet, three-quarters of pre-selected sites did not meet the criterion of European significance, as their potential European dimension was not clearly expressed in the application. This leads to the conclusion that the notion of what constitutes European significance for a site may be unclear, and that the development of a European narrative is difficult for many candidate sites. Moreover, members of the European panel also admit to having different understandings of what the European significance of a site entails.

**Recommendation 4:** Help candidate sites and existing EHL sites to develop their European narratives, in order to meet and maintain the criterion of European significance. To this end, a number of measures could be taken:

- Organising common discussions for national coordinators, panel members and experts on the topic of the European narrative (possibly in the framework of annual meetings)
- Developing guidelines for EHL applicants in this respect
- Including new formats in the annual meetings which address the issue of the European narrative

The EHL can be attributed to a variety of individual sites (both tangible and intangible heritage, archaeological and contemporary, natural and cultural, etc.) as well as to groups of sites that focus on a single, specific theme. This wide focus in terms of eligibility distinguishes the EHL from other initiatives in the field of cultural heritage, and may be considered an advantage in attracting and uniting a variety of sites, both individual and multiple. Our analysis yields no evidence that this variety among applicant sites has a negative effect on the selection process, because no comparison is made between sites during their assessment.

Although the potential for cooperation and thematic networking is built into the eligibility categories, it has not yet been exploited. The majority of sites labelled between 2013 and 2017 were individual sites, mostly historic buildings, documentary and architectural heritage, as well as places of remembrance. Only one transnational and one national thematic site were labelled prior to 2018.

**Recommendation 5:** Promote cooperation and thematic networking between Member States, with a view of labelling more transnational and national thematic sites. This could be achieved by, for example:

- Providing more guidance and support to national coordinators and potential transnational and national thematic sites



- Simplifying the application form for transnational and national thematic sites. To this end, amendments to the legal base might be necessary (Art. 12-2, Art. 13-2)
- Launching thematic priority calls. These calls could follow discussions between national coordinators, panel members and experts on the topic of European significance, as well as any other ideas on common European topics developed during them. To launch such thematic priority calls, the legal base might need to be amended
- Establishing thematic selection criteria every selection year to attract candidate sites covering key European events, personalities or movements (in a similar way to the “Europe for Citizens” programme). To this end, changes in the legal base might be necessary

It was assumed during the Impact Assessment of the action (especially by Member States) that the only way to deliver a fair geographical distribution of the Label across the EU was to select first at national level, and only then at European level. However, a candidate site’s geographical location within a particular Member State plays no role in the selection process. Likewise, national quotas have not guaranteed that all Member States have EHL sites located within their territory, since the quality of the application is the main factor determining the attribution of the Label. As a result, some Member States that were involved in the earlier intergovernmental EHL have failed to obtain EHL attribution for any of their candidate sites. Only 19% of sites involved in the intergovernmental EHL have been carried forward into the EU-level action. The geographical distribution of EHL sites is mixed, with larger states having more EHL sites than smaller ones.

**Recommendation 6:** Balance the geographical distribution of the Label and involve more Member States, so that the action reaches more EU citizens. Examples of measures to achieve this could include:

- Launching national priority calls, based on the example of the two-stage selection process for ECOC, in which a country is pre-selected at the first stage. To this end, changes in the legal base might be necessary
- Providing more guidance to national coordinators of the Member States with low selection rates (Recommendation 4)
- Implementing measures aimed at labelling more transnational and national thematic sites (Recommendation 5)

The analysis shows that the two-stage selection process might lack efficiency, given that almost half of the sites pre-selected at national level submitted applications that failed to meet the selection criteria. Due to the autonomy provided by the legal basis of the action, Member States followed different pre-selection procedures. These resulted in varying opportunities for cultural heritage sites to participate in the action, as well as varying levels of transparency in the national pre-selection processes.

**Recommendation 7:** Increase the efficiency of the two-stage selection process, and improve the opportunities for cultural heritage sites in different Member States to participate in the action. This could be achieved, for example, through the following activities:

- Providing greater guidance to national coordinators in Member States with low selection rates on what the EHL objectives and the three selection criteria are, so that they can better advise their candidate sites and pre-select sites that have a better chance of obtaining the Label
- Promoting bottom-up pre-selection among Member States to increase the transparency of the pre-selection process and to open up opportunities for cultural heritage sites to engage in the action
- Considering, when reviewing the legal basis, additional open calls at European level

The evaluation reveals that the European-level selection process works well. The work of the European panel, which evaluates pre-selected sites and recommends them for the



attribution of the EHL, was generally smooth. However, streamlining the selection, evaluation its processes and providing more detailed feedback to non-selected sites might be considered areas for improvement. The application forms used in the 2013-2015 selections were quite complex and time-consuming to fill in. Although the application form has been improved a number of times, room still exists for further improvement, especially with regard to applications from transnational and national thematic sites.

**Recommendation 8:** Streamline the selection and evaluation processes, and provide more detailed feedback on the selection results. Some measures to achieve this could include:

- Revising the application form for consistency and to eliminate overlaps, so that it is shorter and more relevant to the applicants
- Splitting the evaluation process into two stages: first, the European significance of all candidates could be assessed; after this, the projects and work plans of candidates that had demonstrated their European significance could be examined
- When providing feedback, especially on a candidate site's European significance, use the sub-criteria provided in the legal basis (Art. 7-1(a), as specified in section 4.3.2.b of this report.
- Consider publishing the application forms of all candidate sites.

The efficiency of applying Article 11-2, which provides for the selection of a maximum of one site per Member State per selection year, is doubtful. Various stakeholders perceive more disadvantages than advantages in applying this article. First, it is considered to be a waste of resources for national coordinators and site managers to prepare two applications, when only one can be selected. Second, it discourages sites that are not selected due to Article 11-2 from further engagement in the action. Third, it reduces the transparency of the EU selection process, due to uncertainty about the Article's application. During the evaluation period, Article 11-2 was applied twice. While the Article might have been useful in the initial stages of the action as a means of controlling the number of EHL sites, it is likely to become an obstacle for the future development of the action.

**Recommendation 9:** In reviewing the legal basis of the action, we recommend eliminating the national quota of one site per Member State per selection year (Article 11-2). This would encourage more cultural heritage sites to participate in the action, and consequently boost the overall number of EHL sites. This course of action was also suggested by the panel in 2015 and 2017.

The first round of EU monitoring in 2016 was perceived positively by the sites and panel members who participated in it. A majority of EHL site managers considered it to be useful in taking stock of their achievements and improving the sites' performance. Analysis shows that half of the recommendations given to sites by the panel of experts had been either fully or partially implemented by 2018. However, this monitoring cannot ensure that EHL sites fully implement the projects and work plans submitted in their applications, since the EU has no instruments to influence their implementation, and nor can it offer any financial support to the sites to address deficiencies highlighted in the monitoring process. The evaluators regard EHL monitoring in its current form as a performance review, rather than monitoring in a strict sense. This is because it lacks a clear monitoring framework with common indicators, and its execution is scheduled every four years –too infrequently for such monitoring to be efficient.

The first monitoring process in 2016 was report and dialogue-based. Although this type of monitoring is appropriate to a small number of sites, it might become less suitable if (as outlined in the vision presented in 2017 Panel Report) the EHL expands to 100 sites in the near future.

Although the legal basis of the action provides that the Member States shall be responsible for the monitoring of all sites located in their territory, the role of national coordinators is

currently limited to collecting monitoring information from the sites and submitting it to the Commission every four years.

**Recommendation 10:** Continue and streamline the performance review of EHL sites every four years. Some of the following measures could be considered include:

- Establishing, in cooperation with the European panel, common monitoring indicators for EHL sites, as provided in Article 15-5, and linking these to application forms
- Introducing single monitoring forms for transnational and national thematic sites
- Coordinating any improvements in the monitoring and selection processes
- Engaging national coordinators in the monitoring of EHL sites located in their territory, especially as the number of EHL sites increases

At present, communication of the Label to public is moderately effective. Although the Commission has created a number of visibility and branding materials for the Label, as well as a communication toolbox, not all EHL sites have exploited them. The role of EHL sites in highlighting and communicating their European significance to audiences is crucial. However, diverging perceptions among EHL sites, national coordinators and the Commission regarding the division of communication roles appears to be an obstacle to achieving the more efficient communication of the EHL action.

Communication between the Commission and EHL sites and national coordinators was perceived to be mainly smooth. However, communication between the sites and national coordinators could be considered an area for improvement. Only 37% of EHL site managers perceive it to be sufficient frequency, and agree that their national coordinator is helpful and assists the labelled sites.

Networking among EHL sites is emerging, and great demand exists for more intensive communication within the action. EHL sites and national coordinators are generally satisfied with the annual EHL days and meetings of national coordinators organised by the Commission, but they regard these meetings insufficient for developing closer collaboration. The Commission intends to allocate funding to support the networking and cooperation activities of the sites under the 2019 work programme of Creative Europe. It has already published a call in October 2018, aimed at designing and managing networking and capacity building activities for EHL sites.<sup>146</sup>

**Recommendation 11:** Improve communication of the EHL and promote cooperation and thematic networking among EHL sites. This could be achieved, for example, by:

- Clarifying the division of the roles and responsibilities for communication activities among EHL site managers, national coordinators and the Commission
- Organising EHL Days twice a year
- Identifying common topics (themes) that cut across countries and historical periods
- Providing financial support for the EHL network

## Effectiveness

The EHL action has made some progress in reaching its two general objectives during its first years of operation. The first objective – strengthening European citizens' sense of belonging to the Union – is a complex process, and subject to multiple influences. It is therefore extremely difficult to attribute someone's "change of mind" to a single effect, and the capacity of EHL is certainly limited in this respect. Still, the OPC results reveal that

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<sup>146</sup> Creative Europe, *Design and management of networking and capacity building activities for European Heritage Label sites. Call for Proposals–EAC/S39/2018*. Available at: [https://ec.europa.eu/programmes/creative-europe/sites/creative-europe/files/2018-s39-specifications\\_en.pdf](https://ec.europa.eu/programmes/creative-europe/sites/creative-europe/files/2018-s39-specifications_en.pdf) (accessed: 11 October 2018).

71% of respondents who visited EHL sites directly or online agreed that the visit had strengthened their sense of belonging to Europe.

As cooperation and networking are emerging among EHL sites, some progress towards the second general objective – strengthening intercultural dialogue – is visible. A large majority of national coordinators emphasise that the EHL has provided opportunities for improving intercultural dialogue. However, only around half of EHL sites have promoted intercultural dialogue through educational activities. Unclear and limited understanding of intercultural dialogue among EHL site managers, as well as limited multilingual communication, are the main obstacles to achieving this goal.

**Recommendation 12:** Increase EHL sites' understanding of and commitment to the strengthening of intercultural dialogue. The following measures could be considered:

- Building on the results of the 2008 European Year of Intercultural Dialogue, which include good practices and tangible ways to understand and practise intercultural dialogue
- Organising discussion between EHL sites and national coordinators on the topic
- Including artistic and cultural activities aimed at stimulating intercultural dialogue as an obligatory element of the project (Art.7-1b). For this, the legal basis of the action would have to be amended

Progress is observed in stressing the European symbolic value of sites, and in raising their profile. Most EHL sites highlighted their symbolic European value, and all sites received more publicity after receiving the Label. Developing a European narrative remains a challenge for some sites, and identifying common topics remains difficult for the network as a whole.

Progress has also been made in increasing European citizens' understanding of the history of Europe and the building of the Union, and of their common yet diverse cultural heritage. This aim has mainly been achieved through educational activities. Up to 91% of OPC respondents agreed that a visit to any of the EHL sites (directly or online) had improved their understanding of European history and culture, while 71% agreed that it had improved their knowledge about the building of Europe and its integration.

Progress towards the intermediate objectives of the EHL could be stimulated by developing and communicating the European narratives of EHL sites (Recommendation 4); promoting cooperation and thematic networking among the sites (Recommendation 11); and seeking coherence with other EU actions (Recommendation 3).

Most of the site-specific objectives established in Article 3-3 of the Decision have been achieved or partly achieved. The Label has been successfully added to the communication and education activities of the sites, and has highlighted their European significance. However, at least one site was identified that explicitly stopped dealing with its European narrative. The need remains to develop more educational activities that address Europe's common cultural heritage, as these activities are key to raising citizens' awareness. In addition, reaching local audiences is a challenge for many sites. Less than a half of EHL sites reported collaboration with local communities. Most sites have improved and increased access for visitors, including virtual accessibility in foreign languages. No major improvement is perceived in increasing intercultural dialogue. This remains a challenge for half of the sites, while the other half engages in some good practices. Up to now, little progress has been made in fostering synergies between cultural heritage and contemporary creation and creativity. Only a small share of EHL sites link their own site's narrative with contemporary creation and artistic activities. No evidence was found that the EHL contributes to the economic and sustainable development of regions, although one-third of sites mention being involved in collaboration activities with local communities and businesses.

Half of the sites have implemented collaboration projects with EHL sites in other Member States. These include exhibitions, conferences, lectures, concerts, workshops and promotion events. Based on an analysis of the monitoring data, we could identify 16 collaborations and exchange projects between EHL sites from different Member States. Some sites prefer to cooperate with non-EHL sites dealing with a common topic, while a half of sites would like to improve cooperation within the action. In general, cooperation between sites needs to be improved. Establishing a common network as a structure for facilitating cooperation processes is a hope explicitly mentioned by stakeholders.

To reinforce the sites' progress toward their specific objectives, a mix of measures should be employed, especially those aimed at implementing Recommendations 4 and 11.

The evaluation shows that most sites implement the EHL projects and work plans outlined in their application. Most commonly, EHL sites implement information, communication and education activities. Cultural activities and collaboration with other EHL sites are less common.

The experiences of sites after EHL designation are as diverse as the sites themselves. On the one hand, sites mention many benefits they gain from being designated, such as strengthened local support and European dimension; greater media attention greater integration with Europe; as well as increased visibility and visitor numbers. On the other hand, being an EHL site poses challenges such as an additional need for financial and human resources; the low visibility of EHL in general; poor regional infrastructure that hinders implementation of the project; and so on. Most managers of EHL sites admit that bearing the Label is demanding for them in terms of resources.

Because the first EHL sites were only labelled in 2013, the sustainability of the action cannot yet be judged. Nevertheless, some pre-conditions were identified that could help to ensure its sustainability in the future. These include the EHL's objectives being well explained (especially "European significance" and "intercultural dialogue"); collaboration between the EHL sites and a strong EHL network; measures for capacity building; sufficient financial and human resources for the sites; and substantial research on the topics of European identities and values. Not all of these pre-conditions are fully present yet, and need to be improved if the positive effects of the EHL are to be made sustainable.

In general, no major unintended consequences are apparent when comparing the EHL's actual effects to the expected impacts defined in the Impact Assessment.

**Recommendation 13:** Since the achievement of the EHL objectives and the sustainability of its results relies largely on the capacity of EHL sites, we recommend that the Commission contribute to their capacity building. This could be achieved by, for example:

- Enhancing cooperation among EHL sites
- Providing additional funding to the sites in the form of a prize or start-up grant that could be used to implement the sites' EHL projects
- Providing additional help for the implementation of communication activities

## EU added value

The added value provided by the existence of the action at EU level, in comparison to the previous intergovernmental solution, lies primarily in highlighting the European significance of the EHL sites. It enables the sites to provide something tangible that fills abstract concepts such as European values and identity with content. Furthermore, they can be understood as a link between European narratives on the one hand, and local sites and citizens on the other. Interview analysis shows, however, that some sites could do better in pursuing this aim. It varies from site to site, and more could be given to the sites to provide a better picture of what is meant by European significance and values, i.e. by providing forums for discussion. There is no concrete evidence of EU added value derived from strengthening intercultural dialogue. This might be the result of the characteristics of

heritage sites, which seldom place a special emphasis on activities that provide great potential for supporting intercultural dialogue, as is the case in the fields of socio-culture, performing arts, urban spheres, etc.

The assumptions made in the Impact Assessment have partly materialised. The involvement of the EU has resulted in the establishment of common selection criteria, as well as selection and monitoring procedures at EU level. These developments can be identified as providing important added value, compared to the former intergovernmental initiative. However, the visibility of the Label remains low. Although the EU action increased exchange between the Member States at the level of national coordinators and between EHL sites, developing the network will be an important factor in increasing EU added value. For the sites, the possibility of sharing experiences and best practices, and learning with and from other sites – particularly in terms of European topics and narratives – also constitutes added value.

The hypothetical termination of the action would be premature, and would send a negative signal to citizens and specifically to people and stakeholders connected with the sites and the cultural heritage sector. It might therefore undermine citizens' sense of belonging to the Union. In particular, the efforts made at site level to highlight European significance and raise awareness among citizens would be severely damaged. Taking these possible effects into account – as well as the action's successes and potential, as described above – the continuation of the action is considered sensible.

The narrow scope of the action, i.e. its focus on sites, might be factor limiting its EU added value. To address this, we recommend broadening the scope of the action, especially by developing and communicating European narratives of the sites (Recommendation 4); enhancing cooperation and thematic networking among EHL sites (Recommendation 5); and contributing to their capacity building (Recommendation 13).

## REFERENCES

"Iron Curtain" Network (2018), Available at: <https://www.netzwerk-eiserner-vorhang.de/index.php/startseite-en.html> (accessed: 12 September 2018).

Ajaloomuseum (2018), *Great Guild Hall. Discover History*. Available at: <https://www.ajaloomuseum.ee/visiting/buildings/great-guild-hall> (accessed: 18 January and 23 August 2018).

Arquico Nacional Torre do Tombo (2018), *150 Anos da Abolição da Pena de Morte em Portugal*. Available at: <http://150anosdaabolicaodapenademorteemportugal.dqlab.gov.pt/charter-of-law-of-abolition-of-the-death-penalty-lisbon-portugal/> (accessed: 23 August 2018).

Arquivo Nacional Torre do Tombo (2018), Available at: <http://digitarq.arquivos.pt/details?id=4223286> (accessed: 18 January 2018).

Carnuntum (2018), Available at: [https://www.carnuntum.at/en?set\\_language=en](https://www.carnuntum.at/en?set_language=en) (accessed: 18 January 2018).

Centre des Monuments Nationaux (2018), *Abbaye de Cluny*. Available at: [www.cluny-abbaye.fr/](http://www.cluny-abbaye.fr/) (accessed: 18 January and 23 August 2018).

City of Athens (2018), *The Heart of Ancient Athens*. Available at: <http://www.theheartofancientathens.gr/en/> (accessed: 18 January and 23 August 2018).

City of Lublin (2018), *Projects. The European Heritage Label*. Available at: <https://lublin.eu/en/what-to-see-do/projects/> (accessed: 23 August 2018).

City of Münster (2018a), Available at: <http://www.stadt-muenster.de/tourismus/startseite.html> (accessed: 18 January 2018).

City of Münster (2018b), *Frieden.Europa*. Available at: <https://www.friedensblog.eu/?lang=en> (accessed: 23 August 2018).

City of Osnabrück – The Lord Mayor (2018), *Lab Europe*. Available at: <https://www.lab-europe-osnabrueck.de/> (accessed: 23 August 2018).

City of Osnabrück (2018a), Available at: <http://www.osnabrueck.de/kulturerbe-siegel/> (accessed: 18 January 2018).

City of Osnabrück (2018b), *European heritage sites*. Available at: <http://geo.osnabrueck.de/ehl/EN/map> (accessed: 23 August 2018).

Commission staff working document accompanying the Communication from the Commission to the Council, the European Parliament, the European Economic and Social Committee and the Committee of the Regions: An EU Strategy for Youth – Investing and Empowering. A renewed open method of coordination to address youth challenges and opportunities. Impact Assessment. Brussels, 27.4.2009 SEC(2009) 545.

Commission Proposal for a Decision of the European Parliament and of the Council on a European Year of Cultural Heritage, COM/2016/0543 final - 2016/0259 (COD).

Committee of Experts (2008), *Conceptual basis for a House of European History*. European Parliament: Brussels.

Consolidated Version of the Treaty on European Union, 2010 O.J. C 83/01.

Controller and Auditor-General (2015), *Effectiveness of Governance Arrangements in the Arts, Culture, and Heritage Sector*, Wellington: Auditor-General.

Council Conclusions of 26 November 2012 on Cultural Governance, 2012/C 393/03.



Council of Europe Resolution CM/Res(2013)66 of 18 December 2013 Confirming the Establishment of the Enlarged Partial Agreement on Cultural Routes (EPA).

Council of Europe Resolution CM/Res(2013)67 of 18 December 2013 Revising the Rules for the Award of the "Cultural Route of the Council of Europe" Certification.

Council of Europe, 2017-20, Joint Programme with the European Commission (DG-REGIO), "Routes4U". Available at: <https://www.coe.int/en/web/cultural-routes/eu-jp-2017-20> (accessed: 22 August 2018).

Decision (EU) 2017/864 of the European Parliament and of the Council of 17 May 2017 on a European Year of Cultural Heritage (2018).

Decision No 445/2014/EU of the European Parliament and of the Council of 16 April 2014 establishing a Union action for the European Capitals of Culture for the years 2020 to 2033 and repealing Decision No 1622/2006/EC. *Official Journal of the European Union L*, 132/1.

Decision No. 1194/2011/EU of the European Parliament and of the Council of 16 November 2011 establishing a European Union action for the European Heritage Label. *Official Journal of the European Union L*, 303.

Declaration on the initiative for a European Heritage Label 2007.

DG HOME and EACEA (2018), *Europe for Citizens Programme 2014-2020. Programme Guide for Actions Grants*. Available at: [https://eacea.ec.europa.eu/sites/eacea-site/files/programme\\_guide\\_2018\\_en.pdf](https://eacea.ec.europa.eu/sites/eacea-site/files/programme_guide_2018_en.pdf) (accessed: 07 September 2018).

EENC (2015), *Participatory Governance of Cultural Heritage*. EENC Ad hoc question.

EHL (2013), *European Heritage Label. 2013 Panel Report*.

EHL (2014), *European Heritage Label. 2014 Panel Report. 19 December 2014*.

EHL (2015), *European Heritage Label. 2015 Panel Report. 2 December 2015*.

EHL (2016), *European Heritage Label. Panel Report on Monitoring. 19 December 2016*.

EHL (2017), *European Heritage Label. 2017 Panel Report. 5 December 2017*.

European Commission – Culture, *Intercultural dialogue*. Available at: [https://ec.europa.eu/culture/policy/strategic-framework/intercultural-dialogue\\_en](https://ec.europa.eu/culture/policy/strategic-framework/intercultural-dialogue_en) (accessed: 23 August 2018).

European Commission (2012), *Frequently Asked Questions: European Union Prize for Cultural Heritage/ Europa Nostra Awards*. Available at: [http://europa.eu/rapid/press-release\\_MEMO-12-398\\_en.htm?locale=en](http://europa.eu/rapid/press-release_MEMO-12-398_en.htm?locale=en).

European Commission (2017), *Mapping of Cultural Heritage actions in European Union policies, programmes and activities*. Available at: [http://ec.europa.eu/assets/eac/culture/library/reports/2014-heritage-mapping\\_en.pdf](http://ec.europa.eu/assets/eac/culture/library/reports/2014-heritage-mapping_en.pdf) (accessed: 07 September 2018).

European Commission, 2014 annual work programme for the implementation of the Creative Europe Programme, C(2013)8314 of 28 November 2013.

European Commission, 2015 annual work programme for the implementation of the Creative Europe Programme, C(2014)5313 of 30 July 2014.

European Commission, 2016 annual work programme for the implementation of the Creative Europe Programme, C(2015)5490 of 5 August 2015.

European Commission, 2017 annual work programme for the implementation of the Creative Europe Programme, C(2016)5822 of 16 September 2016.



European Commission, 2018 annual work programme for the implementation of the Creative Europe Programme, C(2017)6002 of 6 September 2017.

European Commission, Commission Staff Working Document, 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, Brussels, 2010 March 9, SEC(2010) 197.

European Commission, Communication from the Commission to the European Parliament, the European Council, the Council, the European Economic and Social Committee and the Committee of the Regions. A New European Agenda for Culture, COM(2018) 267 final – SWD(2018) 167 final.

European Commission, Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions. Strengthening European Identity through Education and Culture. The European Commission's contribution to the Leaders' meeting in Gothenburg, 17 November 2017. Strasbourg, 14.11.2017, COM(2017) 673 final.

European Commission, Creative Europe, *European Heritage Days*. Available at: [https://ec.europa.eu/programmes/creative-europe/actions/heritage-days\\_en](https://ec.europa.eu/programmes/creative-europe/actions/heritage-days_en) (accessed: 03 August 2018).

European Commission, *Mobility Scheme for Artists and/or Culture Professionals*. Available at: [https://ec.europa.eu/programmes/creative-europe/calls/eac-18-2018\\_en](https://ec.europa.eu/programmes/creative-europe/calls/eac-18-2018_en) (accessed: 22 August 2018)

European Commission, *Special Eurobarometer 466. Report. Cultural Heritage. September-October 2017*. TNS opinion & social.

European Commission, *Structured Dialogue in the Field of Culture, EAC/26/2018*. Available at: <https://etendering.ted.europa.eu/cft/cft-display.html?cftId=3888> (accessed: 22 August 2018)

European Commission, Treaty of Lisbon amending the Treaty on European Union and the Treaty establishing the European Community, signed at Lisbon, 13 December 2007, *OJ C 306*, 17.12.2007.

European Heritage Days (2018a), *EHD Strategy 2017-2020*. Available at: <http://www.europeanheritagedays.com/EHD-Programme/EHD-Strategy/>.

European Heritage Days (2018b), *European Heritage Stories*. Available at: <http://www.europeanheritagedays.com/Story/> (accessed: 02 November 2018).

European Heritage Days, *Call for European Heritage Stories. Terms and Conditions*. Available at: [http://www.europeanheritagedays.com/App\\_Documents/Uploads/files/JEP\(2018\)02EN%20Call%20for%20European%20Heritage%20Stories%20TCs%2012Apr18%20a.pdf](http://www.europeanheritagedays.com/App_Documents/Uploads/files/JEP(2018)02EN%20Call%20for%20European%20Heritage%20Stories%20TCs%2012Apr18%20a.pdf) (accessed: 21 August 2018).

European Parliament, *Results of the 2014 European elections*. Available at: <http://www.europarl.europa.eu/elections2014-results/en/turnout.html>.

Europeana, *We transform the world with culture, Europeana Strategy 2015-2020*. Available at: <http://strategy2020.europeana.eu/>.

Eurostat (2017), *Culture statistics – cultural participation by socioeconomic background*. Available at: [https://ec.europa.eu/eurostat/statistics-explained/index.php/Culture\\_statistics\\_-\\_cultural\\_participation\\_by\\_socioeconomic\\_background#Cultural\\_participation](https://ec.europa.eu/eurostat/statistics-explained/index.php/Culture_statistics_-_cultural_participation_by_socioeconomic_background#Cultural_participation) (accessed: 23 August 2017).

Evangelisch-Lutherische Nicolai-Kirchgemeinde Zwickau (2018), *Herzlich willkommen!* Available at: <http://wp.nicolai-kirchgemeinde.de/> (accessed: 12 September 2018).

Fondazione Trentina Alcide de Gasperi (2018a), *Siamo Europea Festival 2018*. Available at: <http://www.degasperitn.it/it/progetti/Siamo-Europa/> (accessed: 23 August 2018).

Fondazione Trentina Alcide de Gasperi (2018b), *Museo Casa De Gasperi*. Available at: <http://www.degasperitn.it/it/museo-de-gasperi/> (accessed: 23/08/2018).

Fundación Residencia de Estudiantes (2018), *Residencia de Estudiantes*. Available at: <http://www.residencia.csic.es/> (accessed: 19 January and 23 August 2018).

General Library of University of Coimbra (2018), Available at: <http://www.uc.pt/en/bguc> (accessed: 18 January 2018).

Greek Ministry of Culture and Sports (2018), *Acropolis of Athens*. Available at: [http://odysseus.culture.gr/h/3/eh351.jsp?obj\\_id=2384](http://odysseus.culture.gr/h/3/eh351.jsp?obj_id=2384) (accessed: 18 January 2018).

ICOMOS (1999), *International Cultural Tourism Charter. Managing Tourism at Places of Heritage Significance*. Mexico, October.

ICOMOS (2004), *The World Heritage List: Filling the Gaps – an Action Plan for the Future*. An analysis by ICOMOS, February. Paris: ICOMOS.

Imperial Palace Vienna (2018), Available at: <http://www.hofburg-wien.eu/php/portal.php> (accessed: 19 January 2018).

Kamp Westerbork (2018), Available at: <http://www.kampwesterbork.nl/index.html#/index> (accessed: 18 January 2018).

Kaunas (2018), *Exploring the European Heritage Map (Including Kaunas!)*. Available at: <http://visit.kaunas.lt/en/kaunastic/exploring-the-european-heritage-map-including-kaunas/> (accessed: 19 January 2018).

Krapina Neanderthal Museum (2018), Available at: <http://www.mkn.mhz.hr/en/> (accessed: 19 January 2018).

Lähdesmäki, T., Turunen, J., Kaasik-Krogerus, S., Mäkinen, K., Ceginskas, V. (2018), *Increasing the Benefits and Transparency of the European Heritage Label. Policy Brief*. Jyväskylä: University of Jyväskylä.

Lieu D'Europe (2018), Available at: <http://lieudeurope.strasbourg.eu/en/> (accessed: 19 January 2018).

Liszt Academy (2018), Available at: <http://lfze.hu/en/home> (accessed: 19 January 2018).

Mestni muzej Idrija (2018), *Partizanska bolnica Franja*. Available at: <http://www.muzej-idrija-cerkno.si/index.php/sl/lokacijerazstave/stalne-razstave/partizanska-bolnica-franja.html> (accessed: 19 January and 23 August 2018).

Ministerio de Educación, Cultura y Deporte (2018), *Archivo de la Corona de Aragón*. Available at: <https://www.mecd.gob.es/archivos-aca/portada.html> (accessed: 18 January and 23 August 2018).

Mundaneum (2018), Available at: <http://www.mundaneum.org/en> (accessed: 19 January 2018).

Museo Casa De Gasperi (2018), Available at: <http://www.degasperitn.it/it/museo-de-gasperi/> (accessed: 19 January 2018).

Muzeum Lbelskie w Lublinie (2018), *Znak Dziedzictwa Europejskiego*. Available at: [https://www.muzeumlubelskie.pl/Aktualnosci/Znak\\_Dziedzictwa\\_Europejskiego-2-474-20.html?font\\_scale=default](https://www.muzeumlubelskie.pl/Aktualnosci/Znak_Dziedzictwa_Europejskiego-2-474-20.html?font_scale=default) (accessed: 23 August 2018).

Muzeum Umění Olomouc (2018), Available at: <http://www.muo.cz/en/> (accessed: 19 January 2018).

Pan-European Picnic (2018), Available at: <http://www.paneuropaipiknik.hu/index.php?lang=en> (accessed: 19 January 2018).

Passo San Gottardo (2018), Available at: <http://www.passosangottardo.ch/en/> (accessed: 12 September 2018).

Peace Palace (2018), Available at: <https://www.vredespaleis.nl/> (accessed: 18 January 2018).

Platform of European Memory and Conscience (2017), *The House of European History. Report on the Permanent Exhibition*. Prague: Platform of European memory and Conscience.

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.

Protestant Monastery of St. Augustine (2018), Available at: <http://www.augustinerkloster.de/en/> (accessed: 12 September 2018).

Schmitt, T. (2011), *Cultural Governance as a Conceptual Framework*, MMG Working Paper 11-02, Göttingen: Max Planck Institute for the Study of Religious and Ethnic Diversity.

Shipley, R., Kovacs, J. F. (2008), 'Good governance principles for the cultural heritage sector: lessons from international experience'. *Corporate Governance*, 8(2), pp. 214-228.

Sites Passionnément Moselle (2018), *Maison de Robert Schuman*. Available at: <http://www.mosellepassion.fr/index.php/les-sites-moselle-passion/maison-de-robert-schuman> (accessed: 19 January 2018).

Special Eurobarometer 399. Report. Cultural Access and Participation. April-May 2013. TNS Opinion & Social. European Union, 2013.

Standard Eurobarometer 89. Public opinion in the European Union. March 2018. TNS Opinion & Social. European Union, 2018.

Stiftung Hambacher Schloss (2018), *Hambacher Schloss*. Available at: <https://hambacher-schloss.de/index.php> (accessed: 18 January and 23 August 2018).

Support Services to Assist in the Preparation of the Impact Assessment and Ex-ante Evaluation of the European Heritage Label: Technical Annexes.

The Bratislava Declaration. Bratislava, 16 September 2016. Available at: <http://www.consilium.europa.eu/media/21250/160916-bratislava-declaration-and-roadmapen16.pdf> (accessed: 23 August 2018).

The Central Archives of Historical Records in Warsaw (2018), *Konstytucja 3 maja / The Constitution of May 3 / Die Verfassung vom 3. Mai (1791) / La Constitution du 3 mai (1791)*. Available at: [http://agad.gov.pl/?page\\_id=1675](http://agad.gov.pl/?page_id=1675) (accessed: 23 August 2018).

The Council of the European Union Regulation (EU) No 390/2014 of April 2014 Establishing the "Europe for Citizens" Programme for the Period 2014-2020, *Official Journal of the European Union*, L 115/3.

The European Solidarity Centre (2018), Available at: <http://www.ecs.qda.pl/title,Jezyk,pid,2,lang,2.html> (accessed: 19 January 2018).

Treaty on European Union, signed at Maastricht on 7 February 1992, 92/C 191/01, Art. 128.

UNESCO (2002), *Memory of the World. General Guidelines to Safeguard Documentary Heritage*. Revised Edition, February 2002.

UNESCO Convention of 16 November 1972 Concerning the Protection of the World Cultural and Natural Heritage. Adopted by the General Conference at its Seventeenth Session, Paris.

UNESCO Convention of 2003 for the Safeguarding of the Intangible Cultural Heritage, Paris.

UNESCO Creative Cities Network (2017), *UNESCO Creative Cities Network (UCCN). "Building a Collective Vision for the Future". Strategic Framework*. Available at: <https://fr.unesco.org/creative->

[cities/sites/creative-cities/files/strategic-framework\\_uccn\\_eng\\_20170705\\_vf\\_no\\_budget.pdf](#) (accessed: 07 September 2018).

UNESCO Creative Cities Network, *Mission Statement*. Available at: [https://en.unesco.org/creative-cities/sites/creative-cities/files/Mission\\_Statement\\_UNESCO\\_Creative\\_Cities\\_Network.pdf](https://en.unesco.org/creative-cities/sites/creative-cities/files/Mission_Statement_UNESCO_Creative_Cities_Network.pdf) (accessed: 07 September 2018).

UNESCO Creative Cities Network, *UNESCO Creative Cities Network 2017 Call for Applications. Designation Procedure*.

UNESCO Memory of the World Programme (2017), *UNESCO Memory of the World Programme. General Guidelines*. Approved Text, December 2017. MoW Guidelines Review Group.

UNESCO World Heritage Centre (2008), *World Heritage Information Kit*, UNESCO World Heritage Centre: Paris.

UNESCO, *UNESCO World Heritage and Sustainable Tourism Programme*. Available at: <https://whc.unesco.org/uploads/activities/documents/activity-669-7.pdf> (accessed: 27 August 2018).

Universidade de Coimbra (2018), *Biblioteca Geral*. Available at: <http://www.uc.pt/bguc> (accessed: 23 August 2018).

University of Jyväskylä (2017), *EUROHERIT – Legitimation of European cultural heritage and the dynamics of identity politics in the EU*. Available at: <https://www.jyu.fi/hytk/fi/laitokset/mutku/en/research/projects2/euroherit> (accessed: 19 October 2018).

University of Tartu (2018), Available at: <https://www.ut.ee/en> (accessed: 19 January 2018).

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