Opinion of the Committee of the Regions on the 'Proposal for a decision of the European Parliament and of the Council establishing the Culture 2007 programme (2007-2013)'

(2005/C 164/08)

THE COMMITTEE OF THE REGIONS,

Having regard to the Proposal for a decision of the European Parliament and of the Council *establishing the Culture 2007 programme (2007-2013*) (COM(2004) 469 final — 2004/0150 (COD)),

Having regard to the decision of the Commission of 15 July 2004 to consult it on this subject, under the first paragraph of Article 265 of the Treaty establishing the European Community,

Having regard to the decision of its President of 27 January 2004 to instruct its Commission for Culture and Education to draw up an Opinion on this subject,

Having regard to article III-280 of the draft Treaty establishing a Constitution for Europe,

Having regard to the Communication of the Commission on *Making citizenship work: fostering European culture and diversity through programmes for Youth, Culture, Audio-visual and Civic Participation'*(COM (2004) 154 final),

Having regard to the Communication from the Commission *Building our Common Future — Policy challenges and budgetary means of the enlarged Union 2007-13* (COM (2004) 101 final),

Having regard to its Opinion on the *Proposal establishing a Community action for the' European Capital of Culture event for the years 2005 to 2019* (CdR 393/2003 fin) [1],

Having regard to its Draft Opinion CdR 259/2004 rev. 1 adopted on 7 December 2004 by its Commission for Culture and Education, (Rapporteur: **Mrs Rosemary Butler**, Elected Member of the National Assembly for Wales (UK/PES),

unanimously adopted the following opinion at its 58th plenary session, held on 23/24 February 2005 (meeting of 23 February).

1. The Committee of the Regions' views

THE COMMITTEE OF THE REGIONS:

General comments

1.1 **affirms** the importance of a European cultural cooperation programme and feels its political relevance is greater than ever, because of the increasing need to promote understanding and tolerance both within the EU and with our neighbours;

1.2 **concurs** with the overall thrust of the Commission proposal, notably the streamlining of the programme to three overarching objectives and three strands. The CoR greatly appreciates this new structure, which should make for a more coherent and targeted programme and welcomes the move away from the sectoral approach;

1.3 **believes** that the European Commission should do its utmost to promote cross sectoral projects and **contends** that the selection criteria should favour projects that are innovative, risk-taking or pilot in nature, with the proviso that innovation is a relative concept and depends on the local and regional context;

1.4 **hopes** that the integration of the three strands into one programme will produce synergies between the strands and increased programme coherence. The CoR asks the Management committee to monitor whether such synergies are actually occurring;

1.5 **supports** the three overarching objectives that underpin the programme, namely mobility for artists, mobility of works together with inter-cultural dialogue;

1.6 **welcomes** the administrative/financial/legal simplification that takes account of the specificity of the cultural sector such as simpler application forms, flat rates for identifiable budget items, improved information to applicants and limited financial verification of organisations receiving small grants. However, the CoR regrets that these improvements are not included in the legal text itself but in the Explanatory Memorandum. It also feels that this simplification process should be developed further with a more flexible approach to in-kind funding and increased proportionality; whereby bureaucratic requirements on project promoters are proportionate to the size of the project budget;

[1] OJ C 121 of 30.4.2004, p. 15

1.7 **recalls** the fact that small cultural operators tend to have limited resources, both human and financial, and find it far more difficult than their larger counterparts to develop applications for funding. With this in mind, the Committee calls for project preparation costs to be eligible for funding under the programme. More generally, public authorities in the Member States should consider establishing a small seed capital fund to support small operators in the feasibility and bid preparation stage;

1.8 **contends** that the Commission's proposal might militate against the participation of smaller operators and against projects that are 'small in scale but high in quality'. Smaller operators must be given reassurance that the programme is inclusive, and should be actively encouraged to participate;

1.9 **emphasises** that large is not tantamount to high in quality, creativity and innovation and that critical mass is dependent on the geographical context. In rural areas with low population density, a small-scale project may have indisputable critical mass and impact;

1.10 **notes** the Commission's intention to ensure that the new programme should complement European Community programmes in the field of youth, education, sport, information technology etc, but **questions** how this will be implemented, and how this objective will be monitored? The CoR **contends** that cultural activities should be emphasised in the new youth and lifelong learning programmes (2007-13);

1.11 **welcomes** that Article III-280 of the draft Treaty establishing a Constitution for Europe stipulates that, in the field of Culture, the co-decision procedure with qualified majority vote in the Council applies to the legislative procedure for adopting European laws or framework laws establishing incentive measures, excluding any harmonisation of the laws and regulations of the Member States;

1.12 **emphasises** that cultural diversity is one of the defining characteristics of the European Union, a diversity that has significantly increased with the accession of ten new Member States. Accordingly the CoR requests strengthening references to this fundamental principle in the text and maintains that Culture 2007 should embrace all local, regional, national manifestations of both cultural and linguistic diversity. In addition, to reflect the diversity within Member States and immigration trends, the Committee feels that the programme should pay particular attention to supporting projects aimed at minorities themselves or at bridging the divide between minority and majority culture in an effort to increase mutual understanding;

1.13 **believes** that Culture 2007 must work to safeguard and promote linguistic diversity and **requests** that that a reference to this goal should be included in the text, in line with Article 3 of the draft Constitution for Europe and the European Commission's Action Plan on language learning and linguistic diversity;

1.14 **suggests** strengthening the reference to the key role of local and regional authorities in promoting and celebrating the culture of their communities, and calls for Culture 2007 to promote the participation of regional and local authorities in the programme. Activities should be focused at local and regional level rather than major, large-scale projects;

1.15 **welcomes** the proposed budget for Culture 2007, which represents an increase as compared to Culture 2000. In the context of the wider debate on EU financing for the 2007-13 period, the CoR **trusts** that an acceptable compromise will be found. In particular it **hopes** that an adequate level of funding for European cultural cooperation will be maintained in the final decision on the financial perspectives. This is important, since the accession of ten new Member States has increased the EU population by 20 %, and in view of the aspirations of the programme itself;

1.16 **would like the new programme** to highlight the socio-economic benefits that culture can bring, notably how it can help contribute to achieving the EU's Lisbon aims. For example the Committee maintain that the programme should highlight equality of access to culture so that the programme does not become elitist, as well as the regeneration and territorial cohesion benefits culture can deliver;

1.17 **questions** whether there is scope to increase the co-ordination between European Community and cultural policies in the Member States, while respecting the principle of subsidiarity, in order to maximise the effect of each European Community Culture programme grant;

1.18 **expresses its concern** as regards the proposals made by the Commission on project duration, increasing the number of co-organisers and vis-à-vis the threshold rules. The Committee feels that quality and flexibility should be central to the culture programme, as opposed to mechanistic selection criteria and inflexible rules;

Detailed comments

Cooperation focal points

1.19 **seeks** clarification on how the degressivity of Community support rule will work with regard to support for the Cooperation focal points;

1.20 **expresses doubts** over whether it is realistic to expect all the Cooperation focal points to become permanent and financially autonomous after their European Community grant comes to an end;

Studies and analyses

1.21 **welcomes** the proposal to spend EUR 8.56 million on studies and analyses as there is a real need for more solid information on the cultural sector in Europe generally, and European cultural cooperation in particular. Also, the development of key indicators would assist local and regional authorities in helping to benchmark their activities, in order to provide better information on, and possible transfer of, successful policy in the cultural sector;

Collection and dissemination of information

1.22 **requests** justification of the need to dedicate EUR 3.43 million to an Internet portal for the sector as the cost for the European Cultural Laboratory four year pilot project, which aims to set up such an internet portal, is an estimated EUR 1.5 million. Moreover, the CoR **notes** that a culture portal already exists;

1.23 **Suggests** with regard to the support for 'action for the preservation and commemoration of the main sites and archives associated with the deportations' (Second strand) that this action includes protection sites commemorating atrocities committed by the totalitarian regime in the former Soviet Union;

Article 8 — Implementation

1.24 **recalls** the good work carried out by the Commission to improve the functioning of the Culture 2000 programme, for example to tackle the delays in launching calls for proposals, an issue which dogged the current programme at the outset. To further improve the working of the programme it also **requests** that the Commission continues its work to ensure that grants are paid speedily in order to reduce cultural operators' cash-flow problems, and for project promoters whose project was not successful to be properly informed of the reason;

1.25 **calls** for thought to be given to ensuring the best fit between the expertise of the jury member and the projects to be judged. In this way ensuring effective and convincing assessment, which is of particular concern with the move away from the sectoral approach. In the case of cross-sectoral projects, more than one judge may be needed to assess an individual project;

Article 10 — Culture Contact Points

1.26 **advocates** developing the work of the Cultural contact points in promoting the exchange of best practice and cooperation;

Article 11 — Financial Provisions

1.27 **considers** that the Management Committee in the early years of the new programme should do its utmost to promote the involvement of cultural operators, including regional and local authorities, from the new Member States. For example the CoR considers that the minimum financial contribution of 5 % could be halved to 2.5 % for the first two years of the programme, as a 5 % contribution will represent more in real terms in the new Member States than the 'old' given that the average income of the former is lower. The 2.5 % rule should also be applied to any new Member States that join the EU after the beginning of the programme, and should be extended if participation levels from the new Member States are low;

Article 13 — Monitoring and evaluation

1.28 **feels** that feedback from promoters and beneficiaries must be fed into the evaluation process via for example the Culture Contact Point;

1.29 **proposes** that the Culture 2007 programme be assessed against the objectives set out in the Decision, with the aim of ensuring that these objectives are achieved and to provide an evidence base for the development of future culture programmes;

Annex II — Programme Management

1.30 **expresses its concern** that pooling of resources into one 'mega' executive agency shared by other European Community funding programmes such as youth and lifelong learning could lead to a loss of expertise and specialised knowledge of, and sensitivity to the cultural sector, which must be avoided at all costs.

2. **The Committee of the Regions' recommendations**

Recommendation 1

Whereas 2

Text proposed by the Commission	CoR amendment
Culture should contribute to improving the external visibility of the European Union by promoting its cultural diversity and the common dimensions of its cultures.	Culture should contribute to improving the external visibility of the European Union by promoting its cultural diversity and the common dimensions of its cultures. Special attention should be devoted to safeguarding the position of Europe's small cultures and less widely-spoken languages.

Reason

A reference to safeguarding the position of Europe's smaller cultures and lesser-used languages should be included in the Culture 2007 text as is the case for the Culture 2000 Decision. Its removal sends a negative message to project promoters from these communities, who on the contrary needs assurance that the new programme is open to them.

Recommendation 2

Whereas 13

Text proposed by the Commission	CoR amendment
It is also worthwhile pursuing the action begun by the European Union in the context of Decision No. 792/2004/EC referred to above in order to help ensure European and international protection of Nazi concentration camp sites as historic monuments.	It is also worthwhile pursuing the action begun by the European Union in the context of Decision No. 792/2004/EC referred to above in order to help ensure European and international protection of Nazi concentration camp sites as historic monuments. The programme should also be open to projects associated with deportations, concentration camp sites and commemoration of victims who suffered under the Soviet totalitarian regime.

Reason

The proposed wording for Art. 13 of the Preamble is based on the perception that support should also be given for actions for the preservation and commemoration of the main sites and archives associated with the deportations, former concentration camp sites and also for actions to keep alive the memory of victims who suffered under the Soviet totalitarian regime. Taking into account the history of Europe during the World War II and its aftermath, the programme should not emphasize only preservation and protection of Nazi main sites and archives associated with the deportations and commemoration of victims at these sites, but also should support actions associated with Soviet totalitarian regime which affected largely the Eastern Europe states and nations. As Latvian historians have argued, the Soviet regime was a totalitarian one and it had a great impact on the part of European states known as 'the socialistic block' at the time and was not less harmful than the Nazi totalitarian regime.

It is also worthwhile mentioning that former concentration camp sites within the system of the Soviet totalitarian regime are understood as forced-labour camps and are referred equal to the ones existed in the Nazi regime. Therefore they should be preserved as historic monuments as well.

Recommendation 3

Article 3 (1)

Text proposed by the Commission	CoR amendment
The general objective of the programme shall be to enhance the cultural area common to Europeans through the development of cultural cooperation between the creators, cultural players and cultural institutions of the countries taking part in the programme, with a view to encouraging the emergence of European citizenship.	The general objective of the programme shall be to enhance the cultural area common to Europeans through the development of cultural cooperation between the creators, cultural players, ~~and~~ cultural institutions as well as regional and local authorities of the countries taking part in the programme, with a view to encouraging the emergence of European citizenship and promoting both linguistic and cultural diversity.

Reason

References to local and regional authorities to be included as set out below given their role in promoting the culture of their communities through for example festivals, the preservation of cultural heritage, safeguarding artistic works, grassroots projects and working in partnerships with cultural operators.

In addition references to the European Union's twin goals of cultural and linguistic diversity should be strengthened in the Culture 2007 decision. This would help reassure future project promoters from lesser-used, regional or minority language-speaking communities that the Culture 2007 programme is addressing the goal of integrating projects from these communities into mainstream funding programmes.

Recommendation 4

Article 4.1 b

Text proposed by the Commission	CoR amendment
Support for bodies active at European level in the field of culture and actions supported for the preservation and commemoration of the main sites and archives associated with the deportations, symbolised by the memorials which have been raised on the sites of the former camps and other large-scale martyrdom and extermination sites, and for keeping alive the memory of the victims at these sites.	Support for bodies active at European level in the field of culture and actions supported for the ~~preservation and~~ commemoration of the ~~main sites and archives associated with the deportations, symbolised by the memorials which have been raised on the sites of the former camps and other large scale martyrdom and extermination sites, and for keeping~~ victims of mass exterminations and martyrdom, mass deportations as well as the preservation of the main sites, memorials, including the former concentrations camps, documenting these events, in order to keep alive the memory of the victims ~~at these sites~~.

Reason

By including the commemoration of the victims of the Soviet totalitarian regime in the common historical memory of Europe, the continent's structured and consensus-based perception of history is broadened ignoring politically 'sensitive' subjects like this one would considerably reduce trust towards the Union, particularly in the eyes of those citizens for whom such subjects, and memory thereof, is a recent and painful reality.

It is also difficult to ignore the fact that the historical truth of the Second World War and its aftermath tells a clear and unequivocal story of many human destinies destroyed by Soviet terror in what are now the new Member States of the European Union

Recommendation 5

Article 4 (3) new

Text proposed by the Commission	CoR amendment
	Operators will be free to propose projects corresponding to their interests and aspirations, whether sectoral or cross-sectoral, in so far as they aim for at least two of the objectives set out above. No facet of cultural and artistic activity will therefore be excluded *a priori*.

Reason

The fact that *all* sectors are eligible should be set out in the legislative text. It is important that the language of the Decision is as clear, simple and unambiguous as possible in order to ensure that all potential project promoters understand the text and are aware that, for example, literary translations will be eligible for support within the Culture 2007 programme.

Recommendation 6

Annex (1.1) change heading

Text proposed by the Commission	CoR amendment
1.1 Cooperation Focal Points	1.1 ~~Cooperation Focal Points~~ Creativity hubs

Reason

The name 'Cooperation Focal Point' should be changed as it is too similar to 'Cultural Contact Point' and will lead to confusion. The recommendation 'Creativity hubs' succinctly describes the aim of this strand. The word cooperation is superfluous since all projects funded by the European Cultural cooperation programme must be collaborative.

Recommendation 7

Annex (1.1) para. 2

Text proposed by the Commission	CoR amendment
Each focal point should constitute at least six operators from six different countries participating in the programme and bring together operators from one or more sectors for various multi-annual activities or projects, sectoral or cross-sectoral in nature but pursuing a common objective.	Each focal point should constitute at least ~~six~~ five operators from ~~six~~ five different countries participating in the programme and bring together operators from one or more sectors for various multi-annual activities or projects, sectoral or cross-sectoral in nature but pursuing a common objective.

Reason

Five co-organisers clearly demonstrate European added value and project promoters should not be obliged to seek six co-organisers from 2007. What matters is the commitment of the projects to joint working and the quality of the project itself.

Recommendation 8

Annex (1.1) para. 3

Text proposed by the Commission	CoR amendment
Each focal point shall be intended to carry out a number of structured, multi-annual cultural activities.	Each focal point shall be intended to carry out a number of structured, multi-annual cultural activities and act as an intermediary grant-giving body.

Reason

The 'Cooperation Focal Points' should be allowed to act as intermediary grant giving bodies. In this way the Cooperation focal points could provide fast-track funding, with limited bureaucracy, for smaller/innovative cultural cooperation projects. This system has worked well in the context of the Structural Funds and should be replicated within the context of the Culture 2007 programme.

Recommendation 9

Annex (1.1) para. 6

Text proposed by the Commission	CoR amendment
Community support may not exceed 50% of the project budget and shall be degressive in nature. It may not be more than EUR 500,000 a year. This support shall be granted for a period of five years.	Community support may not exceed 50% of the project budget and shall be degressive in nature. It may not be more than EUR 500,000 a year. This support shall be granted for a ~~period of~~ minimum of three and up to five years.

Reason

More flexibility should be allowed as regards project duration since not all project promoters will want, or need, to run a five-year project. Moreover, many operators are likely to encounter difficulties in finding co-financing for a full five-year period.

Recommendation 10

Annex (1.2) change heading

Text proposed by the Commission	CoR amendment
1.2 Cooperation measures	1.2 ~~Cooperation measures~~ Creative actions

Reason

The name 'cooperation measures' is too technocratic, whereas 'creative actions' emphasises the fact priority will be given to creativity in the selection of projects.

Recommendation 11

Annex (1.2) para. 2

Text proposed by the Commission	CoR amendment
Each action should be designed and carried out in partnership by at least four cultural operators in three different participating countries, whether these operators come from one or more sectors.	Each action should be designed and carried out in partnership by at least ~~four~~ three cultural operators in three different participating countries, whether these operators come from one or more sectors.

Reason

Three co-organisers amply demonstrates European added value. As noted above in the context of the European Cooperation Focal Points, projects should be assessed on their intrinsic quality not on mechanistic selection criteria.

Recommendation 12

Annex (1.2) para. 4

Text proposed by the Commission	CoR amendment
Community support may not exceed 50% of the project budget. It may not be less than 60 000 euro per year nor more than EUR 200,000 per year. This support shall be granted for a maximum of 12 months.	Community support may not exceed 50% of the project budget. It may not be ~~less than 60 000 euro per year nor~~ more than EUR 200,000 per year. This support shall be granted for a ~~maximum~~ minimum of 12 months and a maximum of 24 months.

Reason

There should be more flexibility regarding the minimum level of European Community support (EUR 60,000 a year which means minimum project size of EUR 120,000 per year) as some projects may not need, or be able to absorb, this amount but still have impact and critical mass.

In addition projects should be allowed to last for up to two years, rendering the programme more flexible and user-friendly for promoters.

Recommendation 13

Annex (1.3) para 4

Text proposed by the Commission	CoR amendment
In this context, significant support will also be given to the 'European Capitals of Culture' in order to help implement activities stressing European visibility and trans-European cultural cooperation.	In this context, ~~significant support~~ 90% of the budget within the special actions strand will ~~also~~ be given to the 'European Capitals of Culture' in order to help implement activities stressing European visibility and trans-European cultural cooperation.

Reason

The focus of the special actions strands should be the European Capital of Culture initiative. European Community funding for the European Capital of Culture should increase since there are likely to be two *European Capitals of Culture* a year from 2009 to reflect the recent enlargement of the EU. Increased support should for example be used to help the city authorities and cultural operators work with partners in other Member States thereby promoting transnational mobility and inter-cultural dialogue. Moreover dedicating 90 % of the special actions budget to the European Capital of Culture increases the transparency of this strand, which has in the past been criticised for being somewhat opaque. The remaining 10 % should be used towards awards such as the Europa Nostra Prize and the European Union Prize for contemporary architecture (the Mies van der Rohe Award).

Recommendation 14

Article (5) 2

Text proposed by the Commission	CoR amendment
The programme shall also be open to cooperation with other third countries which have concluded association or cooperation agreements with the European Community which include cultural clauses, on the basis of supplementary appropriations and specific procedures to be laid down.	The programme shall also be open to cooperation with other third countries with priority given to our near neighbours in line with the European Neighbourhood Policy, ~~which have concluded association or cooperation agreements with the European Community which include cultural clauses, on the basis of supplementary appropriations and specific procedures to be laid down.~~

Reason

The programme should prioritise countries that are included in the European Neighbourhood Policy. The importance of dialogue between civilisations and the free exchange of ideas between cultures, religions, traditions cannot be over-emphasised. Joint projects in the cultural field can help achieve the European Neighbourhood Policies main objectives of connecting people and enhancing mutual understanding of each others' cultures, history, attitudes and values, and thereby eliminating distorted perceptions

Recommendation 15

Article (9) 1

Text proposed by the Commission	CoR amendment
The Commission shall be assisted by a committee, composed of representatives of the Member States and chaired by the representative of the Commission.	The Commission shall be assisted by a committee, composed of representatives of the Member States, a representative of the Committee of the Regions and chaired by the representative of the Commission.

Reason

As competence for cultural policy is often at sub-national level in many Member States, the CoR should be authorised to nominate one representative onto the committee. Moreover Member States delegations to the committee should include local and regional representatives where appropriate.

Recommendation 16

Article 10.1

Text proposed by the Commission	CoR amendment
The Cultural Contact Points as defined in point I.3.3 of the Annex shall act as implementing bodies for the dissemination of information on the programme at national level, having regard to Article 54(2)(c) and (3) of Regulation (EC, Euratom) No. 1605/2002.	The Cultural Contact Points as defined in point I.3.3 of the Annex shall act as implementing bodies for the dissemination of information on the programme at both national and sub-national level, having regard to Article 54(2)(c) and (3) of Regulation (EC, Euratom) No. 1605/2002.

Reason

This amendment is consistent with Recommendation 17 of the draft opinion. Cultural Contact Points must also be able to act at regional level, to make it easier for them to reach cultural operators and adapt to their specific characteristics. It should, therefore, be made easier for local or regional authorities or their delegations to set up Cultural Contact Points, always on a voluntary basis.

Recommendation 17

Article (10) 2

Text proposed by the Commission	CoR amendment
2. The Cultural contact points must respect the following criteria:	2. The Cultural contact points must respect the following criteria:
— have an adequate number of staff, with professional and linguistic capacities appropriate for work in an environment of international cooperation;	— have an adequate number of staff, with professional and linguistic capacities appropriate for work in an environment of international cooperation;
— have an appropriate infrastructure, in particular as regards informatics and communications;	— have an appropriate infrastructure, in particular as regards informatics and communications;
— operate in an administrative context which enables them to carry out their tasks satisfactorily and to avoid conflicts of interest.	— operate in an administrative context which enables them to carry out their tasks satisfactorily, where appropriate for example the Cultural contact points should operate at sub-national level and to avoid conflicts of interest.

Reason

The Culture Contact Points should be encouraged to operate at sub-national level where appropriate in order to be closer to the citizens and cultural operators on the ground. France's system of 'regional poles' operated by the French Culture Contact Point is an example of good practice that should be replicated in other Member States.

Recommendation 18

Article 12 (d) new

Text proposed by the Commission	CoR amendment
	(d) Promoting the linguistic diversity of the EU

Reason

For reasons set out above (recommendations 1 and 2), references to the goal of linguistic diversity should be strengthened in the text.

Recommendation 19

Annex V OVERALL BUDGET BREAKDOWN

Strand 1

Text proposed by the Commission	CoR amendment
Breakdown of the annual budget for the programme	Breakdown of the annual budget for the programme
Percentage of the Budget	Percentage of the Budget
Strand 1 (support for projects) approx. 77% — cooperation focal points approx. 36% — cooperation measures approx. 24% — special actions approx. 17%	Strand 1 (support for projects) approx. 77% — cooperation focal points approx. ~~36%~~ 30% — cooperation measures approx. ~~24%~~ 30% — special actions approx. 17%

The Cooperation Focal points and the Cooperation Measures should each receive 30 % of the total budget as opposed to 36 % for the former and 24 % for the latter as at present. The Committee believes that the current breakdown could discriminate against smaller operators, which are often the most experimental and innovative, because they are less likely than bigger players to secure match funding for five years and have the capacity to carry out the extensive development work that will be required.

Recommendation 20

ANNEX 2.2

Text proposed by the Commission	CoR amendment
Actions may be supported for the preservation and commemoration of the main sites and archives associated with the deportations, symbolised by the memorials which have been raised on the sites of the former camps and other large-scale martyrdom and extermination sites, and for keeping alive the memory of the victims at these sites.	Actions may be supported for the ~~preservation and~~ commemoration of the ~~main sites and archives associated with the deportations, symbolised by the memorials which have been raised on the sites of the former camps and other large-scale martyrdom and extermination sites, and for keeping~~ victims of mass extermination and martyrdom, mass deportations as well as the preservation of the main sites, memorials, including the former concentration camps, documenting these events, in order to keep alive the memory of the victims. ~~at these sites.~~

Reason

By including the commemoration of the victims of the Soviet totalitarian regime in the common historical memory of Europe, the continent's structured and consensus-based perception of history is broadened ignoring politically 'sensitive' subjects like this one would considerably reduce trust towards the Union, particularly in the eyes of those citizens for whom such subjects, and memory thereof, is a recent and painful reality.

It is also difficult to ignore the fact that the historical truth of the Second World War and its aftermath tells a clear and unequivocal story of many human destinies destroyed by Soviet terror in what are now the new Member States of the European Union.

Recommendation 21

ANNEX 3.3

Text proposed by the Commission	CoR amendment
In order to ensure targeted, effective grass-roots dissemination of practical information on the programme, it shall provide for support from 'cultural contact points'. These bodies, acting at national level, shall be set up by the Commission in cooperation with the Member States on a voluntary basis.	In order to ensure targeted, effective grass-roots dissemination of practical information on the programme, it shall provide for support from 'cultural contact points'. These bodies, acting at both national and sub-national level, shall be set up by the Commission in cooperation with the Member States or their regional authorities on a voluntary basis.

Reason

This amendment is consistent with Recommendation 17 of the draft opinion. Cultural Contact Points must also be able to function at regional level, so that they can more easily reach cultural operators and adapt to their specific characteristics. It should, therefore, be made easier for local or regional authorities or their delegations to set up Cultural Contact Points, always on a voluntary basis.

Brussels, 23 February 2005.

The President
of the Committee of the Regions
Peter STRAUB