THE EUROPEAN HERITAGE LABEL

NOTE

EN 2010
The European Heritage Label

NOTE
Abstract

This note provides a short introduction to the European Commission's proposal for creating a European Heritage Label (EHL), published in March 2010.
CONTENTS

LIST OF ABBREVIATIONS 5

1. INTRODUCTION 7
   1.1. The Purpose of this Note 7
   1.2. The European Heritage Label as an Intergovernmental Scheme 7

2. THE COMMISSION'S IMPACT ASSESSMENT (IA) 9

3. ASPECTS OF THE HERITAGE LABEL OPEN TO DEBATE 11
   3.1. Does the Heritage Label Overlap with Existing Schemes? 11
   3.2. Should the Label be Permanent or Temporary? 12
   3.3. Who Should Finance the Heritage Label? 12
   3.4. How Many Sites Should be Awarded the Label? 13
   3.5. Who Should Award the EHL? What Role Should the European Parliament Play? 14
   3.6. What about Transnational Sites? 15
   3.7. Should the Label Be Restricted to EU Member States? 16

4. CONCLUSIONS 19
LIST OF ABBREVIATIONS

**CULT**  Culture and Education Committee

**EHL**  European Heritage Label

**EP**  European Parliament

**EU**  European Union

**MS**  Member States

**IA**  Impact Assessment

**TFEU**  Treaty on the Functioning of the European Union

**UK**  United Kingdom

**UNESCO**  United Nations Educational, Scientific and Cultural Organization

**WHL**  World Heritage List of UNESCO
1. INTRODUCTION

1.1. The Purpose of this Note
The European Commission published its proposal for a decision establishing "a European Union action for the European Heritage Label" on 9 March 2010. At the time of writing (early July 2010) the proposal is being considered by the European Parliament's Committee on Culture and Education (CULT), whose rapporteur for the European Heritage Label (EHL) is Ms Chrysoula Paliadeli.

The purpose of this note is to provide some brief comments on the EHL proposal for CULT Members. It will be succinct for two major reasons. On the one hand, the European Commission has made available a reasonable amount of information on this proposal, having carried out a public consultation, an impact assessment (IA) and several major meetings with interested parties. On the other, the EHL is at present simply a project, and it is useless to speculate in detail on how well it will be implemented. That will depend on the efforts of a large number of individuals responsible for creating interesting projects on the ground as well as on the leadership of national and European Union (EU) authorities.

Therefore, the most one can do at this early stage is to consider how well the EHL - as a concept - has been thought out. That is done in greater detail in chapter three.

1.2. The European Heritage Label as an Intergovernmental Scheme
The EHL has a brief history as an intergovernmental scheme, launched in April 2006 by the French, Spanish and Hungarian governments1. Its objectives were to use cultural heritage to strengthen European citizens' sense of belonging to Europe, in response to the growing apathy or even outright hostility to the European Project registered in the last decade. The idea was to move away from a purely national reading of heritage sites to a more European one. That still remains the major objective of the label as envisaged by the EU institutions. The scheme has therefore always stressed that its aim is largely educational and political; in simple terms, it is not about looking after cultural heritage (preservation) but more about developing a 'message' from that heritage. Additionally, the idea was (and remains) that sites would cooperate among themselves, rather than work in isolation. One should note that economic considerations, such as boosting tourism, have not been a major consideration behind creating the EHL.

According to the Commission's Impact Assessment (see Annex 4) 18 countries were participating in the EHL in October 2009, with 64 selected sites. Of these, 17 were EU Member States, joined by Switzerland. The 10 EU Member States who had not joined the scheme were: Austria, Denmark, Estonia, Finland, Germany, Ireland, Luxembourg, the Netherlands, Sweden and the United Kingdom (UK).

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1 The information for this section - and indeed for much of this note - is taken from the European Commission's 'Impact Assessment' for the EHL proposal, SEC (2010)197.
According to the literature, the countries which launched the EHL as an intergovernmental scheme aimed from the outset to transform it into an EU one. Indeed, they have not been forced to wait long, since on 20 November 2008 the Council adopted conclusions asking the Commission to submit proposals for a European Heritage Label². The Council text goes into some detail on the arrangements for the future EHL, for example proposing the obligations that would be imposed on the participating sites. To some extent therefore, it forestalls the Commission's proposal.

Given that the EHL has existed as an intergovernmental scheme for such a short period of time, and that interested parties rightly expected it to be replaced by an EU initiative in the short term, one might expect that it still finds itself at an embryonic stage. The Commission impact assessment on the EHL confirms that assumption. Indeed, it points out that little structured information about the EHL exists on the Internet. In the online consultation carried out by the European Commission between March and May 2009³, only 42% of respondents knew about the EHL. Given that the overwhelming majority of respondents were professionals connected to the cultural sector - interested in EU policies to the extent that they were willing to fill in an online questionnaire - the figure is very low.

The fact that the EHL is relatively unknown is not perhaps surprising at this early stage. However, according to the IA, the intergovernmental scheme suffers from weaknesses which go deeper. First and foremost, although common criteria and rules were set up for awarding the label, these were apparently insufficiently applied⁴. As one might expect, countries interpreted and applied these criteria in different ways. Another problem is that once the label is awarded, there is no way to ensure that sites are maintained to the standard promised in their original application. Furthermore, the networking activities between the sites have so far been very limited and the fact that the secretariat of the EHL rotated between different countries has made organization more difficult.

In short, the EHL suffers from the type of problems that can arise in any intergovernmental initiative lacking a common authority that applies the rules in the same way across the board and makes sure that they are kept to.

One should emphasize that the European Parliament (EP) has always clearly supported the idea of transforming the EHL into an EU award, notably in its resolution of 10 April 2008 on a European agenda for culture in a globalising world⁵.

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² See: the full text of the Council Conclusions.
³ For unknown reasons, the individual answers to the public consultation were not published online. Instead, the European Commission drew up a report summarising the answers, carried out by an external consultant. However, the individual answers were made available to the author of this note. For more information, see the relevant Commission web pages.
⁴ For a description of the weaknesses of the intergovernmental scheme see pp.18-19 of the IA.
⁵ See the relevant OEIL file on the European agenda for culture.
2. THE COMMISSION'S IMPACT ASSESSMENT (IA)

As already mentioned, the European Commission prepared an impact assessment for the EHL draft decision, as is usually the case with legislative proposals with budgetary implications. However, the term 'impact assessment', with its technical connotations, is somewhat misleading as a description of the Commission's document. It is very difficult to measure the impact, using quantitative data, of a measure like the European Heritage Label, which is supposed to change mentalities by presenting historical sites in a new way. The document should therefore be considered as an analysis of the advantages and disadvantages of taking the EHL under the EU's wing. It contains very little quantitative data, including on economic and environmental issues, which is understandable given the context.

Another feature of the IA which looks somewhat artificial lies in the three options which it compares. As is the norm for impact assessment work, a first option is a continuation of the status quo. Whilst that is a useful general technique for comparative purposes, in this case we already knew that: (1) both the Council and the EP had already asked for the EHL to become an EU scheme and (2) that the intergovernmental EHL has weaknesses which need to be remedied.

The second option compared in the IA was to continue the intergovernmental status quo whilst offering EU financial support. That option, whilst perhaps also useful for the purposes of comparison, appears inherently unrealistic, not only in the light of what was stated in the preceding paragraph, but also because it would not remedy the organizational problems (applying criteria in the same way to all countries) which were identified as weakening the EHL.

Option three in the IA was to make the EHL an EU initiative. This option was sub-divided into three sub-options, which were:

a) Selection of sites would be undertaken by Member States (MS) against common, clear and transparent criteria. Monitoring would be a MS responsibility. The Commission would play a coordinating role.

b) Sites would be selected through an open selection process without taking into account their national origin by an expert committee at European level. Monitoring functions would also be undertaken at EU level.

c) Sites would be pre-selected by MS and then subject to final selection by an independent panel at EU level. Monitoring would primarily be a MS responsibility, but with supervision and review by the independent panel.

Again, the problem here is that two out of the three sub-options, whilst useful for a comparative academic exercise, are to some extent unrealistic. Why? Sub-option (a) does not look convincing in tackling the problems of the intergovernmental scheme. The only major improvement would be that the Commission could provide more stability in the management of the EHL and integrate it better with other EU cultural initiatives.
Sub-option (b) does not appear to be politically feasible. Can one really expect Member States to participate and support the idea of a European Heritage Label without playing a part in the selection process in the expectation that at least some sites from their own country would be selected? We are therefore left with option (c), which is of course what is found in the Commission's legislative proposal.\(^6\)

These introductory comments are not intended to call into question the quality of the Commission's preparatory work for this legislative proposal. Its IA document provides a lot of information and analysis on the advantages and disadvantages of transforming the EHL into an EU initiative. This preparatory thinking has obviously contributed to the quality of the proposal (see below). However, both the term 'impact assessment' and the options laid out have an artificial flavour here.

Nevertheless, it is important to point out that IAs are not supposed to be based on considerations of political feasibility, but instead on a more neutral comparison of data. But one can ask what the point is of comparing options that are obviously not viable? The only possible answer is that such comparisons are theoretical and intended to contribute to thinking out a proposal, which is a useful exercise.

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\(^6\) See the Commission's legislative proposal.
3. ASPECTS OF THE HERITAGE LABEL OPEN TO DEBATE

The Commission's draft decision transforms the EHL into an EU award, but it will still be a voluntary action (see Article 4). Member States can choose whether or not to participate. At the time of writing, it appears that all or almost all of the current EU-27 will participate.

As stated above, the preparatory work has contributed to the quality of the proposal, especially in terms of defining the concept of the EHL. The IA, the public consultation and the meetings with interested parties raised a series of questions which are presented below, to which I have added others. There are few definitive answers to these questions.

3.1. Does the Heritage Label Overlap with Existing Schemes?

Some voices, including some Member State governments, have raised concerns that the EHL in effect duplicates or overlaps with existing schemes such as UNESCO's World Heritage List (WHL) or the Council of Europe's Cultural Routes.

Such fears are not well-founded, for several reasons, which are well-explained in the Commission proposal and its preparatory documents. The EHL, unlike the UNESCO and Council of Europe initiatives, is not supposed to be awarded primarily on the basis of the aesthetic importance of a site but instead on the basis of its symbolic importance in European history and/or the history of European integration. Thus, Robert Schumann's house in Scy-Chazelles is on the list of the intergovernmental EHL, although it does not have outstanding architectural value. The second reason, closely linked to the first, is that the sites are supposed to provide pedagogic content with a more pan-European approach than usual. The third is that the sites are supposed to cooperate among themselves.

Therefore the concept of the EHL has been carefully thought out to distinguish it from similar initiatives. If one looks at the current list of 64 EHL sites and compares it with UNESCO's list, it is apparent that - purely in terms of sites holding both awards - there is some, but not very much, overlap. Examples of sites that are associated with both schemes are the Acropolis, the historical centre of Riga and the circuit of churches with Byzantine frescos in Troodos (Cyprus). In the Commission's public consultation, some respondents argued that there should be no overlap at all, i.e. no site should participate both in the EHL and other designations. That is not the current status quo, but since the sites belonging to the intergovernmental EHL will have to be resubmitted for the EU scheme (see below), it is theoretically still possible in future to eliminate the current small overlap.

It is common sense to assert that the EHL will be easier to distinguish from other schemes if there is no overlap. On the other hand, there is no reason to think that a site cannot simultaneously fulfil the criteria of both the EHL and the UNESCO award, which are complementary.
3.2. Should the Label be Permanent or Temporary?

The question of whether the EHL should be awarded on a temporary or permanent basis closely divided the respondents to the online public consultation\(^7\), with 46% opting for a temporary award and 54% for a permanent one. The arguments for making it temporary would be that it would prevent sites from becoming complacent and it would also permit the participation of a larger number of sites through rotation. A non-permanent status also sits well with the idea that the EHL is more about pedagogic activities and networking, than about conservation.

On the other hand, professionals working in the cultural sector mainly argued that the label should be permanent so that a long-term vision can be implemented at a site, accompanied by the reassurance that - if the project retains a certain quality - its status as an EHL site is guaranteed.

In its proposal the Commission has opted for making EHL sites permanent, which is probably sensible, as long as there is some monitoring to make sure that they continue to respect their engagements over time. In Article 14 of its proposal, the Commission suggests a monitoring mechanism on two levels. The Member States are primarily responsible for monitoring and must submit a report on all the sites located on their territory once every four years. A European panel will then issue a report on these sites and make any recommendations it considers appropriate. The Commission promises to establish common indicators for the monitoring procedure across the EU.

It is important to note that the Commission proposal also includes the possibility of withdrawing the label if a site no longer fulfils the criteria (Article 15), in a two-stage process that would take three years to complete. As is also the case with selection, it is up to the European Panel to issue a recommendation for withdrawing the EHL.

The withdrawal procedure is lengthy and grants plenty of time to the specific site concerned to remedy any shortcomings. When the European panel detects problems, it first initiates a dialogue with the site via the Commission over an 18 month period. At the end of this period, if the problems persist, the panel issues a notification accompanied by recommendations on how to improve the situation. The site then has a further 18 months to implement the recommendations; failing that the European panel shall propose withdrawing the label.

3.3. Who Should Finance the Heritage Label?

According to the Commission, the Council strongly feels that it is up to the Member States to finance the activities of EHL sites at the national or sub-national level\(^8\). The draft decision follows that lead and foresees a very modest budget the EHL for the 2011 to 2013 - 1.35 million EUR. That budget is supposed to finance the strictly EU-centred activities of the EHL, namely the work of the European panel of experts, communications activities and encouraging networking between sites.

Therefore what is being proposed at present is an EU award where the EU plays an almost no role in automatically financing activities on the ground. An element of direct co-financing, used for instance in the European Capital of Culture initiative, under which the EU provides a grant to the host city via the Culture Programme, is missing\(^9\). The Commission considers that the budget of the Culture Programme, at 400 million EUR for the 2007-13 period for the whole EU, is clearly far too small to be able to finance dozens or

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\(^7\) As mentioned above, the Commission prepared a summary document of the answers to the public consultation.

\(^8\) Oral explanation given by Ms Ann Branch, head of unit at DG EAC of the European Commission, at a meeting of the Committee on Culture and Education (CULT) held on 24 June 2010.

\(^9\) This grant amounted, up to 2009, to 1.5 million EUR per host city.
hundreds of EHL sites. In any case, the Culture Programme has never been used for directly funding national heritage projects, because its aim is to encourage cross-border cooperation and networking activities.

Even if the Commission proposal does not foresee any automatic financing, in theory, a host of existing programmes, or their successors after 2013, could be a potential source of funding for EHL activities, given that its educational and civic objectives relate pretty closely to the spirit of programmes such as Youth in Action, the Comenius sub-programme, Europe for Citizens etc. Furthermore, it is possible that sites could attract EU financing by making applications via other funds, for example under rural development.

Similarly, nothing would stop any Member State in future from mobilising the Structural Funds to co-finance individual projects presented by a site or a group of sites. Cities awarded the European Capital of Culture designation, for instance Essen to provide a recent example, have received considerable EU co-financing from the Structural Funds. Since it is up to Member States to set their own priorities under Cohesion Policy, they will have freedom of action to fund EHL-related activities as they see fit.

Therefore the notion that the EU will not fund EHL projects on the ground is a half-truth - it will not automatically do so, but funding opportunities on a project-by-project basis will certainly be available.

Finally, one should note that the EU-centred activities of the EHL will be directly financed by the Culture Programme after 2013.

3.4. How Many Sites Should be Awarded the Label?

The report on the public consultation (see p.14) tells us that 48% of respondents considered that the EHL should be awarded to 5-10 sites per country; 40% preferred a total of more than 10 sites.

Under the Commission's proposal, the first year after the entry into force of the Decision (probably 2012\textsuperscript{10}) should be used for the resubmitting of applications by the sites participating in the intergovernmental label (Article 18 of the Commission proposal). Leaving aside Switzerland, and assuming that all the sites would be accepted, the Label could be quickly awarded to a maximum of 61 sites. In the following year, the 10 EU Member States not having participated in the intergovernmental award would, exceptionally, be allowed to nominate up to 4 sites each. They might be joined by Croatia, so a potential maximum of 44 new labels might be awarded in 2013. In the third year, the EHL would enter its 'normal' awarding arrangements, meaning that a maximum of 28 new sites could be added to the list (one per country). Year 4 will be a monitoring year (under the Commission proposal one year out of every four is used for monitoring).

Therefore, a maximum of 133 sites could potentially be participating in the EHL at the end of the first 4-year period. Two years later, the figure might go up to 189 (assuming no further EU enlargements). For the purposes of comparison, there are about 330 sites in the EU-27 inscribed on the UNESCO World Heritage List\textsuperscript{11}; however it has taken more than 30 years to reach this total.

\textsuperscript{10} Even if the Decision is approved in late 2010, under the Belgian EU Presidency, the first effective year of work is likely to be 2012.

\textsuperscript{11} The author's own rough calculation. For further information, see World Heritage List statistics.
These figures are hypothetical, and the Commission has indicated that it believes that not all Member States will make EHL applications in every year in which it is permitted. Awarding the EHL to a large number of sites will not necessarily have a negative impact on the quality of the projects and the prestige of the award. However, it will have an impact on the depth or extent of the monitoring, especially by the European panel, whose task it will be to review the monitoring reports published by Member States and issue recommendations over a 9-month period in the monitoring year. Even assuming that the number of EHL sites given above is very much inflated, and that we end up with only, say, 50 to 70 sites at the end of the first 4-year period, one has to recognise that it will be difficult for a European panel made up of 12 individuals and a small Commission team to effectively keep an eye on what is happening on the ground in the sites.

In the public consultation, the majority of respondents considered it arbitrary to set a limit on the number of sites that could be awarded the EHL, notably by Member State. Since the EHL includes immaterial patrimony and places of symbolic importance (with no outstanding natural or man-made beauty), and given its pedagogic aims, it is true that the number of potential sites is high.

There are ways to modify the Commission's proposal in order to slow down the potential growth in selected sites, such as extending the monitoring period to 2 years or only awarding the EHL every 2 years. The Commission's initial idea was to split Member States into groups that would apply for the award in different years. This idea was abandoned on legal grounds as it would represent inequality of treatment between Member States.

A separate question raised in debates is whether it is really fair to treat countries of such varied sizes equally in terms of the number of sites they can each nominate, as the Commission has done? It is probably more diplomatic to do so, and given the political and educational aims of the EHL, makes sense. If the EHL is about using sites to underline the commonalities of Europe, then every Member State must participate and, at least at the outset, on an equal footing. In the long-term, it is unlikely that Member States will end up with the same number of sites.

Comparisons with cultural patrimony initiatives, such as the WHL, are not particularly relevant, given the EHL's aims. There are obviously huge differences in the number of UNESCO World Heritage Sites located in different Member States, from 44 in Italy to 1 in Luxembourg. But given the important role played by Luxembourg in the European Project, for instance, it is not hard to imagine that it could potentially propose a fair number of sites that would be appropriate for the EHL.

3.5. Who Should Award the EHL? What Role Should the European Parliament Play?

Article 8 of the Commission proposal creates a "European panel of independent experts", to carry out selection and monitoring at the European level. It is composed of 12 members; Council, Commission and Parliament are supposed to nominate 4 individuals each. The ordinary selection procedure of EHL sites consists of a two-stage process whereby Member States first propose a maximum of 2 sites each per year, following their own arrangements. The European panel then selects a maximum of one site per Member State (Article 11). It is understood that if both sites suggested by a MS fail to respect the selection criteria, they shall both be rejected.

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12 Observations made by Ms Ann Branch, head of unit at DG EAC of the European Commission, at a meeting of the Committee on Culture and Education (CULT) held on 24 June 2010.
It seems sensible to give the final say over the selection of sites to an independent body of experts, which should guarantee the credibility of the award. Equally, having every Member State involved in pre-selection is also important in order to ensure their commitment to the initiative (see above).

The word "selection" is used loosely above. Legally-speaking, the European Commission actually selects the sites (Article 11 (1)); the European panel merely issues recommendations. That distinction will probably turn out to be a formality: it is difficult to imagine a situation where the European Commission would overrule the indications of a European panel created precisely to provide technical expertise and independence. Interestingly, all the recommendations of the panel will be made public.

Nevertheless, the legal distinction is an important one, since specialists in EU law consider that the EU institutions cannot grant other entities formal decision-making powers when that has not been provided for by the Treaties. It also ensures that - in an extreme case where a decision by the panel is for some reason highly controversial or contested - the Commission will have the last word.

The EP and the Culture Committee in particular have at their disposal the usual panoply of instruments to influence the development of the EHL, such as directing written and oral questions at the Commission (followed by debate), drawing up non-legislative reports, passing parliamentary resolutions, holding hearings or workshops etc. These possibilities for debate, coupled with powers for choosing one-third of the European panel, should be enough to allow the EP to influence the development of the EHL after the legislative decision is in place.

One should point out that the European Commission has consciously proposed a selection procedure that is relatively simple and short when compared to the one for the European Capital of Culture initiative\textsuperscript{13}.

The EHL as a whole will be evaluated at the end of the first 6-year period (Article 17 of the proposal). The evaluation will cover a number of issues discussed in this note, including the efficiency of the administrative procedures, the number of sites and the impact of creating the label.

### 3.6. What about Transnational Sites?

Article 12 of the proposal defines 'transnational sites' in two ways. These are either:

- several sites located in different Member States which propose a single application based on a specific theme;

- a specific site geographically situated on the territory of at least two Member States.

Such transnational sites would be proposed by a single Member State (entering that country's ordinary 'quota' of two proposed sites per year). The other participating Member States would have to approve the joint application. The Commission believes that having a 'lead Member State' is practical since, for instance, one country will take overall responsibility in discussions with the European panel.

One should note that the proposal makes clear that transnational sites will be positively discriminated during the selection procedure (see Article 12 (3)). Given that the EHL is about stressing commonalities and creating networks, granting favourable treatment to sites promising a transnational approach from the outset is consistent with the rest of the proposal.

\textsuperscript{13} A point underlined by Ms Ann Branch at the June 24 CULT exchange of views.
3.7. Should the Label Be Restricted to EU Member States?

The Commission proposal suggests that the EHL should be awarded, at least in the next 6 years, only to sites in the EU. This seems to be entirely logical, given that the general objective of the initiative (defined in Article 3) is to contribute to "Strengthen Europeans citizens' sense of belonging to the European Union, based on shared elements of history and cultural heritage". According to this rationale, the EHL serves to strengthen the "European Project", reinforcing internal unity.

However, the second indent in Article 3 lays down a second general objective: to "strengthen intercultural dialogue". The latter expression is often associated with dialogue between people of different religions, ethnicities and cultural backgrounds and does suggest that there might be a rationale for extending the EHL to countries neighbouring the EU. However "intercultural dialogue" is of course also necessary within EU borders and the background to the EHL suggests that the primary reason for its creation is to strengthen a sense of shared destiny within the Union.

In any case, it is prudent not to overestimate the importance of cultural factors as a driving force behind the European Project. Some seem to believe that integration is based or dependent on pre-existing cultural similarities. According to this view, the EHL would make use of these and reinforce a sense of belonging to the Union. That view bypasses the fact that the EU is primarily a political and economic project, whereby a group of countries have decided, through exercising political will, to create an entirely new entity. The process is primarily driven by historical, political, economic and geographical factors. That is not to deny that EU countries share certain values and cultural attributes. However, these are not clearly definable and do not stop at the EU's borders. Political values, such as the attachment to parliamentary democracy, are just as rooted in North America and elsewhere as in the EU. Cultural similarities do not stop at current EU borders either. Is Russia, for instance less European in cultural terms than Portugal? At the same time, and due to colonialism, the English, Dutch, French, Spanish and Portuguese languages and culture have had global influence. A Spaniard or a Briton may well feel closer culturally to an Argentinean or an American than to a Finn. But Finland elects representatives to the EP and is subject to EU audiovisual regulation; Argentina is not involved in either. Spain and Finland are brought together by a political project, by institutions and by EU law.

The point here is that the EHL will have a clearer rationale if it concentrates on its mission as a 'civic' project, aiming to further understanding of European history, in particular of how the European Project came about; rather than trying to define or explain a nebulous common European culture, which does not coincide with the borders of the EU.

In Article 3 of its draft decision, the Commission does lay the stress on the educational and civic elements in the EHL, in the two intermediate objectives it proposes, which are to:

- Enhance the value /profile of sites which have played a key role in the history and the building of the EU;

- Increase European citizens’ understanding of the building of Europe, and of their common yet diverse cultural heritage, especially related to democratic values and human rights that underpin the process of European integration.
The little quantitative evidence available suggests that the general public is divided about what "European heritage" might mean. A 2007 Ipsos survey\textsuperscript{14}, conducted only in 5 Member States, found that 49\% of respondents considered that European heritage was the sum of all the national heritages of the Member States. On the other hand, 45\% believed that it meant a common heritage which was truly shared by all Member States.

In a Eurobarometer survey\textsuperscript{15} from the same year, more comprehensive in the sense that it covered the EU-27, 53\% of respondents agreed with a statement to the effect that: "there is no common European culture because European countries are too different from one another" (15\% agreed very well and 38\% fairly well). However, and perhaps a little paradoxically, respondents in the same survey could identify a separate common European cultural identity vis-à-vis other continents. When confronted with the statement "When compared to other continents, it is much easier to see what Europeans have in common culturally", 67\% agreed (50\% very well and 17\% fairly well).

These results tend to illustrate that it is very difficult to speak with precision of a "common European heritage".

\textsuperscript{14} For the full document, see: \url{Enquête sur les Européens, les patrimoines de l'Europe et le patrimoine européen}.

\textsuperscript{15} See: \url{Eurobarometer survey on cultural values within Europe}. 

17
4. CONCLUSIONS

The arguments for transforming the EHL from an intergovernmental initiative into an EU one are compelling. In particular, the creation of an independent body of experts to select sites and keep an eye on monitoring promises to be an improvement on the current status quo. In general, it seems natural that the EU should take up a project which fits so very well with its competences under the Treaty, which states that Union shall "contribute to the flowering of the cultures of the Member States, while respecting their national and regional diversity and at the same time bringing the common cultural heritage to the fore"\(^{16}\) (author's italics). It also makes sense to make use of the Commission's administrative experience and of the possibility of intertwining the EHL as closely as possible with existing EU policies and programmes.

The Commission has defined the EHL concept in much the same terms as national governments did in 2006. In abstract terms, the idea is clearly distinguishable from existing heritage awards. It will be up to protagonists on the ground to translate the concept into practice. The designation is clearly civic in nature. The intergovernmental scheme was launched mainly to draw the attention of (younger) people to our shared European history; the Commission proposal steers the same course.

The current proposal places the primary responsibility for financing the EHL on the Member States, at a time when some amongst them seem to be entering a period of budgetary austerity.

The EP's role is important not only in shaping the current legislative proposal, but also in selecting four of the experts that will sit on the European panel. The panel - the major novelty in the Commission proposal as compared to the intergovernmental scheme - will face a heavy workload and the difficult task of establishing the coherence of the EHL. A number of practical elements in the proposal, such as the 'rhythm' for awarding the label and the calendar of the first years may still require some discussion.

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\(^{16}\) Wording of Article 167 of the Treaty on the Functioning of the European Union (TFEU).
Role

The Policy Departments are research units that provide specialised advice to committees, inter-parliamentary delegations and other parliamentary bodies.

Policy Areas

- Agriculture and Rural Development
- Culture and Education
- Fisheries
- Regional Development
- Transport and Tourism

Documents