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Proposal for a

DECISION OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL

**establishing a European Union action for the European Heritage List and repealing
Decision No 1194/2011/EU**

(Text with EEA relevance)

EXPLANATORY MEMORANDUM

1. CONTEXT OF THE PROPOSAL

• Reasons for and objectives of the proposal

The intergovernmental European Heritage Label scheme was launched in Granada in April 2006 by several Member States. The Council of the European Union adopted conclusions on 20 November 2008 with the aim of transforming the intergovernmental European Heritage Label into a European Union action. The European Commission submitted a proposal for a Decision of the European Parliament and of the Council establishing a European Union action for the European Heritage Label, which was adopted on 16 November 2011 (Decision No 1194/2011/EU).

This proposal for a Decision of the European Parliament and of the Council puts forward a revision of the legal basis of the European Heritage Label to renew and strengthen the action in order to ensure its continued relevance. It also changes the name of the action by creating a European Heritage ‘status’, which will be awarded to the selected sites inscribed in the European Heritage List. Evaluations of the European Heritage Label in 2018 and 2024 highlighted its success, particularly in raising the profile of the selected sites and enhancing their European significance. A critical mass of 80 sites in 23 countries have now received the European Heritage Label. Both the 2024 evaluation and the experience gained in implementing the action highlight its relevance but also point to the need to adapt it in line with developments. Under the proposal, all sites awarded the European Heritage Label under Decision 1194/2011/EU will be inscribed on the European Heritage List and benefit from the European Heritage status.

• Consistency with existing policy provisions in the policy area

The initiative is consistent with the Commission communication ‘**A Culture Compass for Europe**’, which identifies the renewal and strengthening of the European Heritage Label to ensure its continued relevance as a key action. The communication sets out key policy priorities and actions for the Commission in the field of culture, including activities to safeguard, protect and promote cultural heritage, to foster access to culture and cultural heritage, to foster cultural diversity, to promote culture-led societal and territorial cohesion and development, including through cultural tourism, to promote culture as a catalyst for creativity and innovation, and to promote culture- and cultural heritage-based climate action and disaster risk preparedness and management.

The objectives of the action are fully aligned with the objectives of the **Creative Europe Programme (2021-2027)** and the objectives of the forthcoming Regulation of the European Parliament and of the Council establishing the **AgoraEU programme**, which aims, among other things, to promote cultural and linguistic diversity and heritage and to increase the competitiveness of the cultural and creative sectors.

The proposal is also consistent with other cultural and heritage initiatives, such as the UNESCO World Heritage List, the UNESCO Representative List of the Intangible Cultural Heritage of Humanity, the Council of Europe’s ‘European Cultural Routes’ and other European initiatives such as the European Heritage Days.

In this context, the added value of the European Heritage List lies in the European significance of the selected sites, their educational dimension, their efforts to reach out to citizens, in particular young people, and their cooperation with other selected sites.

- **Consistency with other Union policies**

The proposal to revise the legal basis of the European Heritage Label and establish the European Heritage List is in line with the 2026 Council Resolution on the second cycle of the European Education Area strategic framework (2026-2030), the Union of Skills, the Union of Equality strategies and the European Democracy Shield, in view of the action's importance for promoting common European values and democratic citizenship education as vectors for cohesion and inclusion.

The synergies should also be developed between this action and other complementary Union actions or programmes, such as European Capitals of Culture, Erasmus+ (in particular the DiscoverEU component), New European Bauhaus, European Capitals of Tourism, the national and regional partnership plans, Horizon Europe and other Union programmes. The action should also help promote the selected sites and help manage tourism flows in line with the upcoming European sustainable tourism strategy.

2. LEGAL BASIS, SUBSIDIARITY AND PROPORTIONALITY

- **Legal basis**

The European Heritage action is based on Article 167(5), first indent, of the **Treaty on the Functioning of the European Union**. That Article gives the EU the mandate to 'contribute to the flowering of the cultures of the Member States, while respecting their national and regional diversity and at the same time bringing the common cultural heritage to the fore'. The Union is also to encourage 'cooperation between Member States' in the field of culture, 'if necessary, supporting and supplementing their action'.

- **Subsidiarity (for non-exclusive competence)**

The proposal is in keeping with the principles of subsidiarity and proportionality.

There is a need to lay down common, clear and transparent criteria and procedures for the European Heritage action and for the coordinated identification and promotion of sites awarded European Heritage status across the Member States. As this cannot be sufficiently achieved by the Member States alone, but can rather, by reason of the scale and effects of the action, be better achieved at Union level, the Union may adopt measures in accordance with the principle of subsidiarity to ensure the sound implementation of the European Heritage List action.

The EU also provides support by selecting, preparing and coordinating the European panel of experts and coordinating the support organisation for the implementation of the action.

- **Proportionality**

In accordance with the principle of proportionality, the European Commission does not go beyond what is necessary in order to achieve the objectives set in the proposal.

3. RESULTS OF EX-POST EVALUATIONS, STAKEHOLDER CONSULTATIONS AND IMPACT ASSESSMENTS

- **Ex-post evaluations/fitness checks of existing legislation**

The European Heritage Label (EHL) was evaluated in 2018 and 2024, as specified in the Decision establishing the action. The most recent evaluation was based on feedback from

stakeholders and desk research and assessed the progress of the action during its second phase (2018-2024). It was published on 9 July 2025¹.

The evaluation showed significant progress for the action, particularly in raising the profile of sites and enhancing their European significance. The EHL has integrated well with other EU cultural heritage initiatives, despite challenges in defining European identity. The label has strengthened networks among heritage sites, enabling collaboration and knowledge exchange that national efforts alone could not achieve. It has also facilitated sites' access to EU funding.

The EHL has adapted to EU priorities such as sustainability, digital innovation and inclusion. Progress has been made in improving accessibility and gender equality, although implementation has varied across sites. The evaluation highlights the need for clearer guidance and practical tools for sites to better integrate the European dimension.

The EHL has made significant strides in enhancing the visibility of European heritage and promoting intercultural dialogue in recent years, but the evaluation identified a number of remaining challenges, which led to the drafting of this Commission proposal to ensure that the EHL remains relevant.

Strengthening the European significance criterion. A major conclusion from the evaluation was the challenge in defining 'European significance'. While the EHL has effectively highlighted heritage sites that represent European values, many sites struggled to clearly demonstrate how their heritage connects to the broader European narrative.

Enhancing digital engagement and accessibility. The evaluation also underscored the growing importance of digital engagement, particularly for younger, tech-savvy audiences.

Supporting smaller sites and ensuring equity. Another critical finding was the imbalance between larger sites and smaller sites, which often faced financial and administrative challenges, particularly in rural areas.

Improving feedback mechanisms and the selection process. The evaluation found inefficiencies in the current feedback mechanisms, particularly for unsuccessful applicants.

Sustainability and future growth. The evaluation stressed that, as the number of EHL sites grows, a more sustainable framework is needed to manage the expanding network.

Synergies with other EU programmes. The evaluation identified opportunities for greater synergies with other EU programmes, such as Creative Europe or Erasmus+.

On this basis, it was decided to continue the action with a new legal basis which addresses the problems encountered in implementing the action under the current Decision.

- **Stakeholder consultations**

In the context of the revision of the European Heritage Label, and in line with the Better Regulation Guidelines, a call for evidence on the future of the initiative and an open public consultation were launched on 1 December 2025. Both consultations ended on the same day, 23 February 2026.

¹ 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 Action 2018-2024, COM(2025) 366 final of 9 July 2025, <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A52025DC0366&qid=1784306014845>.

The consultation strategy especially targeted managers of sites holding the EHL, EHL managing authorities in Member States (national coordinators and public authorities), academic experts in the cultural development of European heritage, the general public, cultural networks, non-governmental organisations and civil society organisations.

When the call for evidence closed, 29 unique responses had been received from cultural institutions and networks, scientists, companies and businesses, non-governmental organisations, public authorities and citizens from EU countries. The open public consultation received 21 responses from seven EU countries and one non-EU country (Morocco). Most responses were submitted by public authorities, EU citizens and academic/research institutions.

- **Collection and use of expertise**

During the evaluation process, the Commission gathered evidence through a tailored consultation approach adapted to the different stakeholders. This included:

- targeted surveys of EHL sites and national EHL coordinators to collect quantitative data on the action;
- interviews with stakeholders involved in the action to gather insights and qualitative information;
- interviews with external experts and stakeholders in the EU heritage sector to obtain qualitative feedback on the action.

In addition, Commissioner Micallef conducted an implementation dialogue on 22 April 2026 with representatives of EHL sites (selected to reflect their diversity in terms of location and type), national coordinators, the Director of the EHL Bureau, the Chair of the European panel of experts responsible for selecting and monitoring the sites, and a member of the EHL Youth Advisory Board.

Finally, other feedback was gathered from national coordinators through the twice-yearly EHL general assemblies and from the selection and monitoring reports drawn up by the expert panel in charge of selecting and monitoring EHL sites.

- **Impact assessment**

No impact assessment was carried out for the reasons set out below.

(1) The scale of the impact of the action remains limited.

(2) The action is not a Multiannual Financial Framework (MFF) programme, as its costs are integrated within the Creative Europe Programme (this approach is expected to continue with its successor). The action has only a limited impact, with no funding currently allocated to selected sites under Decision 1194/2011/EU.

Under Decision 1194/2011/EU, the only costs result from the reimbursement of a panel of experts and a grant for an organisation supporting the implementation of the action. The proposal foresees the continuation of this approach (with an increase reflecting the inflation in the Eurozone between 2021 and 2025), reinforced with a monetary prize awarded to sites on a yearly basis. It is proposed that these costs will be covered by the Creative Europe-Culture strand of the AgoraEU programme.

- **Regulatory fitness and simplification**

No digital relevance.

- **Fundamental rights**

The proposal is fully in line with the **Charter of Fundamental Rights of the European Union**, and all relevant EU policy and legislative frameworks in the field of equality and non-discrimination.

Sites' adherence to the Charter of Fundamental Rights of the European Union is assessed when candidate sites are selected and when monitoring the sites awarded European Heritage status.

4. BUDGETARY IMPLICATIONS

The period covered by the proposal will coincide with several multiannual financial frameworks.

For the years after 2027, the legal and financial aspects of the European Heritage List will be directly linked to the provisions included in future multiannual financial frameworks. On this basis, they will also be dealt with within the framework of the respective Union programmes supporting culture, namely the AgoraEU programme (Creative Europe-Culture strand) proposed by the Commission, and its successor programmes.

Subject to budget availability, existing costs for the reimbursement of the panel work and a grant awarded to an organisation supporting the implementation of the action will continue. In addition, the European Commission may award a prize of a low amount- to selected and monitored sites inscribed on the European Heritage List.

For more details, see the legislative financial and digital statement.

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Decision No 1194/2011/EU**

(Text with EEA relevance)

THE EUROPEAN PARLIAMENT AND THE COUNCIL OF THE EUROPEAN UNION,

Having regard to the Treaty on the Functioning of the European Union, and in particular Article 167(5), first indent, thereof,

Having regard to the proposal from the European Commission,

After transmission of the draft legislative act to the national parliaments,

Having regard to the opinion of the European Economic and Social Committee²,

Having regard to the opinion of the Committee of the Regions³,

Acting in accordance with the ordinary legislative procedure,

Whereas:

- (1) Pursuant to Articles 2 and 3 of the Treaty on European Union, the Union is to respect its rich cultural and linguistic heritage. These values are reflected in the rights, freedoms and principles set out in the Charter of Fundamental Rights of the European Union ('the Charter').
- (2) The Treaty on the Functioning of the European Union aims at an ever closer union among the peoples of Europe and, among other things, confers on the Union the task of encouraging cooperation between Member States and, if necessary, supporting and supplementing their action in the area of conservation and safeguarding of cultural heritage of European significance, while respecting their national and regional diversity and at the same time bringing the common cultural heritage to the fore.
- (3) Europe's rich cultural heritage constitutes a fundamental shared resource for giving concrete expression to the Union's values. Heritage sites associated with Europe's history of integration, democratic development, conflict and reconciliation, cultural exchanges and shared experiences enable citizens to engage with the values on which the Union is founded. This strengthens their sense of belonging to the Union and reinforces intercultural dialogue.
- (4) The 2026 Council Resolution on the second cycle of the European Education Area strategic framework (2026-2030)⁴, the Union of Skills⁵, the Union of Equality

² OJ C [...], [...], p. [...].

³ OJ C [...], [...], p. [...].

⁴ [Council Resolution on the second cycle of the EEA strategic framework \(2026-2030\)](#).

⁵ COM(2025) 90 final.

strategies⁶ and the European Democracy Shield⁷ highlight the strategic importance of promoting common European values and democratic citizenship education as vectors for cohesion and inclusion, from an early age and throughout life.

- (5) The added value of the European Heritage List lies in the European significance of the selected sites, their educational dimension, their outreach to citizens, in particular young people, and cooperation with other selected sites. In this context, European significance should be understood as the capacity of a site to illustrate, through its history, narratives and activities, the development of Europe and the European Union.
- (6) Decision No 1194/2011/EU of the European Parliament and of the Council⁸ established a European Union action for the European Heritage Label ('the label'). The 2019 and 2024 evaluations of the label highlighted the success of the action, in raising the profile of the selected sites and enhancing their European significance. It enabled collaboration and knowledge exchange among the sites, complementing national efforts in the field of cultural heritage. The 2024 evaluation also identified areas of development to ensure the label's continued impact in preserving and promoting Europe's shared heritage and values. It also confirmed its relevance in preserving and promoting Europe's shared heritage.
- (7) The communication from the Commission 'A Culture Compass for Europe'⁹ set out a strategic framework for strengthening culture's role in fostering democracy, social cohesion, creativity, and Europe's cultural diversity, including to safeguard, protect and promote cultural heritage. In line with that communication, the European Heritage Label should be renewed and strengthened to ensure its continued relevance. Decision No 1194/2011/EU should therefore be replaced.
- (8) The Joint Declaration 'Europe for Culture – Culture for Europe'¹⁰ transforms the vision of the Culture Compass into a shared political commitment between the European Commission, the European Parliament and the Council of the European Union, providing a strategic framework that places culture at the heart of Europe's identity and stresses its importance for individuals, communities, and the European Union.
- (9) A critical mass of sites have now received the European Heritage Label. The principle of excellence in the selection and operation of those sites should guide the next phase of the action and be maintained through a supportive framework, focusing on dialogue, peer exchange and continuous improvement, while respecting the sites' autonomy and ownership structures. The focus should continue to be on promoting and enabling accessibility of the sites as well as the quality and accessibility of the activities they offer. Conservation of the sites should be ensured by existing protection regimes. Among other things, it is necessary to adjust the process for monitoring sites to simplify it for all involved, while continuing to ensure a rigorous assessment process.

⁶ [Equality and inclusion](#), COM(2020) 620 final, COM(2021) 101 final, COM(2025) 725 final, COM(2026) 12 final, COM(2026) 113, COM(2026) 541 final.

⁷ COM(2025) 791 final.

⁸ 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 L 303, 22.11.2011, p. 1, ELI: <http://data.europa.eu/eli/dec/2011/1194/oj>).

⁹ COM(2025) 785 final.

¹⁰ OJ C, C/2026/3440, 25.6.2026, ELI: <http://data.europa.eu/eli/C/2026/3440/oj>

- (10) The objectives of the action are fully aligned with the objectives of the Creative Europe Programme established by Regulation (EU) 2021/818 of the European Parliament and of the Council¹¹, which aims to safeguard, develop and promote European cultural and linguistic diversity and heritage. The objectives of the action established by this Decision should be fully in line with the objectives of the proposal for a Regulation of the European Parliament and of the Council establishing the AgoraEU programme, and notably its Creative Europe-Culture strand, which aims, among other things, to promote cultural and linguistic diversity and heritage and to increase the competitiveness of the cultural and creative sectors.
- (11) To maximise its impact, the action should strengthen synergies with complementary Union actions, such as European Capitals of Culture, New European Bauhaus, European Capitals of Tourism, the national and regional partnership plans, Horizon Europe and other Union programmes and initiatives relevant to its objectives. This includes actions and initiatives relevant to youth engagement and intergenerational fairness, such as the Erasmus+ programme, in particular its DiscoverEU cultural routes. It should also encourage the promotion of sites and management of tourism flows, in line with the European sustainable tourism strategy. The action should seek synergies and complementarities with other cultural and heritage initiatives, such as the UNESCO World Heritage List, the UNESCO Representative List of the Intangible Cultural Heritage of Humanity, the Council of Europe's 'European Cultural Routes' and other European initiatives such as the European Heritage Days.
- (12) Sites should be supported in exploring the possibility, where appropriate, of seeking financial support from Union programmes and funds. The Commission should support this by raising awareness, providing mentorship and capacity-building tailored to each site's size and location, and implementing activities to assist sites in these efforts.
- (13) The action should continue to award national, transnational and thematic sites, including transnational thematic sites, reflecting the interconnected nature of European history in all its diversity of forms. It should also be open to joint applications. Intangible cultural heritage in all its diverse expressions, such as skills, crafts, practices, knowledge and expressions of human creativity, should be included in the action.
- (14) The procedure for the selection of sites under the action should be carried out in collaboration with the participating countries. Sites should initially be selected at national level, while the final selection should then take place at Union level. Where relevant, Member States could involve local and regional authorities.
- (15) Where there is a clear thematic link between several sites located in one Member State, the action should allow for joint applications. Similarly, because of the transnational dimension of certain sites, the action should also allow for joint applications for sites which are located in different Member States but focus on one specific theme and for a site located on the territory of at least two Member States.
- (16) To guarantee excellence and fairness in the selection and monitoring processes, the sites should be selected and monitored on the basis of common, clear and transparent criteria and procedures. It should be undertaken by a panel of independent experts nominated by the relevant institutions of the European Union.

¹¹ Regulation (EU) 2021/818 of the European Parliament and of the Council of 20 May 2021 establishing the Creative Europe Programme (2021 to 2027) and repealing Regulation (EU) No 1295/2013 (OJ L 189, 28.5.2021, p. 34, ELI: <http://data.europa.eu/eli/reg/2021/818/oj>).

- (17) With a view to reinforcing cultural links with European Free Trade Association countries which are parties to the Agreement on the European Economic Area¹² ('EFTA/EEA countries'), candidate countries and potential candidates for Union membership, the action should also be open, subject to conditions, to sites from those countries in accordance with that agreement.
- (18) In order to enhance the effectiveness of the action, targeted financial support in the form of a prize should be provided to either newly selected or monitored sites to reward the quality of their efforts in fostering European values through the activities they implement.
- (19) Since the objectives of this Decision cannot be sufficiently achieved by the Member States alone, but can rather, by reason of the scale and effects of the action, be better achieved at Union level, the Union may adopt measures in accordance with the principle of subsidiarity as set out in Article 5 of the Treaty on European Union. In accordance with the principle of proportionality, as set out in that Article, this Decision does not go beyond what is necessary in order to achieve those objectives.
- (20) To ensure continuity and the transition from Decision No 1194/2011/EU to this Decision, and in the interest of legal certainty and continuity, Decision No 1194/2011/EU should continue to apply to the selection of European Heritage sites for 2027. In addition, sites selected under the previous Decision should be deemed to have been selected under this Decision for monitoring purposes. Finally, to ensure continuity in the work of the panel, experts appointed in accordance with Decision No 1194/2011/EU should continue and finish their mandate in accordance with the aforementioned Decision.

HAVE ADOPTED THIS DECISION:

Article 1
Establishment of the European Heritage List

The 'European Heritage List' composed of sites holding European Heritage status is hereby established as a Union action ('action').

Article 2
Definitions

For the purposes of this Decision, the following definitions shall apply:

1. 'site' means a tangible heritage element, such as monuments, natural, underwater, archaeological, industrial or urban sites, buildings or groups of buildings, cultural landscapes, places of remembrance, archival holdings, cultural goods and objects, or an intangible cultural heritage element associated with a place, such as musical, literary and theatrical heritage, artistic crafts, living heritage practices and contemporary heritage;
2. 'transnational site' means any of the following:
 - (a) several sites, located in different participating countries, which focus on one specific theme in order to submit a joint application;

¹² [OJ L 1, 3.1.1994, p. 3.](#)

- (b) one site located on the territory of at least two participating countries;
- 3. 'thematic site' means several sites, located in the same participating country, which focus on one specific theme in order to submit a joint application.

Article 3 *Objectives*

- 1. The action shall contribute to the following general objectives:
 - (a) strengthening European citizens', including young people's, sense of belonging to the Union, based on shared values and elements of European history and cultural heritage, as well as on an appreciation of national and regional diversity;
 - (b) strengthening intercultural dialogue and cohesion.
- 2. In order to achieve the objectives set out in paragraph 1, the action shall seek to attain the following intermediate objectives:
 - (a) stressing the symbolic value and raising the profile of sites and their importance for the history and culture of Europe or the building of the Union;
 - (b) increasing European citizens' understanding of the history of European integration, and of their common yet diverse cultural heritage, especially in relation to the democratic values and human rights underpinning the Union;
 - (c) contributing to the attractiveness and the economic and sustainable development of local areas, regions and territories, in particular through cultural tourism.
- 3. The sites themselves shall seek to attain the following specific objectives:
 - (a) highlighting their European significance;
 - (b) raising European citizens' awareness of their common cultural heritage, especially that of young people;
 - (c) facilitating the sharing of experiences and exchanging of best practices between participating countries;
 - (d) increasing and/or improving access for all, especially young people;
 - (e) facilitating intercultural and intergenerational dialogue through artistic, cultural and historical education;
 - (f) fostering synergies between cultural heritage on the one hand and contemporary creation and creativity on the other.

Article 4 *Participation in the action*

- 1. The action shall be open to the participation of the Member States.
- 2. The action shall also be open to the participation of European Free Trade Association countries which are parties to the Agreement on the European Economic Area ('EFTA/EEA countries'), candidate countries and potential candidates for Union membership associated to the Creative Europe Programme or to subsequent Union programmes supporting culture.

3. Each participating country shall designate a national coordinator responsible for coordinating the action at national level and acting as the main liaison between the sites, the Commission and the panel.
4. Participation in the European Heritage List shall be voluntary.

Article 5
Eligibility

All sites defined in Article 2 shall be eligible for selection for the European Heritage List.

Article 6
Criteria

1. Applications shall be assessed against the following criteria ('the criteria') for each site:
 - (a) European significance,
 - (b) the quality of the site's action plan,
 - (c) the operational capacity.

Each site shall be assessed in a proportionate manner, taking into account its characteristics.

2. For the purposes of paragraph 1, point (a), the European significance of a site shall be assessed on the basis of its capacity to illustrate, interpret or symbolise the values of the Union. When carrying out that assessment, one or more of the following elements shall be taken into account:
 - (a) the site's place and role in European history and European integration, or its links with key European events, personalities and movements, highlighting its place and role in the development of the common values that underpin European integration;
 - (b) the promotion, interpretation and transmission of the values enshrined in Article 2 of the Treaty on European Union and the rights, freedoms and principles set out in the Charter of Fundamental Rights of the European Union;
 - (c) the site's contribution to cross-border cooperation, dialogue and mutual understanding among the peoples and cultures of Europe;
 - (d) the site's relevance and capacity for European remembrance and democratic citizenship education, including its capacity to foster critical, inclusive and pluralistic reflection on Europe's history in all its diversity, complexity and contested narrative;
 - (e) the promotion of multilingualism and the provision of access to the site in several languages of the Union.
3. For the purposes of paragraph 1, point (b), the quality of the site's action plan ('the action plan') shall be assessed on the basis of the measures that the site will use to communicate, implement and sustain the objectives of the action. The action plan shall specify how the site will perform the following actions:
 - (a) raise awareness of the European significance of the site, in particular through appropriate information activities, signposting and staff training;

- (b) produce, share and transmit knowledge through educational, research-based and informational activities that foster understanding of the site and its European significance, including in multilingual formats;
 - (c) raise the profile and attractiveness of the site on a European scale and develop and implement a local and regional outreach strategy, making use of digital tools and emerging technologies;
 - (d) engage visitors, local communities and young people and cooperate with artists and cultural entrepreneurs and within the European heritage community;
 - (e) foster the mobility of culture professionals, artists and collections, stimulate intercultural dialogue and encourage linkage between heritage and contemporary creation and creativity whenever the specific nature of the site allows this.
4. For the purposes of paragraph 1, point (c), the operational capacity of the site refers to the site's ability to effectively implement an action plan and sustain the objectives of the action over time. The following elements shall be taken into account:
- (a) the site's management, and its governance arrangements;
 - (b) legal status and ownership;
 - (c) financial sustainability;
 - (d) human resources, professional expertise and capacity to deliver;
 - (e) conservation and safeguarding capacity;
 - (f) accessibility and visitor management;
 - (g) monitoring and reporting capacity.
5. For thematic and transnational sites, the action plan shall demonstrate the operational capacity of each site listed in the application and the overall coherence of the application and of the thematic narrative, and shall set out the mechanisms for coordination between the participating locations.
6. The action plan shall serve as a basis for the selection of the site and for its participation in the periodic review scheme set out in Article 15.

Article 7 *The panel of experts*

1. A panel of independent experts ('the panel') shall be set up to carry out the selection and monitoring in participating countries. It shall ensure that the criteria are consistently applied by the sites across the participating countries.
2. The panel shall consist of 12 members nominated by Union institutions and bodies in accordance with this paragraph.

The Commission shall propose a pool of potential experts to the nominating Union institutions and bodies on the basis of an open call for expressions of interest.

The European Parliament, the Council and the Commission shall appoint three experts each from the pool of potential experts in accordance with their respective procedures and shall nominate another three experts each as reserves. The European Economic and Social Committee and the European Committee of the Regions shall

appoint one expert each from the pool of potential experts in accordance with their respective procedures and shall nominate one expert each as a reserve. Additionally, the Commission shall appoint one expert from the Youth Cultural Ambassador Network¹³ and shall nominate one expert as a reserve in accordance with its procedure.

3. The members of the panel shall be citizens of the Union, resident in the Union and independent experts with substantial experience and expertise in the fields relevant to the objectives of the action. When appointing the members of the panel, the competent Union institutions and bodies shall require the selected experts to declare any actual or potential conflict of interest with respect of the action. Where such a declaration reveals a conflict of interest, the appointing Union institution or body shall select another expert. If such a conflict of interest comes to light during an expert's mandate, that expert shall resign and the relevant Union institution or body shall replace that expert for the remainder of the mandate, in accordance with the relevant procedure. They shall also seek to ensure a complementary mix of competences, a balanced geographical distribution and a gender balance in the overall composition of the panel.
4. The panel shall designate its chairperson.
5. The experts shall be appointed for a mandate of three years, which may be renewed. Experts shall not serve in the panel for more than two consecutive mandates.
6. The members of the panel shall be entitled to remuneration for their services, as well as the payment of all expenses directly related to the performance of their duties under this mandate.

Such remuneration and expenses shall be payable for the full duration of their appointment.

All members of the panel shall receive equal remuneration, regardless of the institution that appointed them.
7. If an expert resigns or is unable to carry out their tasks before the end of their mandate, that expert shall be replaced by the same nominating entity for the remainder of the mandate.
8. The members of the panel shall declare any actual or potential conflict of interest with respect to the selection or the monitoring of a specific site. In the event of such a declaration by a member, or if such a conflict of interest comes to light, that member shall not participate in the evaluation of the site or of any other sites from the participating countries concerned.

Article 8 *Application forms*

The Commission shall provide common application forms ('application forms') based on the criteria set in Article 6. The candidate sites shall use those forms.

The Commission shall ensure the translation of the forms into all official languages of the Union.

¹³ This is an initiative from the Culture Compass for Europe that is currently being developed.

Article 9
National selection in Member States

1. The national selection of sites for the European Heritage List shall be carried out under the responsibility of the Member States.
2. Each Member State may select up to three sites every two years.
3. Each participating Member State shall establish its own procedures in line with the objectives of the action and its own calendar for the national selection in accordance with the principle of subsidiarity, aiming to make the administrative arrangements as light and as flexible as possible. It shall send the application forms for the sites selected at national level to the Commission by 1 February of the year of the selection procedure, in accordance with the calendar set out in the Annex.
4. The Commission shall publish the full list of sites selected at national level and shall inform the European Parliament, the Council, the European Economic and Social Committee and the European Committee of the Regions thereof without delay after the finalisation of the national selection stage, so that the European Parliament, the Council, the Member States, the European Economic and Social Committee, the European Committee of the Regions or any other person or entity may submit to the Commission any observation which could have an impact on the selection of those sites.

Article 10
Selection of sites in EFTA/EEA countries, candidate countries and potential candidates

1. EFTA/EEA countries, candidate countries and potential candidates wishing to submit applications to participate in the action shall notify the Commission thereof by means of an official communication and shall designate a national coordinator for the action.
2. The national selection of sites for the European Heritage List shall be carried out under the responsibility of each EFTA/EEA country, candidate country or potential candidate in accordance with its own procedures. Each country may select up to two sites per selection cycle at national level.
3. The application forms for the sites selected at national level in a participating EFTA/EEA country, candidate country or potential candidate shall be sent to the Commission by 1 February of the year of the selection procedure, in accordance with Article 9. The application forms shall be in English only.
4. The panel shall select a maximum of one site located in an EFTA/EEA country, candidate country or potential candidate in each selection cycle.

Article 11
Pre-selection and selection at European level

1. The selection of sites for the European Heritage List shall be carried out by the panel under the responsibility of the Commission in a two-step procedure.
2. The panel shall carry out an initial pre-selection of the sites submitted by national coordinators following the procedure for selection at national level in accordance

with Article 9. The initial pre-selection shall be based on the European significance criterion referred to in Article 6(1), point (a). After having assessed the applications in accordance with that criterion, the panel shall agree on a shortlist of sites and shall issue a pre-selection report on all the applications by 31 May of the year of the selection procedure.

3. The sites shortlisted at the pre-selection stage shall prepare the final selection form, including their action plan and a description of their operational capacity referred to in Article 6 (1), point (b) and (c), with the support of their national coordinator. The national coordinators shall submit the final selection forms to the Commission no later than 31 August of the year of the selection procedure.
4. The panel may select a maximum of one site per participating country. If necessary, further information may be requested and visits to the sites may be organised.
5. The panel's selection shall be based on the criteria set in Article 6 and on the application forms. The panel shall also take into account the observations referred to in Article 9(4).
6. The panel shall select a maximum of 15 sites per selection cycle. Of the selected sites, a maximum of two sites located in the EFTA/EEA countries, candidate countries and potential candidates participating in the action may be selected in each selection cycle at European level.
7. The panel shall issue a report on the selected sites and send it to the Commission at the latest by the end of the year of the selection procedure. That report shall include a recommendation for the award of European Heritage status and provide an accompanying explanation for its conclusions regarding the sites that have been selected and the sites that have not been selected. The Commission shall forward that report to the European Parliament, the Council, the European Economic and Social Committee and the European Committee of the Regions for information.
8. Candidate sites which are not selected may submit new applications for selection at national level in the following years.
9. The opinion of the panel shall be final.

Article 12

Transnational sites

1. In order for a transnational site to be eligible for European Heritage status, it shall comply with all of the following conditions:
 - (a) each participating site shall comply with the criteria set in Article 6;
 - (b) the application shall be submitted under a common name;
 - (c) where more than one site is involved:
 - (i) one of the participating sites shall be designated as the coordinator and shall be the single contact point for the Commission;
 - (ii) a clear thematic link shall be demonstrated between the sites.
2. Applications in respect of transnational sites shall follow the same procedure as that for other sites. Following consultation among the participating sites, with the involvement of the relevant national authorities, each participating site shall be included in the coordinator site's application form. Transnational sites shall be put

forward by the participating country in which the coordinator site is located, subject to the numerical limits laid down in Articles 9(2) and 11(4), and proposed on behalf of all the participating countries concerned, following agreement by those participating countries. Nationality criteria pertaining to the selection procedure shall apply to the coordinator site only.

3. If a transnational site is selected, European Heritage status shall be awarded to the transnational site as a whole and under the common name.
4. If a transnational site meets all the criteria, priority shall be given to that site during the selection process.
5. Applications in respect of transnational sites with a coordinator in an EFTA/EEA country, candidate country or potential candidate shall follow the same pre-selection and selection procedure as that for other sites. Sites in an EFTA/EEA country, candidate country or potential candidate may join in a transnational site application, irrespective of the nationality of the coordinator of the transnational site.
6. A transnational site which was awarded European Heritage status may be expanded through the inclusion of one or more new participating sites. Where a transnational site is expanded through the inclusion of one or more new participating site, it shall not be counted as a newly pre-selected site. To that end, the national coordinator responsible for the new participating site shall submit a proposal by means of an official communication to the Commission and to the national coordinators responsible for the existing sites before 1 March of the monitoring year, demonstrating the additional site's compliance with the criteria and the thematic link with the existing sites. If none of the national coordinators responsible for the existing European Heritage sites objects to the proposal, the panel shall review the proposal and provide its recommendation to the Commission.

Article 13

National thematic sites

1. In order for a national thematic site to be eligible for the European Heritage List, it shall comply with all of the following conditions:
 - (a) it shall demonstrate the European added value of a joint application as opposed to individual applications;
 - (b) it shall show a clear thematic link between the sites concerned;
 - (c) each participating site shall comply with the criteria;
 - (d) it shall designate one of the participating sites as the coordinator, which shall be the single contact point for the Commission;
 - (e) it shall submit the application under a common name.
2. Applications in respect of national thematic sites shall follow the same procedure as that for other sites. Each participating site shall be included in the coordinator site's application form. National thematic sites shall be proposed by the participating country concerned, subject to the numerical limits laid down in Articles 9(2) and 11(4).
3. If a national thematic site is selected, European Heritage status shall be awarded to the national thematic site as a whole and under the common name.

4. A national thematic site which was awarded European Heritage status may be expanded through the inclusion of one or more new participating sites. Where a national thematic site is expanded through the inclusion of one or more new participating sites, it shall not be counted as a newly pre-selected site. To that end, the national coordinator responsible for the new participating site shall submit a proposal to the Commission by means of an official communication before 1 March of the monitoring year, demonstrating the additional site's compliance with the eligibility criteria and the thematic link with the existing sites. The panel shall review the proposal and provide its recommendation to the Commission.

Article 14 Designation

1. The Commission shall designate the sites to be awarded European Heritage status, taking into account the recommendation of the panel. The Commission shall inform the European Parliament, the Council, the European Economic and Social Committee and the European Committee of the Regions thereof.
2. The sites that are awarded European Heritage status shall display the European Heritage List logo available on the Commission's website.
3. European Heritage status shall be awarded permanently, subject to the conditions laid down in Article 15 and to the continuation of the action and without prejudice to the cases provided for in Article 16.

Article 15 Monitoring

1. Each site awarded European Heritage status shall be regularly monitored in order to ensure that it continues to meet the criteria and that it adheres to the action plan submitted in its application.
2. Monitoring of sites awarded European Heritage status by the panel shall take place every two years on the basis of a pre-defined list of participating countries for a given year. That list shall be published on the Commission's website.
3. Participating countries shall be responsible for monitoring all sites located on their own territory. The monitoring of a transnational site shall be the responsibility of the country in which the coordinator site is located.
4. Participating countries shall collect all the necessary information and prepare a report on the monitored sites in accordance with the calendar published by the Commission. The participating countries shall send the report to the Commission by 1 March of the monitoring year. The Commission shall submit the report to the panel for examination.
5. By the end of the monitoring year, the panel shall issue a report on the state of the sites assessed, providing recommendations to be taken into account for the following monitoring year.
6. The addition of new sites to thematic or transnational sites awarded European Heritage status shall be assessed in parallel with the monitoring of the sites. The recommendations of the panel on the addition of new sites to existing thematic or

transnational sites shall be included in the monitoring report referred to in paragraph 5.

7. National coordinators shall serve as the principal point of support for sites and shall actively collaborate with the sites to rectify any shortcomings identified during the monitoring process. For that purpose, the national coordinator, in collaboration with the site and the panel, shall develop and help implement a tailored support plan. That plan shall include:
 - (a) clear and actionable measures to address identified shortcomings;
 - (b) possible sources of technical or financial assistance, where necessary and proportionate to available resources;
 - (c) a defined timeline for remedial actions, with interim checkpoints to assess progress.
8. Where the panel finds that the criteria are no longer sufficiently met, it may carry out additional monitoring, irrespective of the timeline specified in the Annex.

Article 16

Withdrawal and renunciation of the European Heritage status of a site

1. If, after a monitoring of a site or any additional visit as laid down in article 15(8), the panel establishes that a site has substantially failed to either i) continue to meet the criteria on the basis of which it was awarded the European Heritage status or ii) adhere to the to the action plan submitted in its application, it shall initiate a dialogue with the site concerned, with the support of the national coordinator and the Commission, with a view to facilitating the necessary adjustments to the site.
2. If the necessary adjustments have not been timely carried out, the panel shall notify the Commission of that fact. The notification shall be accompanied by a statement of reasons and shall include practical recommendations on how to improve the situation.
3. If the practical recommendations have not been timely implemented, the panel shall issue an opinion to the Commission for the withdrawal of European Heritage status from the relevant site.
4. If the panel establishes that a site participating in a transnational site or a national thematic site no longer meets the criteria or that it no longer adheres to the action plan submitted in its application, the procedure set out in paragraphs 1, 2 and 3 shall apply. Withdrawal pursuant to this paragraph shall apply to the transnational site or national thematic site in its entirety. However, where the coherence of the transnational site or national thematic site is not undermined, the panel may recommend limiting the withdrawal to the participating site concerned.
5. The Commission shall take the decision to withdraw European Heritage status, taking into account the recommendation referred to in paragraph 3. The Commission shall inform the European Parliament, the Council, the European Economic and Social Committee and the European Committee of the Regions of that withdrawal.
6. Sites may at any time renounce European Heritage status. In such cases, they shall notify the participating countries concerned, which shall in turn inform the Commission of that renunciation. The Commission shall formalise the renunciation

and inform the European Parliament, the Council, the European Economic and Social Committee and the European Committee of the Regions to that effect.

Article 17
Prize

The Commission may consider awarding a pecuniary prize ('the prize') to newly selected sites or monitored sites, subject to the availability of funding under the applicable financial framework. The legal and financial aspects of the prize shall be dealt with within the framework of the respective Union programmes supporting culture.

Article 18
Practical arrangements

1. The Commission shall implement the action. For that purpose, it shall:
 - (a) ensure the overall coherence and quality of the action;
 - (b) ensure coordination between the participating countries, national coordinators and the panel;
 - (c) in the light of the objectives referred to in Article 3 and the criteria referred to in Article 6, establish guidelines to assist with the selection and monitoring procedures in close cooperation with the panel;
 - (d) provide technical support to the panel;
 - (e) publish, on its website, all reports of the panel.
2. The Commission shall support the action. For that purpose, it shall:
 - (a) foster networking and capacity-building activities between national coordinators, sites and the panel;
 - (b) foster the exchange of experience and good practices between sites that have already been awarded European Heritage status and candidate sites, and promote wider dissemination of the sites' monitoring reports and the lessons learned;
 - (c) promote the visibility and reach of the action and the sites at European and international level, including through the dissemination of relevant information and material and through targeted communication activities
 - (d) provide information about existing European funds to help sites develop projects, including through mentoring and training.
3. National coordinators shall coordinate the implementation of the action at national level. They shall have the following functions:
 - (a) act as the main point of contact between the sites, the Commission and possible support structures;
 - (b) support candidate sites in preparing their applications in accordance with Articles 9 and 11;
 - (c) ensure the national selection of sites at national level, in accordance with Article 9;

- (d) support the sites that successfully pass the panel's pre-selection in preparing their final submission to the panel;
- (e) participate in coordination and networking meetings related to the action.

Article 19 *Evaluation*

1. The Commission shall ensure the external and independent evaluation of the action. Such evaluation shall take place every six years in accordance with the calendar set out in the Annex and shall examine the following:
 - (a) the efficiency of the processes involved in running the action;
 - (b) the number of sites;
 - (c) the impact of the action;
 - (d) the widening of the action's geographical scope;
 - (e) how the action could be improved;
 - (f) whether the action should be continued.
2. The Commission shall submit a report on the evaluation provided for in paragraph 1 to the European Parliament, the Council, the European Economic and Social Committee and the European Committee of the Regions within six months of its finalisation, accompanied, if appropriate, by relevant proposals.

Article 20 *Repeal*

Decision No 1194/2011/EU is repealed.

Article 21 *Transitional provisions*

Decision No 1194/2011/EU shall continue to apply to the selection of European Heritage Label sites in 2027. Sites awarded the label under Decision No 1194/2011/EU shall be deemed to have been awarded European Heritage status under this Decision.

Experts appointed to the panel in accordance with Decision No 1194/2011/EU shall continue to serve on the panel for the remainder of their mandate in accordance with Article 7.

Article 22
Entry into force

This Decision shall enter into force on the twentieth day following that of its publication in the *Official Journal of the European Union*.

Done at Brussels,

For the European Parliament
The President

For the Council
The President

LEGISLATIVE FINANCIAL AND DIGITAL STATEMENT

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1. FRAMEWORK OF THE PROPOSAL/INITIATIVE

1.1. Title of the proposal/initiative

Proposal for a Decision of the European Parliament and of the Council establishing a European Union action for the European Heritage List and repealing Decision No 1194/2011/EU

1.2. Policy area(s) concerned

Culture, Tourism, Heritage

1.3. Objective(s)

1.3.1. General objective(s)

- (a) strengthening 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;
- (b) strengthening intercultural dialogue.

1.3.2. Specific objective(s)

- (a) stressing the symbolic value and raising the profile of sites which have played a significant role in the history and culture of Europe and/or the building of the Union;
- (b) increasing 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;
- (c) contributing to the attractiveness and the economic and sustainable development of regions, in particular through cultural tourism;

1.3.3. Expected result(s) and impact

Specify the effects which the proposal/initiative should have on the beneficiaries/groups targeted.

- a strong network of awarded EH sites and cross-border cooperation among sites
- continuous increase of the number of sites awarded with the EH, to ensure an action rewarding excellence in the field of cultural heritage
- simplified application process for applicants with a two-step application process and with clear and precise selection criteria
- efficient governance structure for the action with clear roles for stakeholders
- continuous support to the awarded sites by the establishment of an permanent secretariat for the EH at European level.
- increased visibility of the EH, also through the possible introduction of a prize to directly support sites
- Support to the integration of EFTA/EEA countries, candidate countries and potential candidates by opening the scheme to countries outside of the EU
- UN Sustainable Development Goals (SDGs 4,8,10,11 and 16)

1.3.4. *Indicators of performance*

Specify the indicators for monitoring progress and achievements.

Indicators of performance for the EH will be integrated with those of the AgoraEU Programme.

1.4. **The proposal/initiative relates to:**

- ☐ a new action
- ☐ a new action following a pilot project / preparatory action¹⁴
- ☒ the extension of an existing action
- ☐ a merger or redirection of one or more actions towards another/a new action

1.5. **Grounds for the proposal/initiative**

1.5.1. *Requirement(s) to be met in the short or long term including a detailed timeline for roll-out of the implementation of the initiative*

In the short term: Ensure the carrying out regular selection and monitoring procedures as provided for in the legal basis.

The specific timeline in this regard can be found in the appendix to the decision.

Develop transnational partnerships, monitoring, submit monitoring reports of the panel to the EU institutions and national coordinators. Address any risks (e.g., funding shortfalls, visitor decline). Promotion and networking, collaboration with and participation in other heritage activities (e.g., European Heritage Days), supporting the awarded EH sites in terms of capacity building and communications.

1.5.2. *Added value of EU involvement (it may result from different factors, e.g. coordination gains, legal certainty, greater effectiveness or complementarities). For the purposes of this section 'added value of EU involvement' is the value resulting from EU action, that is additional to the value that would have been otherwise created by Member States alone.*

Reasons for action at EU level (ex-ante)

National governments play a central role in protecting and promoting their national cultural heritage. However, the evaluation of the European Heritage Label Action 2018-2024 found that the EHL adds significant value by creating a pan-European-network of heritage sites that share common goals and engage in collaborative activities. The label facilitates joint projects, including exhibitions, educational programs, and shared cultural initiatives, which have fostered cross-border partnerships and exchanges of best practices.

Expected generated EU added value (ex-post)

Common, clear and transparent criteria and procedures for the EH as well as coordinated identification and promotion of awarded sites are addressed in the legal basis. By reason of the scale and effects of the action, these needs can be better addressed at Union level

Renewing the legal basis will strengthen the initiative's capacity to increase the visibility of the European cultural heritage sites, to support the awarded sites more

¹⁴ As referred to in Article 58(2), point (a) or (b) of the Financial Regulation

efficiently and to increase flexibility in its design and improve its long-term coherence and impact.

This will ensure that the EU continues to play a constructive and complementary role in the cultural and heritage landscape. It will facilitate cross border collaboration among selected sites and other stakeholders of the action, building a network of European Heritage sites with strong European narrative.

The action will facilitate voluntary cooperation, knowledge exchange and visibility among the EH sites across EU countries and non-EU countries as well. The title can be awarded also to sites outside the EU in an EFTA/EEA country, a candidate country or a potential candidate participating in the EU's Creative Europe programme.

The EH supports national efforts by integrating them into a coherent and strategic EU context, helping to align cultural initiatives with broader EU priorities, such as youth engagement, sustainability and digital innovation. The initiative also promotes a more balanced geographic representation.

1.5.3. *Lessons learned from similar experiences in the past*

Strengthening the European Significance Criterion: While the EHL has effectively highlighted heritage sites that represent European values, many sites struggled to clearly demonstrate how their heritage connects to the broader European narrative, defining the “European significance”. Therefore, the draft of the legal basis for the EH action provides clearer guidance for applicants and national coordinators. It also takes up a key recommendation of the 2018-2024 evaluation, introducing a two-step selection process: the first stage assessing European significance to ensure only sites with a clear European connection proceed to the second stage.

Enhancing Digital Engagement and Accessibility: Ensuring that digital resources are accessible to all audiences, including those with disabilities, was a also key recommendation in the evaluation. The action plan as one of the application criteria therefore needs to show how the site develops and implement a local and regional outreach strategy, making use of digital tools and emerging technologies.

Feedback Mechanisms and the Selection Process: The current feedback mechanisms have been found not overall efficient. Many sites reported receiving limited or insufficient feedback, making it difficult to improve future applications. The panel carrying out the selection and monitoring process shall therefore include in his report not only a recommendation for the attribution of the title of the European Heritage but also an accompanying explanation for its conclusions regarding those sites which are not selected. Additionally, the two-step selection process could help improve the efficiency and quality of the selection process.

Sustainability and Future Growth: As the number of EH sites grows, a more sustainable framework to manage the expanding network is required. Simplifying the governance structure, a clear description of the roles of the Commission, the national coordinators and the panel as well as strengthening the support to the developed EH network are key objectives of the renewal of the legal basis.

Synergies with Other EU Programmes: Opportunities for greater synergy with other EU actions and programs have been identified. Examples are the European Capitals of Culture action, the New European Bauhaus and initiatives relevant to youth engagement and intergenerational fairness such as the Erasmus+ Programme,

in particular and the cultural routes of its DiscoverEU component. The aim to seek synergies and to ensure added value is directly addressed in Recital 11 of the proposal.

1.5.4. Compatibility with the multiannual financial framework and possible synergies with other appropriate instruments

The European Heritage aligns well with the Multiannual Financial Framework (MFF) as it supports EU priorities like cultural preservation, social cohesion, and European identity - key objectives funded under programmes like Creative Europe (2021–2027). Synergies also exist with instruments such as Horizon Europe (for research on heritage innovation), Erasmus+ (for educational projects linked to awarded sites), and Interreg and the European Regional Development Fund (ERDF) and Cohesion Fund for cross-border heritage cooperation.

1.5.5. Assessment of the different available financing options, including scope for redeployment

N/A.

1.6. Duration of the proposal/initiative and of its financial impact

☐ **limited duration**

☐ in effect from [DD/MM]YYYY to [DD/MM]YYYY

☐ financial impact from YYYY to YYYY for commitment appropriations and from YYYY to YYYY for payment appropriations.

☒ **unlimited duration**

Implementation with a start-up period from YYYY to YYYY,
followed by full-scale operation.

1.7. Method(s) of budget implementation planned

☒ **Direct management** by the Commission

☒ by its departments, including by its staff in the Union delegations;

☐ by the executive agencies

☐ **Shared management** with the Member States

☐ **Indirect management** by entrusting budget implementation tasks to:

☐ third countries or the bodies they have designated

☐ international organisations and their agencies (to be specified)

☐ the European Investment Bank and the European Investment Fund

☐ bodies referred to in Articles 70 and 71 of the Financial Regulation

☐ public law bodies

☐ bodies governed by private law with a public service mission to the extent that they are provided with adequate financial guarantees

☐ bodies governed by the private law of a Member State that are entrusted with the implementation of a public-private partnership and that are provided with adequate financial guarantees

☐ bodies or persons entrusted with the implementation of specific actions in the common foreign and security policy pursuant to Title V of the Treaty on European Union, and identified in the relevant basic act

☐ bodies established in a Member State, governed by the private law of a Member State or Union law and eligible to be entrusted, in accordance with sector-specific rules, with the implementation of Union funds or budgetary guarantees, to the extent that such bodies are controlled by public law bodies or by bodies governed by private law with a public service mission, and are provided with adequate financial guarantees in the form of joint and several liability by the controlling bodies or equivalent financial guarantees and which may be, for each action, limited to the maximum amount of the Union support.

Comments

N/A

2. MANAGEMENT MEASURES

2.1. Monitoring and reporting rules

The monitoring process for EH Sites will be carried out once every two years by the panel, in a set list of countries, in collaboration with their national coordinators.

The action will be evaluated once every 6 years, following the same approach as the current legal basis, where an external and independent evaluation will examine all elements, including the efficiency of the processes involved in running the action, the number of sites, the impact of the action, the widening of its geographical scope, how it could be improved and whether it should be continued.

2.2. Management and control system(s)

2.2.1. *Justification of the budget implementation method(s), the funding implementation mechanism(s), the payment modalities and the control strategy proposed*

The action will require three different costs:

Cost of the panel. The Commission ensures the reimbursement of the works of independent experts nominated by the different EU institutions with a dedicated budget line in the Annual Work Programme of the EU programme dedicated to Culture, in compliance with Art. 242 FR. Commitment.

Implementation of a secretariat to support the EH action. Under its current form, the European Commission launched a call for proposals for a grant that covers the costs of an organisation tasked with obligations established in the-said call for proposal. Commitment.

Prize. Building on the same model than the Melina Mercouri Prize awarded to European Capitals of Culture, it is proposed that the Commission may award sites with a Prize upon recommendation of the jury. Commitment.

All budget for the action will stem from the successor to the Creative Europe Programme.

2.2.2. *Information concerning the risks identified and the internal control system(s) set up to mitigate them*

The 2024 evaluation of the action did not identify risks with the first two payments listed hereabove.

No risks for the payment of the Prize to EH sites is foreseen.

2.2.3. *Estimation and justification of the cost-effectiveness of the controls (ratio between the control costs and the value of the related funds managed), and assessment of the expected levels of risk of error (at payment & at closure)*

The controls applicable to the European Heritage action are proportionate to the nature and volume of the expenditure involved. Expenditure under the action comprises three categories:

The payment for experts in the panel is governed by standard Commission rules on expert fees. Low risk of error given the limited number of transactions and clearly defined payment conditions.

The Prize awarded to designated and monitored sites following the recommendation of the European panel of low value (TBD but estimated between €10,000 and €20,000 per site). As payments will be made to a small number of identified recipients on the basis of clearly established criteria and panel recommendations, the risk is low.

The support structure is financed through a grant awarded in the framework of the successor of the Creative Europe Programme. The control costs and error risk associated with this grant are consistent with those applicable to operational grants monitored by EACEA

2.3. Measures to prevent fraud and irregularities

The responsible services will continue to apply their Anti-Fraud Strategy – that are in line with the Commission’s Anti-Fraud Strategy (CAFS) – to ensure inter alia that their internal anti-fraud related controls are fully aligned with the CAFS and that its fraud risk management approach is geared to identify fraud risk cases and adequate responses. Anti-fraud strategies of both EACEA and the Commission enable fraud risk to be addressed, mainly via measures to prevent irregularity which are then escalated in the event of fraud detection. The following measures will continue to be implemented, both at the parent DGs as in EACEA: monitoring missions in accordance with a defined monitoring strategy, clear reporting requirements, meetings with new beneficiaries.

3. ESTIMATED FINANCIAL IMPACT OF THE PROPOSAL/INITIATIVE

3.1. Heading(s) of the multiannual financial framework and expenditure budget line(s) affected

Existing budget lines

In order of multiannual financial framework headings and budget lines.

Comment: The EHL/EH action does not have its own funds. Its budget will stem from the successor to the Creative Europe Programme. The estimated impact on expenditure and staffing for 2028 and beyond is added for illustrative purposes only and does not pre-judge the next Multiannual Financial Framework. The source of financing and scope of Union financial commitment in the post-2027 period remain subject to the outcome of interinstitutional negotiations on future MFF and thereafter shall be determined through the annual budgetary procedure. All appropriations and staffing allocations as of 2028 are indicative.

Heading of multiannual financial framework	Budget line	Type of expenditure	Contribution			
	Number	Diff./Non-diff. ¹⁵	from EFTA countries ¹⁶	from candidate countries and potential candidates ¹⁷	From other third countries	other assigned revenue
2	Support expenditure for ‘AgoraEU’	Non-diff.	YES	YES	YES	NO
2	Creative Europe - Culture	Diff.	YES	YES	YES	NO

¹⁵ Diff. = Differentiated appropriations / Non-diff. = Non-differentiated appropriations

¹⁶ EFTA: European Free Trade Association

¹⁷ Candidate countries and, where applicable, potential candidates from the Western Balkans

3.2. Estimated financial impact of the proposal on appropriations

3.2.1. Summary of estimated impact on operational appropriations

- ☒ The proposal/initiative does not require the use of operational appropriations
- ☐ The proposal/initiative requires the use of operational appropriations, as explained below

The estimated impact on expenditure and staffing for 2028 and beyond is added for illustrative purposes only and does not pre-judge the next Multiannual Financial Framework. The source of financing and scope of Union financial commitment in the post-2027 period remain subject to the outcome of interinstitutional negotiations on the MFF 2028-2034 and thereafter shall be determined through the annual budgetary procedure. All appropriations and staffing allocations as of 2028 are indicative.

3.2.1.1. Appropriations from voted budget

EUR million (to three decimal places)

Heading of multiannual financial framework			Number	2						
DG: EAC			Year	Year	Year	Year	Year	Year	Year	TOTAL MFF 2028- 2034
			2028	2029	2030	2031	2032	2033	2034	
Operational appropriations										
Creative Europe - Culture	Commitments	(1a)	0.850	0.650	4.350	0.650	0.850	0.650	4.350	12.350
	Payments	(2a)	0.850	0.650	4.350	0.650	0.850	0.650	4.350	12.350
Appropriations of an administrative nature financed from the envelope of specific programmes ¹⁸										
Support expenditure for ‘AgoraEU’	Commitments = Payments	(3)	pm	pm	pm	pm	pm	pm	pm	pm

¹⁸ Technical and/or administrative assistance and expenditure in support of the implementation of EU programmes and/or actions (former 'BA' lines), indirect research, direct research.

TOTAL appropriations for DG EAC	Commitments	=1a+1b+3	0.850	0.650	4.150	0.650	0.850	0.650	4.350	12.150
	Payments	=2a+2b+3	0.850	0.650	4.150	0.650	0.850	0.650	4.350	12.150

Heading of multiannual financial framework	4	‘Administrative expenditure’ ^[1]
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DG: EAC		Year 2028	Year 2029	Year 2030	Year 2031	Year 2032	Year 2033	Year 2034	TOTAL MFF 2028-2034
Human resources		0.493	0.493	0.493	0.493	0.493	0.493	0.493	3.451
Other administrative expenditure		0.01	0.01	0.01	0.01	0.01	0.01	0.01	0.07
TOTAL DG EAC	Appropriations	0.503	0.503	0.503	0.503	0.503	0.503	0.503	3.521

^[1] The necessary appropriations should be determined using the annual average cost figures available on the appropriate BUDGpedia webpage.

^[2] If you report the use of appropriations under Heading 4, completing Annex 5 is a compulsory requirement.

		Year 2028	Year 2029	Year 2030	Year 2031	Year 2032	Year 2033	Year 2034	TOTAL MFF 2028- 2034
TOTAL appropriations under HEADINGS 1 to 4	Commitments	1.353	1.153	4.653	1.153	1.353	1.153	4.853	15.671
of the multiannual financial framework	Payments	1.353	1.153	4.653	1.153	1.353	1.153	4.853	15.671

The estimated impact on expenditure and staffing for 2028 and beyond is added for illustrative purposes only and does not pre-judge the next Multiannual Financial Framework. The source of financing and scope of Union financial commitment in the post-2027 period remain subject to the outcome of interinstitutional negotiations on the MFF 2028-2034 and thereafter shall be determined through the annual budgetary procedure. All appropriations and staffing allocations as of 2028 are indicative.

3.2.2. Estimated output funded from operational appropriations (not to be completed for decentralised agencies)

Commitment appropriations in EUR million (to three decimal places)

Indicate objectives and outputs ¹⁹			Year 2028		Year 2029		Year 2030		Year 2031		Year 2032		Year 2033		Year 2034		TOTAL	
↓																		
	OUTPUTS																	
	Type	Average cost	No	Cost	No	Cost	No	Cost	No	Cost	No	Cost	No	Cost	No	Cost	Total No	Total cost
SPECIFIC OBJECTIVE No 1 and 3 ²⁰ ...																		
- Output	Panel costs	0.35	1	0.350	1	0.350	1	0.350	1	0.3500	1	0.350	1	0.350	1	0.350	7	2.450
- Output	Support organisation	3.5	-	-	-	-	1	3.5	-	-	-	-	-	-	1	3.5	2	7
Subtotal for specific objective No 1 and			1	0.350	1	0.350	2	3.850	1	0.350	1	0.350	1	0.350	2	3.850	9	9.450

¹⁹ Outputs are products and services to be supplied (e.g. number of student exchanges financed, number of km of roads built, etc.).

²⁰ As described in Section 1.3.2. 'Specific objective(s)'

3																		
SPECIFIC OBJECTIVE No 2 ...																		
- Output	Prize	0.02	20	0.500	15	0.300	20	0.500	15	0.300	20	0.500	15	0.300	20	0.500	245	2.900
Subtotal for specific objective No 2			20	0.500	15	0.300	20	0.500	15	0.300	20	0.500	15	0.300	20	0.500	245	2.900
TOTALS			21	0.850	16	0.650	22	4.350	16	0.650	21	0.850	16	0.650	22	4.350	254	12.350

3.2.3. Summary of estimated impact on administrative appropriations

☒ The proposal/initiative does not require the use of appropriations of an administrative nature

☐ The proposal/initiative requires the use of appropriations of an administrative nature, as explained below

3.2.3.1. Appropriations from voted budget

VOTED APPROPRIATIONS	Year	Year	Year	Year	Year	Year	Year	TOTAL 2028 - 2034
	2028	2029	2030	2031	2032	2033	2034	
HEADING 4								
Human resources	0.493	0.493	0.493	0.493	0.493	0.493	0.493	3.451
Other administrative expenditure	0.010	0.010	0.010	0.010	0.010	0.010	0.010	0.070
Subtotal HEADING 4	0.503	0.503	0.503	0.503	0.503	0.503	0.503	3.521
Outside HEADING 4								
Human resources	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
Other expenditure of an administrative nature	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
Subtotal outside HEADING 4	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
TOTAL	0.503	0.503	0.503	0.503	0.503	0.503	0.503	3.521

3.2.3.2. Appropriations from external assigned revenues

N/A.

3.2.3.3. Total appropriations

TOTAL VOTED APPROPRIATIONS + EXTERNAL ASSIGNED REVENUES			Year	Year	Year	Year	Year	Year	TOTAL 2028 - 2034	
			2028	2029	2030	2031	2032	2033		2034
			HEADING 4							
Human resources			0.493	0.493	0.493	0.493	0.493	0.493	0.493	3.451
Other administrative expenditure			0.01	0.01	0.01	0.01	0.01	0.01	0.01	0.07
Subtotal HEADING 4			0.503	0.503	0.503	0.503	0.503	0.503	0.503	3.521
Outside HEADING 4										
Human resources			0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
Other expenditure of an administrative nature			0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
Subtotal outside HEADING 4			0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000

The appropriations required for human resources								
TOTAL	0.503	0.503	0.503	0.503	0.503	0.503	0.503	3,521

The appropriations required for human resources and other expenditure of an administrative nature will be met by appropriations from the DG that are already assigned to management of the action and/or have been redeployed within the DG, together, if necessary, with any additional allocation which may be granted to the managing DG under the annual allocation procedure and in the light of budgetary constraints.

The estimated impact on expenditure and staffing for 2028 and beyond is added for illustrative purposes only and does not pre-judge the next Multiannual Financial Framework. The source of financing and scope of Union financial commitment in the post-2027 period remain subject to the outcome of interinstitutional negotiations on the MFF 2028-2034 and thereafter shall be determined through the annual budgetary procedure. All appropriations and staffing allocations as of 2028 are indicative.

3.2.4. Estimated requirements of human resources

Comment: Under the current legal framework, 2 FTEs are already assigned to the management of the action.

- ☐ The proposal/initiative does not require the use of human resources
- ☒ The proposal/initiative requires the use of human resources, as explained below

3.2.4.1. Financed from voted budget

Estimate to be expressed in full-time equivalent units (FTEs)

VOTED APPROPRIATIONS	Year 2028	Year 2029	Year 2030	Year 2031	Year 2032	Year 2033	Year 2034
• Establishment plan posts (officials and temporary staff)							
20 01 02 01 (Headquarters and Commission's Representation Offices)	2	2	2	2	2	2	2
20 01 02 03 (EU Delegations)	0	0	0	0	0	0	0
(Indirect research)	0	0	0	0	0	0	0
(Direct research)	0	0	0	0	0	0	0
Other budget lines (specify)	0	0	0	0	0	0	0
• External staff (inFTEs)							
20 02 01 (AC, END from the 'global envelope')	1	1	1	1	1	1	1
20 02 03 (AC, AL, END and JPD in the EU Delegations)	0	0	0	0	0	0	0
Admin. Support line	• at Headquarters	0	0	0	0	0	0
[XX.01.YY.YY]		• in EU Delegations	0	0	0	0	0

(AC, END - Indirect research)	0	0	0	0	0	0	0
(AC, END - Direct research)	0	0	0	0	0	0	0
Other budget lines (specify) - Heading 4	0	0	0	0	0	0	0
Other budget lines (specify) - Outside Heading 4	0	0	0	0	0	0	0
TOTAL	3	3	3	3	3	3	3

3.2.4.3. Total requirements of human resources

TOTAL VOTED APPROPRIATIONS + EXTERNAL ASSIGNED REVENUES		Year 2028	Year 2029	Year 2030	Year 2031	Year 2032	Year 2033	Year 2034
• Establishment plan posts (officials and temporary staff)								
20 01 02 01 (Headquarters and Commission's Representation Offices)		2	2	2	2	2	2	2
20 01 02 03 (EU Delegations)		0	0	0	0	0	0	0
(Indirect research)		0	0	0	0	0	0	0
(Direct research)		0	0	0	0	0	0	0
Other budget lines (specify)		0	0	0	0	0	0	0
• External staff (in full time equivalent units)								
20 02 01 (AC, END from the 'global envelope')		1	1	1	1	1	1	1
20 02 03 (AC, AL, END and JPD in the EU Delegations)		0	0	0	0	0	0	0
Admin. Support line [XX.01.YY.YY]	• at Headquarters	0	0	0	0	0	0	0
	• in EU Delegations	0	0	0	0	0	0	0
(AC, END - Indirect research)		0	0	0	0	0	0	0
(AC, END - Direct research)		0	0	0	0	0	0	0
Other budget lines (specify) - Heading 4		0	0	0	0	0	0	0
Other budget lines (specify) - Outside Heading 4		0	0	0	0	0	0	0
TOTAL		3	3	3	3	3	3	3

Considering the overall strained situation in Heading 4, in terms of both staffing and the level of appropriations, the human resources required will be met by staff from the DG who are already assigned to the management of the action and/or have been redeployed within the DG or other Commission services.

The staff required to implement the proposal (in FTEs):

	To be covered by current staff available in the	Exceptional additional staff*
--	--	--------------------------------------

	Commission services			
		To be financed under Heading 7 or Research	To be financed from BA line	To be financed from fees
Establishment plan posts	2		N/A	
External staff (CA, SNEs, INT)	1			

Description of tasks to be carried out by:

Officials and temporary staff	Coordination and management of the action, organisation of the meeting with the panel, liaison with the support organisation, adoption of Commission decision on nomination of EH sites, supervision of the support organisation.
External staff	Support to the implementation of the European Heritage Label, technical support to the panel, editorial assistance to the panel, develop communication activities for the action, other tasks for administrative support.

3.2.5. Overview of estimated impact on digital technology-related investments

N/A.

3.2.6. Compatibility with the current multiannual financial framework

The proposal/initiative is consistent with the proposal for the MFF 2028-2034.

3.2.7. Third-party contributions

The proposal/initiative:

- ☒ does not provide for co-financing by third parties
- ☐ provides for the co-financing by third parties estimated below:

Appropriations in EUR million (to three decimal places)

	Year 2024	Year 2025	Year 2026	Year 2027	Total
Specify the co-financing body					
TOTAL appropriations co-financed					

3.3. Estimated impact on revenue

- ☒ The proposal/initiative has no financial impact on revenue.
- ☐ The proposal/initiative has the following financial impact:
- ☐ on own resources
- ☐ on other revenue
- ☐ please indicate, if the revenue is assigned to expenditure lines

EUR million (to three decimal places)

Budget revenue line:	Appropriations available for the current financial year	Impact of the proposal/initiative ²¹			
		Year 2024	Year 2025	Year 2026	Year 2027
Article					

For assigned revenue, specify the budget expenditure line(s) affected.

N/A.

Other remarks (e.g. method/formula used for calculating the impact on revenue or any other information).

N/A.

4. DIGITAL DIMENSIONS

4.1. Requirements of digital relevance

Requirement 1:

Article 14 (Designation) :

2. The sites that are awarded the title of the European Heritage shall display the logo of the action available on the website of the Commission.

Article 18 (Practical arrangements):

1. The Commission shall implement the action. It shall in particular:

(...)

(e) publish on its website all reports of the panel;

Actors affected or concerned by the requirement are the European Commission and other EU institutions, National authorities, Beneficiaries and the general public. The high-level process affected is Dissemination.

4.2. Data

The data provided is related to the action's information, news and results and comes from public reports or selection and monitoring forms managed by the European Commission.

4.3. Digital solutions

The digital solution envisaged is the continuation of the section on the European Heritage Label on the Creative Europe website, with an update to its name. The main mandated functionalities are the dissemination of the action's information, news and results. The responsible body will be the European Commission. Accessibility will be catered for and

²¹ As regards traditional own resources (customs duties, sugar levies), the amounts indicated must be net amounts, i.e. gross amounts after deduction of 20% for collection costs.

reusability will be considered in accordance with Commission standards.

No need for using AI.

Without prejudice to Regulation (EU) 2016/679, the European Commission shall ensure the security, integrity, authenticity and confidentiality of the data collected and stored for the purpose of this regulation.

4.4. *Interoperability assessment*

N/A.

4.5. Measures to support digital implementation

N/A.