



**PARLIAMENT OF  
ROMANIA  
EUROPEAN AFFAIRS COMMITTEE**



Bucharest, 25<sup>th</sup> of October 2010  
No.40/600

**OPINION**

on 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

The Committee has acted based on the Parliament Decision No. 52/2006 which entitles the Committee for European Affairs to express an opinion in its area of competence, on behalf of the Romanian Parliament.

The analysis did not reveal any inconsistency with the subsidiarity principle. However, there were raised concerns regarding the proportionality principle, as the proposal excessively regulates comparing to its declared aim to promote a shared vision of the European identity.

*Firstly*, the European Panel Experts are supposed to analyse the candidate sits based on their personal vision which necessarily results from their cultural origin. The provision for an administrative independence cannot impose an independence of the personal judgment from the actual own culture of a given person. Consequently, the sits selection procedure does not provide for sufficient guarantee that it will respect a shared understanding and a common perception by the European peoples, mostly in respect to social or historical meaning and significance of the sits for which the EHL is requested.

*Secondly*, the proposal does not include a procedure to support the Member States to elaborate the candidate sites dossiers, to document them in a shared understanding of the „European significance” concept, regardless its actual content. Elaboration of a Guide or documentary studies in this view may be a solution for this shared understanding and a precaution to avoid nomination of sites that could have conflict potential.

These comments are also supported by the political option “3(a) Selection of sites is undertaken by the Member States against common, clear and transparent criteria”, **from the Proposal Impact Report.**

**Annex:**

The Report (Romanian only) of Mr. Tudor Alexandru CHIUARIU, deputy, member of our Committee

Chairman,

Viorel HREBENCIUC



Rapporteur,

Tudor Alexandru CHIUARIU