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of the European Heritage Label Action

Accompanying the document

REPORT FROM THE COMMISSION TO THE EUROPEAN PARLIAMENT, THE COUNCIL, THE EUROPEAN ECONOMIC AND SOCIAL COMMITTEE AND THE COMMITTEE OF THE REGIONS

Evaluation of the European Heritage Label (EHL)

{COM(2020) 372 final}

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1. INTRODUCTION

This document describes the methodology and findings of the evaluation of the European Heritage Label (EHL) Action as required by Article 18 of Decision No. 1194/2011/EU[1] of the European Parliament and Council. This staff working document (SWD) accompanies the Report to the European Parliament, the Council and the Committee of the Regions. The evaluation aimed to assess the implementation of the EHL Action during its **first six years of existence (2011-2017)** with a view to improve its implementation in the upcoming period in accordance with the principles of Better Regulation. As the EHL is still in its early stages of implementation, the main purpose of this evaluation was to assess the impact of the action and focus on the improvement of its operational aspects: to define which processes are working well or not working and to identify the best practices for improving these processes. Most importantly, the evaluation aimed to identify whether the action was sustainable, whether its geographical scope should be widened, and whether the EHL should be continued. The evaluation examined five criteria: relevance, coherence, efficiency, effectiveness, and EU added value.

The evaluation was supported by an external contractor's report. It covered the period 2011-2017 with a strong focus on the period following the first selection of sites in 2013. The evaluation provides a detailed analysis of the 29 sites that received the European Heritage Label before 2017.

2. BACKGROUND TO THE INTERVENTION

2.1 The European Heritage Label

The European Heritage Label was launched in 2006 as an intergovernmental action under the leadership of France, Spain and Hungary with the goal to identify and designate sites that played a key role in building and uniting Europe, and to promote the European context of the selected sites. By 2010, the Label had been assigned to 68 sites across 18 EU Member States and Switzerland. Participating countries designated sites independently, based on their own judgement and interpretation of 'European-ness'.[2] According to the Impact Assessment that preceded the Commission initiative in 2010, the intergovernmental selection procedures had resulted in disparities between the sites labelled, their relevance and activities. In addition, the EHL lacked visibility among stakeholders, and little progress had been made in the initiative's educational dimension. On request from participating Member States, the EHL was transformed into a formal action of the EU, with the aim of strengthening coordination between the states, and

[1] OJ L 303/1, 22.11.2011

[2] Commission Staff Working Document. Summary of the Impact Assessment. Accompanying document to the Proposal for a Decision of the European Parliament and of the Council establishing a European Union action for the European Heritage Label, 9 March 2010, SEC(2010) 198, 9.3.2010, p. 2 [hereinafter, 'Impact Assessment']

developing "common, clear, and transparent selection criteria".[3] The current EU action for the European Heritage Label was established in 2011 by Decision No. 1194/2011/EU.[4]

The new European Heritage Label is intended for sites that not only have made a contribution to European history and/or the building of the Union, but also promote and highlight their European dimension and demonstrate their operational capacity to carry out these activities. The new requirements are an intrinsic part of (or contribution to) the added value of the new European Heritage Label.

The procedure for attributing the European Heritage Label is carried out in two stages: at the national level a maximum of two candidate sites are pre-selected every two years. Out of these and based upon the recommendations made by a European Panel of independent experts[5], the European Commission decides to attribute the European Heritage Label to a maximum of one site per participating Member State per year.

2013 and 2014, the first two years of the action at the European Union level, were transition years: in 2013 participation was restricted to those Member States, which had not taken part in the intergovernmental initiative, whilst 2014 was reserved for candidate sites from the Member States, which had been involved in the intergovernmental initiative. 2015 was the first year that participation was open to all Member States, if they confirmed their interest: 24 Member States signed up.

Sites awarded are monitored on a regular basis in order to ensure that they continue to meet the criteria for which they were selected. 2016 was the first monitoring year and the European Panel has examined the sites awarded in 2013 and 2014. The next monitoring year will take place in 2020 and will include all sites that received the Label prior to 2019.

2.2 Objectives of the EHL Action

The EHL is an EU action that brings cultural heritage sites with a European dimension to the fore. All types of heritage, from monuments and landscapes, to books and archives, objects and intangible heritage, linked to a place, are eligible if they are significant in terms of the history and culture of Europe or the European integration.

The Label's general objectives are to **strengthen European citizen's sense of belonging to the European Union** in particular that of young people, based on shared values and elements of

[3] 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].

[4] Decision No. 1194/2011/EU of the European Parliament and of the Council of 16 November 2011 establishing a European Union action for the European Heritage Label. OJ L303/1, 22.11.2011

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

European history and cultural heritage as well as an appreciation of national and regional diversity; and to strengthen intercultural dialogue.

The establishment of the EHL at the EU-level was expected to lead to increased access to cultural heritage resources especially for young people, increased interest in and knowledge of a common European Heritage and the understanding of European cultural diversity, increase in intercultural dialogue, greater sense of belonging to the European Union and stronger participation in the democratic process.

Secondary economic benefits were presumed in the Impact Assessment and include positive effects on the local tourism industry, including number of people employed; development of links with cultural and creative industries; and development of innovation and creativity.

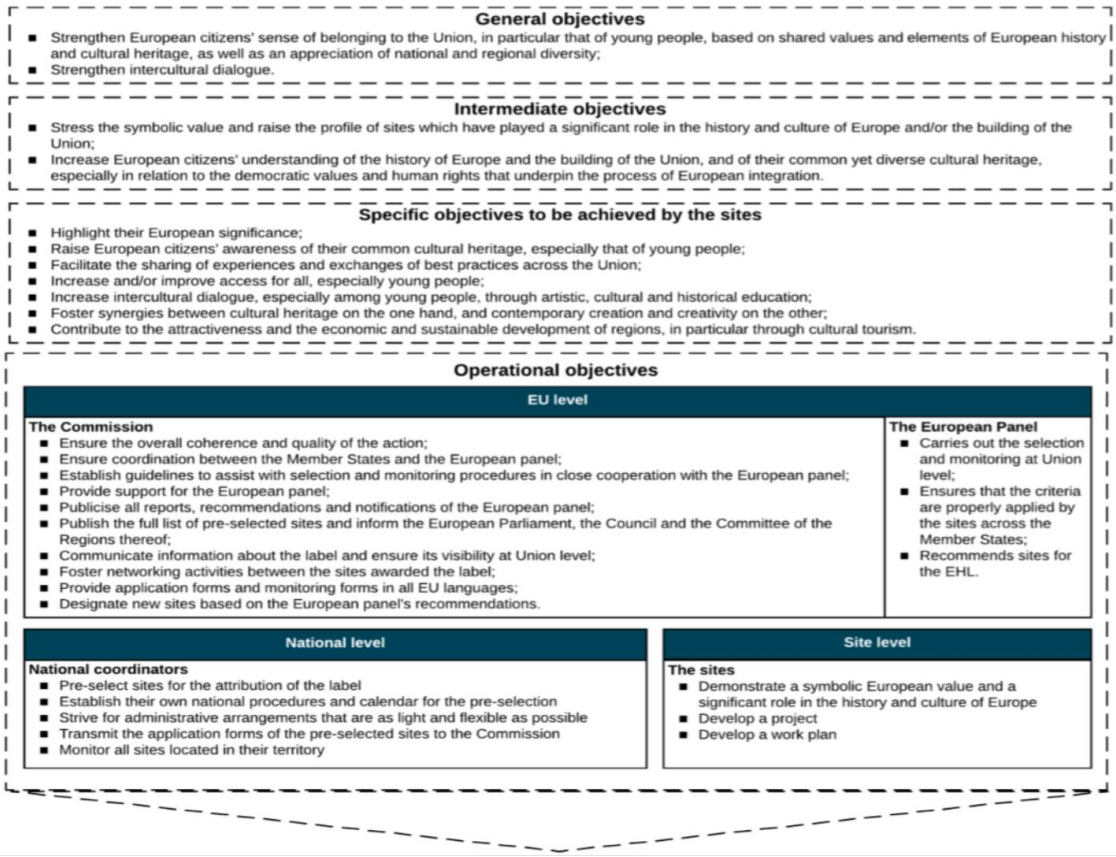
The intermediate objectives of the Label will be to enhance the value and the profile of sites which have played a key role in the history and the building of the European Union, and to increase European citizens' understanding of the building of Europe, and of their common yet diverse cultural heritage, especially related to the democratic values and human rights that underpin the process of European integration. This is the highest level of impact that EHL can achieve on its own.

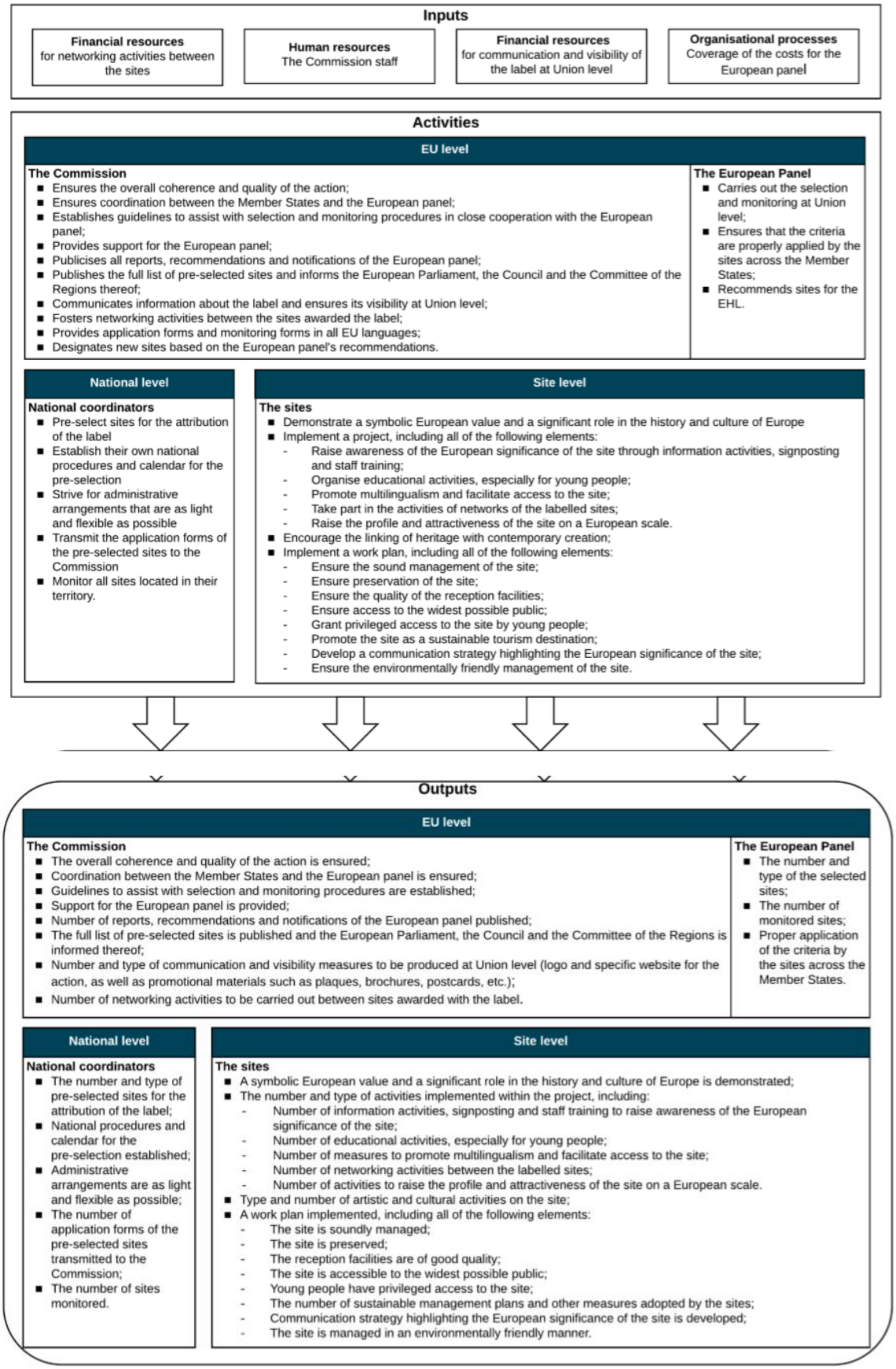
At a more basic level, a set of specific objectives will relate to the direct improvements that sites would be expected to deliver because of their activities linked to the EHL designation or that the new practical arrangements would be expected to deliver. The sites themselves shall seek to attain the following specific objectives:

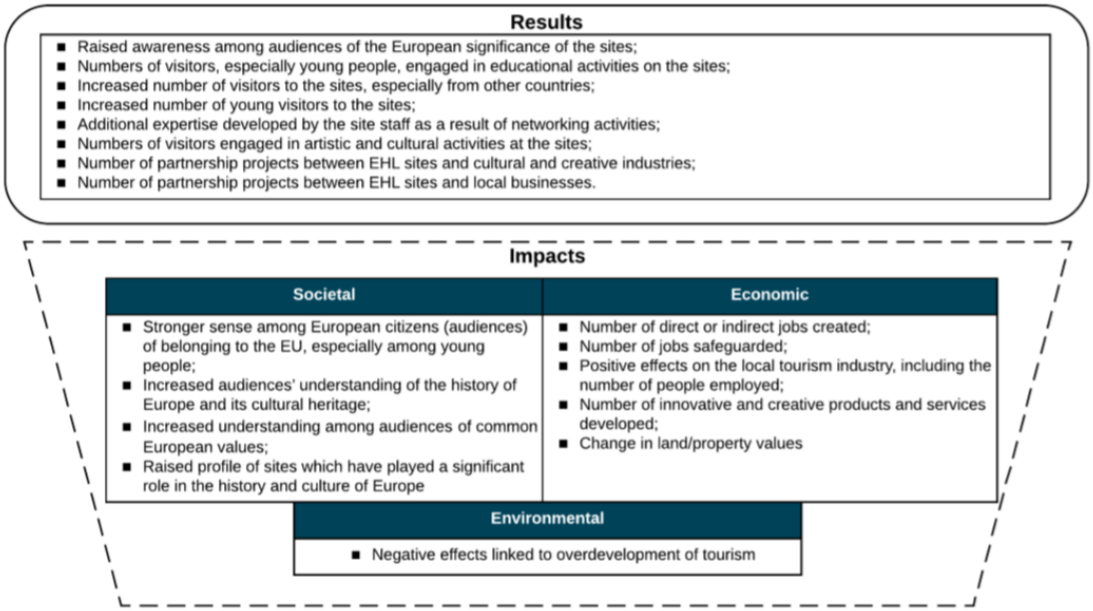
- Highlighting their European significance.
- Raising European citizens; awareness of their common cultural heritage, especially that of young people.
- Facilitating the sharing of experiences and exchanges of best practices across the Union.
- Increasing and/or improving access for all.
- Increasing intercultural dialogue through artistic, cultural and historical education.
- Fostering synergies between cultural heritage on one hand and contemporary creation and creativity on the other.
- Contributing to the attractiveness and the economic and sustainable development of regions, in particular through cultural tourism.

The EHL brings together outstanding heritage sites with a symbolic European value. All the labelled sites have played a significant role in the history and culture of Europe or in European integration. Visitors can enjoy European Heritage sites as single destinations or as a part of a tour. Either way, the will get a real feel for the breadth and scale for what Europe has offer and what it has achieved.To be assigned the EHL sites must have a symbolic European value, 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 strengthen the relationship between the European Union and its citizens and must possess adequate capacities to implement in these activities.

The objectives, expected outputs and impacts are presented in the table below.


General objectives
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;
Strengthen intercultural dialogue.
Intermediate objectives
Stress the symbolic value and raise the profile of sites which have played a significant role in the history and culture of Europe and/or the building of the Union;
Increase European citizens' understanding of the history of Europe and the building of the Union, and of their common yet diverse cultural heritage, especially in relation to the democratic values and human rights that underpin the process of European integration.
Specific objectives to be achieved by the sites
Highlight their European significance;
Raise European citizens' awareness of their common cultural heritage, especially that of young people;
Facilitate the sharing of experiences and exchanges of best practices across the Union;
Increase and/or improve access for all, especially young people;
Increase intercultural dialogue, especially among young people, through artistic, cultural and historical education;
Foster synergies between cultural heritage on the one hand, and contemporary creation and creativity on the other;
Contribute to the attractiveness and the economic and sustainable development of regions, in particular through cultural tourism.
Operational objectives
EU level
The Commission
Ensure the overall coherence and quality of the action;
Ensure coordination between the Member States and the European panel;
Establish guidelines to assist with selection and monitoring procedures in close cooperation with the European panel;
Provide support for the European panel;
Publicise all reports, recommendations and notifications of the European panel;
Publish the full list of pre-selected sites and inform the European Parliament, the Council and the Committee of the Regions thereof;
Communicate information about the label and ensure its visibility at Union level;
Foster networking activities between the sites awarded the label;
Provide application forms and monitoring forms in all EU languages;
Designate new sites based on the European panel's recommendations.
The European Panel
Carries out the selection and monitoring at Union level;
Ensures that the criteria are properly applied by the sites across the Member States;
Recommends sites for the EHL.
National level
National coordinators
Pre-select sites for the attribution of the label
Establish their own national procedures and calendar for the pre-selection
Strive for administrative arrangements that are as light and flexible as possible
Transmit the application forms of the pre-selected sites to the Commission
Monitor all sites located in their territory
Site level
The sites
Demonstrate a symbolic European value and a significant role in the history and culture of Europe
Develop a project
Develop a work plan


Inputs
Financial resources
for networking activities between the sites
Human resources
The Commission staff
Financial resources
for communication and visibility of the label at Union level
Organisational processes
Coverage of the costs for the European panel
Activities
EU level
The Commission
Ensures the overall coherence and quality of the action;
Ensures coordination between the Member States and the European panel;
Establishes guidelines to assist with selection and monitoring procedures in close cooperation with the European panel;
Provides support for the European panel;
Publicises all reports, recommendations and notifications of the European panel;
Publishes the full list of pre-selected sites and informs the European Parliament, the Council and the Committee of the Regions thereof;
Communicates information about the label and ensures its visibility at Union level;
Fosters networking activities between the sites awarded the label;
Provides application forms and monitoring forms in all EU languages;
Designates new sites based on the European panel's recommendations.
The European Panel
Carries out the selection and monitoring at Union level;
Ensures that the criteria are properly applied by the sites across the Member States;
Recommends sites for the EHL.
National level
National coordinators
Pre-select sites for the attribution of the label
Establish their own national procedures and calendar for the pre-selection
Strive for administrative arrangements that are as light and flexible as possible
Transmit the application forms of the pre-selected sites to the Commission
Monitor all sites located in their territory.
Site level
The sites
Demonstrate a symbolic European value and a significant role in the history and culture of Europe
Implement a project, including all of the following elements:
Raise awareness of the European significance of the site through information activities, signposting and staff training;
Organise educational activities, especially for young people;
Promote multilingualism and facilitate access to the site;
Take part in the activities of networks of the labelled sites;
Raise the profile and attractiveness of the site on a European scale.
Encourage the linking of heritage with contemporary creation;
Implement a work plan, including all of the following elements:
Ensure the sound management of the site;
Ensure preservation of the site;
Ensure the quality of the reception facilities;
Ensure access to the widest possible public;
Grant privileged access to the site by young people;
Promote the site as a sustainable tourism destination;
Develop a communication strategy highlighting the European significance of the site;
Ensure the environmentally friendly management of the site.
Outputs
EU level
The Commission
The overall coherence and quality of the action is ensured;
Coordination between the Member States and the European panel is ensured;
Guidelines to assist with selection and monitoring procedures are established;
Support for the European panel is provided;
Number of reports, recommendations and notifications of the European panel published;
The full list of pre-selected sites is published and the European Parliament, the Council and the Committee of the Regions is informed thereof;
Number and type of communication and visibility measures to be produced at Union level (logo and specific website for the action, as well as promotional materials such as plaques, brochures, postcards, etc.);
Number of networking activities to be carried out between sites awarded with the label.
The European Panel
The number and type of the selected sites;
The number of monitored sites;
Proper application of the criteria by the sites across the Member States.
National level
National coordinators
The number and type of pre-selected sites for the attribution of the label;
National procedures and calendar for the pre-selection established;
Administrative arrangements are as light and flexible as possible;
The number of application forms of the pre-selected sites transmitted to the Commission;
The number of sites monitored.
Site level
The sites
A symbolic European value and a significant role in the history and culture of Europe is demonstrated;
The number and type of activities implemented within the project, including:
Number of information activities, signposting and staff training to raise awareness of the European significance of the site;
Number of educational activities, especially for young people;
Number of measures to promote multilingualism and facilitate access to the site;
Number of networking activities between the labelled sites;
Number of activities to raise the profile and attractiveness of the site on a European scale.
Type and number of artistic and cultural activities on the site;
A work plan implemented, including all of the following elements:
The site is soundly managed;
The site is preserved;
The reception facilities are of good quality;
The site is accessible to the widest possible public;
Young people have privileged access to the site;
The number of sustainable management plans and other measures adopted by the sites;
Communication strategy highlighting the European significance of the site is developed;
The site is managed in an environmentally friendly manner.



2.3. Baseline

The original concept of the EHL emerged in 2005 as one of the responses to the gap between the European Union and its citizens. This gap can be attributed to an important extent to a lack of knowledge of the history of Europe, of the role of the European Union and of the values on which it is based.

The scheme was initially launched by several European states in April 2006 on an intergovernmental basis. Its aim was to strengthen European citizens' sense of belonging to Europe and to promote a sense of European identity by improving knowledge of Europe as shared history and heritage, especially among young people. A total of 64 sites located in 17 European Union Member States as well as in Switzerland have been awarded the label. However, the practical arrangements for the initiative have shown some weaknesses and it has not therefore managed to fulfil its potential. This is why, following the example of the European Capitals of Culture, the Member States asked the European Commission in the Council conclusions of November 2008 to transform the intergovernmental EHL into a formal action of the European Union in order to improve its functioning and ensure its long-terms success.

European Union involvement in the EHL was expected to strengthen coordination between Member States and thus to contribute to the development and proper application of common, clear and transparent selection criteria, as well as a new selection and monitoring procedures for the label, thereby ensuring the relevance of the sites in the light of the objectives. Other expected benefit of European Union action was an increase in the number of Member States participating in the initiative.

The European Parliament supported the development of the EHL, first in its resolution of 29 November 2007 on a Renewed European Union Tourism Policy: Towards a stronger partnership for European Tourism where it proposes "that support be given for the creation of a European Heritage label aimed at highlighting the European dimension of the European Union's sites and monuments" and subsequently in its resolution of 10 April 2008 on a European agenda for

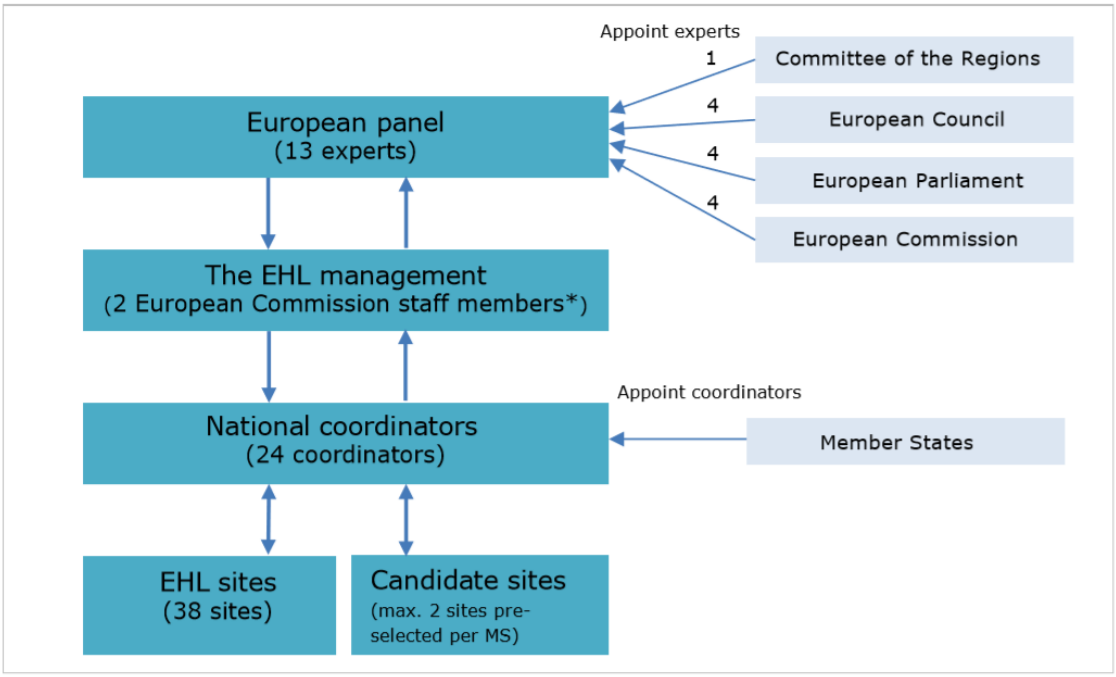
culture in a globalising world in which it underlines "that European heritage label should be established with a view to emphasising the European dimension of cultural goods, monuments, memorial sites, and places of remembrance, which all bear witness to Europe's history and heritage".

Following the Council's conclusions and in line with its procedures, the European Commission launched an impact assessment with the aim to determine whether action by the EU was indeed justified in this area, whether it could really add value to the EHL and, if this is the case, which form this action should take. The analysis of the various impacts has demonstrated that the primary direct effects of the EHL would be social or societal ones. These effects would include increased access to heritage sites, notably for young people, increased interest in and knowledge of common European heritage, increased understanding of European cultural diversity, an increase in intercultural dialogue and a greater sense of belonging to the European Union.

Economic benefits could also be expected as the EHL has the potential to produce positive effects on the local tourism industry, including the number of people employed. However the impact on the number of visitors to a site will greatly depend on the quality and credibility the label will acquire and thus on the prestige it will develop over the years.

3. IMPLEMENTATION / STATE OF PLAY

The operational structure of the action was established in 2011 taken directly from Decision No.1194/2011/EU. The adopted legal basis calls for the European Commission to implement a two-stage selection process (nationally and at the EU level). The legal basis created common selection criteria and the European panel to oversee the initiative.



Implementation of the Label occurred in two stages, preparatory and transitional.[6] The transition period occurred between 2013 and 2014 from the intergovernmental initiative. Starting in 2015 after the end of the transition period, the EHL is managed in three stages: selection, monitoring, and evaluation. Selection occurs every two years with a maximum of one site per Member State. Every four years there will be monitoring and every six years there will be an external evaluation of the action. This staff working document accompanies the evaluation report of the European Heritage Label submitted in accordance with Article 18 of Decision 1194/2011/EU of the European Parliament and of the Council.[7]

2013 and 2014, the first two years of the action at the European Union level, were transition years: in 2013 participation was restricted to those Member States that had not taken part in the intragovernmental initiative. Austria, Denmark, Estonia, Luxemburg and Netherlands confirmed their interest and sent applications. Four sites were labelled.

Archaeological Site of Carnuntum	Petronell-Carnuntum (Austria)
Great Guild Hall	Tallinn (Estonia)
Peace Palace	The Hague (Netherlands)
Camp Westerbork	Hooghalen (Netherlands)

2014 was reserved for candidate sites from the Member States that had been involved in the intergovernmental initiative. 18 Member States confirmed their interest and sent applications. 16 new sites were included in the Label list.

Heart of Ancient Athens	Athens (Greece)
Abbey of Cluny	Cluny (France)
Archive of the Crown of Aragon	Barcelona (Spain)
General Library of the University of Coimbra	Coimbra (Portugal)
Union of Lublin (1569)	Lublin (Poland)
Sites of the Peace of Westphalia (1648)	Munster and Osnabruck (Germany)
3 May 1791 Constitution	Warsaw (Poland)
Hambach Castle	Hambach (Germany)
Charter of Law for the Abolition of the Death Penalty (1867)	Lisbon (Portugal)
Student Residence or Residencia de Estudiantes	Madrid (Spain)
Kaunas of 1919-1940	Kaunas (Lithuania)
Franja Partisan Hospital	Cerkno (Slovenia)
Robert Schuman's House	Scy-Chazelles (France)
Alcide de Gasperi's House Museum	Pieve Tesino (Italy)
Historic Gdansk Shipyard	Gdansk (Poland)
Pan-European Picnic Memorial Park	Sopron (Hungary)

Since 2015, the selection process takes place every other year and participation is open to all Member States provided that they confirmed their interest. In 2015, 24 Member States confirmed their interest in the EHL and eleven sent applications. Nine sites were labelled.

Neanderthal Prehistoric Site and Kaprina Museum	Husnjakovo/Kaprina (Croatia)
Olomouc Premyslid Castle and Archdiocesan Museum	Olomuc (Czech Republic)

[6] Decision No. 1194/2011/EU.

[7] OJ L 303/1, 22.11.2011

Sagres Promontory	Sagres (Portugal)
Imperial Palace	Viena (Austria)
Historic Ensemble of the University or Tartu	Tartu (Estonia)
Franz Liszt Academy of Music	Budapest (Hungary)
Mundaneum	Mons (Belgium)
World War I Eastern Front Cemetery No.123	Luzna-Pustki (Poland)
European District of Strasbourg	Strasbourg (France)

In 2017, the European Commission received applications from 25 candidate sites in 19 Member States. Four Member States participated for the first time and four out of the 25 candidates sites were transnational sites: the applications demonstrate a broader geographical range and a trend towards larger scale applications. In terms of heritage typologies, the candidate sites belonged to more traditional heritage such as castles and fortifications. The Panel recommends nine new EHL sites, six sites present the European history and culture and three sites are related to European integration.

Leipzig's Musical Heritage Sites	Leipzig (Germany)
Dohany Street Synagogue Complex	Budapest (Hungary)
Fort Cadine	Trento (Italy)
Javorca Church and its cultural landscape	Tolmin (Slovenia)
Former Natzweiler concentration camp and its satellite camps	Alsace-Moselle, Haut Rhin (France) Baden-Wurttemberg, Hessen, Rhineland-Palatinate (Germany)
Sighet memorial	Sighet (Romania)
Bois du Cazier	Marcinelle (Belgium)
Village of Schengen	Schengen (Luxembourg)
Maastrich Treaty	Maastrich (Netherlands)

Up to now, 25 Member States have confirmed they wish to take part in the EHL. Sweden and Ireland will not participate for the time being, but can join the initiative later if they wish. The EHL should focus on developing its identity within Member States before extending its geographical scope. First, the EHL should look to include all Member States before it expands to non-EU states. At this point, expanding the Label in its early stages of development appears premature.

Several candidate sites had a link to other EU initiatives, but this does not result in being automatically awarded the Label because the sites must meet the three specific EHL criteria. In particular, not all applicants had fully understood to what extent presenting the European dimension of their site is paramount: if the dimension of a site is not well established or articulated, the projects presenting the European significance of the site to European audiences almost never meet the threshold for the Label.

EHL sites are gateways to information about Europe's history, culture and integration, and further questioning. For the European institutions, the EHL sites are excellent examples to illustrate and explain current challenges to the citizens, in particular through social media, because the sites provide contextual information. All EHL sites have an enormous potential for education including the sites linked to more recent events and history.

The European Panel has gained experience based on four selection years and one monitoring year. It has streamlined its working methods and paid special attention to building up and maintaining institutional memory as its composition evolves over the years.

Sites awarded the EHL are monitored on a regular basis in order to ensure that they continue to meet the criteria for which they were selected. 2016 was the first monitoring year and the European Expert Panel examined the sites awarded in 2013 and 2014. The next monitoring year will take place in 2020 and will include all sites that received the label prior to 2019.

4. METHOD

4.1 Short description of methodology

This is the first evaluation of the European Heritage Label Action. The methodology employed two broad types of method for data collection: desk research and stakeholder consultation. The latter included an open public consultation (OPC), interviews and focus groups. Quantitative data was collected via the OPC and desk research while qualitative data was obtained through interviews, focus groups and desk research. The main evaluation sources can be identified as follows:

Desk Research:

The Impact Assessment and 2009 Open Public Consultation Report provided an assessment of the previous intergovernmental initiative as well as stakeholder expectations in regards to the new EU-level action. These were the main sources used to reconstruct the intervention logic of the EHL.

The evaluation team analysed all application forms from the 2013-2017 period consisting of selected and non-selected candidates, for a total of 88 forms. Emphasis of the analysis was placed on the sites' articulation of their European significance, work plans and outlines of their operational capacities.

The Panel Reports on the 2013, 2014, 2015, 2017 selections[8] produced by European Panel members were analysed to determine how sites were selected, to classify them into categories and to assess their geographic distributions. The Panel Reports were also indicative of the quality of applications and contained suggestions for improvements.

The evaluation team analysed all monitoring forms from the 20 sites that participated in the 2016 monitoring process, and simplified monitoring forms from eight sites that were not involved in the monitoring process, but which were covered by this evaluation. The Panel constructed the 2016 Panel Report on Monitoring, which provided information on the benefits and challenges faced by the EHL sites and recommendations made to the sites by the EHL Panel. The report was used extensively in this evaluation.

Stakeholder Consultation:

[8] https://ec.europa.eu/programmes/creative-europe/sites/creative-europe/files/library/ehl-2013-panel-report_en.pdf
https://ec.europa.eu/programmes/creative-europe/sites/creative-europe/files/library/ehl-2014-panel-report.pdf
https://ec.europa.eu/programmes/creative-europe/sites/creative-europe/files/library/ehl-2015-panel-report_en.pdf
https://ec.europa.eu/programmes/creative-europe/sites/creative-europe/files/library/ehl-2017-panel-report_en.pdf

Open public consultation.	103 responses.
Interviews.	30 managers/senior staff members EHL sites. 5 managers' non-selected sites. 21 national coordinators. 7 members of European Panel. 8 EHL manager Commission and EU actions in cultural heritage. 2 external experts. 3 representative stakeholders' networks and organisations.
Focus discussions	10 (covered 19 EHL sites).

During the evaluation, the following stakeholder categories were targeted:

- Those affected by the action (citizens).
- Those who implement the action (EHL site managers, national coordinators, members of the European panel of experts, 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, etc.).

The open public consultation (OPC) gathered views on all interested citizens and organizations on the role of cultural heritage in bringing the European citizens closer to the Union. Consultation was carried out via an online questionnaire accompanied by a background document. The scope of the OPC covered the visibility of the Label, as well as the relevance, coherence, effectiveness, efficiency and EU added value. The questionnaire covered 15 questions, seven targeting the general public and eight for those involved in the action. The questionnaire was published for 12 weeks (1 March 2018 - 28 May 2018) on a dedicated consultation webpage and was made available in three EU languages (English, French and German). In total, it received 103 responses of which one was not valid.

Interviews were crucial in obtaining data on the perceptions and attitudes of respondents towards the EHL. 76 interviews were conducted by the evaluation team with different stakeholder groups and conducted in a semi-structured manner and followed interview guidelines tailored for each specific stakeholder group. The sample size was proposed in the Inception Report and aimed to cover different types of non-selected sites.

A programme of site-specific and national-level focus groups was also used in the evaluation to provide a platform for various stakeholders to discuss the EHL action within a local or national context. 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), Munster and Osnabruck (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.

4.2 Limitations and robustness of findings

The weaknesses in the methods applied and data collected were as follows:

- Due to variations in the methodology used to monitor different EHL sites with no common indicators to measure progress, it is difficult to compare site-specific data on progress. In these situations further data was collected from other sources (interviews, websites or request in writing) to triangulate findings and ensure validity.
- A few of the interviewees (national coordinators and EHL site managers) were new to their positions and could not provide an informed opinion on EHL processes. Nevertheless, the majority of interviewees provided good insights, and thus provided sufficient data for analysis.
- As the evaluation drew upon answers from interviews, focus groups and OPC to draw certain opinions and perceptions, the data represents evidence where an evaluation question or sub-question was naturally influenced by the respondents' affiliation with the EHL. The evaluation, therefore, corroborated perception-based sources with other sources of evidence – in particular, data from desk research.
- One change was required to the original work plan, as one of the sites refused to host a group discussion. This site was replaced with another site with similar characteristics.
- Evaluators took into account that the OPC does not provide a representative view of the public opinion on the EHL. For this reason, the OPC was not used as the main data source. All data conclusions drawn were based on triangulated data.

5. ANALYSIS AND ANSWERS TO THE EVALUATION QUESTIONS

All figures appearing in the following sub-sections have been drawn directly from the external evaluation report conducted by PPMI and EDUCULT. The reader will find many more examples illustrating the conclusions presented below in the full document.[9]

The evaluation results are given with respect to the five criteria of relevance, coherence, efficiency, effectiveness and EU added value. Often, examples and figures can illustrate different points made under the sub-sections. For ease of reading, repetitions have been limited and the reader is invited to correlate some conclusions presented below with information given in other sub-sections.

5.1 Relevance

5.1.1 The EHL objectives and current needs in the EU

Since the Maastricht Treaty of 1992, the EU has 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). Article 167 of the Treaty on the Functioning of the European Union reconfirmed the commitment of the EU to cultural heritage and called upon the EU to bring its common cultural heritage to the forefront and support the efforts of Member States to safeguard their heritage. Article 167 is characterized by the principle of subsidiarity, meaning that the EU must respect the national importance and interpretation of sites, while offering a European dimension to their interpretation that highlights a common European history.

[9] Evaluation of the European Heritage Label Action. Report:https://publications.europa.eu/en/publication-detail/-/publication/6d66be3f-8d84-11e9-9369-01aa75ed71a1/language-en/format-PDF/source-99344265 Summaries:https://publications.europa.eu/en/publication-detail/-/publication/6699e8c5-8d85-11e9-9369-01aa75ed71a1/language-en/format-PDF/source-99344284 Annexes:https://publications.europa.eu/en/publication-detail/-/publication/2c883308-8d89-11e9-9369-01aa75ed71a1/language-en/format-PDF/source-99344296

In 2014 the Council of the EU published the "Council conclusions on participatory governance of cultural heritage", which highlighted 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"[10]. The participatory approach is reflected in the aims of the objectives of the EHL.

To assess if the EHL objectives are relevant to the current needs of the EU, the following indicators were applied:

- The extent to which the action considers current societal and political developments;
- The extent to which the actions objectives are consistent with EU policy goals;
- The extent to which the action establishes a contemporary understanding of cultural heritage in Europe;
- The extent to which the action considers the needs of EU citizens in the field of cultural heritage.

The Impact Assessment identified several needs[11] in relation to the EU: 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 cultural heritage. The Label seeks to address the growing gap between Europe's citizens and the European Union and to promote access to Europe's cultural heritage. The responses from the OPC indicated that a large majority thought it was 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).

Current EU policy goals in the field of culture are determined in the New European Agenda for Culture, published in 2018. Its strategic objectives are categorized in three dimensions:

- Social dimension, harnessing the power of culture and cultural diversity for social cohesion and well-being.
- Economic dimension, supporting culture-based creativity in education and innovation, as well as jobs and growth.
- External dimension, strengthening international cultural relations.[12]

The examples above demonstrate that the EHL is in accordance with the 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 goals identified in the New European Agenda for Culture.[13]

The European Year of Cultural Heritage 2018 (EYCH), implemented by Creative Europe, motivated many EHL sites to implement activities or be involved with activities taking place within the frame of the EYCH. Creative Europe puts European cooperation at the core of its

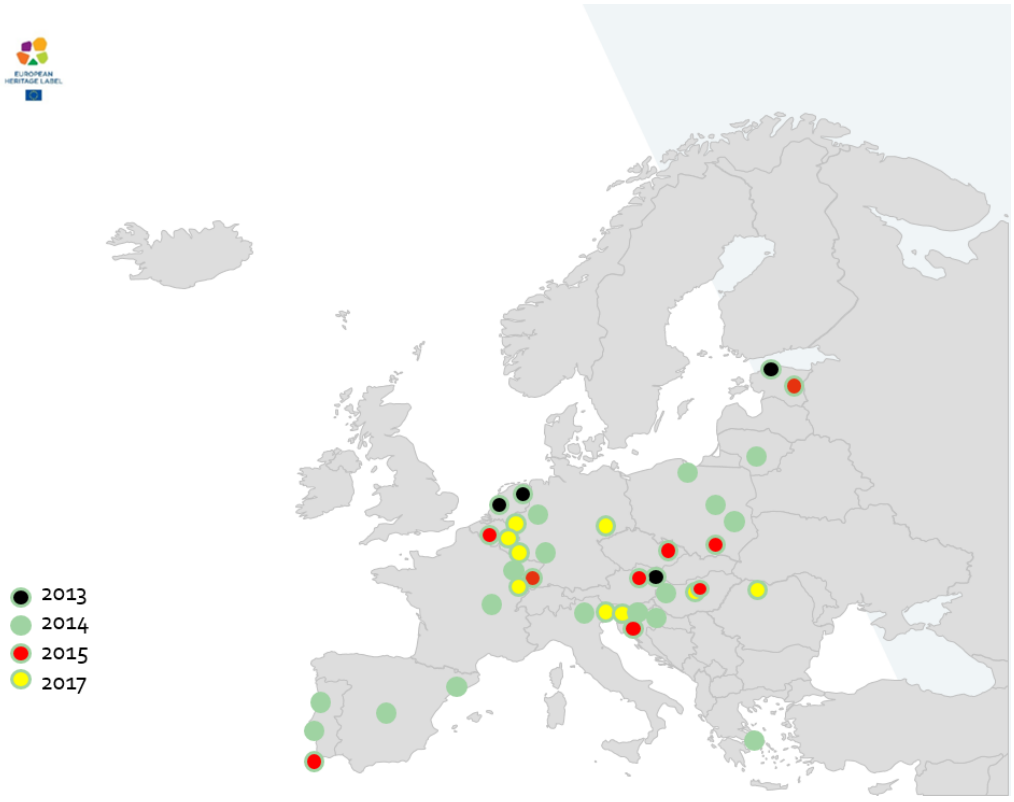
[10] Council Conclusions on participatory governance of cultural heritage (2014/C 463/01), 23.12.2014.
[11] Impact Assessment, p.5. The needs of EU do not seem to have changed in nature since the Impact Assessment was carried out, but do appear to have increased.
[12] Communication from the Commission 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 , 22.5.2018, pp. 2-8.
[13] *A New European Agenda for Culture*, COM (2018) 267, 22.05.2018.

programme. The 2018 Annual Work Programme of Creative Europe mentions that "Cooperation projects will continue to represent the main bulk of EU support in 2018".[14]

Participants in the OPC agreed that it was important for the EU to raise awareness of common European history and values (94% agreed, 64% of which agreed strongly), and to reinforce a sense of belonging to a common European space (92% agreed, 61% agreed strongly). The participants also indicated it was important to promote access to cultural heritage through the use of digital technologies (91% agreed, 58% agreed strongly). The EHL needs to establish a network of sites to reinforce cooperation activities in addition to the collaboration projects undertaken by half of the EHL sites. Interviewees mentioned that transnational sites offer a valuable opportunity for cross-border cooperation but these were not sufficiently established within the scheme.

5.1.2 The geographical scope

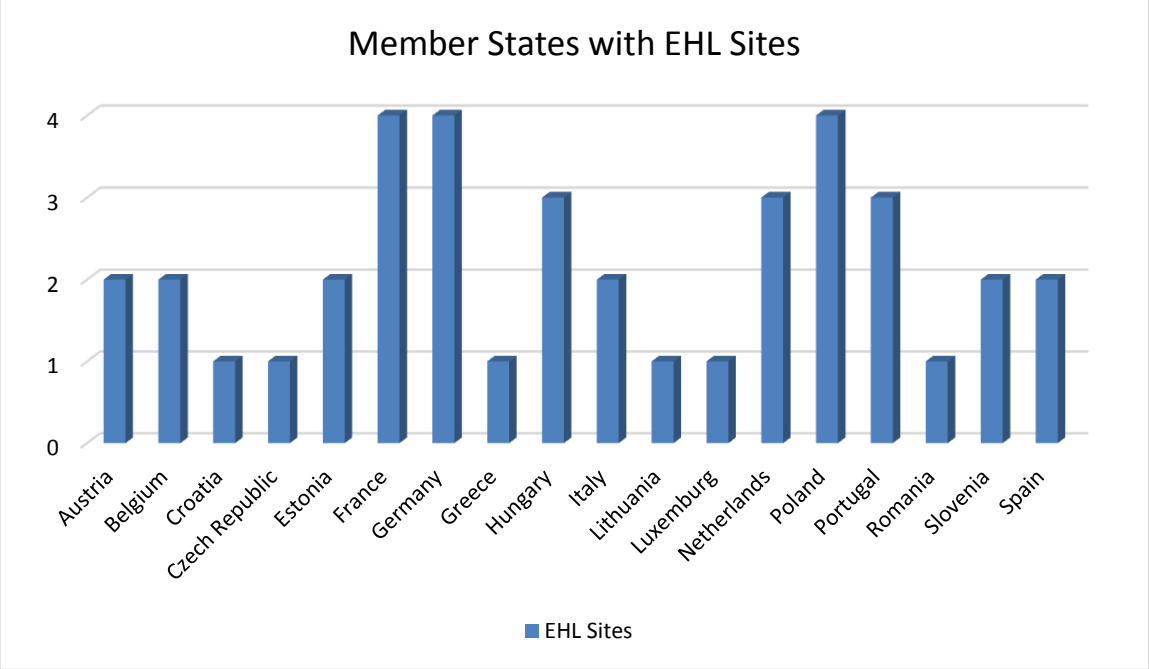
It is observed that the geographical scope and distribution of the labelled sites in the EU action has narrowed in comparison with the intergovernmental EHL. This has occurred due to the EU action being only open to Member States, therefore Switzerland was not eligible to continue participating. Secondly, the selection process at the EU level appears to be a barrier to the geographical distribution of EHL sites. Currently, Denmark, Bulgaria, Cyprus, Latvia and Slovakia, all of which held the Label under the previous initiative, have no sites that have passed the selection at the EU-level.

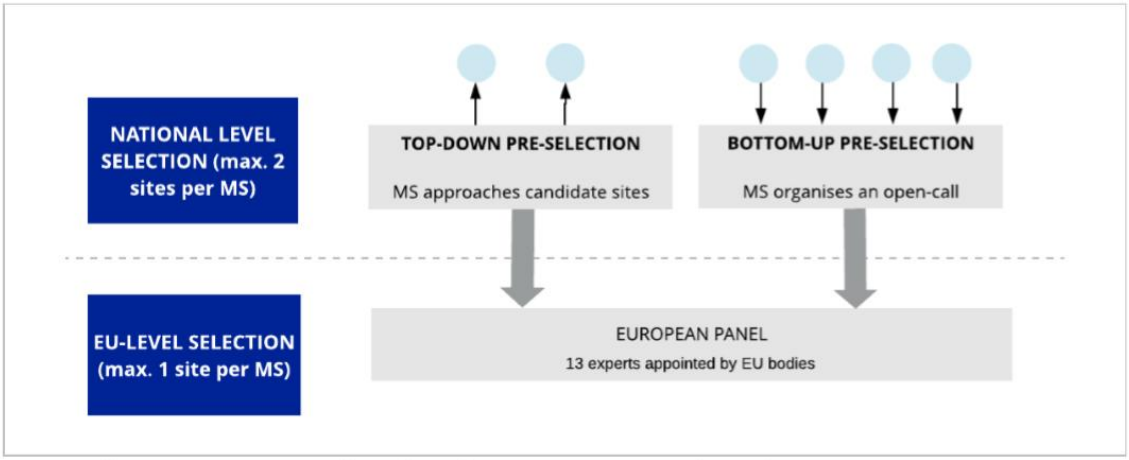


AUSTRIA (2)	Archaeological Site of Carnuntum Imperial Palace Viena	2013 2015
BELGIUM (2)	Mundaneum	2015

[14] 2018 Annual work programme for the implementation of the Creative Europe Programme. C(2017)6002 of 6 September 2017, p.10.

	Bois du Cazier	2017
CROATIA (1)	Neanderthal Prehistoric Site and Krapina Museum	2015
CZECH REPUBLIC (1)	Olomouc Premysild Castle and Archdiocesan Museum	2015
ESTONIA (2)	Great Guild Hall Historic Ensemble of the University of Tartu	2013 2015
FRANCE (4)	Abbey of Cluny Robert Shuman's House European District of Strasbourg Former Natzweiler concentration camps (with GERMANY)	2014 2014 2015 2017
GERMANY (4)	Sites of the Peace of Westphalia (1648) Hambach Castle Leipzig's Musical Heritage Sites Former Natzweiler concentration camps (with FRANCE)	2014 2014 2017 2017
GREECE (1)	Heart of Ancient Athens	2014
HUNGARY (3)	Pan-European Picnic Memorial Park Franz Liszt Academy of Music Dohany Street Synagogue Complex	2014 2015 2017
ITALY (2)	Alcide de Gasperi's House Museum Fort Cadine	2014 2017
LITHUANIA (1)	Kaunas of 1919-1940	2014
LUXEMBURG (1)	Village of Schengen	2017
NETHERLANDS (3)	Peace Palace Camp Westerbork Maastricht Treaty	2013 2013 2017
POLAND (4)	Union of Lublin (1569) 3 May 1791 Constitution Historic Gdansk Shipyard World War I Eastner Front Wartime Cemetery No.123	2014 2014 2014 2015
PORTUGAL (3)	General Library of the University of Coimbra Charter of Law for the Abolition of the Death Penalty Sagres Promontory	2014 2014 2015
ROMANIA (1)	Sighet Memorial	2017
SLOVENIA (2)	Franja Partisan Hospital Javorca Memorial Church and its cultural landscape	2014 2017
SPAIN (2)	Archive of the Crown of Aragon Student Residence	2014 2014





However, the EU-level action has attracted Member States that were not previously involved, including Austria, Croatia, Estonia, Luxembourg, and the Netherlands. Currently, the EU initiative has 38 sites (2013-2017) in 18 countries while the previous initiative had 68 sites in 19 countries (2006-2011). In conclusion, the geographical location has narrowed under the EU action and has not resulted in the participation of all Member States.

This evaluation identified that the biggest difference between the objectives of selected and non-selected sites was the European dimension. 89% of selected sites describe sensitizing to the site's European values and history' as one of their objectives while only 10% of non-selected choose this. These findings confirm the relevance and defining role of the first selection criteria for the EHL action.

5.2 Coherence

The 2010 Impact Assessment found that EHL differs from other initiatives and has the potential to add value in terms of a European dimension, pedagogy and networking.[15] The evaluation found that the EHL is a distinctive initiative within the EU. The Label places emphasis on raising European citizens' awareness of European history and culture rather than emphasis on the preservation of sites. Analysis of other EU and international initiatives revealed that the Label shares similarities with other EU initiatives and programmes in the cultural field: European Capitals of Culture (ECOC)[16], Europe for Citizens[17], and Cultural Routes of the Council of Europe.[18] The EHL is complementary to the ECOC, as EHL activities can be viewed as further enhancing the European dimension of cultural heritage sites, which receive less coverage in the ECOC action. The data collected revealed some examples of complementary activities between the EHL and ECOC at the national level. The ECOC title was awarded to Mons, Belgium (2015), while the EHL was awarded to the *Mundaneum*[19] in Mons, and the site participated in events organized in the ECOC year. The *Mundaneum* reported in its 2016 monitoring form that the ECOC had helped it develop a dialogue with artists.

The analysis revealed potential for establishing synergies with EU programmes in the fields of culture, education and citizenship (e.g. Europe for Citizens programme, Erasmus+ programme, European Capitals of Culture, etc.). The Erasmus+ Key Action 1 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 operation capacity and engaging youth. Key Action 2 of Erasmus+ provides opportunity under Strategic Partnerships, which could also be explored by EHL sites. The EHL could also benefit from the increasing number of mobility opportunities established in the New

[15] Impact Assessment.

[16] **European Capitals of Culture,** was developed in 1985 and has, to date, been awarded to more than 50 cities across the European Union. European Capitals of Culture are formally designated four years before the actual year. The idea is to put cities at the heart of cultural life across Europe. Through culture and art, European Capitals of Culture improve the quality of life in these cities and strengthen their sense of community. Citizens can take part in the year-long activities and play a bigger role in their city's development and cultural expression. Capitals of Culture highlight the richness of Europe's cultural diversity and take a fresh look at its shared history and heritage. They promote mutual understanding and show how the universal language of creativity opens Europe to cultures from across the world.

[17] **Europe for Citizens Programme** adopted for the period 2014-2020 is an important instrument aimed at getting the Union's 500 million inhabitants to play a greater part in the development of the Union. By funding schemes and activities in which citizens can participate, the Programme is promoting Europe's shared history and values, and fostering a sense of ownership for how the Union develops.

[18] **Cultural Routes of the Council of Europe** are transnational grass-roots networks. Since 1987, they act as channels for intercultural dialogue and promote a better knowledge and understanding of European shared heritage. Over 30 networks certified "Cultural Route of the Council of Europe" provide a wealth of leisure and educational activities across Europe and beyond. They cover a range of different themes such as architecture, cultural landscape, gastronomy or major figures of European art, music and literature. Through its programme, the Council of Europe offers a model for transnational cultural and tourism management and allows synergies between national, regional and local authorities and a wide range of associations and socio-economic actors. The networks crossed more than 50 countries in Europe and beyond, and federate over 1600 members working towards cultural democracy and diversity but also mutual understanding and exchanges across boundaries.

[19] A landmark in the intellectual and social fabric of Europe. The Mundaneum's aim was to gather all information available in the world, regardless of its medium (books, newspapers, postcards…) and to classify it according to a system the fondateurs developed: the Universal Decimal Classification.

European Agenda for Culture[20], for which the Commission launched an open call to prepare the ground for a mobility scheme in the creative and cultural sectors from 2021 onwards in the next generation of EU programmes.[21]

Risk of overlap was revealed in the evaluation with the Cultural Routes of the Council of Europe, with substantial similarities between the objectives pursued by the two actions. While some similarities exist in terms of processes, differences are evident with respect to the actions' outputs. The evaluation identified a trend within the EHL to award the Label more frequently to sites that focus on the 20th century, while Cultural Routes display little focus on this historical period. The design of the EHL allows the recognition of sites that are important to European integration, culture or history, but which do not possess many thematic connections with other places in Europe unlike the Cultural Routes. Some interviewees and OPC respondents highlighted similarities between the EHL and UNESCO programmes. However, the mapping of objectives revealed little overlap between the programmes. The UNESCO World Heritage List emphasises the preservation of sites and awards sites based on their Outstanding Universal Value (OUV), promoting a panhuman approach to cultural heritage while the EHL places less emphasis on preservation and instead focuses on raising European citizens' awareness of European history and culture.

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											
Strengthening European citizens' sense of belonging to the Union	No	No	No	No	Medium	Low	Medium	High	High	High	High
Strengthening intercultural dialogue	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

[20] *A New European Agenda for Culture*, COM (2018) 267, 22.05.2018.

[21] European Commission, Mobility Scheme for Artists and/or Culture Professionals. Available at: https://ec.europa.eu/programmes/creative-europe/calls/eac-18-2018_en

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 REOCCURING IN SEVERAL OBJECTIVES											
Targeting the needs of young people	Medium	Medium	No	No	Medium	Low	High	Medium	Low	Medium	Low

Given that the EHL is a recent initiative, it can be assumed that greater synergies will be developed in the upcoming years. Great synergies were already developed in 2018 with the launch of two different calls that offer potential benefits to the EHL action and its sites – the European Heritage Stories and the call to support networking and cooperation among EHL sites. The call for 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. The call is associated with the European Year of Cultural Heritage (EYCH) 2018.[22] 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.[23] The five EHL sites that were successful in receiving the grant were: *Heart of Ancient Athens* (Greece); *Camp Westerbork* (Netherlands); *Historic Ensemble of the University of Tartu* (Estonia); and a joint application by the *Peace Palace* (Netherlands) *and the Mundaneum* (Belgium). The second call was launched by the Creative Europe programme in 2018 and was dedicated to the design and management of networking and capacity building activities for EHL sites.[24] 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.

5.3 Efficiency and governance

5.3.1 Application Form

Since the EHL has become an EU-level action, the Commission has reviewed and improved the application form several times. The 2013-2015 selection forms were too complex, and two-thirds

[22] European Heritage Days, Call for European Heritage Stories. Terms and Conditions, p.2. Available at https://www.europeanhertiagedays.com/App_Documents/Uploads/files/JEP(2018)02EN%20Call%20for%20European%20Heritage%20Stories%20TCs%2012Apr18%20a.pdf

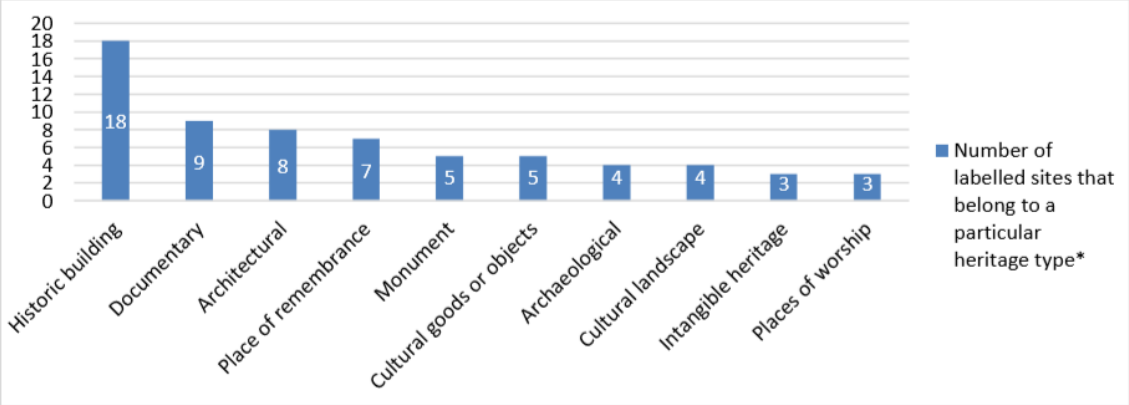
[23] European Heritage Days (2018b), *European Heritage Stories.* Available at: http://www.europeanheritagedays.com/Story/

[24] 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

of the site managers interviewed expressed that the form was too long, repetitive and time-consuming. A new version of the form was introduced in 2017. The 2017 Panel Report indicated that the new form was shorter and easier for candidates to fill-in but could be further improved. Analysis during the evaluation procedure revealed: overlap between the project and work plan sections (communication activities planned to undertake to highlight its European significance II.B.I and II.C.5 of the form, information activities II.B.2 and II.C.3). The 2017 application form also posed difficulties for national thematic and transnational sites to demonstrate how the efforts of different sites/institutions will be coordinated, and required each site of national thematic and transnational sites to each fill in separate application forms.

5.3.2 Efficiency of selection arrangements

The analysis revealed that the action has attracted applicants of diverse types. The figure below demonstrates the visual representation of the labelled sites by the type(s) of cultural heritage they represent.



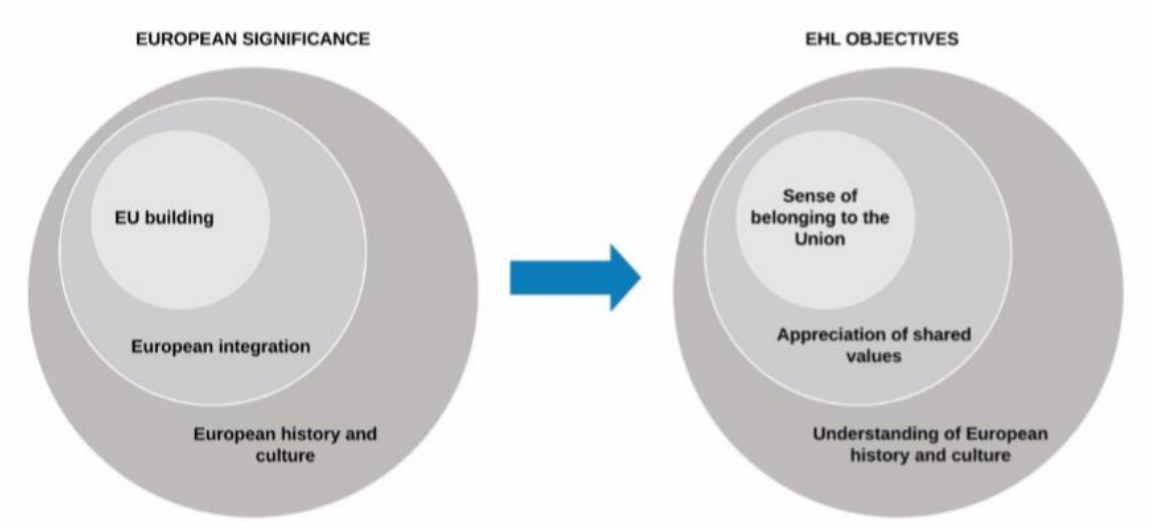
The analysis yields no negative effects stemming from the EHL's current eligibility categories. The current eligibility criteria as set out in the Decision allow for all types of sites be attributed the label as long as the sites have a symbolic European value and played a significant role in the history and culture of Europe and/or the building of the Union.[25] The evaluation considers this an advantage in attracting and uniting a variety of potential sites for the Label.

The Impact Assessment anticipated that the EU-level action would increase the involvement of transnational sites in comparison to the intergovernmental action.[26] The data collected did not indicate a clear reason behind the low level of participation by national thematic and transnational sites. Several factors may contribute to the trend including: the lack of understanding of how to prepare the application, and coordination between states as all entities applying for designation must fill information on their sites individually. A revised application form for the 2017 selection process was introduced but the application could be further unified and simplified.

[25] For the purpose of the Decision, "sites" means monuments, natural, underwater, archaeological, industrial or urban sites, cultural landscapes, places of remembrance, cultural goods and objects and intangible heritage associated with a place, including contemporary heritage (Article 2 of the Decision No 1194/2011/EU).

[26] SEC(2010) 198.

The introduction of common selection criteria was developed for the EHL upon the initiative commencing as an EU-level action. The introduction of a common selection criteria ensures the relevance of the sites to the European Heritage Label's objectives, as the designated sites must clearly define their European significance and commit to implementing activities that achieve the action's objectives. Analysis of the evaluation demonstrates that of the sites labelled in the 2013-2017 period, 34 out of the 28 sites were able to demonstrate their European significance. The common selection criteria clarifies the type of sites represented by the action and positively contributes to the action's identity.



The figure demonstrates that the criterion of European significance provides a framework and the main categories of which the European significance of a site may be defined. Further analysis conducted in the evaluation demonstrates that candidate sites still have difficulty in expressing their European dimension, and the Commission plans on assisting candidate and existing sites develop their narrative. Analysis of the selection criteria demonstrated that while managers of sites and OPC respondents deemed the selection criteria clear, data from interviews and focus groups found that the criterion of European significance was ambiguous and resulted a significant challenge for a majority of non-selected sites. The analysis of the four selection cycles between 2013 and 2017 found that 38 out of 50 non-selected sites failed to meet the criterion. While the legal basis does not establish a hierarchy of the criteria, the European significance has been assumed as the core criterion, so if a site failed to demonstrate the European dimension it would not be in a position to achieve the action's objectives. Currently, the Panel evaluates the projects and work plans of candidate sites who fail to demonstrate the European significance, rendering this part of the process inefficient.

If multiple sites meet the EU-level selection criteria, Article 11-2 of Decision No 1194/2011/EU specifies that the European panel shall select a maximum of one site per participating Member State in each selection year. However, the Decision does not establish how the decision should be made if two sites from a Member State are pre-selected at the national level and both meet the criteria for selection at the EU-level. The Decision also does not clarify if Article 11-2 should be applied to transnational sites. In 2017, the Panel awarded two sites in Germany (Leipzig's Musical Heritage Sites and the Former Natzweiler concentration camp and satellite camps – a

transnational application made by France and Germany).[27] The lack of clarity in the article's application hinders the transparency of selection decision. Panel Reports from 2015 and 2017 suggest that if the legal basis is reviewed, it should consider removing the limit of one site per Member State per selection year.[28] Based on the evaluation findings, stakeholders concur the sentiment and view Article 11-2 in a negative light. The national quotas that were expected to ensure equal distribution of the Label have instead hindered the process.

At the pre-selection level, national coordinators filter the applications to identify the sites that are most relevant to the Action's objectives. The coordinators should be evaluating the extent to which the national sites meet the selection criteria and the EU level. The analysis shows that half of all nationally pre-selected sites did not qualify for selection at the EU level. Between 2013-2017, the EHL was awarded to 38 out of 75 pre-selected sites, a selection rate of 51%. [29] If the selection criteria was applied adequately at the national level, the pre-selected sites should also meet the criteria at the EU level and receive the label unless Article 11-2 is applied.

The EU-level selection is carried out by a European panel consisting of 13 members; four appointed by the European Parliament; four by the Council; four by the Commission; and one by the Committee of Regions as stipulated by the legal basis. Analysis of interviews with European panel members concludes that the overall operation of the Panel is smooth.

Post-selection, managers of selected sites and most OPC respondents perceived the EU-level selection procedures to be transparent. However non-selected sites deemed the feedback insufficient. In order to make the panel's feedback on European significance more specific, the evaluation recommended the use of sub-criteria as follows:

-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 or promoting these values?

The sub-criteria and more specific feedback results in a guiding approach that would encourage applicants to re-apply. In addition, to increase the transparency of the action, scholars recommend making successful applications either fully or partially public (following the ECOC action and UNESCO Heritage Lists). This suggestion could not be implemented under the current arrangements of the action, as selected sites do not currently agree to have their application forms made public.

5.3.3 Efficiency of the monitoring process

A monitoring process was established when the EHL became an EU-level action as no previous monitoring process existed when the action was an intergovernmental initiative. Member States are responsible for the monitoring of all sites and must submit a report every four years to the

[27] 2017 Panel Report.
[28] 2015 Panel Report; 2017 Panel Report.
[29] 2017 Panel Report.

European Panel, via the Commission.[30] The first monitoring year in 2016 covered the 20 sites that had received the Label in 2013 and 2014. The monitoring was report and dialogue based and required sites to report on the progress of the EHL activities they had proposed in their application forms and outlining new activities for the 2016-2020 period. Participating sites were required to present to the Panel and other EHL sites their activities as well as participate in a discussion with panel members.[31] In its current form, the monitoring process is appropriate with the relatively small number of sites, however it could become less practical if the EHL fulfils the vision outlined in the 2017 Panel Report and expands to 100 sites.[32] Since the monitoring process is not outlined in the legal basis, the Panel could consider altering the approach. In the current form, the 2016 monitoring process was perceived positively by sites and panel members, 14 out of the 20 sites perceived it to be useful. OPC results support the conclusion, as most respondents engaged in the action perceived the monitoring as helpful in improving sites' performance. To date, no EHL site has lost the Label.

The 2016 monitoring form included 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); IV) a communication and network sheet. The analysis of the monitoring data shows that most EHL sites demonstrated the capacities to participate in the monitoring process. The Panel recommended in the 2016 Monitoring Report that the form should be revised for 2020 to make it more user-friendly.[33] Additionally, the national-thematic site had been required to submit two separate monitoring forms, like the application forms, and to lighten the administrative burden posed to national-thematic and transnational sites. It is recommended this process be revised.

5.3.4 Efficiency of communication processes

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.[34] The communication of the EHL can be viewed as a three-level process, the framework of which was initiated at the beginning of the action. Analysis of the communication process reveals that EHL sites have not made extensive use of the communication tools provided by the Commission. Visibility of the EHL remains low, but stakeholders involved in the action perceive it has improved in comparison with the intergovernmental label. Analysis of OPC results supports these conclusions, as only 16% of respondents not involved in the action shared the same understanding and knowledge of the EHL. The data collected during focus group and interviews suggests that the Label is not widely recognized among the general public, and even among cultural heritage professionals. Therefore, the Commission needs to emphasize the branding and visibility of the Label. These findings are important as 65% of OPC respondents expressed interest in learning more about the EHL action.

OPC data also demonstrates that visitors to the EHL sites acknowledge their European significance and the majority of respondents involved in the action agree that progress has been made in highlighting the European significance of EHL sites. The respondents felt that real-life communication measures (exhibitions, guided tours, etc.) are the most effective way to reach target audiences. Within the action, the Commission has established the EHL days, consisting of three-day annual meetings with national coordinators and the EHL sites, that were viewed

[30] Article 15(3) of the Decision No. 1194/2011/EU.
[31] 2016 Monitoring Report, p. 45.
[32] 2017 Panel Report.
[33] 2016 Panel Report, p.33.
[34] Impact Assessment.

favourably by interviewees and focus group participants, but EHL managers viewed the days as insufficient in terms of frequency and the exchange formats provided at the meeting.

5.4 Effectiveness

5.4.1 Extent of achievement of specific objectives

The EHL has made some progress in reaching its two objectives in its early years of the Action. The OPC results demonstrate that 71% of respondents who visited EHL sites directly or online agreed that the visit had strengthened their sense of belonging to Europe. Progress has been made towards its second objective- strengthening intercultural dialogue is visible but could be enhanced.

In the interviews conducted, 25 of the 29 site managers reported they could fully or partly implement the activities included in their EHL project as laid out by Article 3.3 of the Decision. This contrasted with the responses by the OPC respondents had a mixed view of the progress made by EHL sites towards their objectives. The most progress was perceived in the site objectives of highlighting their European significance and increasing access to sites through digital tools.

Activities undertaken by sites included: communication activities; education activities; information activities; activities to improve access; cultural activities; and collaboration activities with other EHL sites. Most Label sites were able to implement five or six different types of activities, while a minority implemented between two to four. The 2016 monitoring data concluded that all sites implemented communication activities and all sites display the EHL plaque on-site. The biggest obstacle to sites implementing activities was operational capacities, size and structure therefore affecting the quantity and complexity of the activities the sites can implement. This was supported by data collected in the 2016 monitoring process. 16 of the 20 sites provided feedback that receiving no additional financial support for EHL activities was a challenge. The analysis of the interview data supported this analysis, with 20 site managers noting the implementation of activities was difficult or unsuccessful due to a lack of finances.

The table below details responses to question on the benefits and challenges of receiving the EHL label:

BENEFITS OF AN EHL SITE	CHALLENGES OF AN EHL SITE
▪ Media attention at local, national, and international levels.	▪ Insufficient funding from other bodies (national and EU institutions, non-governmental institutions, etc.).
▪ Strengthened local support and evoking of the European dimension.	▪ Insufficient financial assistance from the EHL for the implementation of the project, increasing of multilingual tools and staff training.
▪ Greater integration into Europe and becoming part of a European network, exchange with other EHL sites.	▪ Low visibility of the EHL.
▪ Increased visibility for the site and awareness about the site among the	▪ Insufficient human resources to implement activities.

local population, especially young people.	
▪ Increased visitor numbers and social media followers.	▪ Undeveloped infrastructure in the region may hinder accessibility to the site.
▪ The Label as a sign of quality.	▪ Developing the EHL network.
▪ Support for the protection/preservation of the site.	▪ Increasing number of visitors.
▪ Additional funding sources.	

Another positive benefit noted was the collaboration between labelled sites. There have been 13 collaborations and three exchange projects between EHL sites from different Member States. In total, 16 out of 29 sites were involved in these projects. A best practice to be identified is the collaboration of the *Franz Liszt Academy of Music* and the *Peace Palace.* The two sites found a common theme and established a collaborative event with Hague Music Academy in 2016 consisting of joint lectures and a concert. As the event was perceived as a success, a second event took place in 2017. To further strengthen collaboration, a network of sites should be developed. Also identified in the interviews was the need for the establishment of common themes to further promote collaboration activities.

One of the aims of the EHL is to increase intercultural dialogue, and monitoring data shows that 22 sites implemented activities on the topic. However, some of the experts interviewed questioned whether multilingualism alone could be classified as intercultural activity and whether it supports the aim of strengthening intercultural dialogue. It was made clear in the interviews that not all of the site managers had a clear understanding of the definition of intercultural dialogue, leading to diverse interpretations. Further analysis of the topic using a combination of monitoring data and interviews leads to the conclusion that 15 sites could be identified as implementing or planning to implement educational activities that directly promote intercultural dialogue as defined by the Commission. An example of these is the project "Lab Europe" organized by the Peace of Westphalia site in Osnabruck implemented in 2018.[35] The project involved inviting 51 young people (ages 18-25) from other cities with EHL sites and from other European countries to participate in an exchange of ideas and work creatively on different European topics. The project supported co-operation between different EHL sites and promoted the Label. The respondents in OPC did not recognize such progress in sites' overall and were doubtful about many sites' progress in increasing intercultural dialogue (9 out of 24 respondents involved in the action recognized some progress, while 9 respondents saw minimal progress). 91% of OPC respondents felt that the EU needs to put efforts into strengthening intercultural dialogue. The Commission will seek to explore ways to enhance the site manager's understanding of and the commitment to strengthening intercultural dialogue to better contribute to the general objectives of the action as this aim has not yet been fulfilled.

5.4.2 Action's achievement of general and intermediate objectives

The methods used to identify evidence for this section are desk research (analysis of monitoring and site-specific data, and the Panel Report 2016), interview and focus group analysis, and the

[35] City of Osnabruck – The Lord Mayor (2018), Lab Europe. Available at: https://www.lab-europe-osnabrueck.de/

OPC analysis. The effectiveness of general and intermediate goals can mainly be assessed by analysing the achievement of site-level objectives. A majority of interviewees and focus group participants felt that the EHL goals needed more time to be achieved as the action is still in its early stages. More than half of OPC respondents involved in the action believed that some or significant progress has been made by the EHL goals. More progress was perceived in stressing the symbolic value and raising the profile of the sites. In general, 92% of all 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. 71% of respondents also stated that a visit to an EHL site had strengthened their sense of belonging to Europe.

5.4.3 Sustainability of the positive effects

As the first EHL sites at the EU-level action were selected in 2013, it is not yet possible to analyse the sustainability of positive effects created by the action. The analysis conducted in the evaluation of interviews and focus groups indicates the 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 efforts, including: 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.

In interviews, there was strong consensus among national coordinators that potential funding for the EHL sites as a key element in securing long-term effects and in raising the impact of the action. While panel members expressed that capacity building and embedding of the site in its local environment would ensure sustainability. Improved communication was also identified as a key measure to ensure the sustainability of the action.

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 develop education activities. All OPC respondents agreed that a pilot project in the field would be a valid measure. Besides these key measures, establishing a network is consistently perceived as a key factor in the sustainability of the action.

5.5 EU added value

The added value provided by the action at the EU-level is the promotion of the European significance of the Label sites. The establishment of the first criterion, having a symbolic European value and playing a significant role in the history and culture of Europe, and/or the building of the Union demonstrates the added value. The interviews supported this as national coordinators and representatives of both selected and non-selected sites possess good understanding of the significance of cultural heritage on European integration. Common values and common European identity are main components for strengthening European integration. The interviewees believed the EHL could support integration by filling the abstract notion of values with concrete content. In the OPC responses, 18 out of 24 sites were found to demonstrate their European significance. Analysis of the responses demonstrated that the communication of a European narrative is not implemented by all the sites, and is influenced by national priorities that could be developed by strengthening projects, monitoring and evaluation.

The Impact Assessment detailed assumptions about the added value that would result from the change from the intergovernmental to EU action. It was expected that 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; and develop clear and transparent selection criteria and monitoring procedures.[36] The Evaluation report reveals that the EHL still suffers from a lack of visibility and 65% of the OPC respondents would like to learn more about the action. There was clear added value in cooperation between Member States as one-half of sites had already implemented collaboration projects, but hope to see further strengthening of the networks by the Commission. OPC respondents who were engaged in the action perceived it had changed positively since its transformation in 2011. All sites reported gains from being awarded the EHL, including increase in media attention, strengthened local support, increased visibility and participation in the network. Respondents viewed termination of the action as premature, the majority believed this would send a negative message to the sites and to the cultural heritage sector.

6. CONCLUSIONS

The Commission concludes that **the main objectives of the EHL – strengthening European citizen's sense of belonging to the Union – and strengthening intercultural dialogue remain highly relevant to the current needs to the EU** and are in line with the objectives of the New European Agenda for Culture[37] and a rising interest in culture and cultural heritage among EU citizens. This document is accompanied by the report, 'Evaluation of the European Heritage Label' that sets forth a list of recommendations with a view of furthering developing the action to reach its full potential. The findings of the evaluation show that the Action should continue to be developed, but its geographical scope should not expand beyond the EU until the action becomes well-established. The evaluation found the action's EU added value may be limited by its scope being too narrow but a termination of the action was determined to be premature. It would send a negative signal to citizens, the stakeholders of the sites and the cultural heritage sector.. The efforts undertaken by EHL sites to highlight their European significance and raise awareness among citizens would be severely damaged.

[36] Impact Assessment, p.11.
[37] *A New European Agenda for Culture*, COM (2018) 267 final, 22.05.2018.

ANNEX 1: PROCEDURAL INFORMATION

1. LEAD DG, D*e*CIDE PLANNING/CWP REFERENCES

The evaluation was led by Directorate General for Education, Youth, Sport and Culture (DG EAC). It is included in the Work Programme of Creative Europe for 2017 and in the Agenda Planning with the reference EAC-2017-0507.

2. ORGANISATION AND TIMING

The evaluation was supported by an external and independent evaluator, under a service contract. The service contract was implemented via a Framework Contract (EAC/22/2013) with reopening of competition and in accordance to the Financial Rules Applicable to the General Budget of the Union and its Rules of Application.

The evaluation Roadmap was adopted on May 2017 and published[38]. A Steering Committee including staff from DG EAC and from the Secretariat General was established on May 2017. The Steering Committee met in three occasions: to kick off the Agenda on 7th December 2017; to approve the Inception Report on 22th January 2018; to discuss the Draft Interim Report on 18th June 2018; and to approve the final report in July 2018. Extensive correspondence between the Steering Committee members was held in between the meetings to follow-up on the evaluation. The evaluation initial schedule foresaw a final report in the fourth quarter of 2018. Due to the late availability of data used for the evaluation, it was agreed to delay the submission of the final report to January 2019.

The evaluation was not submitted to the Regulatory Scrutiny Board, as it not considered a major evaluation, does not contain an impact assessment and does not constitute a fitness check for legislation.

3. EXCEPTIONS TO THE BETTER REGULATION GUIDELINES

None.

4. EVIDENCE, SOURCES AND QUALITY

The 2018 Evaluation of the EHL used a series of data sets to inform its findings. The main ones being:

- An open public consultation at European level. The consultation was published in the relevant Commission's website in English, German and French and was opened for 12 weeks.
- Consultations with a sample of selected and non-selected sites, the national coordinators, the experts of the panel and some stakeholders in the area of heritage.

[38] https://ec.europa.eu/info/law/better-regulation/initiatives/ares-2017-3383232_en. There were only two feedbacks, both coinciding that EHL has a very small number of sites due to the restriction of only two sites per country/selection year, and proposed to open the registration process to NGOs bypassing the national coordinators.

- The evaluation was performed in accordance with the European Commission's Better Regulation Guidelines.
- The evaluation has been based on recognised evaluation techniques, as well as those stemming from the emerging domain of big data analytics when relevant.
- Secondary data has been obtained from all existing literature relevant to the evaluation subject, including any existing robust (academic) research into the topic.
- Primary data has been obtained from the broadest variety of sources and include the views of key informants beyond those directly involved in and benefiting from the intervention.

ANNEX 2: STAKEHOLDER CONSULTATION

1. METHODOLOGY USED

The consultation activities described in this synopsis report were conducted in the context of the evaluation of the European Heritage Label Action during its first six years of its existence (2011-2017). The consultations sought to collect information and stakeholders' views on the evaluation criteria (relevance, effectiveness, efficiency, sustainability, coherence and EU added value. The relevant stakeholders were mapped at the early stage of the evaluation and are described below.

2. OVERVIEW OF CONSULTATION METHODS AND CONSULTEES

The methodological approach used involved the use of two types of data collection: desk research and stakeholder consultation. The latter included an open public consultation (OPC), interviews and focus groups. Quantitative data was collected via the OPC and desk research while qualitative data was obtained through interviews, focus groups and desk research. The table below provides an overview of the types of stakeholders consulted.

Type of consultation	Type of Consultee
High-level interviews	• European Commission officials. • Members of the European panel of experts.
In-depth interviews	• National coordinators. • Managers and senior staff members from labelled and pre-selected but non-selected sites. • Stakeholders of other actions (e.g. European Routes of Industrial heritage, European Institute of Cultural Routes, etc.).
Focus group	• National coordinators. • Managers or senior staff members from labelled sites. • Stakeholders or local or national networks, institutions and organisations related to the labelled sites.
Open public consultation (OPC)	Online questionnaire was open to any interested party or individual over a period of 12 weeks, available in English, French and German.

Interviews

Interviews were crucial in obtaining data on the perceptions and attitudes of respondents towards the EHL. 76 interviews were conducted by the evaluation team with different stakeholder groups and conducted in a semi-structured manner and followed interview guidelines tailored for each specific stakeholder group. The sample size was proposed in the Inception Report and aimed to cover different types of non-selected sites.

Focus group

A programme of site-specific and national-level focus groups was also used in the evaluation to provide 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 consideration the year of selection, characteristics of the site such as size and location. In total, 10 focus group discussions were carried out.

Open public consultation

The open public consultation (OPC) gathered views on all interested citizens and organizations on the role of cultural heritage in bringing the European citizens closer to the Union. Consultation was carried out via an online questionnaire accompanied by a background document. The scope of the OPC covered the visibility of the Label, as well as the relevance, coherence, effectiveness, efficiency and EU added value. The questionnaire covered fifteen questions, seven targeted the general public and eight for those involved in the action. The questionnaire was published for 12 weeks (1 March 2018- 28 May 2018) on a dedicated consultation webpage and was made available in three EU languages (English, French, and German). In total, it received 103 responses of which one was not valid.

3. USE OF THE RESULTS OF THE CONSULTATIONS

The evidence from the OPC and in-depth interviews have been taken into account in the preparation of the final report. The in-depth interviews provided evidence against the evaluation questions and was triangulated against evidence from other sources.

3.1. Relevance

Stakeholders consulted via all methods – interviews, focus groups and the OPC – emphasised the relevance of the EHL action and its general objectives to the current needs of EU societies.

High-level interviewees perceived the EHL to have potential in highlighting the European dimension. In other in-depth interviews, the interviewees mainly shared a similar opinion that cultural heritage and the EHL can promote European integration, cohesion and intercultural dialogue. In terms of EHL's relevance to the current EU needs, only a minority of the site representatives answered the question positively.

The interviewees generally expressed that the action should include all EU countries into the scheme. Some of the interviewees and participants in some national focus groups also perceived

advantages in widening the action's geographical scope to non-EU countries and even non-European countries.

In all focus group discussions, the participants that are involved in the action also expressed the relevance of the EHL for their sites. Nonetheless, in some focus group discussions, the participants mentioned that current societal developments have to be better addressed by the EHL. The OPC respondents shared similar views.

3.2. Coherence

High-level interviewees perceived potential synergies and complementarities to exist between the EHL and other EU-level actions.

A few national coordinators and site managers perceived synergies or complementarities to exist with other EU actions (like the European Heritages Days or Europe for Citizens programmes); however, most of other interviewees did not provide a clear opinion regarding synergies or complementarities. The focus group participants did not cover the topics of synergies, complementarities and overlaps between EHL and other EU actions in-depth. However, some of the stakeholders underlined that more synergies could be created between EHL and other EU actions in the areas of financial support to and capacity building of the labelled sites.

Interviewees widely referred to UNESCO programmes when asked about the extent to which EHL's objectives, instruments. For some of the interviewees EHL seemed clearly distinct from UNESCO programmes, while for others similarities between them were evident. The same difference of views regarding EHL's coherence with UNESCO programmes was identified among the focus group participants. The OPC respondents stated that the EHL has most overlaps with the UNESCO World Heritage List (69% strongly agreed or agreed), the Cultural Routes of the Council of Europe (64%), the UNESCO Representative List of Intangible Cultural Heritage of Humanity (54%) and the European Union Prize for Cultural Heritage/Europa Nostra Award (54%). Least overlaps were seen between the EHL and other initiatives targeted at intercultural dialogue or any other national and local initiatives.

Respondents who are involved in the action reported most overlaps between the EHL and some European programmes. Meanwhile, those respondents who are non-involved in the action saw most similarities between the EHL and the UNESCO initiatives. The share of "Do not know" responses was significantly higher among the non-involved respondents compared to those who are involved in the EHL. All OPC respondents were given an option to specify with what other initiatives the EHL is similar.

3.3. Efficiency

Participants to the focus group programme mostly stressed the low visibility of the label; lack of a clear identity and vision of the label; unclear definition of the European significance criterion; as well as a need for financial and other type of support to the labelled sites.

Regarding pre-selection and selection, interview evidence show that there are two type of pre-selections organised in Member States. 53% of national coordinators reported organising bottom-up pre-selections, while 47% of them stated implementing top-down method for pre-selection.

The panel members interviewed evaluated the EU-level selection process to be working well, including the communication between the panel and the Commission. However, some non-selected sites and national coordinators interviewed indicated that explanations provided in the Panel Reports regarding the selection decisions are sometimes insufficient.

The selection criteria were clear to almost half of the site managers from the labelled sites interviewed (47%) and unclear to only a minor share of them (10%). Some of the different-level interviewees deemed the European significance criterion to be ambiguous. The focus group participants generally shared the same view regarding the European significance criterion and stressed the need to clarify it to reduce its ambiguity.

Some of the focus group participants were concerned that the diversity of the labelled sites may make it difficult to create a common brand and market it. The vision of the label, its future goals and objectives were unclear. Focus group participants generally stressed the need to clarify and disseminate the EHL vision.

With regard to 2016 monitoring procedures, 14 out of 20 senior staff members interviewed from the monitored sites perceived it to be useful and reported that it was an opportunity to take stock of their achievements, as well as allowed them to discuss challenges and future plans with the panel. Three national coordinators stated that they conduct a national-level monitoring, yet it is more informal.

Focus group participants generally emphasised that the label is not widely known neither among the general public nor among the cultural heritage professionals. Some participants reported that they were only aware of the label because of their affiliation with the labelled site.

Only around half of the interviewees perceived the EHL action as sufficient. 50% of the labelled sites and 57% of the national coordinators deemed communication with the European Commission to be sufficient. Site managers of the labelled sites expected the Commission to play a greater role in communication instead.

Focus group participants also had diverging views on communication roles within the action and promotion of the label to wider audiences. Likewise interviewees, some focus group participants repeatedly stressed that a greater role of the Commission in promoting the label is necessary. Meanwhile, a few others highlighted that some sites do not actively communicate the label and should demonstrate more initiative themselves.

Only 37% of the site representatives interviewed perceived communication with national coordinators to be sufficient. However, around half (48%) of the national coordinators reported an active communication with the sites. The interviewees highlighted the usefulness of EHL annual meetings.

Some site managers interviewed reported that several forms used in the action are complicated and could be further simplified. Most of them reported that the application form was long, repetitive and time consuming. Similarly, a few site managers who participated in monitoring reported difficulties with uploading the information on the monitoring sheet.

Overall, stakeholder consultation evidence highlight scope for improvements. Both interviewees and focus group participants expressed a strong need to improve the communication of the action, including adopting more diverse communication measures for communicating to the public and within the action. Some focus group participants also mentioned that the current

promotional tools are not efficient or wide reaching. Different-level interviewees and focus group participants called for establishing a network; providing financial support to the labelled sites to implement their activities; and also highlighted the importance of capacity building of the labelled sites. Yet, a few focus group participants also claimed that the sites themselves need to be more active and collaborate with other sites.

A few focus group participants and interviewees underlined that the EHL is a recent initiative and needs time to evolve further and some of the issues EHL currently faces will resolve with time.

In respect to OPC results, respondents involved in the action quite favourably evaluated the efficiency of measures and tools used in the action in reaching the target audiences and communicating European narrative of the sites.

3.4. Effectiveness

The interviewees had difficulties to judge the achievements of the EHL in terms of the general objectives of "Strengthening the European citizens' sense of belonging to the Union" and "Strengthening intercultural dialogue". The majority of interviewees expressed doubts that an impact was made concerning these objectives. The interviewees generally assumed that the EHL is still a young action that needs more time to achieve greater effects.

All focus groups mentioned the lack of visibility of the EHL, especially among citizens and other local and regional sites. No major effects were perceived in terms of the action's overall objectives of "Strengthening European citizens' sense of belonging to the Union" and "Strengthening intercultural dialogue". In addition, most participants could not prove a connection between the EHL award and a risen popularity of a site. Only more rural sites tended to acknowledge an increased visibility.

Only a few sites representatives interviewed could not make greater progress in implementing their projects. National coordinators also perceived more effects to be visible on a site level compared to the national level. The site-level focus groups put more focus on the activities of the site. Although progress was perceived, participants indicated that further progress could still be made. Still, the exchange with other sites, especially during the EHL Days, was perceived as an important benefit for EHL sites. Participants of national-level focus groups often did not know the EHL well before the evaluation. For them, it was difficult to link the effects to the action.

Regarding sustainability of the action, high-level interviewees were asked for their perspectives on the sustainability of the effects. According to them, the necessary preconditions for the sustainability are still to improve.

OPC respondents stated that most progress in reaching the overall goals and objectives of the EHL was made in stressing the symbolic value and raising the profile of sites significant for common history. Meanwhile, least progress was perceived to be made in strengthening European citizens' sense of belonging to the Union. Regarding the attainment of site-specific objectives, respondents involved in the action perceived most progress to be made by the sites in highlighting their European significance and increasing access to the sites through digital tools, especially for young people. The sites were perceived to be making least progress in the areas of fostering synergies between cultural heritage and contemporary creation and creativity, and contributing to the attractiveness and the economic and sustainable development of regions.

Meanwhile, most of the total number of respondents stated that a visit to an EHL site (either directly or online) has increased their appreciation of cultural heritage and encouraged them to learn more about European history and culture. Most of respondents expressed willingness to know more about the EHL. The majority of respondents stated that knowing that a specific site bears the EHL would encourage them to find out more about the site and other labelled sites.

3.5. EU added value

Panel members, national coordinators and Commission officials perceived the main EU added value of the action in the sites' focus on the European dimension. They noted that sites might need support in strengthening this aspect and increasing the understanding of what European identities and values can mean. However, slightly less than half of site representatives interviewed perceived a change in their site's narrative towards a stronger European dimension. Some interviewees also highlighted the action's importance for the increased value of culture on the EU-level, as well as for the European unification process.

External stakeholders that participated in national focus groups especially, but also other participants, had difficulties to identify the European values and/or narratives represented at the sites, as the sites are very diverse in their approaches and in the topics covered. This diversity was perceived to be both a positive and challenging aspect.

Regarding a hypothetical termination of the action, most interviewees would not expect major consequences if the action is discontinued. However, site representatives expressed fears that if the action was discontinued, a disruption of their achievements and efforts could occur. The interviewees generally agreed that the EHL is a young action and needs more time to generate and increase its effects and added values. Focus group participants stated that EU role in shaping the EHL should be greater at this early stage of the action, especially as there is no other linking organisation, platform or official network that could fulfil this task.

The OPC data show that respondents involved in the action quite favourably evaluated the added value brought by the transformation of the initiative to an EU-level action, specifically in the areas of functioning and visibility of the Label and cooperation between Member States. Regarding a hypothetical termination of the EHL action, the respondents perceived that it could bring negative impact in the areas of European citizens' appreciation of European values and understanding of European history, fostering intercultural dialogue and strengthening citizens' sense of belonging to the Union. Only 3 respondents stated that the termination of the action would bring no change.

ANNEX 3: METHODS AND ANALYTICAL MODELS

1. DATA ANALYSIS METHODS

Four methods were used to analyse the quantitative and qualitative data:

- Descriptive statistics to analyse the responses to the OPC
- Content analysis to analyse qualitative data obtained via the open questions of the OPC, interviews, focus groups, and desk research
- Comparative analysis to evaluate the transition from the intergovernmental EHL to the current EU scheme, their respective operation and results.
- Prospective analysis to formulate recommendations for the future of the action.

Table 1 Evaluation questions

Relevance	
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?
Coherence	
EQ4	To what extent was the EHL coherent with, and complementary to, other EU and international initiatives?
Efficiency	
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 or simplified?
Effectiveness	
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 specific objectives achieved? What type 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?
EU added value	
EQ13	What has been the EU added value of the EHL?
EQ14	What would happen if the EHL were to be discontinued?

2. WEAKNESSES OF THE METHODS USED AND HOW THEY WERE ADDRESSED

- Variations in the methodology were used to monitor different EHL sites. Since there are no common indicators to measure progress, the data presented in monitoring forms appeared inconsistent. Other data sources were sought to triangulate findings.
- A few national coordinators and site managers were new to their positions. Nevertheless, the majority of provided good sufficient data for analysis.
- The evaluation drew upon interviews, focus groups and the OPC to ascertain opinions and perceptions. Perception-based sources were corroborated with other sources of evidence.

- One site refused to host a focus group discussion. This site was replaced by another site with similar qualities.
- 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.