

# Framing European Heritage and Identity: Cultural Policy Instruments of the European Union

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## Abstract

This submission examines the impact of the European Union (EU) policy efforts to construct a European Heritage and a sense of belonging within the wider European population on Heritage policy. The article explores how the EU has selected and wielded instruments that frame particular values that (1) respond to specific policy problems and impact European heritage(s) and (2) build political myths articulating particular visions of what the EU represents and how the population should engage with European integration. Through analysis of four case studies (European Heritage Label, the EU Horizon 2020, European Cultural Routes and the EU Energy Efficiency Directive) in a policy instrument typology, we reveal that the frames embedded in the EU policy instruments carry a range of different values and priorities that often compete, leading to policy outcomes that are fragmented in their effect.

**Keywords:** cultural heritage; European Heritage; European identity; European Union; multi-level governance; policy instruments

## Introduction

The European Union (EU) has experienced a series of events and crises challenging the EU integration future. EU policy-maker reaction concerning the failed 2004 EU Constitution demonstrates EU efforts to link integration to deeper senses of European identity and community (Norman, 2003). In this context, EU decision-makers promoted a common cultural policy, harnessing ideas of common heritage and identity (Craufurd Smith, 2004). Cultural heritage (henceforth labelled ‘Heritage’) policy nests within this larger policy ambition, consequently facing similar challenges. Creating, maintaining and communicating a common Heritage has become an important, explicit European integration priority, but one fraught with political and conceptual contestation.

Our contribution assesses how the EU uses a ‘mix’ (set) of policy instruments to build distinct sector-specific policy frames and ‘myths’ (defined as the narratives that give political meaning) of European integration, heritage and identity (Jo, 2007; Kølvrå, 2016; Lähdesmäki, 2018). Hood (1983) defines policy instruments as tools enabling actors to implement governance strategies. Most policy sectors contain instrument mixes (Flanagan et al., 2011); instruments can reinforce and/or undermine each other when used together in the same sector. Our research question asks to what degree have different policy instruments containing EU values and aims created coherent understandings and messages about EU Heritage and consequently integration. Although the EU has other policies (e.g., regional policy) that impact European integration and cultural heritage, heritage policy is an explicit effort to prioritise these aims and nurture a European identity. We interrogate

how this effort, which the European Commission, the European Parliament (EP) and the member states have pursued in various and different Heritage policies, encounters a series of difficulties resulting from the intrinsic design and implementation of these policies rather than active political resistance. We investigate the degree to which the inclusion of more than one policy instrument with differing objectives and stipulations may lead to friction between the two instruments; at the same time however, the political compromises and ambiguities may mean that the Heritage instruments contain their own tensions that may be equally or even more significant.

### *Significance*

Growing scholarly literature highlights the expanding integration objective of EU cultural policy and governance, whilst also acknowledging the implications of uncertainty surrounding the meaning of culture (Craufurd Smith, 2004). EU Heritage policy focuses on both material/tangible and immaterial/intangible heritage, actively celebrating and giving common meaning to specific places and practices (Lähdesmäki, 2016; Thatcher, 2019). Like culture more generally, creating meaning for this common Heritage is ongoing and inherently ambiguous (Lähdesmäki, 2014).

Saurugger and Thatcher (2019) argue that the sense of diverging Heritage policy reflects the persistence of long-standing member state identities and potentially conflicting, contrasting EU-level values. Stressing the EU's Heritage pursuit through different mechanisms such as political symbols and market regulation, Thatcher (2019) demonstrates how the EU has promoted Heritage policies (without an EU legal definition of Heritage) that evoke general values, such as democracy, that are not exclusively EU or European and that may compete with other values (e.g., economic growth). Equally, scholars note the contradictions between promoting a union of European peoples and a process creating one European people, just as asserting a common European heritage conflicts with celebrating a variety of European heritages (Paganoni, 2015; Shore, 2006).

Dimitrova and Steunenberg (2013, 2017) highlight a core reason for the gap between EU policy and populace: the implementation variation of EU Heritage policy efforts. Stressing the relatively weak Commission effort to ensure compliance, they note the diverse member state positions on Heritage, the varied capacity of national administrative departments and differing views of domestic implementing actors (Dimitrova and Steunenberg, 2013, 2017).

The literature finds that member states and other EU actors will disagree in their visions about culture and the EU role, but our core insight is that the EU strategy to overcome these differences faces a continual pattern of instrument design and implementation issues. This lack of coherence occurs across a wide variety of instruments shaping EU Heritage efforts to bolster community identity through cultural heritage. In taking a policy instrument approach, we acknowledge that the approach does not provide a detailed analysis of the political motivations and actions of the policy actors driving policy; nevertheless, what the instrument approach does focus on is how those motivations and actions are translated into real policy consequences and outcomes. The motivations of policy-makers do not tell us how the policy works on the ground and in real terms.

Our focus is studying particularly the design and implementation of Heritage policy instruments that reflect the inherent ambiguity of operationalising what Heritage means.

Our puzzle is to examine why EU policy-makers (e.g., the European Commission), in the pursuit of integration and European community-building, continue to add layers of instruments that contain tensions and that do not achieve the expected impact. Heritage practitioners, in designing and adding more instruments, are not identifying these ongoing tensions and implementation issues. Our analysis adds an important comparative analytical perspective, focusing on three current instruments with explicit aims of enhancing and maintaining Heritage. Even more original is our examination of policy dynamics (and unintended consequences) of EU efforts that have significant consequences with no explicit Heritage intention. We offer a more nuanced analysis of tensions, priorities and exclusions contained in the EU policy approach to Heritage. Analysing EU policy framing and myth-making approaches, we explore how the EU has designed policy instruments to deliver outcomes that often clash with each other (e.g., protecting the single market versus acknowledging marginalised societal groups) and that reinforce/undermine EU myths.

### *Methods*

Our methodological approach focuses on qualitative case study analysis. To understand differences in policy instrument design and how they shape policy interactions, our case selection takes four instruments from Hood's (1983) typology outlined in the next section. We differentiate between instruments with a specific Heritage focus versus those without. The European Heritage Label (EHL) is a prototypical, popular informational instrument. The European Cultural Routes (ECR), another widely adopted Heritage instrument, emphasises building permanent networks between route members/sites; it is a key organisation-building instrument. The third instrument is EU Horizon 2020 (H2020), funding general knowledge creation, with Heritage as only one priority. The fourth instrument is a regulation existing outside the EU Heritage Sector: the Energy Performance of Buildings Directive (EPBD). Its inclusion represents EU integration reality, that core EU governance occurs via rules, many of which may have significant, unintended impacts on European Heritage. Although measuring unintended consequences is difficult, EU integration may have had a greater, unintended impact on European Heritage than the explicit Heritage policies. The EPBD is a directive where the linkage between policy aims and their unintended impact is more readily discerned: policy-makers face a complex challenge of trading off protecting heritage versus mitigating climate emissions.

Our research utilises qualitative methods (Gerring, 2017), combining assessments of key publicly available documents (e.g., reports, communications), five observation visits to European Heritage sites and 15 semi-structured interviews (of European Commission officials, national heritage officials and academics with practitioner involvement in the EU instruments, see Appendix A) undertaken between 2017 and 2021. The authors conducted the anonymised interviews in English and German, focused on the design and implementation of the instruments. The Horizon 2020 project *CoHERE. Critical Heritages: Performing and Representing Identities in Europe* (Grant Agreement No: 693289) funded the preliminary theoretical and empirical work. The project also utilised 40 publicly available short interviews, organised and conducted by the Routes4U Project, for discursive content. The next section explains the theoretical framework, synthesising policy instrument, policy framing and political myth literatures before the comparative empirical analysis that follows.

## 1. Theoretical Framework

There are various dimensions to policy change, which may range from selecting instruments to the philosophical approaches shaping policy outlooks (Hall, 1993). Policy instruments crystallise social choices and discourses in actual policy responsibility and efforts. Presented in Table 1, we make an original theoretical contribution combining both the micro-level activity and implications of the Heritage instruments and the wider discursive themes underpinning and informing them.

### *Designing and Layering Instruments*

We focus on the basic design of the instruments and their calibration to address specific policy issues (see Table 1). An important consideration to the policy instrument's design and calibration is the degree the policy-maker prescribes (within the instrument) the *means* of achieving policy and specifies the policy *ends* to be achieved (Jordan et al., 2005; Russell and Powell, 1996). This consideration determines how prescriptive the instruments are. Second, we use Hood's (1983) instruments' typology to categorise instrument design choices. Hood focuses on how public actors manipulate resources to achieve policy aims. Acknowledging that some instruments can contain multiple characteristics, the four resources underpinning instruments are the following: organisation (establishing official or unofficial organisations and networks to govern policies); authority (harnessing legal, administrative and hierarchical powers); finance (offering money, e.g., subsidies, or taking it, e.g., taxes); and information (using knowledge and communication to steer societal behaviour or inform public policy).

Table 1: Theoretical Framework.

| Concept                           | Political focus                                                             | Choices                                                                                                                                                                                            |
|-----------------------------------|-----------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Mythmaking                        | Co-producing narratives that give meaning to EU events and policies         | <ul style="list-style-type: none"> <li>● Replacement</li> <li>● Tense layering</li> </ul>                                                                                                          |
| Foundational EU integration myths |                                                                             | <ul style="list-style-type: none"> <li>● Layering and integration/synthesis</li> </ul>                                                                                                             |
| Framing                           | Co-produced view and narrative of how to resolve sectoral policy challenges | <ul style="list-style-type: none"> <li>● Replacement</li> <li>● Tense layering</li> <li>● Layering and integration/synthesis</li> </ul>                                                            |
| Policy layering of instruments    | Policy instrument choices made for a sector containing prior instruments    | <ul style="list-style-type: none"> <li>● Material harmonisation</li> <li>● Material competition</li> <li>● Shared framing</li> <li>● Clashing framing</li> </ul>                                   |
| Policy instrument type            | Type of instrument to meet policy challenges                                | <ul style="list-style-type: none"> <li>● Authority</li> <li>● Information</li> <li>● Finance</li> <li>● Organisation</li> </ul>                                                                    |
| Specific policy instrument design | Instrument calibration                                                      | <ul style="list-style-type: none"> <li>● Flexible instrument means</li> <li>● Prescriptive instrument means</li> <li>● Flexible instrument ends</li> <li>● Prescriptive instrument ends</li> </ul> |

Our third analytical layer addresses the placing or ‘mixing’ of particular instruments within the policy context of European Heritage and EU integration more broadly. Multiple instruments and instrument designs impact on European Heritage, and instruments in other sectors can influence the Heritage sector. Kay (2007, pp. 582–584) suggests that instrument selection in this context creates the dynamic of *tense layering*, in which each new instrument interacts with the other instruments in place. Such interaction may be material, non-material or a combination. Material interactions include a new instrument competing with extant instruments for policy resources (finance, personnel, etc.) or an instrument that may directly benefit some stakeholders over others. Non-material interaction includes framing dimensions, where instruments represent or give different weight to, particular values and policy attitudes (Kay, 2007). Consequently, where a new instrument has potential to trigger such interactions, its addition to the policy mix may create ongoing tension or even policy disruption. Although ideational and design harmonisation is theoretically possible, the policymaking reality is such that policy actors will act incrementally and seek ‘patches’ to current policy problems, leading to less coherent overall outcomes. This effort of layering brings together broader choices about perspective and more instrumental design choices, bridging the micro and macro.

### *Policy Framing*

Policy instruments are the tools that implement policy goals, but those goals are shaped by more abstract, over-arching beliefs. The next layer of abstraction in our framework is policy frames, which we define as sector/issue focused (e.g., Heritage, environment and finance) narratives that policy-makers co-construct. Frames enable policy-makers to assess a particular problem in a sector, formulate a solution and cajole others to embrace this solution (Snow and Benford, 1988). Noakes (2000) posits that state and other actors desiring to protect governing authority and legitimacy will use *official frames* to mobilise groups within society to support state narratives and refute alternative frames.

A critical element to policy framing is assessing the potential role that other actors/communities can play in the policy problem. Policy framing shapes the extent to which other actors are included and/or benefit/lose from the policy decision and instrument choice. In contested areas such as culture, heritage and identity, we are likely to see political actors focusing on different Heritage dimensions, leading them to diverging views of what constitutes appropriate public policy and which actors should be involved (Schön and Rein, 1994).

Table 1 outlines the framing options. Policy-makers can replace frames in the range of instruments within a policy sector or, more likely, layer frames and instruments with other instruments that may have differing frames. Previous EU framing studies suggest that framings can co-exist in the same policy sphere with or without integration attempts. Policy actors can seek to transform the sector’s governance by replacing frames over time but often with limited success (Daviter, 2011; Radaelli, 1995).

### *Political Myths*

Policy frames focus on immediate policy problems in a policy sector. Underpinning such policy choices are more abstract narratives that we label myths. Mythmaking is a *process*

of saying and acting that engages a range of actors in the activity of continually working and re-working the myth (Bottici, 2007, p. 99). Myths are narratives reflecting broader values transcending policy sectors and speaking to wider European integration. In providing broader values and beliefs about the nature of Europe, its identity, heritage and culture, myths confer broader legitimacy to those governing through these instruments (Della Sala, 2010). Mythmaking is not a pejorative value judgement but rather signifies the construction of longer-term narratives carrying political meanings that explain EU thinking over time (Flood, 2013). Kølvråa (2016) and others stress the importance of mythical narratives depicting the past, linking this depiction to contemporary political issues and future desired outcomes. Political myths are narratives that give meaning to political events by creating a sequence of events, practices and symbols that function as a coherent plot (Bottici, 2007, pp. 106, 112–115; Kølvråa, 2016; Lähdesmäki, 2018).

Applied to EU integration, there are primary myths that explain the identity of the EU community and why the community has come together. Various scholars agree that a core integration narrative exists: namely, that the EU has been responsible for ensuring the prevention of war and the flourishing of democracy and prosperity in post-1945 Europe (Della Sala, 2010; Kølvråa, 2016; Lähdesmäki, 2018). The sense of shared common history, including war and reconciliation, that has created the values leading to the EU is another important primary myth (Jo, 2007; Lähdesmäki, 2018). There are other myths that sustain EU political legitimacy by giving meaning to EU political action and priorities, such as environmental policy (Lenschow and Sprungk, 2010). Policy instruments constitute activities that reflect and reinforce the broader European integration mythmaking. As the next section demonstrates, EU Heritage policy reflects a range of frames and myths within the Heritage sector as well as other policy sectors. Policy-makers may choose instruments and priorities that appeal to different myths and frames. Policy-makers generally choose to avoid removing policies and the attached myths, instead layering new policies and myths onto existing ones.

## 2. Comparative Case Analysis

Our decision to take case studies from European cultural heritage policy is grounded in existing multi-disciplinary recognition that within European policy instruments, there are significant overlaps in framing between those addressing cultural heritage and those making particular use of European foundational myths of culture and identity (Kølvråa, 2016; Lähdesmäki, 2018; Niedermüller, 1999).

Within this, our selection of the four case studies (European Heritage Label; European Cultural Routes; Horizon 2020; Energy Performance of Buildings Directive) rests on their fit within Hood's typology of policy instruments (see Table 1). Our initial research and analysis indicated that European heritage policy instruments do not fit into only one type, but rather that they could be differentiated through their distribution across the typology. We selected an instrument from each type for our cases: Authority (EPBD); Information (EHL); Finance (H2020); Organisation (ECR). Selecting from all four types of instruments emphasises a point often overlooked in Heritage studies, which tends to focus on informational tools.

### *Instrument Context and Background*

Informational instruments manipulate knowledge, strategies, messages and data to achieve policy goals. The *European Heritage Label* (EHL) is a representative informational tool, which is the most prevalent instrument type in the Heritage policy sector. The EU has general data tools, notably EUROSTAT, that provide online statistics on cultural consumption, digital platforms (e.g., Europeana) and strategies (European Commission, 2017).

The EHL initiative responded to the 2005 French Referendum negative result on the EU Constitution Treaty (Interview 1). French, Spanish and Hungarian policy-makers were instrumental in creating a 2006 intergovernmental labelling initiative operating without supranational direction (Lähdesmäki, 2014, pp. 403–404). The intergovernmental administration was problematic, lacking co-ordinating and operational management, so the European Council adopted conclusions to transform the instrument into an official EU instrument (Lähdesmäki, 2014). The subsequent 2011 Decision establishing the EHL intended to strengthen a sense of EU belonging (European Union, 2011), particularly framed around the notion of shared ‘European values’ and Heritage, appreciation of diversity (national and regional) and intercultural dialogue (European Commission, 2012, p. 5).

Case two, the *European Cultural Routes* (ECR), provides tourists and visitors information to help them explore ‘how Europeans have lived since ancient times’ (European Commission, 2018b). ECRs have an informational dimension but stand out for their institution building characteristics. The ECR’s prime task is building networks of local and regional actors across each route. Unlike the other three cases, the Council of Europe (COE) originally developed the ECR. As early as 1964, the COE organised an expert panel to improve the collective awareness of European cultural locations and translate this into ‘leisure culture’ (Council of Europe, n.d.). The panel decided that cultural journeys were vital to individual education and an enjoyable leisure pursuit. The COE launched the programme in 1987, with the inaugural certified route being Santiago de Compostela Pilgrimage Routes (Council of Europe, 1987). Subsequently, the European Commission incorporated the instrument into its own Heritage portfolio (Council of Europe, 2012).

A wide range of EU financial instruments impact explicitly on Heritage, but the biggest and most important funds predominantly focus on other, broader EU policy goals. Cohesion funding of regions and sustainable agriculture accounts for 80% of the 2021–2027 EU budget and funds Heritage, but their policy framing explicitly prioritises regional support and targets other non-Heritage priorities more strongly (European Commission, 2024c). We have chosen *Horizon 2020* (H2020), Horizon Europe’s predecessor during the 2014–2020 period, as the financial case. This (€80bn) programme always had a broader focus than cultural heritage. The European Commission Communication proposing H2020 stressed that its name reflected the ambition ‘to deliver ideas, growth and jobs for the future’ (European Commission, 2011). Within this one funding tool, H2020 combined all existing EU research and innovation funding.

EU rules and regulations define our fourth case: the *Energy Performance of Buildings Directive* (EPBD). Other EU regulations exist that explicitly engage with culture and

Heritage; they tend to focus on enhancing the Internal Market and protecting the community within its borders. For example, Directive 2014/60 regulates the return of cultural objects unlawfully removed from the member state territory; it is framed in terms of Heritage, but also on preserving the market. Nevertheless, a potentially bigger EU regulatory impact on Heritage is the unintended effect, potentially positive or negative, of rules *not* focused on Heritage. A Member State Working Group on EU Directives and Cultural Heritage (WGEUDCH) identified a list of 16 directives and 3 regulations, all non-Heritage tools, that had a clear, potentially negative impact on Heritage (Nypan, 2007). Whilst not contesting the core purposes of these instruments, the WGEUDCH isolated content that limited the efforts to preserve the authenticity of elements of EU Heritage. The EPBD was one of the Directives the WGEUDCH highlighted. Originally issued as Directive 2002/91/EC, EPBD was replaced in 2010 by Directive 2010/31 and amended by Directive (2018/844/EU). The EPBD's consistent core mission was to improve building energy performance, a vital EU climate crisis priority.

### *Instrument Design*

In examining design, we examine how prescriptive our case instruments are and how their elements help or hinder implementation. Our expectation is that lack of prescription, combined with an absence of sustained support, will lead to widely varying policy outcomes. The EU intended EHL sites to be “gateways” for citizens to explore and increase their understanding of Europe’ [DG Education and Culture (DGEC), 2013, p. 3]. As informational instruments, the overall guidance is flexible and non-prescriptive for both instrument means and ends. The EHL is marginally prescriptive in that it specifies criteria for places to become designated sites. Site operators must institute communication and work plans to enhance and maintain the site (European Commission, 2019). Nevertheless, the EHL instrument is completely voluntary, placing the burden on individual site actors to trigger a national selection process.

The label confers no site protection, nor does EHL status support site management, educational or outreach activities in any meaningful way, beyond the label's potential prestige. Between 2023 and 2026, the EU established a temporary project creating a European Heritage Label Bureau to support EHL sites (European Commission, 2024a), but financial responsibility for individual EHL sites remains in the hands of the designated national body. Since 2021, the European Heritage Days Programme has supported specific projects for three EHL sites each year, but this is not sustained support across the population of sites (EHL Team, 2021).

As with the EHL, the ECR programme offers some guidance on certification requirements, but the instrument remains relatively flexible in specifying the means and ends for the instrument. Although the instrument focuses on brands and information, it has an explicit expectation that networks of actors govern individual projects (Council of Europe, n.d.). The ECR criteria involve defining a heritage theme, building a network covering the route, building co-operation on heritage aspects and so forth. The Commission held calls for support yearly in 2011–2014; this programme funding promoted the development of physical or virtual ‘routes’ that ‘have a transnational or European dimension and are based on cultural heritage’ (European Commission, 2018a). Since 2017, EU

funding has been more intermittent, with ECR projects able to apply for EU funding sources focusing on the themes of Cultural Tourism, Culture and Social Inclusion and Environmental policy (European Institute of Cultural Routes, 2019). The ECR also differs in the dual role of the EU and COE: the Commission Directorate-General for Regional and Urban Policy and the COE supported the instrument through the Routes4U Project from 2017 to 2020. To support the ECR certification process, the COE created the Enlarged Partial Agreement on Cultural Routes (EPA) in 2010 to bolster the ERC programme politically and financially (Council of Europe, 2013, Aim 1.1).

H2020 and the earlier seven EU research programmes have supported Heritage since 1986 (European Commission, 2017). H2020 contained criteria for assessing proposals, evaluating outcomes, and required regular reporting until a project's end. Although the programme articulated thematic priorities and set restrictions on how money was spent and reported, the funding maintained relatively flexible parameters concerning project content and expected outcomes. H2020 contained three thematic pillars embracing Heritage priorities: Excellent Science, Industrial Leadership and Societal Challenges (European Commission, 2017).

The original 2002 EPBD aimed to establish a common EU framework and methodology to assess all buildings' energy performance (European Union, 2002). Other design elements included: establishing minimum standards on energy performance of new buildings and existing buildings subject to major renovation and a (informational) system for building energy certification. Compared to the other three instruments, there is more prescription in the rules and standards, a methodology for calculating a building's energy performance and the certification process (instrument means), but member states are responsible for setting the minimum standards using EPBD's methodology. Member states are also allowed to exempt historic buildings and other types (European Union, 2002, Article 6). Accordingly, member state implementation has more latitude relative to other EU environmental directives, but more prescription than our other cases.

### *Framing*

To isolate the frames in our case studies, we examine closely the preliminary matter in each piece of legislation as well as specific articles spelling out the objectives. Within the preliminary overview, the preamble of the document will lay out the rationale for the legislation and the intent. We acknowledge that these instruments will often contain several framings (e.g., ensuring value for money), but we focus on the frames central to the instrument.

The EHL Decision articulates various primary objectives including 'strengthening European citizens' sense of belonging to the Union' and 'strengthening intercultural dialogue' (European Union, 2011, Art. 3, 1). Whilst the Decision details the aims, objectives and rationale, it also contains inherent contradictions. These sites encompass common values of European citizens, but the sites simultaneously 'need' to raise citizens' awareness of 'their common cultural heritage' (European Union, 2011, Art. 3, 2). The primary EHL frame is articulated as encouraging a sense of belonging to Europe, through European history, culture and memory, particularly concerning key figures, moments and sites (all of which could be summed up under the term heritage) and connected to 'shared values' (European Commission, 2012, p. 5; Lähdesmäki, 2017a, p. 58).

The COE (1987) ECR Declaration's first sentence emphasises the 'human dimension of society, the ideals of freedom and justice, and confidence in progress are the principles which, throughout history, have forged the different cultures that go to make up the specifically European identity'. The frame recognises that different cultures constitute the European community but articulates these as helping constitute the wider European identity. A second core frame focuses on projects restoring and rediscovering this Heritage. A very strong framing also focuses on the economics of tourism; this framing has increased since the 1987 Declaration. The 2010 EPA gave particular focus to 'themes of symbolic importance for European unity, history, culture and values and the discovery of less well-known destinations' (Council of Europe, 2013, Aims 1.1). The core framings of this revised approach tackled questions of European history and shared values but with a clear emphasis on enhancing tourism. The ECR's economic and rural development framing is strong as the Commission and the COE stress the ECR's potential role in supporting local economies, with 90% of the ECR operating in rural areas (Council of Europe, n.d.).

Contrasting with the ECR and EHL, the three dominant Horizon 2020 frames are not Heritage focused, reflecting their wider integration purposes (European Commission, 2011). The first centres on promoting smart, sustainable and inclusive growth, responding to the 2007 economic crisis and other societal challenges. The second framing stresses maximisation of EU research and innovation performance. Third, the Commission's proposals emphasise the institution's ambition to invest in Europe's future whilst maximising value for money.

The 2002 EPBD frames its role as ensuring integration of environmental protection requirements into EU activities (European Union, 2002). Equally stressed are framings articulating the need to pursue increased energy efficiency to ensure EU compliance with the Kyoto Protocol. EPBD is specifically framed as an ongoing response within a package of instruments to mitigate climate change emissions. Another framing centres around the tool's importance in shaping energy demand management, which in turn enables the EU to 'influence the global energy market and hence the security of energy supply in the medium and long term' (European Commission, 2018a).

Having examined the core frames of how these instruments seek to approach sectoral policy questions, we will now examine the broader integration narratives. With the specification of key policy frames and myths, we then explore the tensions with and between these narratives in the *Tense Layering* section.

### *Mythmaking*

All four case studies pursue mythmaking narratives of a 'better society' and 'community of Europeans'. The sense, however problematic and contested, of sharing past history, collective responsibility and a path towards a common future underpin the four instruments in different ways. The notion of a 'shared' past is crucial to the 'myth' of a clearly identifiable 'European culture', which is the EHL's basis and its perceived value as a tool for educating young people about the significance of their European heritage and promoting intercultural dialogue (European Union, 2011).

The EHL's value and purpose closely connect to European memory and identity mythmaking; this mythology is itself premised on emotional influencing strategies

(Lähdesmäki, 2017b, p. 710). The EHL has strong ‘branding’ informational dimensions: successful EHL applicants are expected to use the EHL logo and publicity materials to strengthen the reach of a collective ‘European heritage’ myth, beyond national, regional or local heritage notions. Lähdesmäki (2014, p. 410) considers this ‘politics of image-making’ part of a bottom-up EU strategy for integration, eschewing overtly top-down measures; this exemplifies a *more-than national* approach to presenting heritage as European. Of the EHL sites extant in 2024, four sites explicitly imbue the primary EU integration myth, focusing on the Founding Fathers and integration efforts to create peace (City of Maastricht, Village of Schengen, Strasbourg European District, de Gasperi Museum). Many more indirectly tap into the primary myth by memorialising the outcome of wars, desire for peace and efforts at transnational co-operation. Several websites focus on the market freedoms myths; a larger number focus on common history and European tradition of rights myths.

Although originally a COE initiative, the ECR conducts similar mythmaking, linking European integration to European identity. The original ECR Declaration (COE, 1987) created the Santiago de Compostela Pilgrim Route (known as the Camino). The Camino reinforces this collective identity by, amongst other things, gathering diverse regional historical sites embodying historical movement, exchange and pilgrimage but also by including sites with a heavily Christian religious aspect and military sites (defending against a hostile, external and non-Christian ‘Other’) (Grabow, 2010). The COE depiction of the routes often articulates primary European integration myths: a common identity around Christian worship and pilgrimage (e.g., the Camino); shared memory of state strife and authoritarianism prior to integration (Iron Curtain Route); common identity through ethnic movement (Viking Route); and shared political heritage (Habsburg Route) (Council of Europe, 2024). Other myths celebrate underlying dynamics that have contributed to integration and a sense of a European community, such as the freedom of the market (e.g., the Hansa Route) and shared European artistic heritage (the Mozart Route).

Although H2020 has a core framing broader than Heritage, specific research calls give a greater sense of how European integration was framed for the research projects. In examining the Horizon 2020 calls and the EU Framework Programmes that preceded H2020, Le Boulay (2021, p. 9) suggests that Framework Programme 6 onwards invited projects addressing how a long historical process created a European identity that is the basis of EU integration. Le Boulay (2021, p. 11) argues that the identity concept enabled history-focused researchers to link their research on the past with the EU’s contemporary concerns about strengthening links between EU integration and the EU citizenry.

The EPBD is part of the EU’s 1972-onwards environmental focus, coming after the initial integration event and therefore not directly part of the EU founding myths. Nonetheless, the EU has developed a secondary myth of a ‘Green Europe’ that is supportive of core integration myths (Lenschow and Sprungk, 2010, p. 136). The EU has pursued a myth emphasising EU legitimacy because its integrative role is needed to enhance member state environmental well-being. This myth goes beyond a sectoral narrative about the EU’s environmental policy success because it links Green Europe to the European ‘brand’, helping make Europe distinctive (and an international leader), reinforcing a common European identity. The Green Myth is framed as a ‘precondition for the continued

success of a long-standing myth of the European Union, the common and competitive market' (Lenschow and Sprungk, 2010, p. 141). It also links to the primary myth of the EU being a unique post-war peace project that saved Europe from danger. The EPBD supports these myths by mitigating the projected climate change peril and the endangered EU energy supply.

### *Tense Layering*

Having laid out the elements of instruments as well as the myths and frames underpinning these tools, we now bring our analysis together by examining each instrument mix in the wider instrumental context.

The EHL contains no provision for finance and is not prescriptive in terms of rules that clash with other instruments' objectives. EHL designation does not favour any set of practitioners or visitors. Nevertheless, tense layering exists because other labels exist. This challenges Heritage managers to decide which label to prioritise. More significant is the clash of values, frames and myths. Sites often have difficulties in articulating the 'European significance' when they may already have significance to and/or labelling or designation from other layers of heritage governance (for example, national protected monument status or UNESCO World Heritage Site status), for example, the Athens Acropolis.

The ECR programme involved limited finance (relative to EU Structural Funds, etc.) that (more recently) Route managers could compete with other varied applicants for EU/COE funding. Like the EHL, there is little prescriptiveness to clash with other policy objectives. The ECR is interesting given the instrument's explicit acknowledgement and incorporation of newer COE instruments, reflecting the evolving 'social context of heritage' (Council of Europe, n.d., p. 15). Various COE conventions, including the 2005 Faro Convention on the Value of Cultural Heritage for Society, provide greater depth of Heritage understanding for the Cultural Routes' effort (Interview 12). Beyond conflicting time demands for ECR site managers, the major tensions come in the EU's (often conflicting) values and other non-cultural heritage instruments supporting European regions containing Heritage sites. The Routes4U interviews, often of senior ECR officials, have sharply contrasting values emphasis. Stefano Dominioni (2019), EPA Executive Secretary, stressed the importance of shared Heritage reflecting the cultural diversity of this same community. This pronouncement (with its own inherent tensions) closely aligns with COE and EU myth-building, but contrasts, for example, with Constanze Metzger (2019), whose values response focused on macro regional strategies and macro cultural identity. Indirectly, the range of frames that can be invoked in the ECR applications and administration can create tense layering. For example, the successful increase of tourist numbers visiting Heritage places and travelling around routes may threaten the area's environmental sustainability and Heritage preservation.

H2020 competes with other EU funding for the finite EU multi-year budget; it also competes for applicants who might prioritise other EU funding. Nevertheless, H2020's limited prescription (beyond application, spending and reporting processes) means it is unlikely to collide directly with other EU policies and rules. The relatively small monetary amount is less threatening to competing budgetary interests, which also can apply for H2020 grants.

The EPBD establishes rules, methods and minimum standards for member states but does not involve an EU budget. The European Commission and other EU decision-makers anticipated one direct tension, seeking to allow states to exempt certain buildings due to historical and aesthetic considerations, but the exemption lets member states or subnational actors decide on implementation. Given the considerable historic building stock in many EU countries, planners and other actors face the challenge of preserving the integrity of buildings and the global climate, which can directly and indirectly affect heritage conservation.

### *Outcomes*

As of 2024, there are 60 EHL (post-2011 EHL Decision) sites covering 22 member states (European Commission, 2024c). This suggests an active, positive and popular tool for enshrining Heritage. Nevertheless, the European Commission's (2019) and our findings discern a tense layering leading to various instrument issues.

Contradictions exist within the EHL and its framing. Whilst sites can be designated as having 'European significance', the nature of this significance is contested. Furthermore, EHL applicants frequently misunderstood this mythmaking, and visitors often overlook EHL designation (European Commission, 2019, p. 13). If the European significance is not evident to visitors, then the public associate the site's cultural value with other aspects. Significantly, given European populism's growth, belief in a unified and identifiable 'European heritage' is problematic and contested, connecting to ongoing debates around what constitutes 'European identity' and why (e.g., see Assmann, 2007; Bodei, 1995). Beyond the conceptual question is the challenge of how sites communicate their European values and significance (DGEC 2013, p. 10; 2014, p. 4; 2015, p. 15; DGEC, 2017, p. 19).

The EHL's lack of prescription, whilst it might attract more applicants, will lead to significant variation in understanding by applicants and panel reviewers and in the actual instrument administration. Panel reports note the failure of articulation of European values as a key reason for sites not being awarded the label (DGEC, 2017). Additionally, EHL sites struggle, with ambiguous guidance, to develop and articulate the EHL alongside pre-existing international heritage frameworks, such as UNESCO World Heritage Sites (European Commission, 2018c); consequently, some meaningful European sites may opt out. For example, the Berlin Wall Memorial holds the intergovernmental EHL label but has not applied to the current scheme (Interviews 3 and 1).

In addition, EHL implementation lacks specific funding from the EU to support such efforts, beyond limited capacity/network building by the 2023 Bureau (Interview 8). Reports from the EHL monitoring highlight this as a key inherent problem, primarily given the challenge for sites implementing new measures without new funds (DGEC 2014, p. 21, 2017, pp. 27, 29).

The ECR Programme also enjoyed significant growth, with 47 routes recognised in 2024 and 25 recognised since 2013 (Council of Europe, 2023). Compared to criticisms of the EHL, the routes have tended towards more nuanced European identity framings and on meanings that embrace a full range of European experience (e.g., Jewish Heritage), negative European history (e.g., ATRIUM) but not explicitly Europe's global impact (excepting partly the Transhumance Route). Nevertheless, the complexity of the framings

attached to many ECR projects can lead ECR stakeholders and visitors to overlook core European Heritage aspects, European identity and European integration to privilege goals such as visitor numbers; various ECR actors focus on important concerns such as the emptying of remote (e.g., Alpine) regional communities (Interview 18). The ECR shares with the EHL the informational problem of showcasing both diversity and commonality in European identity (Interview 17). This reflects tensions in COE and EU official framing and means that information messaging can confuse visitors and site practitioners. More broadly, the largely episodic and marginal linkage between the ECRs and education exacerbates the minimal public identification with the routes (Interview 9; Crivillers Simon, 2021).

Moving to the organisational dimension, stakeholder networking has occurred within the routes; groupings of routes have pursued, for example, H2020 funding (Interviews 9 and 12). Although the data varies, some evidence indicates that the Routes contribute to cultural tourism in particular ECR sites (COE, 2011, p. 62). The research reveals instances where Cultural Routes work together, particularly similar types, for example, pilgrimage routes. Nevertheless, the findings question the long-term sustainability of ECR aims. Crucially, many ECR site managers and officials have raised the limited earmarked funding from EU, national or regional sources as a major problem (Interview 9; Carpentier, 2021; Crivillers Simon, 2021). The funding exacerbates the challenge of co-ordinating Route stakeholders, which tend to have national associations as legal entities and often struggle to communicate across languages. Engagement with regional and local authorities that often dismiss such heritage networks as unimportant is also problematic (COE, 2011, p. 140; Interview 9). These factors interact, incentivising a greater focus on short-term projects over longer-term solidification of the network (COE, 2011). Route network stakeholders experience considerable staffing turnover (Interview 9), and the overworked network head is unable to push networking activities compared to more short-term efforts and branding (Interview 12; COE, 2011, p. 45). The resource scarcity also means that little evaluation of routes' economic and cultural heritage occurs despite routes having to produce 3-year reports (Interview 12; Carpentier, 2021; COE, 2011, pp. 62, 80–81).

The EU H2020 funding supported 33 projects with a specific Heritage aspect in the 2014–2020 programme, spending over €76 m (European Commission, 2024b). Using the Cordis database, we determined that within each project's reporting period, the 33 projects generated: 215 peer-reviewed articles, 25+ interactive applications and software tools/platforms, four exhibits, five films and one folk oratorio (European Commission, 2024b). More importantly for the long-term Heritage progression, the projects have generated networking of educational and non-educational institutions across an average of 6.5 countries, with most projects involving different higher education institutions and small and medium enterprises. Evidence from several projects suggests some professional learning occurring concerning grant application, management and research values (Interview 15). Although certain projects have conducted research mentioning Heritage instruments, we found limited direct involvement of our three other instruments in the 33 H2020 projects: the Transromanica ECR participated in the IMPACTOUR project.

The European Commission (2013, pp. 15–16) review of the preceding 2007–2013 Heritage funding results suggested that the period's funding had some social impact

through generating and communicating more scientific knowledge and through education activities, but less direct economic impact and insufficient efforts to address the needs of 'stakeholders and end-users'. Although not focused on Heritage projects, the Commission's (2023) overall assessment of H2020 projects notes difficulties in assessing the longer-term and wider project impact on society and economy, partly due to insufficient project monitoring and evaluation. Specific practitioners highlight this issue noting that the research infrastructure to link academic knowledge and stakeholders is 'underperforming', without the needed investment and identification of the centres, databases, methodologies, devices and people that Heritage stakeholders can engage (Interview 8). There are also too few Commission staff to provide this linkage, and academic practitioners have often resisted the possibility for integration. A larger gap exists when shifting from organised stakeholders to the general public, in terms of accessing and benefitting from H2020 data (Interview 15).

The Commission (2018a) noted that introducing energy efficiency requirements in national building codes in line with the EPBD has led new buildings to consume only half as much energy as 1980s buildings. The original EPBD's Article 6 seeks to mediate tense layering by allowing member states to exempt certain historic buildings. Nevertheless, our findings suggest that the exemption creates its own tension, centred around how national and locally placed practitioners interpret the exemption. Interpretation of the balance between preservation and energy renovation may vary radically between localities, based on the policy actor's interpretation and potentially taste (Interview 10; Mazzarella, 2015). Beyond aesthetic issues, significantly older buildings contain very specific uncertainties about their energy qualities and ability to cope with energy retrofitting (Pracchi, 2014).

In terms of potentially undermining Heritage preservation, the WGEUDCH noted how member state administrations vary in how they use this exemption (Nypan, 2009). Some incorporate it, to varying degrees with respect to types of heritage structures, in their national legislation whilst others do not (Nypan, 2009). Furthermore, where such exemptions have existed in member state legislation, Nypan (2009) argues that these exemptions are restrictive, not including the valuable heritage structures. In response to the Directive requirement to use more energy efficient windows in historic buildings, the French Ministry of Culture and Communication requested in 2007 exemptions for more than protected buildings such as 'protected environments (cultural & natural), the surrounding perimeter of historic monuments, for 'classed' sites, for UNESCO sites and for buildings protected by regional authorities, for buildings recognised as XX-century heritage,' and for apartment houses and apartments that meet certain criteria (Nypan, 2009). The French government only approved a regulation giving a narrower range of protection to those buildings falling under the Cultural Heritage Act (France, 2007, Art. R. 111–122). Although the EPBD did not specifically prescribe this condition, the scope for how different member states interpret it creates a dynamic that can harm Heritage.

The exemption could damage efforts to reduce the climate crisis, which can harm old EU building stock. For example, Dutch practitioners tend to invoke the exemption for Heritage buildings rather than seek to implement the directive (Interview 10). Italy's legislative decree implementing the EPBD does not specify how conservation officers ensure compliance of historic buildings undergoing renovation or restoration (Mazzarella, 2015). A core challenge is that the Directive did not specify the technical problems relating to

Table 2: Case Study Comparison.

| Instrument                          | <i>EHL</i>                                                                              | <i>ECR</i>                                                                                                                           | <i>H2020</i>                                                                                                                      | <i>EPBD</i>                                                                                                   |
|-------------------------------------|-----------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------|
| Core frame                          | Fostering European belonging through Heritage                                           | Boost tourism by celebrating Heritage as the foundation of European identity                                                         | Promote smart growth, knowledge and R&D innovation, Heritage as core mission of European identity                                 | Mitigating climate change through energy conservation                                                         |
| Myth                                | European community and culture – Unity in diversity                                     | European community and culture – Unity in diversity                                                                                  | Win-win community of European integration                                                                                         | Preserving European peace and the Green Market                                                                |
| Instrument calibration              | Designate significant Heritage sites for Europe – <i>marginally prescriptive</i>        | Designate and certify transnational routes enabling tourists to better understand European heritage – <i>marginally prescriptive</i> | Undertake significant research for Europe, including on heritage – <i>marginally prescriptive</i>                                 | Create a regulatory framework for assessing building energy performance – <i>prescriptive</i>                 |
|                                     | No money – <i>non-prescriptive</i>                                                      | Limited money for specific projects – <i>marginally prescriptive</i>                                                                 | Money for specific projects – <i>partially prescriptive</i>                                                                       | No money – <i>non-prescriptive</i>                                                                            |
|                                     | Inform public of cultural value and encourage sense of being European – <i>flexible</i> | Inform public of cultural value and encourage sense of being European, build supporting network – <i>flexible</i>                    | Fund research and dissemination to specialist/non-specialist audiences – <i>flexible beyond application process and reporting</i> | Creation of rules and energy performance certificate; <i>somewhat less flexible setting minimum standards</i> |
| Tense layering and internal tension | <i>Little tension in layering, but considerable tension in frames, definitions</i>      | <i>Little tension in layering but considerable tension in multiple frames and defining what is European</i>                          | <i>Flexible with small budget = little tension</i>                                                                                | <i>Exemption both eases and creates tension</i>                                                               |

Notes: Bold indicates the authors’ analytical verdict about the policy instruments.

energy retrofitting of historic buildings, leading to a wide variety of interpretations and implementation (Mazzarella, 2015).

Conclusion

Assessing these EU policy instrument case studies indicates that the nature of the instrument content (its calibration as prescriptive or flexible, its framing and the underlying myths) itself – in conjunction with other factors – results in varied tense layering and internal tensions, affecting levels of policy integration, thereby creating unintended impacts within the policy mix.

First, the four instruments are layered together in a way that does not trigger a high level of interaction (and so potential tension) in addressing policy problems. For example, ECRs sometimes overlap with EHL sites (e.g., the Cluny EHL site and Cluniac ECR; the Imperial Palace EHL site and the Habsburg and Charles V ECR), but the evidence does not suggest organisers of one instrument make strong reference to or connect with the other. This partly reflects the relatively low visibility of Heritage instruments to the policy elite and general public. ECRs have a notable collaboration between different routes – interacting within the same instrument type rather than between types. There are also signs of low-level inter-instrument interaction: for example, the funded H2020 research projects did engage with other instruments and indeed set up additional instruments such as the Cultural Heritage Working Group. Other (non H2020) EU project funding has helped launch some ECRs, such as the Creative Europe fund supporting the creation of the European Route of Industrial Heritage. Our research does show some tense layering, in that some instruments with no explicit Heritage purpose (EPBD Directive) work against some explicit Heritage efforts, but that they do so for unintended reasons. Arguably, creators of this Directive anticipated and sought to avoid tense layering between EU Heritage and climate objectives through the exemption route. Nevertheless, the lack of funding resource (apart from H2020, although its funding is small in EU budget terms), the consequent lack of organisational capacity and lack of prescriptiveness in the instruments means that there is minimal tense layering *between* the four instruments.

Second, our findings suggest, contrary to expectations of scholars examining policy mixes (e.g., Flanagan et al., 2011; Kay, 2007), that tense layering here is *not* due to instruments being layered upon instruments, but rather due to non-material *conflicts* over goals and perspectives contained *within the instruments themselves*. In principle, integration of values across the instruments should be possible: they share common myths around EU values and Heritage. Nevertheless, all four instruments contain *tensions between frames* that underpin EU mythmaking, and they place the consequent policy pressure on local practitioners.

Lacking resources and support, different practitioners unsurprisingly make varied choices, resulting in divergent messages for stakeholders and the general public. The mosaic metaphor often used to describe European Heritage aptly depicts the instrument policy mix operating in the Heritage policy sector: a rather incoherent mosaic of instruments often carrying multiple (and sometimes contradictory) policy frames.

Comparing the instruments across our analytical dimensions (instrument calibration, core frame, myth, tense layering and internal tension), we identify the following differences and similarities (see Table 2). At the instrument calibration level, the instruments share a degree of flexibility in specifying implementation. Whilst there are overarching goals and requirements, particularly with respect to the EPBD, there is still some flexibility in how the instruments allow actors to pursue the instrument's means and ends. Lack of money reinforces the diversity of approaches found in the EHL and is reflected to some extent in the EPBD and the ECR. The case of the EPBD offers a warning that, even in the most prescriptive case instrument, interpretation and implementation of the stipulations can differ significantly, consequently impacting negatively on Heritage (or instead prioritising Heritage over other values such as climate change mitigation).

Nonetheless, all four instruments contribute to the EU myths of a diverse but unified community that the EU promotes and performs. As ECR and H2020 demonstrate,

Heritage contains many instruments that come from multiple official EU frames and which also support important EU myths. None of these official frames and myths provide an explicit counter narrative to each other. Rather, the tension lies within. These four instruments contain competing visions of identity and policy values that challenge all stakeholders. Furthermore, certain frames, centred on EU market reinforcement and economic competitiveness, and certain myths of the inevitable progress of the EU market and free movement have the greater voice. The lack of resources and resulting institutional capacity in Heritage policy means that there is an open question of how to sustain the networks, ideas, instruments and sites in the future, indicating that the instruments' framing tensions, identified here, are likely to endure if the instruments' funding and capacity building offer does not increase.

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## Appendix A:

Anonymised interviews, conducted by authors, in chronological order:

- 1 European Commission official, Brussels, 27.6.2017.
- 2 Heritage site practitioner, Germany, 29.10.2017.
- 3 Two heritage site practitioners, Germany, 30.10.2017.
- 4 Heritage site practitioner, Germany, 31.11.2017.
- 5 European Commission official, Brussels, 17.7.2018.
- 6 Heritage site practitioner, Poland, 26.11.2018.
- 7 Heritage site practitioner, Poland, 26.11.2018.
- 8 European Commission official, Brussels, 19.3.2019.
- 9 European Cultural Routes practitioner, Germany, 27.2.2020.
- 10 Member State Conservation Civil Servant, online, 26.5.2021.
- 11 Heritage academic and H2020 Project Lead, online, 4.6.2021.
- 12 European Cultural Routes practitioner, online, 15.6.2021.
- 13 European Cultural Routes practitioner, online, 22.6.2021.
- 14 Heritage academic and EC expert, online, 05.07.2021.
- 15 Heritage academic and H2020 Project Lead, online, 8.9.2021.