



EUROPEAN COMMISSION
IMPACT ASSESSMENT BOARD

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Opinion

Title **Impact Assessment on: a Community action for the European Heritage Label**

(draft version of 27 October 2009)

Lead DG **DG EAC**

1) Impact Assessment Board Opinion

(A) Context

The European Heritage Label (EHL) scheme was launched in April 2006 as an intergovernmental initiative aiming to use the potential of cultural heritage to promote European identity. However, EHL is still very far from having reached its full potential, and its implementation shows many deficiencies.

The European Parliament has supported the development of the EHL in its resolutions on a 'Renewed EU Tourism Policy: Towards a stronger partnership for European Tourism' (2007) and on a 'European agenda for culture in a globalising world' (2008). In November 2008, the Council adopted conclusions inviting the Commission to submit "an appropriate proposal for the creation of a European Heritage Label by the European Union and specifying the practical procedures for the implementation of the project". The aim of this impact assessment report is to discuss the options and assess the impacts of establishing a Community action for the EHL.

(B) Positive aspects

The report discusses openly the potential as well as the limits of the EHL in terms of promoting European citizenship. It makes a good effort to develop the options which allow for light administrative procedures and low associated costs.

(C) Main recommendations for improvements

The recommendations below are listed in order of descending importance. Some more technical comments will be transmitted directly to the author DG.

General recommendation: The report needs further work on a number of aspects. In particular, it should provide an analysis of the selection criteria that will be used to award the EHL, and if possible consider alternative options on the basis of different sets of these criteria. The report should explain better the EU value added of the EHL by emphasising how it differs from other initiatives in the same domain,

and clarify how the participation of transnational sites would be promoted. The operational objectives should be more coherent with the criteria which are used for the assessment and comparison of the options. Finally, the report should be more specific about the costs, in particular by outlining the main cost categories which the potential EHL sites would have to bear in order to comply with the selection criteria.

During the IAB meeting, DG EAC agreed to make the necessary changes in the impact assessment on this basis.

(1) Elaborate on the criteria which will be used to award the EHL. Firstly, the report should provide an analysis of the criteria that will be used to select sites (e.g. their pan-European nature or role in European history). It should illustrate how the selected criteria would help to contribute to the achievement of the objectives, such as 'raising awareness of young people' and 'fostering synergies between cultural heritage and contemporary creativity', and demonstrate that the criteria are objective and unambiguous enough to make them operational.

Secondly, it should discuss the conditions that will be applied to the programs provided by the EHL sites (e.g. educational activities for young people, promoting multilingualism) as well as to their management plans (e.g. use of modern technologies, quality of reception facilities), explaining why these criteria have been chosen and whether others have been excluded. It should clarify whether the criteria in these terms are cumulative or not.

For both categories of the criteria the report should, if possible, develop options for different sets in terms, for example, of their stringency. This analysis should address the issue of whether criteria which are too strict may be too costly or difficult to comply with, resulting in a very low number of participants; or on the contrary, not sufficiently demanding and thus potentially leading to a gradual devaluation of the label. The report could illustrate this discussion by applying the different criteria to the sites in the current EHL list. The report should also explain the conditions under which the EHL can be attributed to immaterial creations.

(2) Be more explicit about the value added of the EU initiative. The report should explain better, bringing examples, the specific features which contribute to the enhancement of shared cultural heritage and make the EHL distinct from other similar initiatives (such as UNESCO World Heritage List, the Council of Europe's 'European Cultural Routes' and the EU Prize for cultural heritage/Europa Nostra Awards). It should underline the complementarities with these schemes and demonstrate how the possible overlaps will be avoided. It should be explicit that the most important factor for awarding the EHL would be the symbolic rather than the aesthetic value of the site. The report should explain more fully the trans-national aspect of the initiative, for instance by clarifying how the participation of trans-national sites in the EHL can be encouraged.

(3) Redefine the objectives. When presenting the general objectives, the report should clarify the level of ambition of the initiative. The specific and operational objectives should be redrafted in such a way that they can be used to assess and compare the options. They should, for example, include the objectives of improving efficiency of the selection process, ensuring sufficient geographical representativeness of the sites, and improving visibility of the EHL.

(4) Be more specific about the costs. The report should clarify that, in addition to the costs of selection procedures and of the permanent secretariat, there are also costs the sites will face in order to comply with the EHL selection criteria. The report should identify the main categories of such costs and assess, in qualitative terms, their magnitude for instance by providing a few illustrative practical examples. Regarding the administrative costs related to the selection procedure and the running cost of the secretariat, the report should quantify these, as far as feasible, both at EU and Member States level, and demonstrate that these are indeed as light and streamlined as possible.

(5) Clarify better why the option of the temporary label was dropped without further analysis. While discussing the most effective ways for implementing the label, the report should explain in more detail why a ‘permanent label with a possibility of withdrawal’ was preferred to the ‘temporary (but long-term) label with the possibility for renewal’, especially given that that the latter may have certain advantages, such as more active list management and lower administrative costs. The report should also be explicit that the participation of Member States in the EHL scheme would be on a voluntary basis.

(D) Procedure and presentation

It appears that all necessary procedural elements have been complied with. In order to improve readability, the report should briefly summarise (e.g. in an Annex) the content and objectives of the other initiatives in the domain of heritage appreciation, such as the UNESCO World Heritage List or the Council of Europe Cultural Routes. Lastly, it should put the results of a Eurobarometer survey on cultural values in Europe into an appropriate context.

2) IAB scrutiny process

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External expertise used	No
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