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Introduction

The inter-relation between cultural heritage and environmental sustainability has emerged as a critical area of inquiry in contemporary policy studies. As the climate crisis intensifies, questions arise about the role that cultural policies, practices, and institutions might play in sustainable futures. Within the European Union, where cultural heritage holds particular significance as both a pillar of collective identity and an instrument of political cohesion, the articulation of heritage and environmental concerns reveals fundamental assumptions about the nature of culture, its relationship to the natural world, and the possibilities for transformative change.

This thesis examines the conceptualization of nature and environmental sustainability within European Union cultural heritage policy. Despite growing recognition of the interconnections between cultural and environmental dimensions of sustainability, the integration of these domains within institutional frameworks remains fraught with conceptual ambiguity and practical challenges. The European Union presents a particularly compelling case study, given its ambitious environmental commitments under the European Green Deal and its simultaneous investment in cultural heritage as a foundation of European values and identity.

The central research questions guiding this analysis are: how are nature and environmental sustainability conceptualized in European Union cultural heritage policies? What role does heritage play in relation to the environment, and what role does environment play in relation to heritage, according to these frameworks?

These questions analyze the underlying assumptions, narratives, and frameworks through which European Union institutions articulate the relationship between cultural heritage and environmental sustainability, describing both the possibilities and limitations of current policy approaches.

To address these overarching questions, it is first necessary to understand how the European Union defines and approaches cultural heritage within its institutional architecture, including the legal competences and policy instruments at its disposal. Since environmental sustainability considerations in the European Union framework have evolved considerably, particularly following the adoption of the European Green

Deal, examining this trajectory reveals shifting priorities and emerging conceptual frames that increasingly link heritage to environmental sustainability. The Green Deal and related initiatives such as the New European Bauhaus have repositioned heritage not merely as an object of preservation but as an active element in climate policy, circular economy strategies, and the broader zero-emission agenda. Yet this integration is not neutral: heritage serves political functions within EU governance, contributing to identity construction, legitimation, and the mobilization of citizens around sustainability goals. Understanding these dynamics requires attention to both the instrumental uses of heritage and the genuine tensions that arise when preservation imperatives meet decarbonization targets.

This research examines the conceptualization of nature and environment in European Union policies, applying recent theoretical frameworks on cultural sustainability. Scholars such as Katriina Soini and Inger Birkeland (2014), Jenni Pekkarinen (2025), and Miikka Pyykkönen (2024) have developed analytical tools for understanding the diverse ways in which culture and sustainability can be related, from preservation and instrumental approaches, to more radical conceptualizations that challenge the dominant narratives around culture and nature. By applying these frameworks to the European Union's cultural heritage policy, this thesis describes how, in the analyzed institutional discourse, policies both reflect and shape broader cultural foundations regarding the relationships between humans, heritage, and nature.

This research also provides insights regarding the connection between heritage and politics, examining how the European Union mobilizes cultural heritage for political, economic, and diplomatic purposes while navigating the tensions between cultural diversity and European cohesion. The analysis links heritage definitions and sustainability frameworks and describes how they reflect competing ideological orientations ranging from conservative preservation imperatives to neoliberal instrumentalization to emerging environmentalist perspectives.

The thesis adopts a qualitative approach to policy analysis, examining key European Union documents from 2014 to 2025, a period spanning from the emergence of major European Union policies that connect heritage and sustainability, through the European Year of Cultural Heritage in 2018, to the implementation and legacy of the

European Green Deal framework. This temporal scope allows for the identification of continuities and shifts in policy discourse, revealing how environmental considerations have gradually entered heritage policy while remaining subordinate to economic growth objectives and identity-building imperatives. The analysis draws upon the Soini and Birkeland (2014) cultural storylines framework and the Pekkarinen (2025) ecosystemic approach to map the diverse and sometimes contradictory framings that coexist within European Union institutional discourse.

The thesis is structured as follows. Chapter 1 establishes the conceptual framework, examining scholarly discourse on cultural sustainability, the various roles attributed to culture within sustainability frameworks, and emerging post-anthropocentric perspectives that reconceptualize culture-nature relations. Chapter 2 addresses the European Union's competences in cultural heritage, tracing the legal and political foundations of European Union action in this domain. Chapter 3 analyzes definitions of cultural heritage in European Union policy, describing the political dimensions of heritage conceptualization. Chapter 4 examines environmental sustainability as defined in the Green Deal framework, establishing the parameters within which heritage-environment integration occurs. Chapter 5 presents the core policy analysis, tracing the evolution of environmental sustainability within the European Union’s cultural heritage frameworks from 2014 to 2025. The thesis concludes by synthesizing findings and reflecting on the implications for both scholarship and policy practice.

CHAPTER 1

Environmental sustainability and cultural policies: a conceptual framework

This chapter examines the evolving intersection of environmental sustainability and cultural policies through various interconnected conceptual lenses. This structure traces the key ideas that animate current scholarship. The analysis begins with the problem of defining and placing culture within the sustainability discourse, moves through different analytical critiques, and examines emerging scholarly frameworks that fundamentally reconceptualize culture-nature relations, challenging the dualistic and anthropocentric assumptions that have historically characterized dominant approaches to culture and sustainability. The chapter concludes by analyzing scholarship insights about cultural institutions practices and challenges regarding environmental sustainability in the cultural field.

1.1 Culture in sustainable development frameworks

The academic literature identifies a fundamental problem pervading cultural policy, scholarship, and practice: both ‘culture’ and ‘sustainability’ have been conceptualized in varying ways across time and disciplines, this ambiguity and vagueness resulting in the general exclusion, or elusive inclusion, of culture in sustainable development frameworks. Of the two concepts, sustainability, despite its diverse interpretations, has developed a more structured and coherent framework, while culture and cultural sustainability remain considerably more varied and vague in their definitions.

Sustainability, as a concept, emerged from fundamentally ecological concerns such as the need to preserve life on Earth, mounting anxieties about resource

management and climate change, and growing awareness of the long-term consequences of human behaviour (Katriina Soini and Inger Birkeland 2014). The 1987 United Nations report *Our Common Future*, better known as the Brundtland report, provided the foundational definition of sustainable development, a definition deliberately broad in scope and open to application across diverse domains. Since then, the concept of sustainability has undergone several developments, most notably the tripartite model comprising environmental, economic, and social pillars, which continues to pervade policy frameworks such as the European Green Deal. Throughout this evolution, however, culture has entered sustainability discourse only tentatively, through disjointed and marginal attempts.

As Jenni Pekkarinen (2025) and Elena Borin, Mara Cerquetti, and Leticia Labaronne (2025) highlight, despite decades of advocacy and efforts, culture's position within the United Nations 2030 Agenda and its 17 sustainable development goals (SGDs), remains surprisingly limited. While the environmental aspects remain, at least discursively speaking, at the origin of the sustainability discourse, economic and social aspects have been widely integrated and included in policies, being stably recognized and described as pillars intertwined with and non-divisible from the environmental sustainability goals.

Culture has not been systematically included in sustainability frameworks, practices, and institutional policies for a long time, and still struggles to find its place nowadays. Scholars agree in affirming that the difficulty in articulating the relation between culture and sustainability, and its vague and discontinuous expression in policies and institutional frameworks, is largely due to the ambiguity surrounding what we mean by 'culture' itself, both conceptually and in practice. This definitional ambiguity is described as the main reason for culture's marginalization in international sustainability agendas. In their exploration of the scientific discourse on cultural sustainability, scholars document how policymakers oscillate between different and sometimes contrasting definitions and conceptualizations, creating conceptual vagueness:

"Cultural advocates and policymakers tend to use the notion of culture in

> sustainability discussions to mean both arts and heritage and entire ways of life in the anthropological sense, which makes the concept vague, ineffective, and inoperable in theoretical and practical realms ” (Pekkarinen, 2025).

Although institutional discourse, particularly at the international level, continues to struggle with conceptualizing the relationship between culture and sustainability, scholars and organizations have produced over the recent decades a vast corpus of ideas, concepts, frameworks, and evidence on the importance of integrating culture into sustainability discourse, and vice versa. This chapter seeks to recapitulate some of the most recent and influential positions, including emerging approaches that reframe the entire culture and sustainability discourse towards less anthropocentric, and more systemic views.

This scholarly turn has recently found some resonance in international policy, though institutional engagement with culture and sustainability has remained cautious, and operating within prevailing anthropocentric and growth-oriented frameworks. International organizations have increasingly engaged with the culture-sustainability nexus, and, as the European Union policy analysis in subsequent chapters will demonstrate, mounting efforts to elaborate this relationship within policy and programmatic frameworks have recently emerged.

Soini and Birkeland (2014) attribute this growing academic and policy interest to a “recent acceptance of and openness to the geographical and cultural diversity of the world associated with globalization and localization”. They argue that dominant institutions have become more attuned to the socially and culturally constructed nature of concepts and to the evidence that even ‘sustainable development’ and ‘sustainability’ are not neutral and fixed categories but derive from, and constitute, particular worldviews, value systems, and interpretations. In the case of the European Union, however, this growing engagement with cultural sustainability cannot be attributed solely to such an opening in horizons. As the analysis of scholarship discourse about European Union heritage definition will show, the development of European Union cultural sustainability frameworks is also linked to more overtly political interests.

1.2 Culture in, for, as sustainability

1.2.1 Defining culture

Scholars broadly agree that a fundamental obstacle to the development of cultural sustainability policy lies in the absence of a shared definition of culture itself. Academics, institutions, and policymakers oscillate between narrow understandings, meaning for example culture as the arts, heritage, and creative industries, and wider ones that include culture as ways of life, values, and worldviews. Even within these broad categories, significant disagreements persist over how, where, and if, the boundaries should be drawn.

As Pekkarinen (2025) highlights, academic responses to this ambiguity diverge considerably, with some scholars embracing the multidimensional nature of culture as a strength, arguing that diverse understandings provide flexibility for addressing complex sustainability issues across varied contexts, and others calling for more focused definitions.

Soini and Birkeland's (2014) conceptualisation refers to the wide definition of culture as "[...] the condition and premise for action, meaning, and communication [...][as well as the ensemble of][...] symbolic patterns, norms, and rules of human communities", that divide humans from nature, and from other humans. In the narrow sense, they define culture as civilisation, and as "[...] the improvement of the human, and to that which is excellent (for example, in the arts and science)".

Pekkarinen (2025) addresses this vagueness in definition by stressing the importance of conceptually differentiating culture, intended as the scope of cultural policies, and culture as a broader entity. A narrow definition of culture, as the domain in which cultural policy operates, would include arts, heritage, creative industries, and cultural institutions. The wider definition refers to ways of life, worldviews, values, and symbolic systems in the anthropological sense. Pekkarinen (2025) argues that both understandings are necessary and intertwined with different roles in the wider ecosystem of Earth sustainability: culture in the narrow sense, as the scope of cultural

policies, forms what she calls the ‘cultural ecosystem’ while culture in the wide sense constitutes the ‘cultural foundations’ that shape mindsets, habits, and values across all sustainability, and in general human, dimensions.

Pyykkönen (2024) attributes the persistent vagueness surrounding definitions of culture and cultural sustainability to the inability of cultural policies to conceptualize culture in a radically different, nature-paired, and ecological way. Pyykkönen identifies two reasons for culture’s marginalization in sustainability discourse: first, when culture is understood narrowly, as arts, heritage, or creative expressions, he argues the scope is too limited for policymakers to see how culture could play a major role in the green transition of societies. When culture is approached broadly as ‘way of life’, the concept fragments, in his opinion, into countless aspects of existence without being explicitly linked to any specific policy domain, becoming what he (drawing on Pirnes, 2008) calls a “politically useless empty signifier” (Pyykkönen 2024). In other words, policymakers cannot clarify culture’s role in sustainability because they have not yet grasped that such clarification demands an entirely new understanding of what culture means in an era of ecological crisis, and, more fundamentally, of what culture means in relation to nature and vice versa.

1.2.2 Three roles of culture

Beyond the contested definitions of culture itself, a second layer of conceptual complexity concerns where culture stands in relation to sustainability, and what sustainability means in culture. Soini and Birkeland (2014) identified three distinct roles that scholars and policymakers have assigned to culture within sustainability frameworks. These were structurally conceptualized by Joost Dessein, Katriina Soini, Graham Fairclough, and Lummina G. Horlings (2015) and furtherly developed by Katriina Soini and Joost Dessein (2016) into a widely adopted analytical framework distinguishing culture’s role ‘in’, ‘for’, and ‘as’ sustainable development. These three roles are often intertwined in discourses and reflect different emphases and underlying assumptions about both the nature of culture intended in a narrow or wider sense, and of sustainability itself as environmental protection, economic development, or social cohesion.

The first position, culture ‘in’ sustainability, treats culture as a fourth distinct pillar alongside the ecological, economic, and social dimensions. The focus is on the internal sustainability of the cultural sector: ensuring the richness, conservation, maintenance, preservation, and resilience of cultural forms, actors, and institutions. In this position, the focus is on assuring the sustainability of culture in order to transmit it to future generations. (Soini and Dessein, 2016).

The second position, culture ‘for’ sustainability, frames culture as an instrument or mediator for achieving broader sustainability aims. Here, culture serves as a driver and enabler of ecological, social, or economic sustainability, valued for what it can accomplish in service of other goals. The central question becomes: what can culture do for sustainable development? As the analysis of scholarly discourse will demonstrate, this is one of the most prevalent frameworks through which culture is understood, studied, and described in sustainability research and policy, particularly regarding its role in local development, diversity, social cohesion, and economic vitality. However, this position also attracts the most criticism. Critics argue that culture is treated instrumentally, with its role predominantly framed in economic terms: culture as a tool for fostering growth and job creation. As the analysis of European Union’s policies will show, this economic emphasis is evident, though the European Union also stresses culture's social role in fostering democracy, social cohesion, a sense of belonging, and connection to a common European history and space. The ecological dimension within this framework has received less attention, though it is increasingly being explored in both research and policy. Emerging areas of focus include the role of culture and heritage, traditional practices, and indigenous knowledge in promoting sustainable conservation and circular economy approaches, as well as the capacity of the arts to raise awareness about climate change. Nevertheless, scholars such as Pyykkönen (2024), argue that even when ecology and environment are incorporated into this framework, economic growth and development remain the ultimate objectives.

The third position, culture ‘as’ sustainability, describes culture in an overarching role: culture as a necessary foundation that encompasses and underpins all other dimensions of sustainable development, and as a lens through which to understand sustainability itself. Drawing primarily on broader anthropological understandings of

culture, as ways of life, worldviews, and values, this perspective suggests that any transition to a truly sustainable society requires fundamental cultural transformation: a shift in the mindsets, values, and behaviours that currently drive unsustainable practices. Within this framing, culture assumes a pivotal role, as it can foster movement toward alternative paradigms, a transformation essential to ensuring the wellbeing of our planet and all its forms of life.

Pekkarinen (2025), through the ecosystemic approach, proposes a full integration and interconnection of these frameworks, also overcoming the conventional separation between environmental, social, and economic dimensions of sustainability, treating them instead as interconnected ecosystems in constant interaction. This ecosystemic perspective reframes the culture in, for, and as sustainability distinctions and the traditional three-pillar model as interconnected aspects of a dynamic whole, bounded ultimately by planetary limits.

Soini and Birkeland (2014), while not proposing an encompassing framework, analyze the different angles through which culture and sustainability are described and propose approaching the definition problem by examining the very nature of concept formation itself. They argue that cultural sustainability's lack of fixed definition derives from the inherent characteristic of concepts that function transdisciplinarily and at supra-disciplinary level, operating across and beyond traditional disciplinary boundaries. Moreover, rather than simply describing or representing the world, concepts actively construct the problems and the potential solutions they address. In this case, the very definitions of ‘culture’ and ‘sustainability’ are shaped by how they are deployed.

Although ecosystemic approaches like Pekkarinen's (2025) have in some respects superseded earlier analyses by systematically connecting the various dimensions of culture and sustainability, Soini and Birkeland's (2014) observation that cultural sustainability may require changes in the discursive order and open alternative policy options anticipated what has since become a more explicit critique of dominant ‘Western’ scholarship. As they concluded, “cultural sustainability does not belong to one discipline or within a hierarchical system of concepts; it is transversal and overarching at the same time. The unfolding of the complexity of this discourse has only begun” (Soini and Birkeland, 2014, p. 221).

This unfolding has taken a decidedly non-anthropocentric turn in more recent work. Pyykkönen (2024) argues that the fundamental obstacle to integrating culture meaningfully into sustainability frameworks is not merely definitional vagueness but rather the anthropocentrism embedded in how both concepts have been constructed: “Current mainstream cultural policy understands culture as merely a human issue and makes humans the subject of and to cultural policy” Pyykkönen (2024), positioning humanity as the sole locus of meaning and value. This anthropocentric framing, Pyykkönen contends, is incompatible with genuine ecological sustainability, which requires recognising the interconnectedness and interdependence between human and nature. What emerges from this trajectory is a recognition that the transformation required for sustainability, and for cultural sustainability, may be far more radical than initially conceived.

1.3 Cultural storylines and political views

Soini and Birkeland's (2014) identify seven distinct storylines through which cultural sustainability is articulated, and link these to four broader political and ideological contexts. Their work reveals that debates over cultural sustainability are never merely technical or definitional but fundamentally political, reflecting competing visions of what culture is, what sustainability requires, and whose interests should be prioritised. Soini and Birkeland present these storylines moving from perspectives oriented toward preservation and continuity, through approaches that conceptualize culture to serve economic or social goals, toward frameworks that reimagine the culture-nature relationship itself. This trajectory illuminates not only the diversity of existing positions but also the direction in which the discourse appears to be evolving in recent scholarship.

1.3.1 Conservative and neoliberal storylines

At one end of the spectrum lie the ‘heritage’ and ‘cultural vitality’ storylines, both rooted in a conservative political ideology that emphasises preservation, continuity of culture, and the safeguarding of cultural capital for future generations, conceived in a

linear dimension of time and space. These perspectives, according to Soini and Birkeland (2014), position culture as an independent, self-standing pillar of sustainability, alongside the environmental, economic, and social dimensions. Sustainability is conceived as 'in' culture, in the sense that heritage and cultural practices deserve protection and preservation in order to be transmitted to future generations.

The 'heritage' storyline operates on the assumption that culture is what is inherited from the past and must be passed on to future generations. It holds a view of culture as "cumulative in temporal terms and local in spatial terms" (Soini and Birkeland 2014), with both tangible and intangible heritage seen as temporally and spatially embedded: produced in a particular place and time, providing a source of identity connected to a sense of place that makes it worthy of preservation. Challenges to this vision include globalisation, which can be seen as a threat to preservation, climate change and its effects on heritage, unsustainable industrial and agricultural practices, but also the unavoidable question of deciding what is worth protecting and what is not.

The 'cultural vitality' storyline shares this conservative orientation but increases the shifts in focus toward the role of culture and heritage in fostering community wellbeing, while educating citizens to appreciate and respect culture, creativity, and fostering a sense of belonging. Unlike the heritage perspective, this view is not threatened by globalization and technology, but finds them a source of new influences and dynamism. The challenge lies in balancing heritage preservation with innovation, access, and participation, allowing culture and heritage to remain accessible and relevant, nurture social cohesion and common identity. Notably, neither storyline critically interrogates the meaning of sustainable development itself. As Soini and Birkeland (2014) observe, "sustainability is taken as a given". Culture is treated as an object deserving protection and at the same time as an instrument of development that provides social benefits such as cohesion and wellbeing, but the broader sustainability framework remains unquestioned.

Moving along the spectrum, the 'economic viability' (Soini and Birkeland 2014) storyline reflects a neoliberal political ideology that treats culture primarily as an

economic resource. Within the analytical framework, this represents the role of culture 'for' sustainability, as an instrument to achieve broader economic sustainability aims. This perspective describes cultural heritage, local food, traditions, and place-based identities as assets for tourism and regional development. In a globalised world, local culture will inevitably be shaped by market forces, and rather than seeing this as a threat, proponents argue that culture mobilised as an economic resource can find a way of remaining sustainable while generating economic profit. The tools here are market-driven: place branding, marketing, and tourism development. Decision-makers are expected to exploit opportunities and leverage culture as a resource for territorial economic development. Sustainability, in this framing, is understood primarily in economic terms.

1.3.2 Communitarian storylines

The 'cultural diversity' and 'locality' storylines share a communitarian political ideology, articulating in different ways the concept of sustainability, that must be grounded in specific communities or contexts, with the inclusion of populations in planning and decision-making. These perspectives also position culture 'for' sustainability, but the goals shift from economic growth toward social acceptance, participation, and the protection of cultural rights.

The 'cultural diversity' storyline puts in discussion the role of sustainability, recognising that society contains many different values, perspectives, and cultural backgrounds, and that there is no single objective vision of culture or development. For development projects to succeed long-term, they must be culturally acceptable to diverse stakeholders. This requires participatory planning methods that include ordinary people, not just experts, and ensure the support and inclusion of minority and indigenous cultures. Cultural diversity itself is valued intrinsically.

The '*locality*' storyline draws a sharp distinction between local and global. It positions locally-based development as positive, inclusive, and respectful of place-based values, while viewing globalisation, tourism, and externally-imposed development projects as threats that denaturalise culture and traditions, reducing their authenticity. Culture, in this view, cannot be separated from the places in which it was created, and

from the particular systems of relations and social dynamics that give it meaning. This position is particularly attentive to the inclusion of marginalized communities, to whom locality guarantees the full expression of culture and rights. Decision-makers must adopt a territorial approach that prioritises local and indigenous knowledge, practices, and values, particularly regarding environmental protection. Sustainable development is rooted in the spatial dimension of regions and territories and must include communities in decision-making. Top-down forms of decision-making should not exceed the capacity of local populations to adapt, while laws and decisions must be differentiated according to local needs. Underlying this is a notion of dwelling and care: culture and development are sustainable when they are relevant, understood, and appreciated by the communities in which they happen.

1.3.3 Environmentalist storylines

The 'eco-cultural resilience' and 'eco-cultural civilization' storylines are both grounded in an environmentalist political ideology. These perspectives differ fundamentally from the others in their strong ecological emphasis and their understanding of nature as an integral part of human systems and as the ultimate limit for sustainable development.

The 'eco-cultural resilience' storyline builds on the concerns of diversity and locality but reconceptualises the culture-nature relationship. Rather than treating them as separate domains, this perspective sees culture and nature as interlinked: culture exists within the natural environment and is part of it, while nature is shaped by human cultural meanings and practices. Drawing on systems thinking, this approach considers sustainable development as requiring the integration of both cultural and ecological aspects. Decision-makers should foster collaboration between environmental sciences, social sciences, and cultural fields, facilitating the synthesis of different knowledges. Local community management and indigenous practices are often seen as better paths to this integrated sustainability, offering a model for respecting nature as indivisible from culture. Within the analytical framework, this represents in Soini and Birkeland view, the role of culture 'for' sustainability but with ecological rather than economic or purely social goals.

The 'eco-cultural civilization' storyline goes furthest, arguing that achieving

sustainability ultimately requires a fundamental shift in human values, beliefs, and behaviours. Here, culture is understood as a system of values, principles, and beliefs that shapes what people believe, how they make decisions, and whether they accept or resist change. Environmental progress depends on transforming cultural attitudes toward nature. Regulations and management programmes alone cannot solve sustainability problems, but cultural transformation is the key. This transformation must occur at both individual and collective levels: farmers adopting new environmental attitudes, industries shifting practices, communities reconnecting with their sense of place. The greatest obstacle to sustainability, in this view, is not lack of technology or resources but limitations in human understanding and our capacity to rethink how we relate to the natural world. Within the "culture in, for, and as sustainability" framework, eco-cultural civilization occupies, in Soini and Birkeland's view, a unique position. It can be read as culture 'for' sustainability, an instrument for achieving ecological goals, but it also points toward culture 'as' sustainability: culture understood as the necessary foundation for any transition to a truly sustainable society, encompassing and underpinning all other dimensions. In this sense, it suggests what Soini and Birkeland (2014) describe as "a new paradigm in sustainable development thinking".

Political context	**Core ideology**	**Associated storylines**
Conservative	Preservation, continuity of culture, safeguarding of cultural capital for future generations	Heritage, Vitality
Neoliberal	Culture as resource for economic development, sustainability framed in economic terms	Economic Viability
Communitarian	Cultural rights of groups, participatory approaches, sustainable development is discussed as a concept and needs to be	Diversity, Locality

	adapted	
Environmentalist	Eco-centric perspective, culture linked to ecological sustainability, nature-culture relation	Eco-cultural Resilience, Eco-cultural Civilization

Table 1: Four Political/Ideological Contexts, author's interpretation of source: Exploring the scientific discourse on cultural sustainability (Soini and Birkeland 2014).

Soini and Birkeland's analysis thus reveals that there are multiple ways to consider culture within sustainable development, each linked to distinct political and normative positions. Some of these positions, particularly the conservative and neoliberal framings, remain fundamentally anthropocentric, treating culture as a human resource to be preserved or exploited. Others, especially the eco-cultural storylines, move toward an ecocentric perspective that recognises nature and planetary boundaries as the ultimate limits within which all human activity, including culture, must operate.

What emerges from this mapping is a concept that resists simple definition precisely because it draws on knowledge from many different fields, encompasses competing political ideologies, operates across different spatial and temporal scales, and embeds divergent representations of the nature-culture and human-nature relationship. Yet this complexity is not a weakness in Soini and Birkeland's view. When these different perspectives enter into dialogue, they hold the potential to transform how we think and talk about sustainable development, and to open policy directions that more narrowly conceived frameworks would never consider. As Soini and Birkeland (2014) conclude, cultural sustainability is an "emerging discourse with concepts and meanings that challenge the discourse on sustainable development" (2014, p. 222). The trajectory from heritage preservation to eco-cultural civilization suggests that this challenge may ultimately require not merely adding culture to existing sustainability frameworks, but fundamentally rethinking the anthropocentric assumptions upon which those frameworks have been built.

1.4 Culture as an ecosystem

According to Pekkarinen (2025), “an ecosystemic perspective can help grasp the multidimensional, multi-level nature of the relationship between culture and sustainability in a clearer and more inclusive and comprehensive way”. Pekkarinen bridges two strands of academic discourse, cultural ecosystems (CE) and cultural sustainability, proposing an ecosystemic approach as a framework for both academic analysis and policy development. Pekkarinen grounds her ecosystemic approach in the tradition of systems thinking, drawing particularly on Capra (1997), who argues that living systems cannot be understood by analyzing individual parts but must be approached as integrated wholes, focusing on their organization, interactions, relationships, and context. From this, Pekkarinen retains the call for ecocentric rather than anthropocentric values, the recognition of the interconnectedness of all phenomena, and for humans to identify with and care for nature.

Studying culture as an ecosystem means considering the relations, exchanges, and interdependences within cultural activities and between the cultural sector and broader social, political, and environmental systems. Unlike place-based frameworks such as creative cities or clusters, the ecosystemic approach objective is to not be confined to specific geographic boundaries. It aims to trace interdependencies across multiple levels, local, regional, national, and global, capturing how cultural activities flow and connect beyond any single territory. This flexibility is particularly significant for sustainability, as environmental challenges don’t respect administrative borders. The ecosystemic perspective puts relationships at the center of the analysis, both in the connections within the cultural sector itself and in those between human societies and the natural world. By studying these links, the approach aims to demonstrate that cultural life cannot be approached in isolation: it is shaped by, depends on, and has real effects on the planet. This means that addressing the relationship between culture and the environment is not just an option, but an essential part of the conversation, and that the focus of study must shift from an anthropocentric vision to the analysis of systems and processes happening in the planetary boundaries.

Through a systematic literature review, Pekkarinen identified four distinct ways in which previous scholarship research has connected ecosystemic notions to culture

and sustainability, assigning different roles to the cultural ecosystems (CE): cultural ecosystems as drivers of sustainable local development, the sustainability of organizations within the cultural ecosystems, cultural ecosystems as safeguards of cultural diversity, and an inherent culture-nature relation in cultural ecosystems.

1.4.1 The ecosystemic framework

Synthesizing the various insights from the literature review and prior theoretical work on cultural ecosystems and sustainability, Pekkarinen (2025) proposes an ecosystemic framework for analyzing culture and sustainability. The framework builds upon and extends the culture in, for, and as sustainability framework, while explicitly departing from mainstream international cultural policy approaches. To address the ambiguity surrounding the term 'sustainability' when applied to culture, Pekkarinen (2025) distinguishes between narrow/internal and wide/external dimensions while demonstrating their interconnection. The narrow/internal sense of sustainability refers to the internal sustainability of the cultural sector itself, while the wide/external sense encompasses ecological, economic, and social sustainability more broadly.

Sustainability in the narrow sense, or as she defines it, the 'internal sustainability', refers in her discourse to the vitality, resilience, and long-term sustainability of the cultural sector, the social aspects of equality and participation, as well as cultural rights, and the ecological sustainability of cultural activities. In Pekkarinen words, the internal sustainability of the cultural ecosystem encompasses:

> "[...] richness, diversity, and resilience of the cultural sector, arts, heritage, and creative expressions; possibilities and conditions for diverse cultural forms, actors, and operations to exist, work, and renew themselves; the quality, equality, and complexity of networks and connections; and the sustainability of cultural operations." (Pekkarinen 2025)

The wide sense of sustainability, or in her words, the 'wider sustainability interlinkages', refers to "the ways in which culture, in connection with other societal and policy domains and the natural environment, may influence sustainable practices

and transitions in other areas" (Pekkarinen 2025). Crucially, she treats the ecological dimension as a priority and determining factor to which all other sustainability considerations should be connected.

However, Pekkarinen cautions against assuming culture is inherently a positive force. In the wider sense, culture can also promote unsustainable lifestyles and worldviews, and in the narrower sense, arts and culture can promote and practice unsustainable consumption patterns, and cultural and artistic processes themselves may be environmentally harmful. Genuine sustainable transitions therefore demand concrete changes, deliberate effort, and critical self-examination within the cultural sector itself. Pekkarinen, grounding her ecosystemic perspective theoretically in systems thinking and deep ecology, argues that living systems must be approached as integrated wholes, with attention to their organizing principles, interactions, relationships, and context. A systemic worldview, must then be rooted in deep ecology, a perspective that rejects anthropocentrism and acknowledges the fundamental interconnectedness and interdependence among all phenomena. Transitioning toward such ecological vision demands profound shifts in perception, thought, and values, dimensions intimately tied to culture. Drawing on recent ecosystemic approaches to culture, Pekkarinen conceptualizes the cultural ecosystem (CE) as operating across three interconnected levels, each representing a different scale of cultural activity:

Level	**General Meaning**	**Application in Pekkarinen Framework**
Micro	Individual actors	Artists, cultural professionals, organizations, their practices, works, and projects
Meso	Local and regional	Projects, initiatives, communities, networks, and cultural policies at the local/regional scale
Macro	National and international	Platforms, bodies, projects, initiatives, networks, and policies operating nationally or globally

Table 2: Author's interpretation of source: Towards an ecosystemic approach to culture and sustainability (Pekkarinen 2025)

The cultural ecosystem is intended as culture in the narrow sense and as the domain of cultural policy (arts, heritage, cultural sectors), and sits at the center of the framework. It includes "the public, private, third, and fourth sector actors, both non-profit and for-profit cultural activity, and both amateur and professional artistic and cultural practices" (Pekkarinen 2025). Its internal sustainability and well-being are essential: the cultural ecosystem's ability to contribute positively to sustainability elsewhere depends on its own health, and vice-versa the functioning of the wider sustainability dimensions influences cultural ecosystem's vitality, resilience, and sustainability. The three levels (micro, meso, macro), are not isolated but constantly overlap and interact with one another, the degree of interaction depending on the specific context under study. This flexibility aims to allow researchers or policymakers to adopt different perspectives, such as focusing on the cultural ecosystem as a whole, on a specific level, or even on a particular sub-ecosystem such as a specific art form or genre.

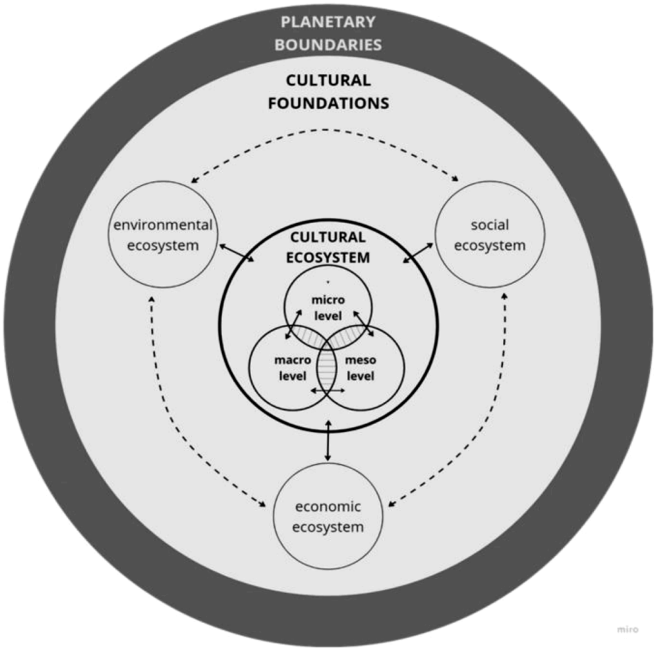

Figure 1: Visualisation of the ecosystemic framework, source: Towards an ecosystemic approach to culture and sustainability (Pekkarinen 2025)

The broader sustainability landscape is understood, as evidenced in *figure 1*, as consisting of four interdependent and interconnected ecosystems: cultural, environmental, social, and economic, building on the traditional three-pillar system with the addition of the cultural ecosystem (culture intended as the domain of cultural policy). The framework underscores the interconnectedness among diverse stakeholders, sectors, policy domains, levels, and human and non-human actors as essential sustainability questions. Complex sustainability challenges, Pekkarinen argues, require cooperation and understanding that transcend sectoral and disciplinary boundaries. In cultural research and cultural policy the focus of the research must be in the interaction of the cultural ecosystem with the other sustainability dimensions.

The analysis of the cultural ecosystem represents the analysis of culture 'in' sustainability: how cultural activities, across all levels, are sustainable in all senses. The analysis of the interactions between the cultural ecosystem and the other ecosystems, represents the study of culture 'as' sustainability, of how culture contributes to each of the sustainability dimensions. All ecosystemic interactions take place within what Pekkarinen terms an 'ecocultural reality' *(figure 1)*, shaped by two forces: cultural foundations and planetary boundaries.

Cultural foundations, referring to culture understood in the wider sense as ways of life, as worldviews, and values, provide the underlying conditions that can either enable or hinder sustainable practices. Here, the analysis and study refers to culture 'as' sustainability, to the founding conditions that enable the sustainability of all activities, across all sustainability ecosystems.

Planetary boundaries constitute the ultimate limits within which any activity can be sustainable. Pekkarinen (2025) emphasizes that regardless of how positive an activity's cultural, social, or economic contributions might be, it can only be genuinely sustainable if it operates within planetary boundaries. The cultural foundations and the cultural ecosystem (*figure 1*) mutually influence each other.

The cultural foundations shape mindsets, habits, and values within the cultural ecosystem, while the cultural ecosystem and its interconnections with other ecosystems in turn reshape the cultural foundations, and the sustainability outcomes of these interactions can be either positive or negative. The cultural foundations must therefore

be grounded in awareness of culture-nature interdependence, ecocentric values that recognize the inherent worth of all life forms, and an ecological worldview acknowledging human embeddedness in nature. Pekkarinen (2025) links this perspective to the recognition of the inherent value of non-human life, identification with nature, and care for all living things.

Cultural sustainability, in this view, requires that activities within the cultural ecosystem respect planetary boundaries while being grounded in "a respectful, responsible, and reciprocal relationship with nature, based on culturally-grounded values and the simultaneous nurturing of culture, nature, and their interconnections" (Pekkarinen 2025). Finally, Pekkarinen (2025) stresses that her ecosystemic framework must incorporate more diverse and inclusive forms of knowledge and perspectives on the relationships between humans and nature, tradition and modernity, and global and local dimensions, in order to move beyond 'Western'-centric and anthropocentric conceptions of culture and sustainability. Indigenous and local communities' cultures, perspectives, ontologies, and epistemologies, she argues, can offer crucial insights for the necessary transformations in mindsets, established conceptualizations, and values.

1.5 Post-growth perspectives

Recent cultural sustainability scholarship pushes significantly further in challenging the dominant discourse on culture and sustainability. Miikka Pyykkönen (2024), for instance, argues that achieving genuine sustainability requires radical cultural and social transformation: abandoning the pursuit of endless economic growth, fundamentally reconceiving the nature-culture relationship, and rethinking humanity's role within a post-growth framework that acknowledges planetary limits.

To support this argument, Pyykkönen (2024) analyzes major international cultural policy documents spanning from the 1987 Brundtland Report to 2024. He focuses on these international texts because they serve as guiding frameworks that national and regional policymakers are expected to follow when developing their own approaches, positioning international organizations like UNESCO and UNCTAD as pathfinders, uniquely situated to lead conceptual and policy change. His analysis reveals

that economic concerns and anthropocentrism persistently dominate how sustainability is framed in these documents, and that culture is valued primarily for its contribution to economic growth rather than for its potential to transform our relationship with the natural world. Pyykkönen (2024) critiques this economistic framing by drawing on recent theoretical work at the intersection of economy and ecology, including scholars such as Tim Jackson, Bruno Latour, and Andreas Malm.

Building on existing critiques, Pyykkönen identifies an economic turn in cultural sustainability policies that operates in two directions: first, culture is valued for what it can contribute to economic sustainability through growth, job creation, and local development; second, culture is seen as a beneficiary of economic development, particularly at local and regional levels, where economic growth is expected to support the vitality and richness of the cultural sector. Within this framework, sustainability is frequently reduced to the potential of cultural and creative sectors to drive economic growth, a conceptualization that derives from a deeply anthropocentric worldview. Pyykkönen (2024) argues that:

> "This economic and anthropocentric approach is very problematic in the era of an expanding environmental crisis, which urgently calls for not only new and more influential policies for ecologically sustainable development but also a different way of thinking about the relationship between humans/culture and nature than the still very hegemonic dualist—or even binary—understanding derived from modernism. We need theories, concepts, and policies that profoundly challenge the modernist understanding of humans and their cultures as superior, as well as related approaches and ways of operating, and are brave enough to suggest radical changes to systems, cultures, and narratives [...]". (Pyykkönen 2024)

This economic turn is sometimes stated explicitly but more often operates implicitly within policy discourse. Drawing on previous scholarship, Pyykkönen (2024) argues that the economic turn emerged partly as a response to the persistent vagueness surrounding culture's definition within sustainability frameworks. However, the motivations behind this shift varied among actors. For some, it was driven by primarily

economic interests, while for others, such as UNESCO, the economic framing served as a strategic means to secure recognition, protection, and sustainability for culture as something possessing inherent value.

Pyykkönen (2024) further outlines that this “economy-oriented cultural approach to sustainability is contradictory with or even harmful to ecological sustainability, which is the foundation of the whole sustainability discourse (e.g., Clammer, 2016).” (Pyykkönen 2024). He identifies the European Union as a particularly active player in this ‘economization’ of culture and sustainability. He does, however, note the New European Bauhaus program, which attempts to unite the different sustainability pillars of economy, society, and culture under an ecological imperative. Yet even this initiative, Pyykkönen observes, ultimately remains oriented toward economic growth.

In general, he argues that the dominant discourse in international cultural policies and scholarship is focused on:

> "[...]conceptualizing culture and creativity in ways that make them comfortable to use in promoting the sustainability and growth of economies [...] culture as its own 'autopoetic system,' 'field,' or 'pillar' whose rights, autonomy, and sustainability need to be guaranteed so that it can also reflexively influence the other systems, pillars, and so on [...] culture as a framework for ecologically sustainable human actions and policies, also integrating the features of ecological and human ecosystems under the umbrella of culture [...]" (Pyykkönen 2024)

The third approach positions culture ‘as’ sustainability: similarly to Peakkrinen (2025) cultural foundations, culture here is the encompassing context within which all human-nature relations unfold, the lens through which we understand both human societies and ecological systems as fundamentally interconnected. Pyykkönen (2024) finds this third positioning promising but ultimately insufficient, viewing it as an expansion of the concept of culture to include nature, but lacking a more radically transformative twist that is necessary to address the current ecological crisis.

In his view, we need to fundamentally rethink the very distinction between the human and natural worlds, a distinction inherited from modernist thinking that positions

humans as separate from and superior to the rest of existence. Most importantly, this intellectual shift cannot remain purely theoretical. It must connect directly to concrete proposals for restructuring political and economic systems. Changing how we conceptualize culture-nature relations means little if we leave intact the growth-driven economic models and governance structures that perpetuate environmental destruction. Pyykkönen (2024) stresses the need to put ecology at the center of the sustainability and cultural sustainability discourse, stressing the need for: "(a) an update of what culture means in cultural and sustainability policies, (b) the acknowledgment of the interlinkedness of culture and ecology, and, hence, (c) the adoption of a perspective of culture as sustainability." (Pyykkönen 2024), not only in "praxis and policies", but also in the "theoretical conceptualization of culture".

1.5.1 Pairness and mutualism of nature and culture

Pyykkönen (2024) builds on recent theories that challenge the dominant anthropocentric and economy-centered discourse in favor of a radical ecologic approach in economy, society, and culture (e.g., Jackson 2009, 2021; Malm and Horborg 2014; Malm, 2017; Latour, 2017;). Notably, Pyykkönen (2024) engages with the ontological tension between two of his key theoretical sources. For Andreas Malm, nature and culture remain distinct types of properties, but they are fundamentally paired and mutually dependent, with social properties ultimately depending on natural ones. Culture and nature are not the same, but they cannot be separated in practice or policy. Bruno Latour, by contrast, argues that 'nature' and 'culture' have never actually existed as separate categories, but they are so deeply intertwined that the distinction itself is a modernist illusion. Pyykkönen (2024) proposes synthesizing both perspectives as an ontological basis for the 'new' culture required in the age of climate crisis, one that recognizes both the analytical distinctness and the fundamental inseparability of nature and culture, as it is for example the case in some indigenous cultures. Pyykkönen (2024) stresses that, while this indigenous-type of knowledge is starting to be recognized as valuable inherently and ecologically by dominant research and by UNESCO, the overall approach to culture is still widely anthropocentric, and "no fast shortcuts or unanimous solutions are in sight".

Beyond critique, Pyykkönen offers a constructive proposal: the research and policy conceptualization of sustainable culture, referring to *"[...]* ecologically sustainable ways of life with a new understanding of paired, intertwined, or merged nature and culture, as well as the material and immaterial cultural expressions supporting and speaking for these ways of life." (Pyykkönen 2024). This reframing carries implications for both scholarship and policy. On the scholarly side, Pyykkönen (2024) proposes that researchers pay closer attention to how nature and the environment are described in cultural policies and treated in cultural practices, analyzing how these discourses and practices can influence and impact the natural world.

1.5.2 Role of policymakers in the post-growth era

Regarding decision-makers, before effective policies can be created, policymakers must fundamentally change how they conceptually understand what culture is. Currently, most policymakers think of culture as something purely human and separate from nature. Although anthropocentrism is never stated explicitly, Pyykkönen argues it pervades the discourse of sustainability even when it deals with values like human rights, creativity, gender equality, and peace, because these don't acknowledge nature's needs. Drawing on Malm, he argues that policymakers need to adopt a completely different mental framework: one where culture and nature are understood as fundamentally intertwined, mutually dependent, and inseparable:

> "[...] cultural policymakers, like all policymakers, must adopt a new 'metaconceptualization' of culture, which builds on this pairness and mutualism and takes the culture's footprint on nature as its decisive concern and point of departure." (Pyykkönen 2024)

Nature becomes the lens through which all policies, including cultural policy, are evaluated. At the horizon of this vision lies a vision in which humanity recognizes obligations 'to' nature, not just rights 'over' it. International climate agreements gesture toward this ideal, but Pyykkönen (2024) argues they do not go far enough because they fail to demand the deep cultural and systemic transformations necessary to honor such a

contract. International cultural policy organizations, as pathfinders for national policies, are uniquely positioned to lead this reconceptualization. Pyykkönen (2024) argues they should be the first to address culture and sustainability primarily from the point of view of ecological sustainability, abandoning what he calls the "old-fashioned economic growth ideals" (Pyykkönen 2024). This framework would lead, in Pyykkönen's opinion, to the achievement of a wellbeing meant as not only that of humans, but also "of the whole (earth system) and its interlinked ecosystems" Pyykkönen (2024). He suggests the following steps for policy development: first, to replace the economic growth imperative with an ecological imperative, and second, an understanding of culture as not merely human, but belonging and inscribed in the Earth system. This means recognizing that no form of culture, narrow or wide, can survive without nature's survival, and to take into consideration not only human wellbeing, but also the "wellbeing of nature and its subjects" (Pyykkönen 2024). Third, he calls for the creation of policies and funding programs that promote ecological sustainability in all areas. In this sense, it is interesting to notice that, while criticizing anthropocentrism and economic growth, Pyykkönen's first recommendation in promoting ecological sustainability regards the promotion of cultural-related jobs as exemplary in sustainability in reason of their "immateriality and minimal waste and emissions [...][and] potential to increase equal wellbeing [...][stressing that the cultural sector can] employ a lot of people in the post-growth economy." (Pyykkönen 2024). The second recommendation regards the fostering of ecological education at all levels, while the third is directed to guiding cultural actors towards embracing more ecological solutions and raising ecological awareness through their work.

1.6 Environmental Sustainability in cultural institutions

In recognition of the gap in the representation of culture within the SDGs framework, UNESCO provided 22 thematic indicators for culture, the Culture 2030 Indicators (UNESCO 2019), aiming to measure the contribution of culture to the implementation of the 2030 Agenda at national and local level. These indicators are organized into four areas: environment and resilience, prosperity and livelihoods, knowledge and skills, and

inclusion and participation. Alongside this effort, several projects, organizations, and studies have proposed frameworks for sustainability measurement and reporting tailored to the cultural sector[1]. The resulting landscape is one of considerable plurality rather than consolidation. The proliferation of frameworks, each developed from different disciplinary vantage points and for different institutional contexts, has produced a wide range of proposals that are not easily comparable. This diversity of approaches reflects, in part, the extraordinary heterogeneity of the cultural and cultural heritage sector itself: institutions vary enormously in nature, scope, size, governance structures, and territorial embeddedness, making it understandable that no comprehensive measurement language has emerged capable of capturing such varied realities. Heritage sites generate value in fundamentally different ways, and it is reasonable and important that the tools developed to assess their sustainability contributions reflect those differences.

At the same time, this plurality presents a challenge for any attempt to assess the overall state of play of environmental sustainability in the cultural heritage sector: the tools for measurement exist in various forms, but they do not yet add up to a fully coherent picture (Borin, Cerquetti, and Labaronne, 2025). This difficulty in producing aggregated, sector-wide evidence may well be one of the reasons why concrete policy applications of cultural sustainability have remained rare and comparatively weak. Policymaking, not least at the European Union level, increasingly aspires to be data-driven and evidence-based, yet capturing comprehensive data from the cultural sector is an exceptionally difficult undertaking. Most existing research relies on individual case studies rather than on systematic, cross-institutional approaches, a limitation that is particularly pronounced in the field of cultural heritage. Without a robust evidence base that speaks the language of policy, meaning comparable metrics, representative samples, longitudinal data, the cultural sector struggles to make a compelling case for its integration into sustainability frameworks at the level where funding and regulatory decisions are made.

[1] For a comprehensive view of these frameworks and reporting tools, the *Greening the Creative Europe Programme – Final report* (Feifs et. al. 2023) offers a comprehensive overview at European level

1.6.1 Culture, heritage, and intergenerational mission

Cultural heritage occupies a distinctive position in the sustainability debate by virtue of what can be described as an intrinsic mission alignment: the dominant narrative of heritage as something to be preserved and transmitted to future generations embeds sustainability concerns into its very reason for being, even when those concerns are not explicitly articulated in environmental terms. Heritage is in this sense, by definition, engaged in an intergenerational project. This argument has gained considerable traction in recent years, particularly as institutions have sought to articulate their relevance in an era of escalating environmental and social crises (Borin, Cerquetti, and Labaronne, 2025).

This inter-generational mission has developed in culture primarily along social and economic lines and, in the specific case of heritage, the environmental dimension has been framed almost exclusively in defensive terms, as a climate change threat, while the reverse relationship, the potential contributions of heritage itself to environmental sustainability, has only very recently begun to attract scholarly and policy attention. This emerging shift is reinforced by the broader concept of cultural institutions as bearers of a public mission: there is a growing shared understanding, particularly among publicly funded theatres and museums, of having to serve public interest, and that remaining relevant in society increasingly demands active engagement with the sustainability challenges of the present moment, environmental ones included (Matina Magkou, 2026).

Yet this mission argument carries a tension that is central to the lived experience of cultural institutions. The alignment between institutional purpose and sustainability is genuine and shared among cultural actors, but it risks becoming self-undermining for institutions when environmental goals do not match with economic viability. As Heidi Wiley, Executive Director of the European Theatre Convention[2] (ETC), argues in the interview conducted by Magkou (2026), for cultural institutions, this means that environmental sustainability cannot be pursued at the expense of the institution's long-term survival. If an institution channels its limited resources toward environmental goals to the point where its core cultural activities, fair working conditions, or long-term

[2] https://www.europeantheatre.eu/ (accessed 18 February 2026)

financial viability are compromised, the sustainability effort may paradoxically destroy the very capacity it seeks to protect. This is what Wiley describes as the risk of 'self-erasement' (Magkou 2026). The mission argument, therefore, is not a straightforward justification for environmental action, but a framework within which environmental, social, and economic imperatives must be continuously and carefully balanced, with one dimension not being pursued at the expense of the others.

1.6.2 Holistic Transformation Versus Carbon Tunnel Vision

Among the most contentious debates in the operationalization of environmental sustainability within cultural institutions is the question of what, precisely, institutions should measure and how they should frame their environmental ambitions. The measurement of carbon footprint has emerged as the most visible and tangible tool: it is quantifiable, comparable, and offers a clear metric for tracking progress over time. Wiley (Magkou 2026) acknowledges its usefulness while being aware of the critique that reducing sustainability to carbon calculators represents a 'carbon tunnel vision' that obscures the multidimensional nature of sustainability.

The holistic view contends that environmental sustainability must be balanced with economic viability, fair pay, good working conditions, circularity, and social exchange. For cultural institutions, this means that carbon reduction cannot be the sole or even the primary metric of environmental engagement; it must be embedded within a broader understanding of what makes institutions sustainable in the fullest sense of the term. Wiley describes transformation processes of this kind as holistic by nature, requiring creative ways of embedding environmental sustainability in institutional practices and through awareness-raising.

The underlying message is that environmental sustainability is not a single metric or a single area of action, it is a transformation that touches every aspect of how an institution operates, creates, and presents itself to the world.

The question of how cultural institutions report on their sustainability performance is central to understanding the state of environmental sustainability implementation in the sector. A detailed examination of this topic is provided by Diana Martello, Paolo Dubini, and Alberto Monti (2025), who conducted semi-structured

interviews with professionals from 20 Italian cultural organizations spanning museums, performing arts, urban regeneration, and archives and libraries, that had published at least one non-financial report between 2018 and 2022.

The study identifies five drivers for non-financial reporting in cultural organizations, with internal assessment emerging as the most significant motivation: organizations use the reporting process as a self-understanding tool, often representing the first occasion for an institution to comprehensively examine its focus, added value, and weaknesses, which then supports external communication, legitimacy-building, and fundraising (Martello, Dubini, and Monti, 2025). Data collection was universally cited as the most difficult phase, as cultural organizations lack dedicated staff, appropriate skills, and suitable software systems, but more fundamentally, these institutions have not historically operated within a 'data culture', where systematic measurement forms part of their organizational identity. This connects to the overall nature of cultural institutions: cultural value resists easy quantification, and while attendance figures and ticket sales are straightforward, they fail to capture qualitative impacts, such as civic engagement, community building, or cultural identity preservation, qualitative indicators are essential but harder to standardize and often perceived as less rigorous by external audiences.

The study (Martello, Dubini, and Monti, 2025) found that most organizations struggle to assess long-term impact, partly because cultural effects materialize over years or decades, requiring longitudinal tracking that most institutions cannot sustain, and partly because established methodologies suited to the sector remain lacking. Frameworks like the GRI standards, designed for the corporate world, do not adequately represent how cultural organizations create value. Without standardization, comparability and external credibility suffer, while imposed standards risk flattening the diversity that makes cultural work distinctive.

These findings (Martello, Dubini, and Monti, 2025) collectively outline that environmental sustainability in the cultural sector cannot be reduced to emissions monitoring alone. The study reveals that cultural organizations currently concentrate almost exclusively on social reporting, with operational environmental concerns notably absent, suggesting the need for frameworks that integrate environmental considerations

within the relational value that cultural organizations already understand themselves to create. The lack of environmental reports can also be caused by the ‘ green hushing’, that leads cultural organizations that are actually implementing environmentally sustainable practices to not report them due to the challenges presented above. A holistic approach is necessary, one that sustains institutions efforts and recognizes that sustainability encompasses how institutions shape community relationships with nature, foster environmental consciousness through programming, and model regenerative practices, and such an approach must be developed with the cultural sector to avoid the homogenization trap, capturing both measurable impacts and the qualitative, long-term transformations that define cultural work.

1.6.3 Constraints, Tensions, and Competing Priorities

The environmental sustainability gap documented above is the product of a set of constraints, tensions, and competing priorities that shape how cultural institutions allocate their finite attention, resources, and political capital. Understanding these constraints is essential for moving towards the understanding of what cultural policies and funding programmes can concretely do in order to foster environmental sustainability implementation can and cannot look like in the cultural sector.

The most fundamental constraint is financial (Magkou 2026). Funding for theatres, museums, and other cultural institutions has been cut across Europe, with European Union funds being massively redirected towards defence expenditure and the primacy of institutional survival means that every decision must be economically viable. This leaves limited space for risk-taking and experimentation, precisely the kind of space that environmental innovation often requires (Magkou 2026). In the specific context of theatres, but also regarding cultural heritage, buildings represent both the most problematic source of emissions and the most investment-intensive challenge, particularly for historic structures that cannot be easily retrofitted with modern energy systems without compromising their architectural and historical integrity. Green building renovation, investment in energy-efficient technologies, sustainable materials for conservation or set design, and the development of carbon tracking systems all require upfront investment that institutions with shrinking budgets struggle to justify,

particularly when the returns are diffuse and long-term.

Geopolitical instability (Magkou 2026) has emerged as a competing urgent theme that cultural institutions cannot ignore. Theatres and museums have a responsibility to engage with the issues that concern their communities, and in a period of escalating conflict, political polarization, and social anxiety, environmental sustainability must compete for institutional attention with themes that may feel more immediately pressing. As Wiley (Magkou 2026) observes, ideally theatres could use all their energy to talk about environment and climate change, but the reality is that there are economic constraints, political constraints, and many urgent issues to address simultaneously.

The political dimension introduces its own distortions. Short-term political interests frequently override long-term green visions: politicians and funders who influence theatre governance are often more concerned with winning the next elections than with supporting the green transition. They view theatres as symbolic capital, assets that enhance their political profile, rather than as agents of environmental change (Magkou 2026). The result is that green engagement in theatres often survives because management cares about it despite difficult conditions, not because of political support (Magkou 2026). This creates a precarious situation in which environmental sustainability depends on the personal commitment of individual leaders rather than on structural incentives or institutional mandates.

Cultural institutions across Europe operate within vastly different resource environments, national policy frameworks, and production models.. This diversity, which is one of the cultural sector's greatest strengths, becomes a significant obstacle when attempting to develop and implement standardized environmental sustainability frameworks.

1.6.4 The role of the European Union

As Heidi Wiley (Magkou 2026) argues, the translation of sustainability ambitions into institutional practice does not happen in isolation, but networks serve as critical intermediaries between European Union policies and the everyday reality of cultural institutions, occupying a delicate and important position between policy frameworks

and operational challenges. The experience of the European Theatre Convention (ETC), an EU-funded network through the Creative Europe program, illustrates how this intermediary function works in practice and reveals both the opportunities and limitations of network-driven sustainability governance in the cultural sector.

The ETC formed a Green Theatre Committee to develop a climate strategy, culminating in the ETC Sustainable Action Code[3]. Drawing inspiration from previous frameworks, the network developed and released the ETC Theatre Green Book[4] in 2024, providing practical tools for measuring and applying sustainability in theatres, with the overarching objective is to aim for a climate-neutral network of theatres by 2030.

The approach rests on self-assessment tools that leave theatres in control, an essential design principle given that each institution operates within different national contexts, resource environments, and production models. At the same time, being part of a network frames the sustainability effort as a collective one, preventing institutions from feeling isolated in the face of difficult and overarching challenges, and fostering the sense of working towards a common mission. Wiley (Magkou 2026) emphasizes that good practices do not emerge spontaneously, but they require structure and facilitation. The ETC mission towards environmental sustainability is based on fostered dialogue and exchange of practices among members and with external experts, successful results visibility, and on fostering collaboration rather than competition between its members, in a process of deliberate cultivation rather than organic emergence.

On the role of EU policy, Wiley (Magkou 2026) recognizes the challenge of defining and balancing the amount of intervention and interference from politics in the arts. She acknowledges that European Union regulations and cultural frameworks can sometimes be perceived as constraining and limiting especially in the cultural domain, which is not directly under European Union's competence. In her opinion though, European Union cultural policies have a positive impact in providing common

[3] https://www.europeantheatre.eu/page/advocacy/sustainability/etc-sustainable-action-code-for-theatres (accessed 15 February 2026)
[4] https://www.europeantheatre.eu/news/etc-theatre-green-book-guides-european-theatres-towards-net-zero (accessed 15 February 2026)

frameworks and objectives, especially in regard to horizontal priorities such as the green transition, which can benefit from a coordinated approach at the European level. She outlines that linking funding to environmental sustainability could accelerate progress for achieving environmental sustainability in culture. She acknowledges that national cultural policies, and the green requirements in this area, are very unequal across Europe, and that implementation of green practices depends not only on policy frameworks but also on each country's style of production, whether more state-led or relying on private, smaller companies.

The value of networks extends beyond practical tool-sharing. In Wiley's view, networks and overarching policies such as the European Union ones, should provide cultural institutions with a framework to 'lean on', a source of like-minded colleagues with whom to exchange practices, refine purpose, and progress in collaboration rather than competition. This function is especially important in a sector where green engagement often survives because management cares about it despite difficult conditions, rather than because of political support. Acting together is also important for lobbying, for making theatre's voice heard, and for ensuring that cultural and environmental treasures are passed to future generations, the primary motivation, as Wiley (Magkou 2026) describes it, of her thinking.

CHAPTER 2
European Union competences in cultural heritage

2.1 The cultural, religious and humanist inheritance

This chapter aims to address two central questions: what competences does the European Union hold in the field of cultural heritage, and how are these competences defined? Through what mechanisms are these policies put into practice? Examining these questions reveals both the subsidiary role of the European Union in cultural policy and the central importance of funding instruments in enabling concrete implementation. Notably, the European Union's understanding of cultural heritage is tied, from the Treaty level onward, to the notion of shared European values. The Treaty of the European Union preamble explicitly anchors these values in "the cultural, religious and humanist inheritance of Europe, from which have developed the universal values of the inviolable and inalienable rights of the human person" (Consolidated Version of the Treaty on European Union [2016] OJ C202/13, Preamble). This declaration traces the origins of the European project and community integration back to shared cultural, religious, and humanist heritage, presenting these as the foundation of European identity. As further analyzed in chapter 3 of this thesis, this process of humanist integration and the idea of a common European heritage have been studied and criticized by scholars as a form of invisible power dynamic. The European Union, despite struggling in defining the form of this common identity, is coherent across the decades in linking heritage to European values and a sense of belonging and 'Europeanness', as is evident from the Treaties until the most recent policies in this field. In this scenario, cultural heritage assumes strategic relevance that goes beyond its intrinsic aesthetic or historical value. Cultural heritage, in its dual material and immaterial dimension, constitutes a bridge between past and future, simultaneously offering memory of common roots, awareness of historical events, and a tool for

imagining alternative development paths. Cultural heritage, in the Union's vision, promotes democracy, integration, social cohesion, and the well-being and quality of life of European citizens, contributing to that dimension of well-being explicitly mentioned in the Treaties as a fundamental objective of the Union.

2.2 Legal basis

The European Union's cultural heritage competence is based on a legal framework that balances the need for preservation of national cultural sovereignty with the recognition that certain challenges and opportunities in this domain transcend national borders.

The Treaty on European Union traces the Union's six foundational values [5] back to Europe's collective cultural, religious, and humanist traditions (*Consolidated Version of the Treaty on European Union*, 2016 OJ C202/13, Preamble). It explicitly commits the Union to respecting its rich cultural and linguistic diversity and to ensuring that "Europe's cultural heritage is safeguarded and enhanced" *(Consolidated Version of the Treaty on European Union,* 2016 OJ C202/13, Article 3*)* This formulation reflects a delicate and challenging balance: the recognition of shared values and common heritage coexists with the preservation and celebration of Europe's diverse cultural expressions, starting from Member States till local communities. The European Union framework conceives cultural heritage as simultaneously unifying and pluralistic. The legal foundation for EU action in cultural heritage rests upon the principle of conferral, which fundamentally structures the relationship between the Union and its Member States[6]. The Union may only exercise those competences that Member States have explicitly conferred upon it through the Treaties, with all remaining powers residing at the national level. Within this framework, culture is recognized, under Article 6 of the Treaty[7], as an area of supporting competence, meaning that the Union has the authority to carry out actions to support, coordinate, or supplement Member State initiatives, but cannot replace or supersede national cultural policies. Unlike areas of exclusive or

[5] "The Union is founded on the values of respect for human dignity, freedom, democracy, equality, the rule of law and respect for human rights", Consolidated Version of the Treaty on European Union [2016] OJ C202/13, Article 2

[6] Consolidated Version of the Treaty on European Union OJ C202/13, Article 5

[7] Treaty on the Functioning of the European Union (consolidated version) OJ C326/47, art 6

shared competence, where the EU can adopt binding legislation that require harmonizing national laws, in the cultural sphere the Union's role is auxiliary and complementary to the action of Member States, and operating under the principles of subsidiarity and proportionality (*Consolidated Version of the Treaty on European Union*, 2016, OJ C202/13, Article 5). These principles are aimed to ensure that EU interventions respect the diversity of national and regional cultures while allowing the Union to act to achieve common objectives.

Article 167 of the *Treaty on the Functioning of the European Union* (Consolidated version, 2016, OJ C202/13) provides the substantive framework for EU cultural policy, articulating both the Union's aspirations and the areas of its intervention: Article 167 establishes that "The Union shall 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". Several specific areas where Union action is deemed appropriate are identified:

> "Action by the Union shall be aimed at encouraging cooperation between Member States and, if necessary, supporting and supplementing their action in the following areas: —improvement of the knowledge and dissemination of the culture and history of the European peoples, —conservation and safeguarding of cultural heritage of European significance —non-commercial cultural exchanges —artistic and literary creation, including in the audiovisual sector." (*Consolidated Version of the Treaty on the Functioning of the European Union,* 2016, OJ C202/13, Art. 167 *)*

Each of the areas identified in Article 167 TFEU, represents a domain where transnational cooperation can generate benefits that would be difficult for individual Member States to achieve in isolation. The conservation of cultural heritage of European significance, for instance, recognizes that certain monuments, sites, or traditions resonate beyond national boundaries and embody values or historical experiences shared across the continent. The European Union's approach to cultural heritage does not operate in isolation, but is deeply embedded within a network of specialized organizations and expert bodies, including UNESCO, the Council of

Europe[8], Europa Nostra[9], ICOMOS[10], and other heritage institutions that provide technical expertise, normative frameworks, and platforms for policy coordination. These partnerships are further operationalized through mechanisms such as the Open Method of Coordination (OMC)[11], which facilitates structured policy dialogue between the European Commission and cultural heritage experts and stakeholders, and the exchange of good practices among Member States and international partners.

[8] https://www.coe.int/en/web/culture-and-heritage (accessed 20 December 2025)
[9] https://www.europanostra.org/ (accessed 20 December 2025)
[10] https://www.icomos.org/ (accessed 20 December 2025)
[11] https://ec.europa.eu/transparency/expert-groups-register/screen/expert-groups/consult?lang=en&groupID=3650 (accessed 20 December 2025)

CHAPTER 3

Definitions of cultural heritage, when politics meets memory

This chapter analyzes the concept of cultural heritage as framed by the European Union until 2014, when the first major cultural policy documents explicitly linking heritage to sustainability appear. The analysis will be carried out through a critical review of existing literature. The policy analysis of the main cultural heritage documents after 2014 will continue in chapter 5, and focus on the evolving relations of heritage and environmental sustainability.

3.1. Political origins of European Union cultural heritage definitions

The history of EU conceptualization of cultural heritage reveals an incremental, politically-driven process rather than a coherent conservation framework. As Oriane Calligaro (2013, page 81) demonstrates, the concept of European cultural heritage first appeared at the European Union level in a motion for a resolution presented by the European Parliament group Liberal and Allied Group on a few months before the *Declaration on European identity* of December 1973*,* meaning that the concept emerged not from cultural ministries concerned with preservation, but from political actors seeking new legitimating narratives for Europe. The 1973 Copenhagen *Declaration on European Identity*, issued by the nine foreign Ministers, represented the first official effort to articulate what Europe meant beyond economic cooperation, thus remaining vague in defining common heritage and European identity. However, the clear statement of the Declaration for the survival of the 'common European civilization', is an evidence of the fact that the Copenhagen Declaration was primarily oriented toward defining Europe's position in international affairs rather than articulating the beginning of a cultural path. The European Parliament's *Resolution of 13 May 1974 on the*

protection of European cultural heritage marked the first concrete institutional engagement with the concept. According to Calligaro (2013), the cultural initiatives undertaken by the European Community from the seventies onward were intended to give concrete form to the idea of European identity and to encourage citizens to develop a sense of belonging to the European project. Heritage discourse proliferated significantly in those years: UNESCO's 1972 *Convention Concerning the Protection of the World Cultural and Natural Heritage* established the first comprehensive international framework for heritage protection, introducing the concept of 'outstanding universal value' and creating mechanisms for collective international responsibility toward endangered sites. This Convention appears to have influenced the European Parliament's engagement with heritage, with the 1974 Resolution echoing UNESCO's protection-oriented language. However, the substance of the EP Resolution diverged significantly from UNESCO's conservation framework. The Resolution was presented as a response to a crisis that was both economic and cultural, positioning heritage as a possible solution for the broader legitimacy crisis affecting European integration and international positioning, rather than primarily as a conservation concern. From the 1970s on, heritage became a political resource increasingly mobilized by diverse actors across multiple scales, as it is still the case nowadays: States continue to deploy it for identity-building, subnational and minority groups reappropriate heritage discourses to contest dominant national narratives and strengthen distinct identities, and international bodies like UNESCO positions as arbiters of universal cultural significance. The Community and, later, the EU, found themselves navigating between these competing uses, simultaneously enhancing the importance of cultural diversity, later framed as the Union strength through the motto "United in diversity", while attempting to construct the image of a unified community defined by a shared cultural heritage. As Calligaro (2013) affirms, "the flexibility of the concept [of cultural heritage] was particularly propitious to the expressions of a variegated Europeanness."

The 1980s witnessed a qualitative shift for EU cultural heritage policy, derived from a more structured and planned strategic approach to strengthen citizens' sense of belonging to Europe and their trust in its institutions. The 1985 Adonnino Report on a *People's Europe* (Pietro Adonnino Committee 1985) recommended European symbols,

such as a common flag, anthem, and passport, and cultural initiatives such as the Erasmus programme to foster citizens' emotional attachment to Europe. This marked the first official articulation of elements now widely recognised as iconic symbols of European integration, often perceived as organic expressions of European unity but in fact constructed as instruments of identity building. In 1983, the Athens Acropolis received the Community attention, with the site's preservation importance motivated in political terms as the symbol of the Greek democracy inheritance of Europe, while in 1984, the first fundings for cultural heritage were established, when the European Parliament created the European Historical Monuments and Sites Fund (Calligaro 2013, p. 88). The institutionalization of EU cultural action came with the 1992 Maastricht Treaty, which introduced Article 128 (now Article 167), providing for the first time an explicit treaty basis for Community action in culture, including "the conservation and safeguarding of cultural heritage of European significance" (Calligaro 2013, p. 89). The Raphael Programme, launched in 1997, was the EU's first official support programme devoted to European heritage. Heritage was subsequently absorbed into the broader cultural programme Culture 2000, with approximately 34 percent of its budget dedicated to heritage preservation. The Culture Programme 2007–2013 succeeded Culture 2000, continuing action in favour of heritage. (Calligaro 2013, pp. 89–90).

3.2 Crisis, enlargement, and opportunities

Given the strong subsidiarity of the EU in relation to cultural policy, the Council of Europe historically hosted the main discussions on cultural heritage, producing the most valuable conventions in the matter . However, from 2009, the Council of Europe underwent significant reforms, refocusing on human rights, democracy, and rule of law, which progressively pushed culture and heritage outside its main priorities (Sciacchitano, 2015). The period between 2004 and 2014 created both a vacuum and an opportunity for EU engagement with cultural heritage. The Eastern European enlargements of 2004 and 2007 necessitated rethinking common cultural narratives within a more differentiated cultural landscape. The Lisbon Treaty, signed in 2007 and entered into force 2009, strengthened the legal framework for EU cultural action, with

Article 167(4) of the Treaty of the Functioning of the European Union establishing the legal basis for mainstreaming cultural considerations into other EU policy areas, stipulating that "The Union shall take cultural aspects into account in its action under other provisions of the Treaties, in particular in order to respect and to promote the diversity of its cultures" (*Consolidated Version of the Treaty on the Functioning of the European Union,* 2016, OJ C202/13, Art. 167*)*. Concurrently, the European Heritage Label, which will be examined in detail below, emerged first as an intergovernmental initiative in 2006 before being transformed into an European Union action in 2011. The year 2014 represented a turning point in EU heritage policy because multiple factors converged simultaneously. The 2008 financial crisis and subsequent sovereign debt crisis had fundamentally shaken the EU's legitimacy. The European Union needed new ways to connect emotionally with citizens beyond economic rationales. On one hand, the increasing European coordination and the emergence of major integrated funding schemes such as Horizon 2020 and Creative Europe, under the 2014–2020 Multiannual Financial Framework, enhanced the opportunities for local players to address common challenges through European Union cooperation. On the other hand, more integration meant that EU intervention in other policy areas of shared competence such as Agriculture, Environment, and Cohesion increasingly started influencing cultural heritage. As we will see in the dedicated paragraph, political momentum combined with sustained advocacy from heritage stakeholders, created the conditions for a comprehensive European Union approach to cultural heritage.

3.3 The European heritage label and the concept of heritage of European significance

The European Heritage Label represents the most formal EU level recognition of what constitutes cultural heritage of European value. It was established through Decision 1194/2011/EU of the European Parliament and of the Council in 2011. This initiative emerged from an earlier intergovernmental effort launched in 2006, which was subsequently formalized into an official European Union label, with proper criteria and a selection and monitoring process. The Label pursues two general objectives as set out

in Article 3 of the Decision: “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 [...]” and “strengthening intercultural dialogue”. The rationale behind these objectives is explained in the Decision's preamble: “A better understanding and appreciation, especially among young people, of their shared yet diverse heritage would help to strengthen the sense of belonging to the Union and reinforce intercultural dialogue”. These objectives, on one side build upon the existence of a common history, framed as being the foundation to the creation of the European community as a community of peace and shared fundamental values, but also stress the fundamental coexistence of both a common and a multicultural heritage, and the need to foster and reinforce multicultural dialogue. The European Heritage Label and its objectives are critical to the question of the concept and use of heritage as a political tool by the European Union. The 67 sites awarded by EHL till now are presented as “milestones in the creation of today’s Europe”, and, according to the 2025 European Panel report on the subject, the initiative “has established itself as a key pillar of European identity-building based on shared values” (European Commission 2025). The decision about what constitutes such milestones of European Heritage resides in different evaluators power, starting from the Member States, which pre-select the sites every two years, and ending with an evaluation from a panel consisting of independent experts appointed by the European Parliament, Council, Commission, and Committee of the Regions. The label is awarded on a permanent and voluntary basis, though sites are monitored every four years to ensure continued compliance. Voluntary withdrawal from the label is also possible, and a procedure for forced withdrawal is established in the Decision if criteria are no longer met. Even if the selection structure of the Label maintains the Members states as the primary level of selection, the European panel ultimately controls what counts as "European significance" and reframes how sites present their heritage, requiring for a consistent enhancement of the European dimension into their communication strategies, branding, and action plans. European Heritage Label sites have the risk of being "conditioned to govern themselves both through and towards Europeanization". (Tuuli Lähdesmäki et al., 2020, page 40), as the Label asks sites to be the primary actors in implementing and making Europe prominent

in their narratives[12]. Sites are defined by European Heritage Label 2011 Decision as: “monuments, natural, underwater, archaeological, industrial or urban sites, cultural landscapes, places of remembrance, cultural goods and objects and intangible heritage associated with a place, including contemporary heritage” (European Parliament and Council of the European Union 2011). The notion of site is primarily linked to tangible heritage, even if the broad scope of the definition encompasses not merely historic monuments but also industrial heritage, natural sites, intangible heritage, and even contemporary heritage. The criteria for sites to be selected are, according to Article 7.1(a) of the 2011 Decision, to "have a symbolic European value [and to} have played a significant role in the history and culture of Europe and/or the building of the Union” (European Parliament and Council of the European Union 2011). They must also demonstrate at least one of three characteristics:

> "how their past and present influence and attraction go beyond the national borders [...] their place and role in European history and European integration, and their links with key European events, personalities or movements; their place and role in the development and promotion of the common values that underpin European integration;” (European Parliament and Council of the European Union 2011)

The criteria for the European Heritage Label focus heavily on European significance and on political and historic values, distinguishing it from designations that emphasise universal and aesthetic or scientific value. The 2011 Decision explicitly positions the European Heritage Label as complementary to but distinct from other heritage initiatives[13]. The key distinction lies in focus. The Decision's preamble clarifies: “The main focus of the action should be on the promotion of and access to the

[12] Requested sites are asked to submit a project including actions under the 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

[13] Article 5 requires that "the Commission and the Member States shall ensure the added value and complementarity of the action with regard to other initiatives in the field of cultural heritage such as the Unesco World Heritage List, the Unesco Representative List of the Intangible Cultural Heritage of Humanity and the Council of Europe's European Cultural Routes." (European Parliament and Council of the European Union 2011)

sites as well as on the quality of the information and activities offered, as opposed to the preservation of the sites, which should be guaranteed by existing protection regimes" (European Parliament and Council of the European Union 2011). While UNESCO emphasises outstanding universal value based on aesthetic, history and science, and is focused on preservation, the European Heritage Label emphasises the symbolic democratic values underpinning European integration and focuses on the educational dimension, without providing direct funding for the awarded sites. European Heritage sites are thus conceived for their relation to the creation of today's Europe and as places that celebrate and symbolise European ideals, values, history, and integration.

The research by Lähdesmäki (2020) demonstrates that EHL sites employ their historical narratives and educational focus as instruments to shape visitors' engagement with European Union goals, revealing that standardized notions of what constitutes 'European values', 'European culture', and 'Europeanness' are actively constructed through European Union policy discourse, and these same framings subsequently appear in how visitors articulate their own understanding of Europe. In this sense, the study findings reveal that both evaluators and visitors envision these values as socially positive and promoting social peace, including "idealistic discourses of Europe based on imagined or desired aspects of social justice and equality in current and future European societies." (Tuuli Lähdesmäki et al., 2020, page 40).

3.4 Definitions of cultural heritage

The convergence of crisis and opportunity led to the proliferation of cultural heritage-related conclusions starting from 2014 (Sciacchitano, 2015), culminating in the European Year of Cultural Heritage in 2018. Crucially, in 2014 did the EU finally produce a comprehensive definition. The *Council conclusions of 21 May 2014 on cultural heritage as a strategic resource for a sustainable Europe* (Council of the European Union 2014) provides the following definition:

> "Cultural heritage consists of the resources inherited from the past in all forms and aspects - tangible, intangible and digital (born digital and

> digitized), including monuments, sites, landscapes, skills, practices, knowledge and expressions of human creativity, as well as collections conserved and managed by public and private bodies such as museums, libraries and archives. It originates from the interaction between people and places through time and it is constantly evolving. These resources are of great value to society from a cultural, environmental, social and economic point of view and thus their sustainable management constitutes a strategic choice for the 21st century;" (Council of the European Union 2014)

The Conclusions establish a tripartite classification of tangible, intangible, and digital heritage, a framework that has been widely adopted in subsequent European Union policy and funding documents. The explicit inclusion of digital heritage as a distinct category alongside tangible and intangible forms marks an addition from earlier international frameworks, which do not articulate digital heritage as a separate dimension. This inclusion reflects the European Union's broader strategic investment in the digital and audiovisual cultural industry, characterised by both cultural and economic policy objectives. The development of this definition will follow a path that frames the digitalisation of heritage, in policy and funding instruments, not solely as a cultural preservation mechanism, but as a strategic resource for European competitiveness. Europe's digitalised heritage is both considered as heritage and as a resource for innovation and a competitive asset in the global economy, as it is operationalised through Creative Europe's consistent support for digitisation, audiovisual and media projects, and Horizon 2020's actions on digital preservation and access. The presence of digital heritage, both "*born digital and digitized*" in this first comprehensive heritage definition poses the foundation for a rich presence of digital in cultural and cultural heritage policy, with specific measures ranging from the *2021 Commission Recommendation on a common European data space for cultural heritage* (European Commission 2021), to the increasing development of platforms such as

Europeana[14] or the European Collaborative Cloud for Cultural Heritage[15]. The conceptualisation of heritage as an evolving construct that emerges from the interactions between human communities and their environment demonstrates clear alignment with the Council of Europe's 2005 *Faro Convention*, which similarly defines heritage in article 2 as "a group of resources inherited from the past which people identify, independently of ownership, as a reflection and expression of their constantly evolving values, beliefs, knowledge and traditions". Simultaneously, the inherent tension between the dynamism of heritage as a living process and its fundamental fragility and irreplaceability outlines a type of contrasting framing that is very common in the European Union definitions of cultural heritage. The 2014 Conclusions attempt to reconcile these positions by positioning sustainable management as the strategic response to heritage's dual nature: simultaneously living process and vulnerable inheritance. The narrative of cultural heritage as a foundational shared inheritance of European peoples, as established in EU treaties and addressed in the second point of the Faro convention definition, starts to be increasingly leveraged and developed by the EU starting from 2014.

3.5 Other frameworks: UNESCO and Council of Europe

UNESCO's 1972 Convention Concerning the *Protection of the World Cultural and Natural Heritage* marked a pivotal moment in international heritage governance, conferring 'outstanding universal value' on selected cultural and natural properties and establishing a global framework for heritage governance. Scholarship outlined the controversial nature of the concept of 'universal value', evidencing how it builds on a culturally European idea of heritage while framing it as universal (Sophia Labadi 2013). The 1972 UNESCO definition remained primarily oriented toward tangible and built heritage, while natural heritage, defined separately in Article 2, is recognised against criteria of scientific interest, biodiversity conservation, and aesthetic value. The 1972 Convention operational guidelines have been revised many times over the years,

[14] https://www.europeana.eu/en
[15] https://research-and-innovation.ec.europa.eu/research-area/social-sciences-and-humanities/cultural-heritage-and-cultural-and-creative-industries-ccis/cultural-heritage-cloud_en

allowing the ‘outstanding value’ principle to evolve and adapt to other heritage narratives. However, it is interesting to notice, from an European perspective, that while UNESCO’s 1972 protectionist framework is deeply rooted, beyond the historical and scientific dimensions, in cultural conceptualizations such as ‘art’ or ‘aesthetic’, the European Union first step in cultural heritage protection in the same decade are already rooted in socio-political values and symbolic identitarian meanings of heritage. The 2003 UNESCO *Convention for the Safeguarding of the Intangible Cultural Heritage* has also shaped European Union policy discourse by drawing attention to heritage's intangible dimension, though EU policies frame this dimension largely in terms of history and traditions.

Similarly to UNESCO, as a supranational institution, the European Union directs its policies and funding instruments toward preserving and promoting heritage through concrete actions, while establishing top-down frameworks to guide these efforts. In practice, tangible and intangible heritage gains recognition only when local actors engage with EU programmes, prizes, or labels, which effectively detain the responsibility to determine what merits funding or designation. The European Union however, has a more ‘territorial’ concept to defend, while UNESCO aims to act globally: the European Union, through labels and programmes, selects which sites, practices and traditions to fund and recognise, yet the practices it selects must be understood as simultaneously rooted in a specific locality and as expressions of a broader European heritage. The discourse surrounding European heritage, including its intangible forms, remains bound to the EU's territorial scope. This territorial framing has also been mobilised, for instance, in the contexts of enlargement and partnerships, where shared heritage and values serve in the integration or intervention narrative of ‘extra-EU’ States. Certain values, sites, or intangible practices are presented as distinctly European, while the very concept of European Union heritage continuously evolves not only in virtue of the nature of heritage itself, but also following the territorial enlargement incorporating new cultures and traditions, that become recognised as belonging in some way to this common set of values and narratives. In all cases, the European Union's conception of intangible heritage remains embedded in what is essentially a territorial logic of governance. The boundaries of cultural heritage,

while fluid, dynamic, and cross-national, ultimately remain within the space of the Union itself: heritage is at once local, cross-national, and European. This is conceptually but not inherently contradictory. To design frameworks, policies, and allocate labels or funding for the protection of tangible and intangible heritage, an institution must direct those policies toward a defined scope, whether territorial, national, regional, or local. Linking political provisions and funding to a specific space or to particular traditions is, in this sense, an inherent feature of heritage governing.

The Council of Europe 2005 *Convention on the Value of Cultural Heritage for Society* (Faro Convention) can be considered a bridge between the UNESCO 'universal' aim and the European Union's more 'territorial' approaches. According to this framework, heritage is not defined by experts or governments, but by what people and communities themselves identify as meaningful to them, representative of their collective memory and values, and worth transmitting to future generations. The definition encompasses both tangible and intangible heritage, as well as the entire environment as shaped by human meaning:

> "Article 2 – Definitions: For the purposes of this Convention, a cultural heritage is a group of resources inherited from the past which people identify, independently of ownership, as a reflection and expression of their constantly evolving values, beliefs, knowledge and traditions. It includes all aspects of the environment resulting from the interaction between people and places through time; a heritage community consists of people who value specific aspects of cultural heritage which they wish, within the framework of public action, to sustain and transmit to future generations." (Council of Europe 2005)

Drawing on Article 27 of the 1948 United Nations *Universal Declaration of Human Rights*, the Convention describes heritage as a human right, stating that "everyone, alone or collectively, has the right to benefit from the cultural heritage and to contribute towards its enrichment;" (Council of Europe 2005. art. 4). This represents a fundamental shift in emphasis: heritage is not primarily about objects to be preserved by

specialists, but about people and communities, who themselves decide what constitutes heritage, regardless of ownership and through dynamic and evolving narratives. The concept of a ‘heritage community’ in the Faro Convention moves heritage discourse from object preservation toward a community centred framework, where the European community can be conceptualized as a sort of wide heritage community. Article 3 of the Convention elaborates:

> “The Parties agree to promote an understanding of the common heritage of Europe, which consists of: all forms of cultural heritage in Europe which together constitute a shared source of remembrance, understanding, identity, cohesion and creativity, and the ideals, principles and values, derived from the experience gained through progress and past conflicts, which foster the development of a peaceful and stable society, founded on respect for human rights, democracy and the rule of law.” (Council of Europe 2005. art. 3)

European heritage is framed as a collective construction of meaning, based on shared collective memory, identity, inspiration, and the collective understanding of what makes Europeans similar. The concept of common European heritage, even if based on ‘all forms of cultural heritage in Europe’, implicitly assumes that there must be a common denominator, and is based on the idea of the promotion of an understanding of this common heritage of Europe and its narratives towards peace and the values of human rights, democracy, and rule of law. The emphasis on learning from 'past conflicts', a principle culturally foundational to the European Union itself, can be read in different ways: as reflecting the traditional narrative of the European institutions as guarantor of peace in Europe after the Second World War, or as other, less dominant narratives, for example the colonial past. The underlying concept seems to be that members of the European community collectively shape a shared understanding of heritage, with the common denominator across these narratives being an understanding of European heritage implicitly grounded in the values of peace, human rights, the rule of law, and democracy.

3.6 Cultural goods

Interesting formulations regarding the challenges in defining tangible cultural heritage at EU level are present in the history of EU legislation concerning the import and export of cultural goods, and the prevention of illicit traffic among countries. Even if not directly linked to the environmental dimension of cultural heritage, these provisions establish a clear and binding framework upon what is considered a 'cultural object' or a 'cultural good' by the EU. The *Directive 2014/60/EU on the return of cultural objects unlawfully removed from the territory of a Member State* (European Parliament and Council of the European Union 2014) builds upon Article 36 of the *Treaty on the Functioning of the European Union,* and emphasizes the European Union subsidiary role in respect of culture as framed by the Treaties. The ultimate authority to define what constitutes a cultural object or cultural heritage resides with the Member States. At the same time, however, the Directive acknowledges that the EU holds a mandate to protect cultural heritage "of European significance, to which such national treasures belong" (Directive 2014/60/EU). The directive defines a 'cultural object' as anything "classified or defined by a Member State as being among the 'national treasures possessing artistic, historic or archaeological value' under national legislation" and continues referring to the previous Directive 93/7/EEC (European Parliament and Council of the European Union 1993), which defined very precise categories in order for cultural objects to be considered as such according to age and financial value thresholds. The 2014 Directive reaffirms Member States' sovereignty in determining which cultural objects qualify as 'national treasures' under its scope, and precises that "cultural objects classified or defined as national treasures should no longer have to belong to categories or comply with thresholds related to their age and/or financial value in order to qualify for return under this Directive" (Directive 2014/60/EU). The *Regulation 2019/880 on the introduction and the import of cultural goods* (European Parliament and Council of the European Union 2019) draws on the UNESCO 1970 convention in order to legitimize a new and more restrictive definition and categorization of what constitutes a cultural good: "cultural goods' means any item which is of importance for archaeology, prehistory, history, literature, art or science as

listed in the Annex." (Regulation 2019/880). This definition is deliberately tied to the categories enumerated in the Annex, which includes a detailed list of cultural goods covered by the directive. The Annex (Regulation 2019/880) itself is divided into three parts corresponding to different levels of regulatory control based on the type of goods, economic value, and age. The troubled legislative journey concerning the import, export and traffic of cultural goods, an area where the European Union holds legislative authority given that the single market falls within its exclusive competence, reveals the profound difficulty of establishing a centralised definition of cultural goods and, by extension, of cultural heritage itself. The European Union must maintain a delicate balance between its commitment to protecting and preserving national and European 'treasures', and the need to not interfere with the definitions of cultural heritage developed by Member States and local communities. The challenge is not merely technical but deeply political and philosophical, touching upon fundamental questions of identity, sovereignty, and collective memory. Cultural heritage is inherently tied to the peoples and communities, and any attempt to impose a uniform definition risks flattening the rich diversity of meanings that different societies attach to their material and immaterial patrimony. At the same time, the absence of harmonised standards creates vulnerabilities in the fight against threats such as illicit trafficking or climate change, and leaves gaps that can be exploited by those seeking to profit from neglecting the destruction of cultural heritage. The Union thus finds itself navigating between two legitimate imperatives: the need for effective, coordinated action to safeguard shared heritage, and the respect for the principle of subsidiarity, which recognises that decisions about cultural matters are often best made at the level closest to the communities concerned.

3.7 Limits of institutional heritage discourse criticism

There is a strong scholarship agreement around the political reasons behind the evolution towards an European Union cultural and cultural heritage policy and the need of making culture and cultural heritage functional to multiple European Union objectives, including fostering a sense of belonging among its citizens. The numerous

academic studies on the European Union definition of cultural heritage suggest that the European Union mostly refers to heritage in relation to European Union values and as a strategic resource for strengthening Europe's democracy, cohesion, and integration. However, to define what constitutes the common European heritage while committing to promote diversity is a challenging mission for the Union. European Union cultural heritage discourse typically frames heritage as a shared legacy and collective wealth that unites Europeans under a positive vision of the continent. This framing, however, tends to engage with Europe's history and narratives selectively. While certain traumatic past and present events, more recently Russia's war in Ukraine, have been strongly incorporated into the official EU narrative, others, for example Europe's multifaceted colonial history, remain largely absent. Despite the positivistic and Europe centric vision, the European Union's efforts to construct a shared narrative by drawing on heritage as a means of strengthening citizens' connection to EU values should not be entirely criticized. The European Union, despite the undeniable economic orientation of the project, is also a political community and, as such, the foundation upon some common ground between Member States is fundamental for its survival. Furthermore, some objectives and challenges, such as the ones related to climate change and environmental protection, can benefit from common, supra-national frameworks such as the European Union is.

Heritage discourse operates across multiple, intersecting scales of governance, from local municipalities to regional administrations, nation-states, supranational entities such as the European Union, and global frameworks including UNESCO's World Heritage Convention. At each level, the production, legitimation, preservation, and valorization of heritage are fundamentally shaped by institutional structures exercising what Foucault (1991) called 'governmentality'[16]: the ensemble of institutions, procedures, and tactics through which populations are governed, particular forms of knowledge are privileged, and certain narratives of collective identity are authorized as legitimate. As Laurajane Smith (2006)[17] has compellingly argued, an 'Authorized Heritage Discourse' (*AHD)* operates hegemonically across these

[16] Foucault, M. (1991). Governmentality. In G. Burchell, C. Gordon, & P. Miller (Eds.), *The Foucault effect: Studies in governmentality* (pp. 87–104). University of Chicago Press.
[17] Smith, L. (2006). *Uses of Heritage*. London: Routledge.

institutional contexts, naturalizing assumptions about heritage's inherent value while privileging certain narratives, aesthetics, and knowledge as arbiters of cultural significance. Crucially, this discourse is not unique to any single political entity but rather constitutes a fundamental feature of governance at all scales. Within this framework, the European Union's heritage initiatives, including the European Heritage Label, function according to the same discursive logic that animates heritage governance at local, regional, and national levels. As Lähdesmäki (2020) and other academics demonstrate, the EU employs heritage instrumentally to foster a sense of collective belonging and to construct normative categories such as common European values and 'Europeanness'. However, this practice is neither exceptional nor uniquely problematic. Heritage is inherently political: it serves as an instrument through which institutions build coherent collective identities at whatever scale they operate. The critical heritage studies literature has productively illuminated the EU's tendency toward consensual interpretations of the past that marginalise non-dominant perspectives (Višnja Kisić 2016). These critiques carry significant methodological and ethical weight: they expose the constructed nature of heritage narratives, challenge their claims to universality, and open space for a greater plurality of voices. Nevertheless, such critiques encounter an inherent limitation when they fail to account for the structural conditions that necessitate heritage discourse in the first place. The production of such narratives is not an aberration of institutional governance but its constitutive feature: politics itself operates through the articulation of founding myths and collective stories. The discursive construction of collective identity through a shared heritage is not unique to the European Union, it is a fundamental function of all political institutions, from local municipalities to international organisations. The EU is not engaged in something uniquely objectionable when it mobilises heritage toward the construction of common ground. It is exercising what Foucault (1991) would describe as a form of governmentality, a rationality of rule that operates at every institutional scale. A more productive critical orientation would therefore recognise the structural inevitability of partial and constructed heritage discourse within institutional contexts, while working toward either more inclusive, polyphonic, and environmentally sustainable forms of heritage practice within existing structures, or toward fundamentally reimagining the

institutional architecture through which people and heritage are governed. To dispense entirely with common narratives and values framed through top-down mechanisms, our societies would need to adopt radically different institutional forms altogether.

CHAPTER 4
Environmental sustainability as defined in the Green Deal

This chapter will identify the main European Union definitions of environmental sustainability in the Green Deal framework, through an overview of a selection of the most relevant provisions in defining and mainstreaming environmental sustainability. This selection is relevant in defining the framework for analyzing how environmental sustainability is addressed through recent EU main cultural heritage policies, and for understanding the framework in which funded heritage projects are expected to contribute to environmental sustainability. The final section of this chapter will also provide insights about the primary importance of EU non-cultural, and in particular, environmental policies in cultural heritage definition and governance.

4.1 Core provisions of the Green Deal: the definition of environmental sustainability

The European Union has progressively consolidated its approach to environmental sustainability through a comprehensive policy framework centred on the European Green Deal (European Commission 2019). Presented by the European Commission in December 2019, the European Green Deal represents the EU's most comprehensive and ambitious framework for environmental sustainability to date, aiming to achieve climate neutrality by 2050 while transitioning toward a resource-efficient economy with zero net greenhouse gas emissions. It conceptualises environmental sustainability as a multi-dimensional challenge requiring action across climate neutrality, biodiversity protection, circular economy, zero pollution, and sustainable resource management. The framework is characterised by legally binding targets, and the explicit mainstreaming of sustainability into all EU policies and programmes. For cultural heritage policy, this

evolving environmental sustainability framework presents both opportunities and obligations, as heritage sites, practices, and management approaches must increasingly align with the environmental objectives while potentially contributing to sustainability goals through nature-based solutions, circular practices, and climate adaptation strategies. The Green Deal represents a significant discursive shift in EU environmental policy, moving environmental sustainability from a peripheral concern to a central organising principle of European governance. According to the European Commission (2019), the Green Deal serves as "a roadmap for making the EU's economy sustainable by turning climate and environmental challenges into opportunities across all policy areas and making the transition just and inclusive for all" This framing positions environmental sustainability not merely as an environmental policy objective but as a transformative economic strategy.

4.1.1 Environment Action Programme

The European Union's conceptualisation and articulation of environmental sustainability under the Green Deal is structured around six objectives provided in the *8th Environment Action Programme (8th EAP)***,** adopted in April 2022 through the European Parliament and Council of the European Union Decision 2022/591 on a *General Union Environment Action Programme to 2030*. It provides the policy direction framework for European Union's environmental policy until 31 December 2030, and sets interlinked environmental and social ambitions in the long-term: Article 2(1) of the decision states:

> *"*The 8th EAP shall have the long-term priority objective that by 2050 at the latest, people live well, within the planetary boundaries in a well-being economy where nothing is wasted, growth is regenerative, climate neutrality in the Union has been achieved and inequalities have been significantly reduced." (European Parliament and Council of the European Union 2022)

The Decision (European Parliament and Council of the European Union 2022)

identifies six ‘interlinked thematic priority objectives’, which have to be implemented through policies, in accordance with European Union’s competences set in the Treaties, and have to be monitored through competent EU agencies on annual, mid-term (2024), and final evaluation (2029) basis. The priorities identified in the Decision’s article 2(2) (European Parliament and Council of the European Union 2022) involve:

> "(a) swift and predictable reduction of greenhouse gas emissions and [...] enhancement of removals by natural sinks [...] whilst ensuring a just transition that leaves no one behind; (b) strengthening resilience and adaptation and reducing the vulnerability of the environment, society and all sectors of the economy to climate change, while improving prevention of, and preparedness for, weather- and climate-related disasters; (c) advancing towards a well-being economy that gives back to the planet more than it takes [...] where growth is regenerative, resources are used efficiently and sustainably, and the waste hierarchy is applied; (d) pursuing zero pollution [...] in order to achieve a toxic-free environment, including for air, water and soil [...] and protecting the health and well-being of people, animals and ecosystems from environment-related risks and negative impacts; (e) protecting, preserving and restoring marine and terrestrial biodiversity [...] halting and reversing biodiversity loss and improving the state of ecosystems and their functions and the services they provide; (f) significantly reducing key environmental and climate pressures related to the Union's production and consumption, in particular in the areas of energy, industry, buildings and infrastructure, mobility, tourism, international trade and the food system." (European Parliament and Council of the European Union 2022)

The European Commission's mid-term review of the *8th EAP*, published in March 2024, (European Commission 2024) finds that actual implementation remains insufficient to meet the 2030 targets. According to the report, “the pace of emission reduction needs to accelerate to reach almost triple the average annual reduction rate

achieved over the last decade [...] the most significant cuts in emissions are needed in buildings and transport, where the pace of decarbonisation is sluggish or even moving in the opposite direction". (European Commission 2024, page 3). The EU is losing rather than gaining carbon sinks, material consumption and plastic packaging waste have increased, two-thirds of agricultural soils are degraded, biodiversity continues to decline, and the EU's consumption footprint is exceeding what the planet can sustainably handle. In essence, while the European Green Deal represents a laudable and pioneering commitment to environmental transformation, a considerable gap persists between its objectives and their effective operationalisation on the ground.

4.1.2 European Climate Law

The core of the Green Deal action and of the EU environmental sustainability concept is defined in greenhouse gas emissions targets. The *European Union Climate Law,* (Regulation[18] (EU) 2021/1119 of the European Parliament and of the Council), which entered into force in July 2021, establishing two legally binding targets for the European Union as a whole: 2050 climate neutrality (Article 2(1)), meaning reaching net-zero emissions by 2050, and the 2030 intermediate target (Article 4(1)), meaning reaching at least 55% net emissions reduction by 2030 compared to 1990 levels. An European Parliamentary Research Service briefing from September 2024 (Jensen and Dewulf 2024) examines the enforcement challenges facing the EU's 2030 climate targets, revealing an implementation gap between ambition and action. According to the briefing, the draft National Energy and Climate Plans (NECPs) submitted by Member States by June 2023 were"not yet sufficient to deliver the 2030 target and would lead to a net reduction of only 51%" (Jensen and Dewulf 2024), instead of the 55% reduction target required for 2030. At Members State level, some sectors, such as transport, buildings, and agriculture, are identified as requiring more effort than others in cutting emissions, and an increase in the presence of carbon sinks (forests and land that absorb CO2) is required. A central tension in the briefing concerns the distinction between EU-level targets set by the *European Climate Law* (Regulation (EU) 2021/1119), and

[18] A Regulation is directly applicable in all EU Member States without the need for transposition into national law. A Directive requires Member States to transpose its provisions into their national legislation.

targets that are binding at Member State level, which are established through EU Regulations and Directives but depend on implementation at national level. The Jensen and Dewulf 2024 document states clearly that "The 2030 EU Climate Law target is binding at EU level. Its achievement, however, depends on the success of plans and measures at national level, across a range of policy areas." Reaching the climate neutrality and net emission reduction targets, in practice, depends on Member States implementing measures and policies at national level, and on how effectively EU enforcement mechanisms and governance frameworks can ensure progress towards binding targets across all sectors, particularly those where emission reductions have been slower, such as transport, buildings, and agriculture. The briefing also outlines that, while the European Commission monitors and can pursue infringement proceedings against Member States for Regulations infringement, "EU law does not have specific instruments to hold the Union accountable for an obligation it owes to itself", with the main risk in the failure to reach the targets being "a loss of credibility for the Union as a whole" (Jensen and Dewulf 2024). On 2 July 2025, the European Commission proposed amending the European Climate Law to include a new intermediate target: reducing net greenhouse gas emissions by 90% by 2040, compared to 1990 levels[19] (European Commission 2025). In December 2025, the European Parliament and Council reached a provisional political agreement on this legally binding 2040 target (European Parliament and Council of the European Union 2025). However, the agreement modified how the 90% reduction would be achieved. Under the agreed terms, at least 85% of the reduction must come from cuts made within the EU itself. The remaining 5% can be achieved by purchasing carbon credits from emission-reduction projects outside Europe, rather than through additional domestic action[20]. This trajectory, while still object of challenging negotiations, still seems to confirm the EU's commitment to what the European Climate Law establishes as a core principle of environmental sustainability: "ensur[ing] that all EU policies contribute to [the climate neutrality] goal and that all sectors of the economy and society play their

[19] https://climate.ec.europa.eu/document/download/e1b5a957-c6b9-4cb2-a247-bd28bf675db6_en?filename=com_2025_524_en.pdf (accessed 20 December 2025)
[20] https://www.consilium.europa.eu/en/press/press-releases/2025/12/10/2040-climate-target-council-and-parliament-agree-on-a-90-emissions-reduction/ (accessed 20 December 2025)

part" (Regulation (EU) 2021/1119 of the European Parliament and of the Council).

4.2 Mainstreaming environmental sustainability

The *Taxonomy Regulation* Regulation (Regulation (EU) 2020/852, 2020) and climate mainstreaming in the 2021-2027 Multiannual Financial Framework[21], besides representing two core provisions of the Green Deal, also have a strong influence on what is considered concretely environmentally sustainable, and on the contribution that funded programs, including the ones related to cultural heritage, are expected to make to the Green Deal.

4.2.1 The Taxonomy regulation and the 'do no harm' principle

The Taxonomy Regulation (Regulation (EU) 2020/852) was published in the Official Journal of the European Union on 22 June 2020 and entered into force on 12 July 2020. It establishes the basis for the EU taxonomy by setting out four overarching conditions that an economic activity must meet to qualify as environmentally sustainable. First, the activity must substantially contribute to at least one of six defined environmental objectives. Second, it must not significantly harm any of those same objectives. This means that activities that contribute to environmental sustainability in one dimension, but produce harm in another, cannot qualify as environmentally sustainable. Third, it must be carried out in compliance with minimum social safeguards. Fourth, it must meet the technical screening criteria established by the Commission for that specific activity. The six environmental objectives against which both substantial contribution and significant harm must be assessed mirror the structure of the 8th Environment Action Programme. These are climate change mitigation, climate change adaptation, sustainable use and protection of water and marine resources, transition to a circular economy, pollution prevention and control, and protection and restoration of biodiversity and ecosystems. Article 17 (Regulation (EU) 2020/852) provides detailed guidance on what constitutes significant harm to each objective, requiring assessment

[21] https://commission.europa.eu/system/files/2022-06/swd_2022_225_climate_mainstreaming_architecture_2021-2027.pdf (accessed 20 December 2025)

across the full life cycle of the products and services an activity provides. In addition to the 'do no harm' requirements, activities must also comply with minimum requirements aiming to ensure that environmental sustainability is not achieved at the cost of social harm, meaning that an economic activity cannot be considered 'green' if it violates fundamental human rights or labour standards. Article 18(1) (Regulation (EU) 2020/852) states that companies must implement procedures to ensure the respect of human rights and labour standards. Without such procedures, an economic activity cannot qualify as environmentally sustainable under the Taxonomy, regardless of how beneficial it may be for the environment.

4.2.2 Recent amendments to the Taxonomy Regulation

Since its entry into force in July 2020, the EU Taxonomy Regulation has remained the foundational legal framework for determining what constitutes an environmentally sustainable economic activity. However, in response to concerns about administrative burden and competitiveness, and sector specific lobbying, the European Commission has introduced significant changes in 2025 aimed at simplifying the regulatory landscape while preserving core environmental objectives. On 26 February 2025, the European Commission published the Omnibus Proposal[22], a comprehensive package designed to streamline and simplify existing sustainability regulations. This package introduces modifications to several key pieces of legislation, including the Corporate Sustainability Reporting Directive (CSRD), the Corporate Sustainability Due Diligence Directive (CSDDD), the Sustainable Finance Disclosure Regulation (SFDR), and the EU Taxonomy Regulation itself. The overarching stated goal is to reduce the reporting burden on companies, particularly those newly brought into the scope of sustainability reporting, while maintaining the EU's commitment to its climate and environmental goals. Following the Omnibus Proposal, the Commission adopted a delegated regulation on 4 July 2025 (Delegated Regulation (EU) 2026/73) that amended several implementing acts under the Taxonomy Regulation, introducing several key simplifications. Previously, companies were required to assess all of their economic

[22] https://commission.europa.eu/law/law-making-process/better-regulation/simplification-and-implementation/simplification_en (accessed 20 December 2025)

activities against the Taxonomy criteria to determine whether they qualified as environmentally sustainable. This was contested as a time-consuming and resource-intensive process, particularly for companies with diverse business operations. Under the new rules, companies are no longer required to carry out this assessment for activities that represent a minor part of their business. These changes are intended to make Taxonomy reporting more practical and less burdensome, particularly for smaller entities even if, de facto, they restrict the scope of the Taxonomy Directive in many ways. The amendments entered into force on 28 January 2026, which is the twentieth day following their publication in the Official Journal of the European Union.

4.2.3 The green budget

Climate mainstreaming in the 2021-2027 Multiannual Financial Framework (MFF) is built on four pillars established in the December 2020 Inter-Institutional Agreement between the Commission, European Parliament and Council[23]. These pillars comprise the do no harm principle set in the Taxonomy regulation, but also an overall target of at least 30% for climate-relevant expenditure across the MFF. The overall 30% target has been broken down into specific targets for individual EU funding programmes. Creative Europe, as a cultural funding program, does not have its own specific percentage target like infrastructure-focused programs. However, it is required to contribute to the overall 30% goal. The Creative Europe Regulation 2021/818 (European Parliament and Council of the European Union 2021) states that the programme is intended to contribute to mainstreaming climate actions and to the achievement of an overall target of 30% of Union budget expenditure supporting climate objectives, and that actions under the Creative Europe program should respect the 'do no harm' principle.

4.3 Environment in heritage, heritage in environment

The emergence of the European Union cultural policy is derived by the expansion of its competences after the Lisbon treaty entered into force in 2009, but the European Union promoted heritage long before that through implicit provisions in other policies with the

[23] https://eur-lex.europa.eu/eli/agree_interinstit/2020/1222/oj/eng

aim of constructing European identity and meaning. Culture and cultural heritage, given the European Union subsidiary role, are more often governed and impacted through policies that are related to other fields. There are infinite examples in many fields of European Union policy, including the environmental one. A typical example includes the *Energy Performance of Buildings Directive 2024/1275* (European Parliament and Council of the European Union 2024), governing the decarbonization of Europe's building stock under the European Green Deal, but there are other examples that tackle heritage at the heart of its definition even without mentioning it directly, such as the PDO (Protected Designation of Origin), PGI (Protected Geographical Indication), and TSG (Traditional Speciality Guaranteed) labels. Cultural heritage is affected by non cultural policies, consciously or less consciously, since the beginning of the European project. The consideration of environment in cultural policies instead, emerges first in the conception of natural heritage, and becomes more dominant with the gradual shift from a heritage conception based on monumentality, to one that includes landscapes, sites, and becomes more inclusive. Tuuli Lähdesmäki (2019), in her analysis of 2412 European Commission documents, notes that natural heritage was discussed by the Commission already in the seventies, starting with the need of protecting specific ecosystems and increasingly broadening towards the environment as a broader entity that includes nature, buildings, industry and heritage. In its early decades, and particularly until the 2000s, the European Union policy maintained a clear division between cultural and natural heritage, reflecting the distinction established in the 1972 UNESCO Convention. This separation was also shaped by the specific focus of individual policies, as a dedicated European Community and European Union cultural heritage policy did not yet exist. The boundaries between natural and cultural heritage, as well as between tangible and intangible heritage, were rarely questioned. Yet the concept of rural heritage implicitly cuts across these divisions, bringing together landscapes, buildings, agricultural products, and practices under a single framework. During the nineties and two thousands, the policy landscape evolved further. The launch of the Natura 2000 network[24] and the LIFE programme[25] marked the establishment of a

[24] https://biodiversity.europa.eu/natura2000/en
[25] https://cinea.ec.europa.eu/programmes/life_en

more structured environmental protection framework. Cultural heritage also began to appear within environmental policy, notably in the 2001 *Strategic Environmental Assessment (SEA) Directive 2001/42/EC* (European Parliament and Council of the European Union 2001) and the 2011 *EU Biodiversity Strategy* (European Commission 2011). Throughout this period, environmental sustainability and heritage protection are consistently addressed alongside economic development and growth. Over time, the concept of sustainability itself broadened. It moved beyond a focus on environmental protection and preservation to encompass social and economic dimensions as well. This wider understanding of sustainability remains visible today, both in the European Green Deal and in the most recent cultural heritage policies, which frame sustainability as a cross-cutting concern rather than a purely environmental one.

CHAPTER 5

Environmental sustainability in European Union cultural heritage frameworks

5.1 Methodology and academic frameworks

This analysis takes the year 2014 as its starting point. While the integration of cultural heritage and sustainability had been addressed in earlier instruments, the 2014 Council of the European Union and European Commission policy documents represent the first dedicated European Union cultural policy instruments to place cultural heritage and this integration at its centre (Lähdesmäki et al. 2019, Sciacchitano 2015).

A two-stage approach was adopted to ensure comprehensive document identification. The initial scoping phase involved consultation of EU institutional sources, principally the European Commission's Culture and Creativity website[26], which provided a preliminary corpus of key policy documents. This was followed by a systematic search of the EUR-Lex database[27] to verify completeness and capture any additional relevant instruments. The search combined keyword queries (‘heritage, ‘cultur*’) with targeted searches for key funding programmes and initiatives. From this initial corpus, documents were selected through purposive sampling based on substantive engagement with the intersection of cultural heritage and environmental sustainability. The selection excluded false positives (e.g., ‘culture’ in scientific or adjectival usage unrelated to the cultural sector), as well as judicial cases, parliamentary voting records, opinions, and proposals. An exception was made for 2025 policy proposals not yet adopted. Open Method of Coordination[28] (hereafter, OMC) reports were included as a distinct category. These expert group outputs, commissioned under

[26] https://culture.ec.europa.eu/ (accessed 01 December 2025)
[27] https://eur-lex.europa.eu/homepage.html (accessed 20 December 2025)
[28] https://culture.ec.europa.eu/policies/cultural-policy-cooperation-at-the-eu-level/cooperation-with-the-eu-countries

the Council Work Plans for Culture, occupy a unique position in the EU policy ecosystem: produced by cultural practitioners and experts, they function as a feedback mechanism linking implementation realities to policy development[29], embodying the cross-level coordination characteristic of EU cultural governance. A note on terminology is warranted, as the EU holds no binding competence in the cultural heritage field: classifying instruments such as Council Conclusions or Commission Communications as 'policies' is not uncontroversial (Lähdesmäki et al. 2019). Nevertheless, this term is used throughout to denote the non-binding instruments through which the EU articulates its heritage-related objectives and coordinates Member State action. Throughout this analysis, OMC outputs are referred to as 'reports' or 'studies' rather than 'policies'. The analysis includes the New European Bauhaus initiative and Creative Europe 2021-2027 programme. The New European Bauhaus engages directly with culture and sustainability, with particular relevance for built heritage, positioning environmental sustainability as a foundational pillar alongside aesthetics and inclusion. Creative Europe is the European Union's primary cultural funding programme, and the *Regulation (EU) 2021/818* explicitly links the programme to the Union climate commitments (European Parliament and Council of the European Union 2021, Recital 36). The European Capitals of Culture[30] and European Heritage Label[31] are excluded from this analysis, because of their nature as primarily designation and labelling schemes rather than funding instruments or frameworks. More substantively, while examining environmental sustainability in their implementation would be of considerable interest, the governing frameworks of neither initiative establish environmental sustainability as a priority or criterion. Although the provisions on cultural goods and trafficking offer useful insights for defining cultural heritage, they lack substantive content regarding environmental sustainability and have therefore been treated summarily in Chapter 3.

This research employs a combined analytical framework that integrates discourse analysis with ecosystemic framework to examine how cultural heritage

[29] https://eur-lex.europa.eu/EN/legal-content/glossary/open-method-of-coordination.html
[30] https://culture.ec.europa.eu/policies/culture-in-cities-and-regions/about-european-capitals-of-culture (accessed 20 January 2026)
[31] https://culture.ec.europa.eu/cultural-heritage/initiatives-and-success-stories/european-heritage-label (accessed 20 January 2026)

ecosystems have been discussed in EU cultural policies in relation to sustainability, particularly environmental sustainability and the role of nature. Drawing on Soini and Birkeland (2014), I analyze policy discourse through their seven storylines, generative narratives through which ideas and concepts give meaning to phenomena and reveal underlying political-ideological contexts (conservative, neoliberal, communitarian, environmentalist). Simultaneously, I apply Pekkarinen's (2025) ecosystemic approach, which provides analytical tools for examining the interlinkages between cultural and other sustainability dimensions, the distinction between internal sustainability and external sustainability contributions, and how sustainability questions are addressed across macro, meso, and micro levels. Together, these frameworks enable a systematic examination of how environmental sustainability is framed in European Union cultural policy, what narratives emerge concerning the relationship between cultural heritage and nature, and what political-ideological assumptions and ecosystemic logics underpin these framings. The analysis attends particularly to whether policies position culture and nature as separate or inherently intertwined, and whether culture is conceptualized in, for, or as sustainability. I will not apply Pekkarinen literature review frameworks, as they refer to scholarship and are less tailored to analyze policies. The analysis will focus on Soini and Birkeland (2014) seven storylines in order to identify the political ideologies behind the narrations, while applying Pekkerinen proposed (2025) ecosystemic analytical approach in order to structure the analysis and study the links between the cultural ecosystem (culture in the narrow sense), cultural foundations (culture in the wider sense), and the environmental, social, and economic dimensions of sustainability. Pekkarinen (2025) framework will also be used to analyze the conceptualization of nature, and of planetary boundaries.

5.2 Heritage integration in the sustainability strategy

The *Council conclusions of 21 May 2014 on cultural heritage as a strategic resource for a sustainable Europe*(Council of the European Union 2014), besides providing the first comprehensive European Union definition of cultural heritage, as analyzed in chapter 3, also represents the first main European Union policy that explicitly focuses

on the integration of cultural heritage and sustainability. As described in chapter 4, the integration of heritage conceptions and environmental sustainability was present from long before this date, especially through policies that tackled environmental, agricultural and regional development aspects, but also in the concepts of natural, industrial and rural heritage. In 2014, however, the European Union found itself in the midst of an identity crisis, originating from different causes but principally from the disruptive effects of the 2008 financial crisis and the internal divisions it generated.

The fight against rising euroscepticism and the resurgence of nationalistic extremism was waged by the EU, in part, through the symbolic and political terrain of cultural heritage, resulting in the adoption of two major policy documents: the Council conclusions and the Commission communication *Towards an integrated approach to cultural heritage for Europe* (European Commission 2014). Significantly, these instruments emerged at a moment when public financing for cultural heritage across Member States had contracted sharply in the aftermath of the crisis. In this context, the 2014 policy framework can be also possibly read as a strategic reframing: by articulating cultural heritage not merely as a sector deserving protection, but as a strategic resource capable of contributing to "smart, sustainable and inclusive growth" (Council of the European Union, 2014), the European Union sought to legitimise continued investment in heritage within an austerity-dominated policy environment. This turn, positioning heritage as a driver of economic regeneration, social cohesion, and territorial development, has been noted by scholars as both an opportunity and a source of tension, as it risks subordinating the cultural values of heritage to measurable socio-economic outputs (Lähdesmäki et al. 2019). Nevertheless, the 2014 conclusions marked a decisive shift in European Union discourse, elevating cultural heritage to a cross-cutting priority with claimed relevance in different domains.

5.2.1 Contrasting definitions of heritage

The Council Conclusions constitute a call from the Council of the European Union, to the Commission and Member States to take action towards shared goals, meaning this type of policy acts as a non-binding guide at macro-level, with Member States being the main governing actors in implementation at meso and micro level. The economic crisis

effects can be strongly perceived in the *Council conclusions of 21 May 2014 on cultural heritage as a strategic resource for a sustainable Europe* (Council of the European Union 2014), which focus mainly on economical and social dimensions rather than environmental ones. Heritage is clearly framed in what Soini and Birkeland (2014) would describe as the 'heritage' and 'vitality' storylines, as it is defined as a set of resources inherited from the past.

The definition, however, encompasses nature in the sense that it also describes heritage as originated by a dynamic interaction between people and the environment. Heritage is described as something that evolves through time, but remains conceptually placed in a linear historical continuity and belonging to a precise place. While being described as *evolving*, heritage is repetitively framed as a non-renewable resource, whose internal sustainability is threatened by different aspects of contemporary society, including climate-change and technology. Technology, in particular, is framed both as a threat and as a part of heritage definition, in the sense that digital born and digitised heritage are included in the document's heritage definition. The adjectives that accompany heritage's conceptualization are contrasting in the way they frame heritage both as something static and dynamic at the same time: *strategic resource, constantly evolving, inherited, non-renewable, unique, non-interchangeable.* While these terms provide an oscillation between the 'heritage' and 'vitality' storylines, the internal sustainability of heritage is clearly framed as the conservation and preservation of this non-renewable cultural capital in face of contemporary challenges.

5.2.2 Sustainable development, in socio-economic terms

Heritage definition includes *sites, landscapes, skills, practices, knowledge,* encompassing natural elements and intangible ones, but no more development is put on these concepts. Heritage contributions 'for' sustainability, or, in Pekkarinen's (2025) words, its "wider sustainability interlinkages", are mentioned across all sustainability ecosystems, however, the document introduction articulates heritage's role regarding the social and economic impacts, ignoring the environmental ones. The sustainable management of heritage is framed as "[...] a strategic choice for the 21st century" (Council of the European Union 2014), regarding all dimensions of sustainability:

cultural, social, economic, and environmental. Heritage is also defined as a "[...] major asset for Europe [...] [and as an] [...] important component of the European project" (Council of the European Union 2014), and its value defined as both intrinsic, cultural, environmental, social, economic. It's also described as a resource capable of driving society, especially during the crisis, towards ethical, aesthetic and ecological values. Heritage is described and articulated as a driver in enhancing social capital by increasing citizens' participation in democracy and their quality of life, through fostering dialogue, inclusion, education, and the development of skills, knowledge, creativity and innovation. Economically, heritage is defined as a "powerful driving force of inclusive local and regional development [...]'that'[...] creates considerable externalities, in particular through the enhancement of sustainable cultural tourism" (Council of the European Union 2014). Here, the contributions of heritage to social and economic sustainability clearly link the 'vitality' storyline features of local development, social cohesion and sense of belonging, with economic viability, expressing heritage as an instrument in achieving *considerable externalities* through the exploitation of tourism. One sentence mentions that heritage contributes to environmental sustainability, but doesn't specify in what ways. More specification about the role of heritage is done indirectly, describing the policy areas that impact cultural heritage and in which heritage "offers a strong potential" for the achievement of policy objectives: " [...] regional development, social cohesion, agriculture, maritime affairs, environment, tourism, education, the digital agenda, research and innovation" (Council of the European Union 2014).

The most relevant environmental mention is the one that promotes "[...] supporting, enhancing and promoting cultural heritage via an integrated, holistic approach, while taking into account its cultural, economic, social, environmental and scientific components;" (Council of the European Union 2014), and calls on Member States to foster the training and acquiring of traditional skills related to sustainable heritage preservation and management. In this sense, traditional knowledge education and the environmental components are more linked to the internal sustainability and external socio-economic contributions of cultural heritage rather than to external environmental impacts. Heritage's role in sustainable local development of cities and

rural areas in " [...] redevelopment and rehabilitation projects [...]" (Council of the European Union 2014), is also mainly framed in economic terms, with a call for Member States to both leverage the potential of heritage for other policy areas, and to increase heritage internal sustainability through funding opportunities, making use of non-cultural programmes as sources of heritage financement.

Other mentions in this Conclusion will reappear and be developed in the following years, including in the most recent policies: the need to collect data and statistics about heritage for evidence-based policies, the need for involving heritage stakeholders and communities in decision-making, as well as promoting networks between private and public entities; the need to promote education and awareness-raising about cultural heritage, especially among young generations; the importance of encouraging access and use of digital heritage resources, fostering cross-border cooperation and supporting research in cultural heritage. While these mentions provide alternative versions of both heritage storylines, and links with external sustainability impacts, the core part of this document remains about preserving cultural heritage and leveraging it as a socio-economic resource. The role of nature and the environment, while encompassed in heritage definition and in the concept of 'landscapes' and 'sites', is referenced but not explored, described in rare occasions only in terms of climate change's impacts on heritage, with the dimension of environmental sustainability remaining almost unexpressed. Nature is never mentioned directly in the document. As further analyzed in this chapter, alternative roles and stories of heritage will be developed more consistently in future policies.

5.2.3 Heritage as/for the European Union's cultural foundations

The European Commission Communication *Towards an Integrated Approach to Cultural Heritage for Europe* (European Commission 2014) responds to the Council invitation to examine heritage's social and economic contributions and to develop a strategic approach for leveraging these dimensions. The document's scope is therefore mainly defined in addressing heritage's role for economic growth, social cohesion and inclusion, especially in tourism, innovation, and cultural vitality, and does not focus on its environmental contributions. Sustainability, in this context, means the continuation

and growth of socioeconomic benefits, both internally and externally to the heritage ecosystem, rather than describing ecological dimensions. The document adopts a choice of words derived from socio-economic terms in describing heritage as *asset/responsibility, common wealth, inheritance/legacy, resource for economic growth/employment/social cohesion, common good, shared resource.* Here, heritage is defined not only as a resource inherited from the past, but specifically developed from *previous generations of Europeans* as a *legacy* for future ones. The continuity of cultural capital is then directly linked to a sense of European identity, to the sense of belonging to the Union's community, to the continuity of values and worldviews of 'being European' through time:

> "Political interest at EU level has steadily grown - cultural and heritage stakeholders recently highlighted in the Declaration on a New Narrative for Europe: 'Europe as a political body needs to recognise the value of cultural heritage. Heritage reveals what it has meant to be a European throughout time. It is a powerful instrument that provides a sense of belonging amongst and between European citizens'." (European Commission 2014).

This framing, which is very often used to describe the importance and value of heritage in European Union policies, suggests that heritage as an ecosystem reinforces in some ways what we could define as the cultural foundations or, in Pekkarinen (2014) terms, the eco-cultural reality, of being 'European'. These cultural foundations are being reinforced and strengthened through heritage, rather than discussed or challenged. As Soini and Birkeland (2014) would describe the concept, they are taken as given, as something that has already been developed and in some sort crystallized in some defining principles. These principles are mostly implicitly embedded in policies rather than explicitly acknowledged, and are usually implicitly connected to the European values as described in the European Union Treaties (human dignity, freedom, democracy, equality, rule of law, human rights), although specifications and framings of these values are present depending on specific policies' nature.

In this specific Communication, heritage is described as having intrinsic,

economic, and social value, defined as an *irreplaceable repository of knowledge,* with its impacts in sustainability being described through 'economic viability' and 'cultural vitality' framings:

> "It is an irreplaceable repository of knowledge and a valuable resource for economic growth, employment and social cohesion. It enriches the individual lives of hundreds of millions of people, is a source of inspiration for thinkers and artists, and a driver for our cultural and creative industries. Our cultural heritage and the way we preserve and valorise it is a major factor in defining Europe's place in the world and its attractiveness as a place to live, work, and visit. [...] Looking after our heritage is, therefore, our common responsibility. " (European Commission 2014)

The tone in this Communication is more strategically-driven than in the Council conclusions, as heritage is considered a major factor in Europe's internal and international branding. Both heritage internal sustainability and external impacts are described in a collectivist way, with heritage being a shared resource under everyone's responsibility and care. In this sense, while the narration vaguely shifts towards a communitarian approach, the notions of cultural capital and cultural foundations continuity, to be leveraged in fostering 'Europeanness', continue to permeate and be at the base of the discourse, with collective responsibility being directed towards the preservation of heritage for future generations rather than effectively having a role in shaping heritage's narrative. Furthermore, there is both an element of inclusion and exclusion in the concept of *our cultural heritage*, which implicitly describes the heritage ecosystem as something belonging to a defined community of Europeans. Heritage internal sustainability is described as vulnerable in virtue of its public exposure to *over-exploitation and under-funding,* or to *neglect, decay,* and *oblivion,* and European Union actions related to tackle trafficking of cultural goods with internal market regulations are highlighted. Heritage internal sustainability is directly linked to the overall image of the EU and its 'attractiveness' and prosperity as a living space.

European Union's role in heritage internal sustainability, meaning heritage protection, is outlined as complementary to, and not less important than the primary one

of national, regional, and local authorities, implicitly reminding that common and interconnected challenges, such as the international trafficking of cultural goods, are better managed and coordinated at EU rather than only national level.

Further than reminding the importance of EU's role with practical and strategic reasons such as Union's ability to tackle complex interrelated and supra-national challenges, the EU goes further in 'justifying' its role in humanist terms, using what is a very common EU spatial, definitional, and ultimately identitarian framing: "heritage is always both local and European. It has been forged over time, but also across borders and communities. Heritage is made up of local stories that together make the history of Europe." (European Commission 2014). The quote employs an interesting asymmetry: time is treated linearly, while space operates across simultaneous scales: local, cross-border, and continental. Heritage exists and develops in and across each micro, meso, and macro level, with the aggregate of these dimensions supposedly constituting Europe's cultural foundations. This framing reveals two distinct functions of heritage in sustainability discourse. On one hand, heritage is positioned 'as' sustainability itself, in the sense that the sums of its part constitute the wide European cultural foundations. On the other hand, the framing instrumentalizes heritage 'for' sustainability, meaning these European values are not defined dynamically through heritage and communities' evolution, but are fixed principles that heritage helps to reinforce. The central contradiction lies in the aggregative logic. If *local stories together make the history of Europe* we must ask: what is this history about? What principle of selection or coherence transforms disparate local narratives into a unified European story? The implicit answer, that these stories must correspond to European Union values, is assumed. Local stories then seem to become legible as 'European heritage' only insofar as they can be read as precursors to or expressions of a predetermined set of values.

Heritage value is described as a function of the different forms in which heritage exists, and its contributions to sustainability (*flow of services*), are described as *cultural, physical, digital, environmental, human and social,* meaning that nature and the environment are implicitly considered in heritage definition and as a part of this function. However, the focus remains on outlining heritage's *undervalued* contributions to economic growth, outlining major studies and statistics available regarding heritage

economic contributions through renovation and maintenance industries, heritage-related investments' economic returns and spill-over economic effects in other sectors, and heritage socio-economic potential in regional development through tourism, regeneration, job creation, education and social cohesion. Technology and digitisation are also described as providing economic opportunities in audience development. The need for centralised data, in this sense, is also considered important primarily for measuring heritage's economic value, impact, and contributions to economic growth.

The potential of heritage for the European Union's image and presence at international level is outlined at the end of the document, in which heritage is defined as "an essential asset of Europe's public diplomacy" (European Commission 2014). The role of heritage here is leveraged by the European Union sharing in the form of funding programmes that provide *expertise* and foster its *cultural values* among partners. Heritage projects contributions are described to promote sustainable development through "pro-poor growth and peaceful relations" (European Commission 2014) and in helping against the illicit traffic of cultural goods. European action is also framed, in a slightly Western centric way, as European expertise provided to extra-EU countries by "willing to share know-how [..] to protect sites and help partner countries develop sustainable, community-based strategies [...] [through the assumption that] [...] heritage programmes contribute to the stability and development of democratic, peaceful and free civil societies" (European Commission 2014). *The European Parliament Resolution of 12 May 2011 on the Cultural Dimensions of the EU's External Actions* (European Parliament, 2011), already established culture and cultural diplomacy as central to international relations, in a way that will reappear in future similar policies. The resolution commits to respecting and defending religious and cultural diversity, including that of minorities. Fostering and respecting diversity is described as a tool to enable inclusion, respect, human rights, peace, fight to extremism and inequality, and the upholding of laic democratic values in the face of global challenges, including climate change.

While heritage is defined as the basis of the cultural identity of citizens, the EU promotes its commitment to the UNESCO *Convention on the Protection and Promotion of the Diversity of Cultural Expression* (UNESCO 2005) rejecting "essentialist visions

of cultures as fixed entities"[...] [and distancing itself from] [...] framing "cultural differences as a confrontation between irreconcilable blocks" (European Parliament, 2011). While diversity is celebrated, it is valued as a pathway toward cohesion and "a common core of universal values" (European Parliament, 2011), meaning the creation of common cultural foundations. The resolution acknowledges that aspirations for democracy, justice, and human dignity are universal rather than exclusively Western concerns, but this framing simultaneously positions the EU as a steward of these values. Cultural diplomacy and the use of heritage as a diplomacy tool, will increasingly gain recognition and importance in EU cultural and external policy, as several subsequent declarations and recommendations exemplify. Culture and heritage ecosystems are, in these policies, framed as nurturing European cultural foundations, both internally and internationally, thereby contributing to the sustainability of the EU as a political, economic, and social project.

The body of EU policy aimed at fostering European values and image through culture is vast, with examples including the *Council Conclusions on culture in the EU's external relations with a focus on culture in development cooperation* (Council of the European Union 2015), the joint communication to the European Parliament and the Council *Towards an EU strategy for international cultural relations* (European Commission 2016), the *Council conclusions on an EU strategic approach to international cultural relations* (Council of the European Union 2017). Since the 2010s, the direction has been clearly one where culture and heritage serve to reinforce the Union's cultural foundations, with the discourse oscillating between the recognition and protection of cultural diversity and the reinforcement and fostering of the sense of belonging and cohesion around the Union's space, community, and values, with patterns that constantly alternate concepts of inclusion and exclusion. I do not examine these documents in detail here, however, since none of them engages substantively with environmental sustainability.

5.2.4 Heritage, cultural vitality, economic viability storylines

The definition of threats and opportunities for the heritage sector, as framed in the 2014 European Commission Communication *Towards an Integrated Approach to Cultural*

Heritage for Europe (European Commission 2014) , confirms heritage's framing according to Soini and Birkeland (2014) 'heritage, 'cultural vitality' and 'economic viability' storylines, while it implicitly acknowledges the existence of other emerging narratives in the heritage sector, anticipating policy evolution. The threats and challenges are mostly related to heritage's internal sustainability, with environmental main threats being tourism, defined as a mixed blessing, global warming and climate change, rising sea levels and extreme natural events. The need to protect heritage sites and landscapes with broad development plans, rather than concentrating on isolated buildings, is also acknowledged.

Other challenges for the cultural heritage sector include cuts in public budget, urbanization and globalization, adapting to technological changes, renewing business and investment models, and the acquisition of traditional skills by heritage practitioners. This latter is framed more in economic terms rather than a source towards greener and circular practices. The cultural heritage sector is acknowledged for presenting significant opportunities for sustainability, with environmental awareness and innovative social approaches already well established within the field.

This recognition reflects that environmental sustainability is already acknowledged as an existing strength within the heritage sector, alongside innovative social approaches. The cultural heritage sector has been anticipating formal integration of sustainability principles, moving away from the isolated preservation of individual heritage elements toward a more holistic approach that emphasizes the preservation of entire landscapes and sites. It is acknowledged as increasingly embracing participatory and community-driven approaches, seeking to enhance cultural vitality by making heritage relevant and meaningful to audiences by moving away from sterile preservation toward adaptive strategies that address contemporary challenges, including "sensitive and difficult" (European Commission 2014) narratives. Museums and archives are seen to be digitizing their collections despite resource constraints, recognizing the potential for enhanced audience engagement, new revenue streams, improved access, and expanded educational offerings. Heritage is described to contribute to "smart, sustainable, and inclusive growth" (European Commission 2014) by generating both social and environmental capital, contributing meaningfully to local development. This

contribution is typically framed in socio-cultural and economic terms aligned with growth-oriented frameworks, encompassing economic activity, knowledge production, creativity and culture, community interaction, social integration, and innovation.

It interesting to notice how heritage relation with nature and heritage contributions to environmental sustainability, while being acknowledged as emerging practices in the "energy-efficient re-use of historic buildings, and the promotion of greener transport and cultural tourism" (European Commission 2014) and the close links to nature related to rural heritage, is embedded in the narration of preserving a growth-oriented framework and the cultural foundations of 'Europeanness'. Environmental sustainability in heritage is here framed as heritage preservation and restoration, in the light of ensuring heritage remains accessible, relevant for citizens, and leveraged for economic growth[32]. The relationship with nature remains anthropocentric and directed to attract economic impacts through tourism, industries, and innovation[33]. Even the cultural contributions of heritage are framed in the way they foster creative industries' direct and indirect economic potential. The document positions the renovation of historic buildings as one of heritage's primary contributions to economic development, while natural heritage and nature within heritage contexts are presented largely as assets for attracting tourism and stimulating creative industries. This framing embeds environmental dimensions firmly within an economic logic, rendering them instrumental to heritage's economic impacts rather than valuable in their own right. Such an approach reaffirms the predominantly economic orientation characteristic of this post-crisis document.

5.2.5 The integrated approach, towards policy and funding integration

The need for the integrated approach originates from the recognition that "many public policies have an impact on heritage, and heritage in turn has many impacts in other policy areas" (European Commission 2014). Such integrated approach in heritage *c*onservation, promotion and valorisation is then to be intended as the inclusion of

[32] "Historic cities, towns and villages face the most complex problems in terms of preserving the fabric of European identity while generating sustainable growth and employment." (European Commission 2014)
[33] "Thanks to the attractiveness of their urban and natural environments, heritage sites often host clusters of cultural and creative industries." (European Commission 2014)

heritage in other relevant policies and funding instruments, as well as including influences from other policy areas in cultural heritage policy. This approach recognizes that heritage is shaped by a range of different and muti-disciplinary policies and acknowledges the inherently interdisciplinary nature of both heritage and sustainability. It can be understood as ecosystemic in orientation, in the sense that the focus here is on the interlinkages between heritage ecosystems and other ecosystems, and in the interconnectness of heritage and sustainability dimensions. The integrated approach therefore seeks to reinforce and expand these linkages for reciprocal benefit. It should be noted, however, that within this document the environmental dimension is addressed primarily in terms of its effects on heritage, rather than the reverse.

Therefore, the core part of this integrated approach to cultural heritage resides in policy cooperation. The *Directive 2014/52/EU of the European Parliament and of the Council of 16 April 2014 amending Directive 2011/92/EU on the assessment of the effects of certain public and private projects on the environment 2014/52* (European Parliament and Council of the European Union 2014) is mentioned as the main example of Commission's efforts towards an integrated approach, with a call to mainstream cultural heritage considerations in other policies. This directive updates the earlier 2011 framework governing environmental impact assessments for public and private projects, while placing greater emphasis on the obligation of Member States to evaluate how such projects affect cultural heritage. Under its provisions, any environmental assessment must account for a broad range of factors that a project might significantly impact, cultural heritage being explicitly listed among these, together with considerations such as population, biodiversity, land use, soil quality, water resources, air quality, climate, and landscape. The directive also calls particular attention to the visual dimension of project impacts: changes to the appearance of built environments, natural landscapes, and urban areas must be carefully considered as part of the assessment process, reflecting a commitment to the preservation of historical, cultural, and landscape values. This integration of cultural heritage within environmental assessment procedures is significant for guaranteeing heritage's internal sustainability. By embedding cultural heritage considerations within mandatory environmental impact assessments, the Directive ensures that heritage protection is not treated as an isolated

concern but is systematically factored into development planning.

As previously analyzed in this thesis, non-cultural policies, including environmental ones, have often more direct effects on heritage than cultural policies themselves, especially at European Union level. The Council and Commission initiative to an integrated approach, which replied to sectorial advocacy in this sense, is thus extremely important in reminding not only the interdisciplinary nature of heritage, but also the interconnectedness of ecosystems and sustainability dimensions. However, in the 2014 frame, this approach remains oriented towards a clear economic oriented framework, with the integration of policies and funding instruments more directed to heritage internal sustainability in terms of preservation and conservation, with its external sustainability dimensions being directed mainly to socio-economic impacts. The European Commission's strategy towards an integrated approach to cultural heritage also includes research and innovation, directed towards heritage internal economic sustainability through research on sustainable investment, financing, and business development, and internal environmental sustainability, in addressing the effects of climate change and natural disasters on cultural heritage and developing the technologies for its preservation. The Commission also stresses the importance of leveraging the potential of emerging technologies and digitisation for the "understanding, preservation, and dissemination of cultural heritage" (European Commission 2014), including the development of new heritage narratives and interpretations. Research and innovation in the digital field is also framed as useful for heritage internal sustainability, offering opportunities for preservation and restoration, while providing opportunities for socio-economic contributions through increasing audiences, access, and the "economic exploitation of cultural assets" (European Commission 2014). The Commission's integrated approach promotes interdisciplinary collaboration and commits to addressing persistent challenges in cultural heritage digitisation, particularly around digital content management, copyright, licensing, and interoperability, through targeted policy measures.

Finally, the integrated approach encompasses a range of EU programmes and initiatives. Creative Europe, which will be examined in a dedicated section in this chapter, was launched in 2014 alongside ongoing efforts such as European Heritage

Days, the European Union Prize for Cultural Heritage, the European Capitals of Culture, and the European Heritage Label. Integration also entails encouraging the use of non-cultural funding schemes to support heritage-related objectives. Instruments such as the EU Structural and Investment Funds, the European Regional Development Fund, the European Agricultural Fund for Rural Development, the European Maritime and Fisheries Fund, and various investments and incentives for urban regeneration are mobilized to finance heritage restoration, cultural industries, and the training of cultural heritage professionals. However, these interventions remain framed within broader objectives of growth and development in both urban and rural contexts. The underlying aim is to exploit heritage's potential for local and regional development and to harness the economic potential of EU cultural heritage.

Regarding sustainable tourism, the proposed strategy is to differentiate the touristic offer by promoting “sustainable, responsible and high-quality tourism” (European Commission 2014) towards lesser known locations, including industrial heritage, while fostering Council of Europe’s programmes on cultural routes for joining sites “in a common narrative” (European Commission 2014). Protecting Europe’s underwater heritage from rising sea levels and human activities is also recommended, while mapping sites in order to include them in broader development plans and boost tourism to fight precarious employment in coastal areas.

Applying Pekkarinen's 2025 ecosystemic framework to the integrated approach reveals that it operates across multiple levels. At the macro level, the Communication articulates mechanisms of policy integration, research coordination and funding instrument complementarity. These macro-level interventions are designed to generate desired outcomes at the meso level, fostering local and regional development in both social and economic dimensions. What makes this approach interesting is its capacity to reconcile seemingly contradictory narratives within a coherent framework. Tourism, for instance, is simultaneously acknowledged as a potential threat to conservation and as an economic opportunity, globalization and urbanization are framed both as challenges in diversifying audiences and pressuring sites, and as catalysts for innovation and new forms of engagement. Digitisation, while demanding significant adaptation from the heritage sector, is strategically leveraged to serve both the internal sustainability of the

cultural heritage ecosystem and its external sustainability impacts.

The integrated approach thus operates along two axes. Horizontally, it connects European instruments and policies that are by nature governed at the macro level, fostering inter-ecosystemic cooperation between cultural, economic, social, and environmental domains. Vertically, it establishes deliberate linkages between macro-level frameworks and meso-level implementation, encouraging local and regional uptake of European Union instruments. However, this vertical dimension functions here more in terms of meso-level implementation of macro-level frameworks, rather than encompassing micro-level or working as a bottom-up approach. We will see in the next paragraph that participatory approaches will conceptually address this gap. This vertical dimension is further reinforced through cross-level interaction mechanisms, such as transnational networks, peer-learning initiatives, and measures specifically designed to integrate isolated heritage sites and institutions into broader collaborative frameworks, thereby making overarching policies and funding instruments operational and valuable at the local level. However, nature and the environment are considered in an anthropocentric way and mainly as threats to heritage preservation, which is itself finalized at achieving human-centered scopes such as fostering a common identity, and promoting economic growth. The concept of planetary boundaries is far from being expressed in this framework.

5.3 Participatory approach: a sustainable dimension in heritage governance

Some months after the European Commission integrated approach proposal, the *Council conclusions on participatory governance of cultural heritage (Council of the European Union 2014)* provide the first of a series of European Union policies and reports developing a different narrative in cultural heritage sustainability.

The Conclusions describe participatory governance as fostering democratic participation and social cohesion in face of the "social, political and demographic challenges of today" (Council of the European Union 2014). Increasing the public recognition of heritage as a shared resource is described as a way of fostering public responsibility and stewardship in its protection, as well as enhancing its social and

economic benefits. Emphasis is put on the need to strengthen the links between the micro, meso and macro level, in fostering the development of “multilevel and multi-stakeholder governance frameworks” (Council of the European Union 2014) between local, regional, national, and European levels of governance, as well as in the involvement of different heritage stakeholders, including civil society, in decision-making, policy development, monitoring and evaluation. The participatory approach extends also in the recommendation of finding new ways of increasing citizens’ participation in all phases of decision-making processes, through digital consultations and crowd-funding.

This represents an evolution of the integrated approach, extending the logic of integration beyond macro-level European and national policies to encompass local governance, individuals, and collaboration among actors at all levels. Heritage sustainability is reconceptualized as a matter requiring community stewardship, dependent not only on top-down frameworks but also on civic engagement and public responsibility. The discourse emphasizes that heritage management should deliver benefits to local stakeholders and citizens that extend beyond economic returns, to include the preservation and continuation of local culture, and community wellbeing. Tourism, accordingly, is framed in less purely economic terms and oriented more toward fostering synergies with local actors, fostering active community involvement.

While the economic growth remains strongly present, it is now balanced against the need to protect local culture and quality of life. This shift is also evident in how traditional practices are characterized. By describing them as the "intangible heritage of people" (Council of the European Union 2014), the framework implicitly grounds these practices in a sense of place and community, moving beyond a purely instrumental economic framing. While this shift in European Union cultural policies is important, it is important to recognize that the overall framing of the document, even if including elements of the ‘diversity’ and ‘locality’ storylines, does not shift from a dominant conservative and neoliberal vision of culture and heritage, one where environmental sustainability is practically ignored. However, the call for for participatory approaches represents a shift in the integration of different levels of action in cultural heritage ecosystem and in the conceptualization of heritage sustainability, matters that will be

further developed, as analysed in the following paragraphs, during the 2018 European year of Cultural Heritage and in the 2018 Open Method of Coordination report on *Participatory governance of cultural heritage* (European Commission Directorate-General for Education, Youth, Sport and Culture 2018). Cultural Heritage is also one of the four main priorities of the 2015-2018 *Work plan for culture* (Council of the European Union 2014)**,** together with "Accessible and inclusive culture [...] Cultural and creative sectors: creative economy and innovation [...] Promotion of cultural diversity [...] Culture in EU external relations and mobility".

The improvement of comparable and up-to-date cultural statistics is a horizontal priority that has to be implemented across all the other four, as it is perceived as the base for evidence-based and sound cultural policy-making. Within the cultural heritage domain, risk assessment appears as a sub-priority alongside participatory governance and the fostering of traditional skills and knowledge. The text addresses not only climate change and natural disasters but also threats from over-exploitation, pollution, and unsustainable development. This represents a shift toward incorporating the environmental dimension into cultural heritage sustainability. While the focus remains on the sustainability of heritage itself, rather than heritage's impact on the natural environment, there is nonetheless a more articulated consideration of the environmental factors, particularly human activities, that contribute to unsustainable outcomes. The Open Method of Coordination works on heritage following the 2015-2018 Work Plan, will produce two valuable outcomes: the report on *Participatory governance of cultural heritage* (European Commission Directorate-General for Education, Youth, Sport and Culture 2018) and the study on *Safeguarding Cultural Heritage from Natural and Man-Made Disasters* (European Commission Directorate-General for Education, Youth, Sport and Culture 2018).

5.3.1 The sustainable dimension of participatory approach: Involvement, care, responsibility

The Open Method of Coordination (OMC) working group, composed of experts from 26 EU Member States and Norway, defines in this report participatory governance as a cultural heritage management shift from expert-led decision-making towards a model

where communities, businesses and local stakeholders are genuinely involved in everyday, common practice, and not just consulted as a formality. The report distinguishes traditional ‘government’ approaches, characterized by state authority, top-down control, and centralized responsibility, from ‘governance’ models involving multiple actors, cooperation, and decentralized decision-making across different levels and stakeholders. The report argues that information-sharing or consultation are insufficient in order to create genuine participation, while citizens and communities should retain a certain level of decision-making power, in order for the process to be considered truly participatory and a source of collective sense-making. Cultural heritage professionals are required in this model not only to exercise technical expertise, but to also take into consideration the social context in which heritage exists, and communities' relationship with it.

The report acknowledges this requires significant institutional change: heritage organizations must learn to work in partnership, shifting from being leaders to becoming facilitators. Particularly in early phases, the focus should be less about measuring outcomes or chasing a predetermined final result, and more about experimenting and testing new ideas through the participatory process, though monitoring and evaluation remain important as projects mature. The report emphasizes that the quality of the participatory process itself can be as important as the final project outcome. Participatory governance is considered important in first place for heritage internal sustainability, as something that emerges from the quality of relationships between heritage institutions and communities: when communities are meaningfully involved in heritage-related decision-making, and actively shaping project outcomes rather than serving as passive beneficiaries, they develop a sense of ownership, care, and responsibility that can endure over time, fostering long-term stewardship of heritage they perceive as integral to their daily lives. Community engagement and developing public sense of ownership of cultural heritage is additionally presented as a practical response to challenges such as insufficient funding or shifting political priorities for heritage protection, even if financial and political support in the long-term is needed for projects to be effectively sustainable in the long-term. Other motivations are broader, such as achieving better balance between economic, social, cultural, and environmental

aspects, promoting regional development, fostering social inclusion and active citizenship, strengthening sense of belonging. The report frames participation both as a democratic principle, a right of those affected by decisions, and as a practical approach that produces better, more relevant, and more durable outcomes.

In its practical recommendations for cultural heritage institutions and professionals, the report organizes implementation into three phases. The first phase involves creating the right preconditions for the participatory approach to be effective: this involves providing information about existing legal frameworks for participation and identifying stakeholders beyond expert circles, with attention in including marginalized groups. Communities should not only be informed about decisions, but already involved in a previous phase, meaning in the co-creation of a common vision of the project. The second phase focuses on communicating transparently about objectives and decision-making processes, maintaining participant engagement, fostering a sense of common responsibility and trust in professional roles, while genuinely sharing power in decision-meking. The third phase addresses ensuring sustainability of the project through three components: monitoring and evaluating how the participatory process is actually working, strengthening people's intrinsic motivation, and actively communicating the benefits that heritage stewardship brings to the broader community.

The report identifies several lessons from case studies examples across Member States, acknowledging that . Building relationships and trust with communities takes time, and long-term commitment to financing and resources must be ensured, while staff in cultural heritage institutions require substantial training to implement participatory approaches. Bottom-up and top-down approaches are complementary rather than opposed, and better results are achieved when communities participate in decision-making while national and regional authorities provide political and financial support, especially in the long-term. Transparency is essential, as lack of access to information about how institutions make decisions can exclude communities and favor insiders. The report consistently emphasizes that there is no one-size-fits-all solution: each situation has characteristics that must be weighed carefully before deciding on the appropriate model and level of participatory governance.

The principle that communities should participate in decisions about their

cultural heritage is now widely endorsed in international conventions, national laws, and policy frameworks across Europe. Yet as the European Commission working group observed, participatory governance of cultural heritage "seems to have had difficulties progressing from a rhetorical level to a practical one" (European Commission Directorate-General for Education, Youth, Sport and Culture 2018). The challenges are multiple: genuine participation takes time that often clashes with project cycles and political calendars, while cultural heritage institutions must perform a transition many professionals find uncomfortable. Balancing the competing interests of politicians, professionals, local communities, and minority groups is challenging and requires transparency about decision-making power that is often lacking. Top-down initiatives frequently struggle to connect with the communities they aim to involve due to differences in language, communication styles, and, above all, priorities. None of this undermines the value of participatory approaches, but it does suggest that treating participation as a simple add-on to existing processes will disappoint, as meaningful engagement requires realistic timeframes, institutional flexibility and ability to adapt, and acceptance that the process itself may matter as much as any final outcome.

The second OMC report on *Safeguarding cultural heritage from natural and man-made disasters* (European Commission Directorate-General for Education, Youth, Sport and Culture 2018) provides an overview of the information available at EU and international level on risk assessment and prevention to safeguard cultural heritage, mapping the existing strategies in Member States.

It analyzes threats to cultural heritage related to climate change, extreme natural events, and strictly human related causes. The report calls for a comprehensive and coordinated approach that operates across multiple levels of governance: the foundation consists of the Implementation phase, which encompasses the full disaster management cycle: preparedness, emergency response, and recovery. This operational layer is where concrete actions take place, including risk assessments, emergency interventions, and post-disaster restoration efforts. Above this sits the governance layer, which provides the necessary coordination, oversight, and management structures to ensure that implementation efforts are properly organised and resourced. At the apex of the pyramid is policy making, where strategic decisions are taken and legislative frameworks are

developed to guide all activities below. A crucial element of this framework is the role of knowledge and research. Scientific research and knowledge generation serve as continuous inputs into the system, informing the definition of priorities at the highest political level, raising awareness among stakeholders, and guiding the allocation of resources. This creates a cyclical process whereby research findings shape policy decisions, which in turn should identify new areas requiring further investigation.

The framework operates simultaneously across four distinct levels: European, national, regional, and operational. This multi-level approach recognises that effective cultural heritage protection cannot be achieved by any single authority working in isolation. Rather, it requires cooperation between European institutions, national governments, regional authorities, and local operators, as well as horizontal collaboration among stakeholders at each level. This integrated system aims to ensure that policies are translated into practical actions at the operational level, while experiences and knowledge gained from implementation feed back into improved governance and policy-making processes. These two reports articulate in different ways the need for integrated approaches. The participatory governance report, even if not directly mentioning environmental sustainability, is of particular interest in addressing a mechanism that moves the heritage narrative towards more communitarian storylines, in the sense that it calls for a redistribution of power from top down frameworks to local communities, valuing locality, inclusion, and diversity.

The concept that communities involvement in heritage fosters its sustainability is also interesting, because it involves the idea that communities tend to care more when they co-create the reasons, or in other terms, the cultural foundations, that motivate them to take care of heritage. This concept implicitly implies that cultural foundations that are provided only from top-down frameworks only are not sustainable, while at the same time, bottom-up approaches that cannot benefit from funding, resources and political support, lack the instruments for translating these foundations into implementation in the heritage ecosystem.

The report about risk management is interesting in the way it provides an example of integration between different levels of the heritage ecosystem, that only in coordination across levels can effectively achieve effective results in safeguarding

heritage. While the narration of heritage continues to be shaped by the 'heritage' and 'vitality' storylines, as well as maintaining a clear frame centered in economic growth, these reports outline that the narrative at EU level starts to include, at this point, approaches that include elements of the 'diversity' and 'locality' lines, especially through the enhanced role of local communities. However, nature and environment continue to remain a small part of the narrative, with natural aspects being considered only in relation to climate change impacts, without questioning heritage external effects, and without questioning the overall relationship of heritage with nature. Most importantly, the reasons behind climate change are not treated, and the role of culture and heritage in expressing a more ecologically sustainable lifestyle is still not fully developed.

5.4 European year of cultural heritage and its legacy

The *Decision (EU) 2017/864 of the European Parliament and of the Council of 17 May 2017 on a European Year of Cultural Heritage* (European parliament and Council of the European Union 2018), while being rooted in the same overall framework of previous documents, presents some developments in narrative compared to the 2014 documents. Elements of continuity can be found in the symbolic conception of history and heritage, with the year in itself representing the 100th anniversary of the end of World War I and the 400th anniversary of the start of the Thirty Years' War. Heritage and history thus have a symbolic value, in the sense that they provide the foundations of what is described as belonging to an European common space. Heritage is described as a source of remembrance, identity, understanding, dialogue and cohesion, forged over centuries by interactions of the "various civilisations that have populated Europe" (European parliament and Council of the European Union 2018), while providing a resource for finding cohesion "at a time when cultural diversity is increasing in European societies" (European parliament and Council of the European Union 2018), and being a resource for integration and inter-cultural dialogue.

Access and inclusion are one of the priorities, with emphasis put on removing barriers to access and reaching all social groups in order to raise awareness about the

importance of heritage, both for reinforcing cohesion and belonging, and to promote the diversity of cultural expression. Participatory, people-centred approaches are encouraged, as well as the concept of heritage as a shared resource. The focus is described as putting people and human values at the center, while raising awareness about common history and values, as well as providing evidence of heritage socio-economic contributions. The narrative appears to include several conceptions and storylines related to heritage, encompassing continuity, conservation, cultural vitality, and cultural diversity, as well as economic viability. The internal and external 'branding' potential of heritage is also enhanced.

Environmental sustainability is addressed with a call to integrate heritage in environmental and planning policies, as well as promoting integrated approaches in interventions on heritage sites and energy efficiency. While the main objectives are awareness and access, the inclusion of energy efficiency concerns, together with addressing the need for integrating heritage in environmental policies, represents a little step forward in the overall European Union policy narrative on the question. The European year of cultural heritage developed into a large initiative involving all EU institutions, all 28[34] Member States, and nine partner countries (Albania, Bosnia and Herzegovina, North Macedonia, Montenegro, Serbia, Georgia, Iceland, Norway, and Switzerland). According to the Commission,[35] 11,700 events were held across Europe and dedicated activities reached over 6 million people, with the European Heritage Days engaging up to 30 million people in over 70,000 events. The *European framework for action on cultural heritage* (European Commission: Directorate-General for Education, Youth, Sport and Culture 2019) was created as a follow-up mechanism to capture the results, lessons learned, and inputs gathered during the year. The framework re-organizes the activities and results of the European year of cultural heritage into 5 pillars, providing an idea of the vast scope of the projects' and activities that were deployed:

[34] UK was then still a member of EU
[35] https://culture.ec.europa.eu/cultural-heritage/eu-policy-for-cultural-heritage/european-year-of-cultural-heritage-2018

"1. Cultural heritage for an inclusive Europe: participation and access for all;
2. Cultural heritage for a sustainable Europe: smart solutions for a cohesive and sustainable future;
3. Cultural heritage for a resilient Europe: safeguarding endangered heritage;
4. Cultural heritage for an innovative Europe: mobilising knowledge and research;
5. Cultural heritage for stronger global partnerships: reinforcing international cooperation."
(European Commission: Directorate-General for Education, Youth, Sport and Culture 2019, page 10)

The 2018 year and its follow-up actions are proposed as initiatives aiming to have long-lasting effects and to be promoted across the European Union. Environmental sustainability activities include the adaptive re-use of buildings, which emerges as one of the most concrete sustainable practices. The framework promotes repurposing abandoned or underused heritage buildings like former industrial sites, religious buildings, military facilities, hospitals, railway stations, and even "ghost villages", rather than constructing new ones. This practice, for which quality standards were proposed[36] and circular economy models studied[37], is also promoted in allowing the regeneration of urban areas, historic centers, and urban landscapes. Sustainable cultural tourism receives significant attention, with unmanaged visitor numbers recognized as a threat to heritage sites, local communities, and the environment. The framework's findings recommend research on carrying capacity at sensitive sites and to propose

[36] On 23 November 2018 in Leeuwarden (Netherlands), stakeholders adopted a Declaration titled *Adaptive re-use of the built heritage: Preserving and enhancing the values of our built heritage for future generations.* https://ace-cae.eu/wp-content/uploads/2024/10/ADAPTIVE-RE-USE-OF-THE-BUILT-HERITAGE-PRESERVING-AND-ENHANCING-THE-VALUES-OF-OUR-BUILT-HERITAGE-FOR-FUTURE-GENERATIONS.pdf

[37] From 2019 onward, a Task Force launched with Horizon 2020 support would provide expertise and advice specifically on financing and managing the re-use of built heritage in cities, framed within circular economy models. (European Commission: Directorate-General for Education, Youth, Sport and Culture 2019)

sustainable tourism models. Climate resilience and disaster protection are addressed in regard to improving heritage's resilience and developing cost-effective adaptation strategies, seismic and energy retrofitting. Integration of natural and cultural heritage is also promoted, as well as the integrated management of natural, cultural and rural heritage.

Building on the year 2018 findings and results, sustainability in cultural heritage is one of the priorities of the *Council conclusions on the Work Plan for Culture 2019-2022* (Council of the European Union 2018), together with cohesion and well-being, an ecosystem supporting artists, cultural and creative professionals and European content, gender equality and international cultural relations. Digitalisation, in terms of "access, expression, preservation, dissemination and consumption" (Council of the European Union 2018) of heritage, and cultural statistics are the horizontal priorities for this period. Sustainability in heritage is framed explicitly as a follow-up and comprehensive implementation of the 2018 year, and the key priority areas identified for the OMC group to work on cover environmental, social and economic aspects: participatory governance, adaptation to climate change (with particular attention to energy efficiency in historic buildings), quality principles for cultural heritage interventions and alternative funding for cultural heritage, meaning not only relying on public funding but also on private investors, through measures like tax credit for donations.

The framework reflects a shift towards a more comprehensive integration of environmental sustainability. Environment and climate change are no longer considered solely for their impact on heritage; the environmental effects of built heritage itself, including building emissions and overtourism, are also studied and recognized as challenges requiring action. The approach moves beyond mere protection to encompass adaptation and mitigation strategies, including efforts to tailor emission reduction interventions to the specific constraints and needs of historic buildings. While the overall direction is that of economic growth, the narrative in the 2019-2022 Work plan appears slightly different from previous official documents, with more direct inclusions of both environmental contributions and diversity: "Cultural heritage is both the manifestation of cultural diversity passed down from previous generations and a

resource for sustainable cultural, social, environmental and economic development in Europe" (Council of the European Union 2018).

5.4.1 New European Agenda for Culture

Despite the progress made regarding the environmental dimension, the cultural framework proposed by the Commission communication *A New European Agenda for Culture* (European Commission 2018) focuses mainly on socio-economic aspects. The narratives in the introduction are very similar to those of the 2014 documents, with the economic aspect and 'Europeanness' dominating the narrative. Although the Agenda explicitly refers to the European year of cultural heritage as a point of reference, establishing heritage as a horizontal priority alongside digital to achieve all the actions of the agenda, the framing of the document can be well summarized by this quote, included in the document:

> "[it is] in the shared interest of all Member States to harness the full potential of education and culture as drivers for jobs, economic growth, social fairness, active citizenship as well as a means to experience European identity in all its diversity." (European Commission Communication Strengthening European Identity through Education and Culture, European Commission 2017)

Culture and heritage are described to reinforce European Union cohesion, sense of belonging, values, economic growth, a vision of an attractive Union, and as a resource for fostering intercultural dialogue, community bonding and inclusion, including of "newly arrived refugees and other migrants" (European Commission 2018). The document explicitly positions culture as a means of reconnecting Europe in the aftermath of the economic crisis, rising social inequalities, terrorist attacks, and the spread of populism. Culture is framed as a tool for finding common ground among Member States. The stated aim is to increase funding for culture so that it can help restore unity to a divided and challenged Europe by highlighting shared roots and values. The only environmental mentions regards the experiences and contributions of

the European year of cultural heritage to the adaptation and reuse of built heritage[38], and to the natural-cultural heritage integrated management in rural areas[39].

5.5 The policies after the Green Deal: a story of heritage and emissions

The Green Deal represented a major paradigm shift for environmental considerations in the European Union. Environmental sustainability, as expressed by, among others, the core provisions described in chapter 4, becomes one of the core Commission priorities between 2020 and 2024. Environmental considerations, and regulations, increasingly populate the policy domain, generating momentum for the prioritization of environmental aspects and ecology, previously treated as an issue among others. This cluster of initiatives, and the overall frameworks, were certainly positive and revolutionary compared to previous political landscapes, and the weakening of the Green Deal policies we witness nowadays is to be regarded with concern. However, it is important to acknowledge that the Green Deal framework remains rooted in the paradigm of endless economic growth, and in a tripartite conception of sustainability, one where culture is not considered.

The results of this shift in priorities had both positive and negative consequences for cultural heritage. While compared to previous frameworks, climate change and environment are treated as matters of primary importance, it is also true that this resulted in a difficult and slow integration of cultural aspects in environmental policies, with consequences especially in the management of built heritage. Building on the vast policy and research framework of the Green Deal, the impact of climate change, and especially that of human activities causing it, becomes more and more outlined and perceived by institutions, with more threats to cultural heritage being identified, research providing increasingly dramatic results, as well as calls and frameworks for risk prevention and management.

The *Council conclusions on risk management in the area of cultural heritage*

[38] "There is a new, adaptive approach to shaping our built environment – and it is rooted in culture" (European Commission 2018)

[39] "In rural areas, restoration and upgrading of cultural and natural heritage contributes to growth potential and sustainability. Integrated management of cultural and natural assets encourages people to discover and engage with both." (European Commission 2018)

(Council of the European Union 2020) link the risk factor to not only natural events but also to "unintended or deliberate human activity" and calls for the creation and implementation of risk management plans in cultural heritage. It describes climate change as "a global phenomenon and a colossal challenge that has a major influence on cultural and natural heritage" and calls on undertaking "measures to prevent, mitigate, adapt to and, where possible, reverse negative impacts" (Council of the European Union 2020). The document outlines the need to integrate heritage in urban and rural mapping, planning, disaster risk policies and management plans, making use of digital technologies and satellite programmes, and calls for heritage to be "seen as an asset and not threatened or neglected" (Council of the European Union 2020). The Conclusions also call for more integration between government levels, cross-sectorial cooperation, and for providing communities with the necessary information and education in order to be engaged in the safeguarding and conservation measures. The safeguarding and transfer of traditional skills and know-how is here described in a context of encouraging the regular maintenance of tangible heritage with high-quality methods, techniques and materials, as well as using digital technology as a tool for research and documentation, in order to guarantee heritage's sustainability.

Within this framework, all the tools that were employed in previous documents primarily in socio-economic terms, such as digitisation, digital skills, awareness raising, training of professionals and knowledge-transfer, cross-sectorial and multi-level cooperation, access to financing and resources, are framed and directed to guaranteeing the internal sustainability of cultural heritage through protection and prevention, especially regarding climate change-related threats. Even if the discourse does not turn towards the possibility of raising awareness of climate change effects through cultural heritage, the document calls on promoting responsible behaviour and participation in safeguarding activities among citizens.

5.5.1 New narratives: culture for the planet

More developments towards the potential of cultural heritage in promoting a change in behaviours, ways of life, and even values towards a more ecologically-oriented cultural foundation is provided in some sections of the 2022 Open Method of Coordination

report on *Strengthening cultural heritage resilience for climate change* (European Commission 2022). The report addresses not only the importance of fostering heritage integration in environmental policies and research programs, but also strongly calls for advancing the research, techniques, and cost-benefit analysis of adaptive reuse of historical buildings, and for fostering the use of traditional skills and practices in the circular economy.

The OMC report stresses that while member countries rightly prioritize extreme weather events, gradual climate change deserves equal attention. Rising temperatures and fluctuations in humidity and freeze-thaw cycles, as well as biological threats like mold, algal growth, and new pest species, cause ongoing material degradation, increasing restoration needs. At the same time, the report emphasizes that "cultural heritage is both a victim of climate change and an integral part of the solution" (European Commission 2022), outlining the need for fostering research and preservation of traditional knowledge not only in order to protect intangible heritage (for which the report evidences a lack of information and research regarding how climate change impacts its safeguarding), but also in virtue of the fact that these practices developed in times and society that were considerably less energy-consuming than the contemporary one, offering zero-emissions and biodiversity-friendly alternatives and solutions for today's challenges.

The report also concentrates on heritage buildings, which represent one of the largest sources of carbon emissions in the European Union, accounting for approximately 40% of anthropogenic greenhouse gas emissions. However, the report outlines that this impact is primarily associated with the production, transportation, and assembly of building materials, processes that have already occurred in existing structures. Historic buildings' embedded 'grey energy' gives them a significant ecological advantage that is often overlooked by policymakers and the construction industry alike. Rather than viewing cultural heritage buildings as obstacles to climate goals, OMC calls to recognise them as integral components of the circular economy. These structures frequently incorporate climate-friendly materials which were traditionally sourced and manufactured locally, thereby avoiding the high transport costs and emissions associated with modern construction. To fully appreciate this value,

energy performance assessments must adopt a life-cycle approach, with holistic assessment considering the energy and emissions associated with construction, the operational phase, and eventual demolition. OMC outlines that, beside the aesthetic, cultural, and historic value, the environmental benefits of preserving and adapting existing buildings, rather than demolishing them and constructing anew, must be researched and communicated, and quotes architect Carl Elefante in observing that "the greenest building is the one already built" (European Commission 2022).

Finally, the report also calls for raising awareness not only in regard to the symbolic importance of cultural heritage and the threats associated with climate change, but also on the importance of heritage in fostering alternative ways of life that are more environmentally-friendly, integrated with nature, and related to biodiversity sustainability. Preserving heritage sites and landscapes, fostering the rediscovery and use of traditional skills, considering the whole life-cycle energy consumption of buildings, as well as researching traditional materials and techniques isolation properties, can provide tools for a change in mindset that fosters re-use, reparability, and durability over the logic of consumption. Crucially, OMC calls for raising awareness of this active role of heritage in the green transition, while outlining that "no conflict of interest between cultural heritage conservation and the net zero goal" and that "climate crisis cannot be solved with a cultural heritage crisis" (European Commission 2022), in the sense that heritage provides a way towards a more holistic approach to sustainability, one that does not only focus on reducing emissions but provides tools for a comprehensively sustainable and durable climate strategy, rooted in changing the cultural foundations towards more sustainable ways of living that work together, rather than in contrast, with nature.

In line with this new narrative around heritage and culture, the *Council Resolution on the EU Work Plan for Culture 2023–2026* (Council of the European Union 2022) represents the strategic framework guiding cultural cooperation among EU Member States during the current programming period. The Work Plan establishes sustainability in priority C, among other three:

> "a) artists and cultural professionals: empowering the cultural and creative

> sectors, b) culture for the people: enhancing cultural participation and the role of culture in society, c) culture for the planet: unleashing the power of culture d) culture for co-creative partnerships: strengthening the cultural dimension of the EU external relations." (Council of the European Union 2022)

Cultural statistics remain a horizontal priority. The document expresses the environmental potential of culture in terms of accelerating the urgent sustainability transformation through culture's power of fostering awareness-raising, creativity and innovation. It also positions cultural heritage as contributing in meeting the Green Deal objectives. The document couples sustainability with digital transformation, as it was the case in previous documents. The guiding principles section positions cultural actors as agents capable of driving a broader societal transformation: "freedom of artistic expression and creativity are fundamental to the human ability to address challenges, to think critically, to innovate and to invent." (Council of the European Union 2022). The Work Plan addresses cultural heritage through the lens of risk management and adaptation to climate change.

Under Priority C, the document warns that "the cultural and creative ecosystems in Europe and beyond are facing serious threats of both natural and human origin, with climate change in particular having a long-term impact on European cultural and creative sectors" (Council of the European Union 2022) and continues outlining the need for heritage protection and adaptation: "It is essential that cultural heritage and the CCS be prepared for future challenges. It is high time to act on risk preparedness in cultural heritage and on strengthening cultural heritage's resilience to climate change" (Council of the European Union 2022). The document references the New European Bauhaus initiative as a key framework for addressing the built environment dimension of cultural heritage. Beyond environmental sustainability, the document addresses social dimensions of heritage engagement. It emphasizes the importance of participation for people of all ages and backgrounds, as heritage "enhances people's quality of life, and improves the health and overall well-being of individuals and communities" (Council of the European Union 2022). The primary funding vehicle referenced is the Creative Europe Programme, while the document stresses the need for more integration between

the EU cultural programs: ″The realisation of the Work Plan and the implementation of the Creative Europe Programme through its annual work plans and other culture-related programmes and activities should complement each other in a synergetic way." (Council of the European Union 2022)

5.6 The Culture Compass

In October 2025, the European Commission presented the Culture Compass for Europe, a comprehensive strategic framework designed to replace the 2018 New European Agenda for Culture. This initiative responds to calls from the European Parliament, the Council, and cultural stakeholders for a more coherent and future-proof approach to cultural policy at the EU level. The Culture Compass establishes a vision captured in the motto *"Europe for Culture - Culture for Europe"* (European Commission 2025), which provides the Compass main vision: Europe must stand up for culture by integrating it as a key dimension within all relevant strategies, policies, and funding tools, while simultaneously leveraging Europe's rich cultural diversity, heritage, and creativity to strengthen EU values and democracy, enhance social and territorial cohesion, boost citizens' well-being, and improve competitiveness. The Culture Compass is accompanied by a draft *Joint Declaration* to be agreed by the European Parliament, the Council, and the Commission (European Commission 2025), signalling a strengthened political commitment to culture. It also serves as the strategic anchor for culture within the 2028-2034 Multiannual Financial Framework. The Culture Compass guides EU policies towards four key directions, following and updating the same conceptual structure of previous work plans for culture:

> "-An EU that upholds and strengthens European values and cultural rights – safeguarding artistic freedom, promoting cultural and linguistic diversity, and widening participation in and access to culture.
> -An EU that empowers artists and cultural professionals, and supports people – ensuring decent working conditions, facilitating cross-border mobility, giving youth a voice, providing arts education, and enhancing health and well-being

through culture.

-An EU that draws on culture and cultural heritage to become more competitive, resilient and cohesive.

-Harnessing digital technologies and AI, promoting culture-led regional development, safeguarding cultural heritage, and addressing climate change and environmental sustainability.

-An EU that champions international cultural relations and partnerships – embedding culture strategically in EU external action, scaling up cultural cooperation in enlargement processes, and strengthening multilateralism through culture."

(European Commission 2025)

The direct focus is on the enhancement of 'Europeanness' and European values, while the tone and choice of words (*ensuring, harnessing, addressing, embedding, champions)* suggests the will for the EU to regain the faith of its citizens, and in particular of the cultural sector, in face of the massive disruption that AI represents for the creatives' world. The Culture Compass positions culture and cultural heritage as crucial elements in the shift towards environmental sustainability. The Compass Communication goes further than the Work Plan in positioning culture as an active driver of the green transition, stating that cultural sectors should be "mobilised to drive climate and biodiversity action" while cultural actors should be ″empowered to lead the green transition" (European Commission 2025). The Culture Compass adopts a dual approach to sustainability, synthetizing the results of sustainable participatory approaches with the more protection and risk preparedness oriented ones. The double framing of "Sustainability in Culture" and "Culture as a Driver of Sustainability" (European Commission 2025) express a notable change in the narrative that, while maintaining a strong focus on economic development and on the 'EU branding' role of culture, does not concentrate only in the cultural ecosystem internal sustainability but also on its external environmental impacts, and potential in developing new and more sustainable cultural foundations. Regarding the internal sustainability of the cultural ecosystem, mention is made on "Supporting cultural sectors in adopting environmentally and economically sustainable business models, tackling issues such as

energy efficiency in heritage buildings while respecting their integrity, and promoting practical greening tools" (European Commission 2025).

This represents a change in narrative compared to previous documents, which encompassed protection-oriented frameworks without expressing the need for the cultural sector to become more environmentally sustainable in its internal practices. At the same time, the potential of culture and heritage to propose new living models is described with the intention of "Leveraging culture's capacity to generate new ideas, narratives, and trends that promote environmentally responsible behaviour, and enabling cultural and heritage agents to lead and change narratives in co-creation with communities." (European Commission 2025). The *Joint Declaration* (2025) also proposes to commit the European institutions to emphasise the importance of culture in the policy tackling climate challenges through the promotion of architecture, design, heritage safeguarding and landscape management that pursues quality, innovation, inclusion and excellence, the use of practical greening tools and enabling cultural and heritage agents to lead and change narratives in co-creation with communities. Following the developments of this policy will constitute interesting material for future research.

5.7 European Union culture programmes

European Union policy action in the field of cultural heritage and environmental sustainability is largely confined to non-binding instruments or, as described in chapter 4, to the inclusion of cultural heritage aspects in other policies, some of which exert a more direct influence than others. Funding schemes are the European Union's principal tool for explicit concrete cultural heritage action, providing support without requiring legislative harmonization, operating through voluntary participation, and creating European added value through cross-border cooperation. This section outlines the two principal European Union cultural funding instruments related to cultural heritage and environmental sustainability. The following programmes were not selected based on the amount of funds allocated to cultural heritage projects compared to other European Union funding schemes, but because they address culture and cultural heritage as their

primary objectives. The wide range of European Union programmes and policy areas through which cultural heritage can access funding[40] clearly demonstrates its multi-faced nature and the strategic importance in achieving multiple European Union objectives, from environmental sustainability and climate action to social cohesion, regional development, and digital transformation. However, this very diversity of funding opportunities and initiatives presents a significant challenge. The dispersion of cultural heritage projects and research across numerous programmes, each with its own management structure, reporting mechanisms, and dissemination channels, makes it difficult to centralise data, track outcomes, and consolidate lessons learned. As a result, valuable knowledge generated by individual projects often remains fragmented and underutilised, limiting the potential for replication and of successful approaches. This situation highlights the need for a centralised European Union platform and dedicated databases specifically designed to collect, organise, and share best practices, research outcomes, and innovative solutions related to cultural heritage and climate change.

5.7.1 Creative Europe programme and its greening strategy

Creative Europe[41] is the main financing programme of the EU in the cultural field. With a budget of €1.47 billion for the first period of the programme (2014-2020) and €2.44 billion for the current one (2021-2027)[42], the programme has so far issued grants for 5602 projects[43]. The Creative Europe programme was established in 2014 as an integration of previously existing funding instruments, and it was renewed in 2021 with the new Creative Europe established under Regulation (EU) 2021/818 of the European Parliament and of the Council. The Creative Europe programme has two main objectives: "to safeguard, develop and promote European cultural and linguistic diversity and heritage" and to "increase competitiveness and economic potential of the cultural and creative sectors, in particular of the audiovisual sector" (Regulation (EU)

[40] https://culture.ec.europa.eu/cultural-heritage/funding-opportunities-for-cultural-heritage (accessed 23 January 2026)
[41] https://culture.ec.europa.eu/creative-europe (accessed 23 January 2026)
[42] https://culture.ec.europa.eu/creative-europe/about-the-creative-europe-programme (accessed 23 January 2026)
[43] https://culture.ec.europa.eu/creative-europe/projects/search/?page=1&sort=&domain=ce2021&view=list&map=false (accessed 18 January 2026)

2021/818, article 2). Currently, the programme is divided into three strands, culture, media and cross-sectorial, each including different clusters of actions. According to the European Commission (2025) report *A Decade of Creative Europe*, the media strand receives the largest share of funding between the three programme's strands, reflecting the strategic importance of audiovisual content in today's media landscape. The Culture strand receives approximately one-third of the budget, with the remainder allocated to Cross-sectoral actions. This distribution has remained consistent across both programming periods. European cultural and media actors, including the cultural heritage sector, are fragmented along national and linguistic borders, particularly compared to other players on the global stage. This is why Creative Europe actions are mainly aimed at fostering cooperation, with the programme's added value lying in its transnational dimension. While Member States remain the primary source of public funding for culture, Creative Europe focuses specifically on cross-border cooperation. The programme consistently identifies three main cross-cutting, horizontal priorities that every proposal must address, regardless of which sector, priority or objective the project targets: inclusion and diversity, gender equality, and reduction of environmental impact (Feifs et al., 2023).

Regarding environmental priority, the programme is expected to contribute to the European Green Deal by adopting more environmentally sustainable practices and helping reach the EU's target of 30% of budget expenditure supporting climate objectives (Regulation (EU) 2021/818, Recital 36).

The study *Greening the Creative Europe Programme* (Feifs et al., 2023), commissioned by the European Commission, provides a comprehensive framework of good environmental practices intended for current and potential beneficiaries of the Creative Europe Programme. These recommendations do not carry binding force and are not directly linked to receiving Creative Europe funding, but they serve as an aspirational guide to help cultural and creative sector (CCS) organisations progressively advance towards climate neutrality, providing an interesting overview of sectorial greening strategies already developed across the EU. The study distinguishes between two dimensions of greening: 'internal greening' involves projects reducing their own environmental footprint through sustainable management practices, while 'external

greening' refers to projects that promote climate and sustainability themes through their creative content.

The *Good Environmental Practices Guide* (Feifs et al., 2023) focuses primarily on promoting the internal sustainability of projects, covering environmental governance, travel and transportation, energy usage, waste management, and green procurement. It also addresses measurement and monitoring practices, including listing the main available carbon calculators for cultural and creative sectors. The external dimension of awareness raising and capacity building is also addressed, though more briefly. This section outlines how beneficiary organisations can promote sustainability objectives through awareness-raising events, working groups, competitions and awards, advocacy work, publications, storytelling, and environmental campaigns. Furthermore, the study's *Monitoring Guide* (Feifs et al., 2023) section envisions progressively ambitious greening through the five consecutive multi-annual programme periods from 2021 to 2050, proposing a detailed strategy in order for the Creative Europe programme to contribute to the 30% EU budget spending for climate-relevant expenditure, and eventually becoming a climate-neutral programme by 2050. This strategy involves propositions for program managers to implement green labels, enable eligible greening costs, and KPIs to identify environmentally friendly projects, while acknowledging the process must be gradual, take into account structural differences in resources across sectors and geographical areas, and must not limit the primary creative and cultural nature of projects.

In this vision, the current programming period (2021-2027) would focus on recognizing, collecting and disseminating green practices that projects are already implementing voluntarily. The second stage (2028-2034) would involve monitoring developments in the cultural and creative sectors, following debates about innovative green practices, and testing what works through progressively more demanding requirements. The guide specifically notes that during early programme greening stages, the approach should be descriptive rather than prescriptive, focusing on a bottom-up approach that is directed to sustain, encourage, and promote projects' voluntary green commitments and practices, rather than proposing binding greening requirements. The prescriptive and mandatory phases would involve later stages, starting from 2035, with

the introduction of standardized frameworks and requirements across the programme, and reaching full alignment with EU climate neutrality targets after 2050. The guide acknowledges this timeline is indicative, and recognizes that different sub-sectors, schemes, and strands may progress at different speeds, while approaches may need revision.

While this study does not represent an official EU policy nor a binding provision in funding programmes, it provides an interesting overview of both the existing greening efforts implemented by the cultural sector, and of EU funding programmes greening possibilities in the upcoming years.

5.7.2 New European Bauhaus: integration of culture, social, and environmental objectives

The New European Bauhaus (NEB)[44] is an initiative launched by the Commission in 2020 as a movement that combines three core values, defined under the slogan *beautiful, sustainable, together*. Like the early 20th-century Bauhaus design movement that inspired the name of the project, New European Bauhaus was born as a creative and transdisciplinary movement, combining the artistic, cultural and design fields with science, engineering and technology. The aim of the project is creating sustainable living spaces that are also beautiful and inclusive, making the Green Deal become tangible in European Union neighbourhoods and cities, and enhancing the quality of people and communities life. The New European Bauhaus is better defined as a policy tool and a network rather than a proper funding program. However, it provides funding capacity: the current (2021-2027) funding of the project is of €1.4 billion euros, mainly provided by the Cohesion policy funds (€840+ million euros) and Horizon Europe (€530+ million euros). Since 2020, the New European Bauhaus framework has delivered more than 700 projects and established a community of over 2000 organisations[45].

The European Commission aims to substantially expand the New European

[44] https://new-european-bauhaus.europa.eu/index_en (accessed 23 January 2026)
[45] https://ec.europa.eu/regional_policy/whats-new/newsroom/20-02-2026-applications-for-new-european-bauhaus-prizes-and-boost-2026-are-open_en (accessed 20 February 2026)

Bauhaus's role in the future (European Commission 2025, *New European Bauhaus - from vision to implementation*, COM(2025) 1026 final), integrating it with the environmental and circular economy policy, as well as social policies. This strategic repositioning establishes the New European Bauhaus as a key component of the European affordable housing plan[46], with particular emphasis on sustainable and circular building practices, while strengthening the interdisciplinary connections between arts and culture, industry, technology, and science. The December 2025 European Commission Communication *New European Bauhaus - from vision to implementation* articulates the intention to transform NEB into a policy framework with concrete effects on people's life and the environment, and to scale up the effect and scope of NEB projects. The *Proposal for a Council Recommendation on the New European Bauhaus* (European Commission, 2025), issued by the Commission to the Council on the same day as the Communication, focuses strongly on the clean transition of the built environment: neighborhoods, buildings, and public spaces. The focus is on climate change, sustainability in buildings, clean transition, and circular economy, but also housing affordability and community participation and resilience. It is interesting to note that the legal basis of the proposed Recommendation is grounded in environmental policy provisions such as Articles 191 and 192 TFEU[47] (European Commission, 2025, p. 2), the European Union Treaty provisions governing EU environmental policy. By anchoring the New European Bauhaus and its core values within the environmental policy framework, the Commission enables the integration of cultural objectives into a domain where the EU possesses stronger legislative and funding instruments. This mainstreaming approach allows 'NEB' principles to benefit from the more robust institutional architecture of environmental policy, including access to dedicated funding streams, coordination mechanisms, and the political legitimacy that comes with the EU's environmental shared competence.

In the New European Bauhaus framework, the cultural, 'beautiful' dimension enters the sustainability discourse as a dimension intertwined with the environmental, social, and economic one. The approach aims to be transdisciplinary and participatory,

[46] https://housing.ec.europa.eu/european-affordable-housing-plan_en (accessed 10 February 2026)
[47] Consolidated Version of the Treaty on the Functioning of the European Union, 2012 O.J. C 326/47. https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:12012E/TXT

and, despite the focus remaining strongly on innovation and economic growth, the cultural, economic, social and environmental dimensions of sustainability are conceptualized as equally important in a project's outcome, providing an unicum in the European Union policy policies panorama. The 2025 European Commission Communication describes the New European Bauhaus as a possible solution for addressing current challenges and citizens' concerns, providing a sense of predictability and a feeling of security in their daily lives. The environmental component is strongly present in the document, with the primary objective of reducing the built environment's greenhouse and environmental impact. The built environment represents one of the main sources of gas emissions in the European Union, and one of the sectors that needs to accelerate the most in its greening in order for the European Union to reach its net-zero commitments.

In the Commission 2025 documents, 'nature' is directly mentioned in expressions like 'nature-positive design', 'nature-based solutions', 'nature-based construction', while the 2025 Commission proposal for a Council Recommendation calls for efficient and adaptive reuse of the built environment over demolition and new construction, in order to "[...] support the adaptation of the existing building stock to people's needs in terms of space and accessibility, while respecting planetary boundaries". The concept of 'planetary boundaries', despite being present in the Green Deal documents, was not expressed before in any of the cultural policies analyzed in this research. Even if the proposal is not yet approved, this represents an evolution in the environmental dimension of cultural policies, especially compared to 2014 documents. The New European Bauhaus thus represents, on paper, what could be described in some senses as an ecosystemic approach, one in which the sustainability dimensions are recognized as interdependent and based on planetary boundaries and nature, and one in which the cultural ecosystem related to the built environment makes sustainable cultural foundations visible, while these latter provide the foundations of beautiful, sustainable, and inclusive buildings. However, while the developments of this program will provide interesting developments and material for research, it must be acknowledged that these provisions are contextualized in an anthropocentric and growth-related narrative, one that values nature as importantly as the economic benefits,

where planetary boundaries are framed more as a constraint, rather than something inseparable from and mutual to the human dimension.

Conclusion

This analysis has examined the evolution of European Union cultural heritage policy from 2014 to 2025 through the analytical lens of Soini and Birkeland (2014) storylines and Pekkarinen (2025) ecosystemic framework. These theoretical tools proved particularly valuable for navigating a policy landscape characterized by considerable fragmentation and conceptual ambiguity.

Throughout the examined documents, the roles attributed to culture and heritage shift frequently, as well as the spatial levels at which policy action is envisioned. The relationship between heritage and sustainability's various dimensions appears variously conceptualized, in explicit and implicit ways. The ecosystemic approach, with its attention to micro, meso, and macro levels and inter-ecosystemic interconnections, provided a means of mapping these dispersed and often contradictory framings. Soini and Birkeland's storylines offered an interpretive vocabulary for identifying the ideological underpinnings of different policy articulations, revealing how conservative, neoliberal, communitarian, and emergent environmentalist perspectives coexist, compete, and occasionally converge within the same institutional framework. What this dual analytical lens ultimately reveals is a complex and sometimes contradictory trajectory, characterized by gradual narrative shifts toward greater environmental awareness, participatory governance, and recognition of culture-nature interdependencies, yet one that nonetheless remains firmly anchored within a paradigm of endless economic growth that the policy discourse rarely interrogates and never fundamentally challenges.

The 2014 policy framework, emerging from the aftermath of the financial crisis, was overwhelmingly shaped by the ‘heritage’ and ‘economic viability’ storylines. Cultural heritage was framed primarily as inherited cultural capital requiring preservation, while simultaneously being instrumentalized as a resource for economic growth, tourism development, and the consolidation of European identity. The ‘vitality’ storyline appeared in references to heritage's dynamic and evolving character. Environmental sustainability, while mentioned, remained underdeveloped and largely confined to climate change impacts on heritage rather than heritage's potential

contributions to ecological sustainability.

The period following the European Year of Cultural Heritage 2018 introduced elements of the ‘diversity’ and ‘locality’ storylines, emphasizing community involvement, local stewardship, and the redistribution of decision-making power from centralized institutions to heritage communities. The participatory governance framework implicitly acknowledged that cultural foundations imposed exclusively through top-down mechanisms lack the legitimacy and durability that emerges from community co-creation. This represents a significant conceptual development: sustainability becomes not merely a matter of preserving cultural capital, but of fostering the relational conditions through which communities develop care, responsibility, and attachment to their heritage. However, the reports from the Open Method of Coordination provided evidence that the implementation of participatory approaches is at nearly stage in its implementation.

The period following the 2019 Green Deal framework introduced more substantial environmental considerations, with subsequent policy documents beginning to articulate heritage’s active role in the green transition. The recognition that historic buildings embody ‘grey energy’ and that traditional skills offer low-carbon alternatives represents a movement toward the ‘ecocultural resilience’ storyline, wherein culture and nature are understood as fundamentally interlinked systems requiring integrated management. The 2023-2026 Work Plan's framing of ‘culture for the planet’, the 2025 Culture Compass's explicit dual approach of ‘sustainability in culture’ and ‘culture as a driver of sustainability’ and the New European Bauhaus initiative signal an emerging willingness to position cultural heritage not merely as victim of climate change but as integral to ecological solutions.

The ‘ecocultural civilisation’ storyline, with its fundamental reconceptualization of the human-nature relationship, is absent in all the examined policies.

The analysis of the European policies in cultural heritage reveals a strong dominance of conservative and neoliberal ideology, where heritage preservation for future generations is deeply linked to identitarian and economic objectives. This confirms the findings of scholarly literature on the European Union conceptualization of cultural heritage as instrumental for broader political, diplomatic, and economic

objectives. However, elements of integration of more communitarian approaches are present, especially regarding the focus on cultural diversity. The environmentalist ideology is largely absent before the Green Deal years, while the various efforts and articulations of the culture-nature integration that follow the European Union zero-emission frameworks seem to pave the way for an overall change that still struggles to conciliate the will to change the narrative with the increasing market and geopolitical pressures.

In this sense, while the Green Deal represented a landmark framework whose effect is evident also in cultural heritage policy, the weakening of its core provisions we witness nowadays mirrors the trajectory analyzed in heritage policies: climate change , and the need to protect nature in all its forms, are established directions and objectives of the European Union. However, these commitments are not yet seen and treated as true priority, and tend to become secondary concerns in face of economic and political pressures.

Applying Pekkarinen's ecosystemic framework reveals significant developments in how the European Union policy conceptualizes heritage governance across micro, meso, and macro levels.

The 2014 integrated approach represented an important recognition that heritage sustainability depends upon policy coordination across multiple domains, yet this integration remained primarily horizontal, connecting different policy areas and programmes at the EU level. The participatory governance agenda marked a deliberate attempt to strengthen vertical interconnections within the cultural ecosystem. By advocating for community involvement in decision-making, the development of multilevel governance frameworks, and the recognition of local stakeholders as active agents rather than passive beneficiaries, these policies acknowledged that heritage sustainability emerges from the quality of relationships across ecosystem levels. The OMC reports further articulate this multi-level architecture, positioning policy-making, governance, and implementation as interdependent layers requiring continuous knowledge exchange and coordination between European, national, regional, and operational levels.

The New European Bauhaus initiative represents perhaps the most ambitious

attempt at inter-ecosystemic integration, explicitly linking the cultural ecosystem with environmental, social, and economic dimensions within a framework of 'beautiful, sustainable, together'. By anchoring cultural objectives within environmental policy legal bases, NEB creates institutional pathways for cultural heritage to benefit from more robust regulatory frameworks while contributing to circular economy and climate objectives. The proposal to integrate traditional skills, local artisanship, and heritage valorization within affordable housing and construction strategies demonstrates how inter-ecosystemic cooperation can generate mutually reinforcing sustainability outcomes.

The analysis reveals a tension between heritage's instrumentalization for reinforcing existing cultural foundations and its potential role in transforming those foundations toward greater ecological sustainability. Throughout the examined period, European Union policy consistently positioned heritage as a resource for consolidating 'Europeanness', fostering social cohesion, and strengthening the Union's identity and international image. Heritage is framed as aggregating local stories into a unified European narrative. This conservative function, wherein heritage serves to perpetuate existing values and worldviews, is in contrast with more recent developments in EU policies that describe heritage as a resource capable of driving transformative change toward sustainability. This tension is inherent to the European Union's broader endeavor to ground its political and economic architecture in cultural and humanist foundations.

The Union finds itself navigating between two imperatives: on one hand, the pursuit of cohesion and a unified voice among Member States and on the other, respect for national cultural sovereignty and the commitment to foster cultural diversity. This delicate balance is evident in the policy documents themselves, which repeatedly justify EU cultural actions and programmes through legislative and practical rationales, while continuously reaffirming Member States' primary competence and the imperative to protect and foster cultural diversity. The tension operates simultaneously at governance and conceptual levels. At the governance level, the European Union must demonstrate added value and subsidiarity compliance for every cultural initiative. At the conceptual level, it must reconcile two potentially contradictory objectives: celebrating cultural diversity as a defining strength while simultaneously cultivating sufficient common

ground to sustain a shared sense of European belonging. While the policy discourse examined in this chapter evolves throughout the decade toward greater inclusion, diversity recognition, and participatory approaches, these developments do not resolve this foundational tension. Rather, they represent successive attempts to manage and channel it. This challenge extends well beyond cultural policy, reflecting a structural feature at the heart of the European project itself: the aspiration to create unity without uniformity, to foster belonging without erasing difference.

The Pekkarinen (2025) framework illuminates this tension by distinguishing between the cultural ecosystem and the broader cultural foundations that shape and are shaped by ecosystemic activity. European Union policy has been considerably more attentive to the internal sustainability of the cultural ecosystem and its relation to the socio-economic ecosystems, than to its role in transforming the cultural foundations that ultimately determine whether societal practices respect planetary boundaries.

While recent documents acknowledge heritage's potential to propose alternative living models and foster environmentally responsible behavior, this recognition remains subordinate to growth-oriented and capitalist frameworks and the reinforcement of European identity internally and externally.

The question of planetary boundaries, central to Pekkarinen's framework, receives only indirect treatment and very recent mention in European Union's cultural heritage policy. Climate change appears primarily as an external threat requiring adaptation and risk management rather than as a consequence of the cultural foundations, including consumption patterns and growth imperatives, that heritage policy might critically interrogate. The recognition that heritage can play an active role in the green transition exists and represents a valuable framing, yet it stops short of acknowledging the deeper cultural transformation that genuine alignment with planetary boundaries would require.

Throughout the examined policies, nature occupies an ambiguous position. Heritage definitions consistently encompass landscapes, sites, and the dynamic interaction between people and environments, yet this inclusion rarely translates into substantive policy development. Nature within heritage contexts is predominantly framed as an asset or as a threat through climate change impacts, rather than as an

integral dimension of heritage and the ultimate foundation of any human activity. The anthropocentric orientation that Pekkarinen (2025) identifies as characteristic of most cultural sustainability discourse persists throughout European Union policy, with nature valued primarily for its contributions to human wellbeing, economic development, and cultural identity rather than recognized for inherent worth. While the notion of natural heritage is present, and many are the calls and programmes toward integrated management of natural and cultural heritage all along the analyzed period, these integrations remain largely at the level of policy and programme coordination. An ecosystemic approach grounded in identification with and care for nature as part of a systemic whole, is still far from being present in European Union cultural heritage policy.

The conceptualization that sustainability ultimately depends upon cultural foundations respecting planetary boundaries exposes the limitations of policy approaches that remain rooted in a growth-oriented and capitalistic framework. The recent New European Bauhaus developments offer promising directions, particularly in its integration of cultural and social objectives within environmental policy frameworks. Whether these initiatives will catalyze genuine transformation or remain absorbed within growth-oriented paradigms will depend substantially on implementation at meso and micro levels, where communities, practitioners, and institutions translate policy discourse into lived practice. Future research could make use of these translation processes, examining how the narratives identified in this analysis materialize, or fail to materialize, in the everyday operations of the cultural heritage ecosystem.

More broadly, the fundamental tension inherent in contemporary environmental sustainability in all policy domains can be illuminated through the analytical frameworks developed in cultural sustainability scholarship. While environmental provisions addressing emission reduction, biodiversity protection, and climate adaptation are undeniably valuable, they operate within a structural contradiction that limits their transformative potential. Drawing on Soini and Birkeland (2014) discourse analysis, current environmental measures largely function within the ‘economic viability’ storyline, where sustainability is instrumentalised to serve neoliberal objectives rather than fundamentally challenging them. Within this paradigm,

environmental protection becomes a variable to be balanced against market competitiveness, inevitably subordinated when trade-offs emerge. This explains why, even when oriented towards ecological sustainability, cultural institutions and companies consistently find themselves unable to prioritise ecological considerations without compromising their economic sustainability or cultural productions, and thus their overall sustainability in the long-term. The eco-cultural civilization perspective, as well as Pekkarinen's framework, suggest that environmental management systems and regulatory frameworks alone cannot solve ecological crises: what is required is a profound cultural shift in values, consciousness, and attitudes toward nature and growth. Without a radical cultural transformation, environmental measures risk perpetual blockage in the name of efficiency and market simplification. Within the existing framework, practitioners and institutions face an irresolvable tension between ecological responsibility and competitive survival. Only by abandoning the foundational myth of endless growth, which constitutes a cultural question in the widest anthropological sense, environmental policies can acquire the transformative power their ecological urgency demands.

This analysis also revealed that European Union cultural policy, given its subsidiarity constraints and non-binding nature, may not always produce concrete effects on heritage and sustainability practices at the national or local level. However, the Union's added value lies in its capacity to coordinate action and facilitate exchange among cultural actors, particularly on horizontal challenges like environmental sustainability. European networks, funding programmes, and Open Method of Coordination processes serve as mechanisms for mapping both progress and obstacles in the cultural sector’s green transition across Member States. These instruments provide valuable infrastructure for connecting institutions and building collective momentum toward sustainability goals, especially when implementation remains difficult due to lack of funding and resources. European Union networks and programmes embody cross-level coordination by linking practitioners working at micro and meso levels with the macro ecosystem of European Union policymaking.

European Union policy documents consistently acknowledge that environmental awareness and innovative sustainability approaches are already well established within

the cultural heritage sector. Given this landscape, the European Union's most productive role in culture may not be prescriptive regulation but rather the systematic collection, connection, and amplification of efforts already underway, coupled with financial funding for the cultural sector. The policy analysis reveals a persistent problem: valuable knowledge generated by individual projects remains fragmented and underutilized because cultural heritage initiatives are dispersed across numerous programmes and institutions, each with distinct management structures, reporting mechanisms, and dissemination channels. This fragmentation limits the potential for replicating successful approaches and accumulated expertise. The EU is uniquely positioned to address this gap by aggregating dispersed resources, gathering existing research, sector-specific green frameworks, case studies, and connecting professionals and communities across Member States. The European Union's role in funding, research, and coordination could democratize access to advanced resources, connect institutions facing similar challenges, and ensure that smaller or more remote organizations can participate in collaborative networks. By establishing shared baselines, identifying common priorities, and creating infrastructure for knowledge transfer, European coordination can help the cultural sector's sustainability efforts co-exist into a more coherent movement, one that builds on what practitioners are already doing while providing the visibility, legitimacy, and resource-sharing that individual organizations cannot achieve alone in the current market-dominated system.

Environmental sustainability, if treated as a genuine founding principle and translated into proper joint action, could become a source of common ground in uniting different cultures and nations towards the goal of living in harmony with nature and protecting the health of the environment. Currently, despite the major impact of European Union Green Deal policies towards environmental sustainability, the discourse around values at European Union level remains anchored to human-centered principles that, while of primary importance, exclude nature from the equation. Environmental sustainability in the Green Deal appears sometimes framed as another element of 'Europeanness', or as a green duvet for economic and competition aspects, or as another insidious challenge to manage among the 'more important' geopolitical ones. The European Union as a whole, remains de facto a big polluter, and a meaningful

shift for ‘us Europeans’ and ‘our heritage’, would also involve collectively acknowledging Europe's historical role as a major contributor to global pollution and as a colonial power. Building on these recognitions, the European Union could orient the strategic discourse around its common values and heritage toward environmental sustainability as a founding principle, including it among the core European Union values.

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