European Heritage Hub

Policy Review

3rd Report:
February - October 2024

Green Transition Policies in Europe's Heritage Sector

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1. Introduction

On 29 February 2024, the Policy Team of the European Heritage Hub was delighted to launch the Hub's Policy Monitor. The objective of the Monitor is to gather and analyse policies affecting cultural heritage from across Europe with the findings set to inform a series of policy recommendations which the Hub will deliver to the European Commission to guide the next phase of decision making at EU-level on cultural heritage policy.

The Policy Team has now completed its preliminary research in more than 33 countries across Europe including member-states of the European Union, candidate countries as well as EFTA Member States. More heritage and heritage-related policies will follow, focussing on European regions and cities with uploads scheduled until the end of the European Heritage Hub pilot project in April 2025.

The Policy Team of the Heritage Hub produces quarterly policy reviews to share preliminary observations and findings gathered through the Policy Monitor. A first Policy Review was published in April 2024 and a second Policy Review, dedicated to the digital transition, followed in July 2024. It is worth noting that the second Policy Review highlighted the interconnected relationship of the digital and green pillars, as research on the environmental dimension of new technologies is advancing. However, it also highlighted that, from a policy perspective, the environmental dimension of heritage digitisation strategies remains in its early stages.

This third report has been curated by Europa Nostra, and includes commentary from all Hub partners. Europa Nostra has been a leading voice in the green transformation challenge advocating for greater attention to the impacts of climate change on cultural heritage. We have also highlighted the potential of culture & cultural heritage to reinforce science-backed narratives on the devastating impacts of climate change on life on the planet as well as to mitigate these effects, thus, helping to create more sustainable living conditions for all.

To this date (30 October 2024), the Policy Monitor gives access to over 960 policy documents. Of these documents, more than 250 are relevant to the green transition. This is an impressive number that shows the relevance of green policies and plans for the cultural heritage sector. Whilst not all identified policy documents feature explicit mentions of cultural heritage within the body of the text, the Policy Team have identified possible links which could be explored further and articulated as part of a bold vision for the future of the cultural heritage sector.

2. Methodology

The search for information in the Policy Monitor is being guided by the [Five Pillars of the Framework for Action on Cultural Heritage](#), and takes into consideration the concepts of the [Triple Transformation](#), the overarching theme for all the Hub's activities. Drawing on these concepts, the following categories have been developed to collect and group information: Digital Transition; Green Transition; Heritage Preservation; Inclusion and Accessibility; and International Cultural Relations. Quite often these categories are not distinct from one another in practice. For example, the [Bucharest Call to Action](#) emphasises the importance of considering the interplay of the green and digital pillars in cultural heritage practice, specifically pointing to the environmental underpinnings of using new technologies towards digitisation and facilitating audience access to collections and sites.

As already reported, more than 25% of all documents uploaded on the Policy Monitor are either 'green' policies directly addressing cultural heritage as a sector or are relevant to the Green Transition and can impact cultural heritage albeit without direct mentions in the documents on said effects.

A selection and analysis of policies currently available in the Monitor concerning the Green Transition is presented below. The analysis has selected broader green plans and sometimes legislation available on an EU level. This analysis is then complemented by examples of national or regional policies which tie to or directly respond to the core concept of the EU law or plan that has been selected for discussion. This has been done in an effort to demonstrate that when EU green regulations and plans are transferred to national and regional contexts, they almost always affect cultural heritage. This is not always clear to legislators or cultural heritage professionals, therefore, this Policy Review is targeted mostly at these audience segments who, at present, do not see the multiple linkages between environmental and heritage policies.

3. Analysis

An Introduction to the Green Transition

According to data from NASA, 2016 currently holds the title as the hottest year on record, closely followed by 2020 and 2023. However, recent observations indicate that 2024 is on track to potentially surpass these records. Rising temperatures, increased precipitation, and extreme weather events can cause direct physical harm to cultural assets. It is also widely accepted that volatile climatic conditions can also alter landscapes that are integral to cultural heritage.

At the same time, awareness is increasing on the potential of the cultural sector to open up the dialogue between local communities and expert groups by facilitating the transmission of

complex, scientific information to citizens in an era when disinformation and mistrust dominate public life. This dual relationship between culture, cultural heritage and climate change is increasingly being debated in policy and advocacy circles with the view to explore further their dynamic interchange in what has been dubbed as 'culture-based climate action'.

Towards this direction, the 2023 Emirates Declaration on Cultural-based Climate Action underlined the importance of international and multi-stakeholder cooperation in strengthening socio-cultural enabling conditions for responding to climate change. Though a non-binding declaration, it outlines commitments by several European and non-European states to integrate culture into climate action and to promote culture-based responses to the climate crisis at the UNFCCC. It is the direct result of the Global Call to put Heritage, Arts and Creative Sectors at the heart of climate policy launched and workshopped during the European Heritage Hub Forum 'Reimagining the Anthropocene: Putting Culture and Heritage at the Heart of Climate', which took place in September 2023 in Venice.

Following this success, in October 2024, the Council of the European Union acknowledged in a landmark document the devastating effects of climate change on cultural heritage and pointed to its unrealised potential to raise public awareness. Additionally, the Council Conclusions welcome the inclusion of the protection of cultural heritage in the UAE framework for Global Climate Resilience further paving the way for more policy action on the level of UNFCCC.

These efforts are in line with the UN's 2030 Global Goals, and specifically Target 11.4 'to protect the world's natural and cultural heritage'. Although a standalone goal on culture was eventually omitted in the UN's Pact for the Future published in September 2024, advocacy efforts are still strong and its inclusion in the revised Agenda for Sustainable Development is considered a matter of time.

In relation to the Policy Monitor, there are many documents originating from the EU level which will have notable implications on the climate crisis, however, not all policies that impact on heritage are necessarily explicitly related to heritage. For example, the present Policy Review has included analysis on two strategic documents in which heritage is not explicitly mentioned in the text: the EU's Nature Restoration Law and the EU's Circular Economy Action Plan while the third selected document, the Energy Performance of Buildings Directive, mentions heritage in an exception clause. Despite their seeming lack of direct relevance, these documents ought to be discussed at source in consultation with the cultural heritage sector as the implementation of the aforementioned regulations and plans on the national level can either omit provisions for cultural heritage or include it in the legal text without seeking direct input from the sector.

In the following pages, we have analysed the main purpose of each of these policies, searched for links to cultural heritage and addressed the implementation of the policy by highlighting case studies on a national, regional or local level that could be read in tandem with the policy or as a direct response to the policy at hand.

The EU Nature Restoration Law

The **EU's Nature Restoration Law**, first proposed in 2022 and adopted by the European Parliament in 2023, aims to address biodiversity loss and environmental degradation across member states. It sets legally binding targets for restoring ecosystems on a wide scale, focusing on areas like forests, wetlands, marine ecosystems, and urban green spaces. The law mandates that member states rehabilitate at least 20% of the EU's land and sea areas by 2030, gradually increasing restoration efforts across degraded ecosystems by 2050.

Central to the law is its commitment to reversing the decline of pollinators and improving habitats for threatened species. These actions are designed to mitigate climate change impacts by enhancing carbon storage in natural landscapes and contributing to flood protection. By promoting ecosystem health, the Nature Restoration Law also supports sustainable agriculture, forestry, and fisheries, which rely on healthy natural systems.

The law's implementation depends on collaboration between EU bodies and national governments, with each country required to create and submit detailed restoration plans and periodically report on progress. Despite facing opposition due to potential economic impacts, the law is seen as pivotal in aligning EU policies with global biodiversity and climate targets, like the Paris Agreement and the UN Global Biodiversity Framework.

While the law does not directly address cultural heritage, its implementation may indirectly benefit heritage sites located within restored natural areas. By mandating the restoration of degraded ecosystems, the legislation helps preserve landscapes that are integral to Europe's cultural identity, such as traditional agricultural lands, historical forest areas, and coastlines. Restoring these areas not only promotes biodiversity but also revitalises cultural landscapes that have been shaped by centuries of human activity, thereby maintaining traditional land use and supporting cultural practices tied to the land.

Moreover, the law's focus on ecological resilience directly impacts heritage conservation by protecting sites vulnerable to environmental degradation, such as ancient woodlands and archaeological areas at risk from erosion or climate change. Rehabilitating wetlands, rivers, and coastal zones helps buffer heritage sites from natural disasters, particularly in regions prone to flooding or wildfires. Additionally, the emphasis on biodiversity and sustainable ecosystems supports cultural tourism, a crucial economic factor for many rural communities rich in heritage.

The following initiative exemplifies a good practice example of local measures adopted to ease the Green Transformation.

Adoption of regulations on the protection of Henningsvær cultural environment

An important example of measures adopted on a municipal level towards the preservation of an historic cultural and natural environment comes from Vågan municipality in Norway. **The regulations on the protection of the Henningsvær cultural environment** play a crucial role in preserving this historic fishing village, which is recognised for its unique heritage and traditional fishing practices. Henningsvær, located in the Lofoten Islands of Norway, has been designated as a protected cultural environment due to its significance in showcasing the evolution of coastal fishing communities from the 1800s to the present day. The protection status aims to maintain the village as a vibrant hub for residents while ensuring that its historical character is not compromised.

The regulations emphasise a balanced approach that allows for both conservation and development. This involves preserving the historic wooden buildings, traditional fishing practices, and cultural landscape while accommodating the needs of modern residents and businesses. By highlighting the interplay between preservation and sustainable development, the regulations support ongoing economic activities such as fishing and tourism, which are vital to the community's livelihood. This balance ensures that Henningsvær remains a living testament to its maritime heritage.

Moreover, the protection regulations encourage community engagement in natural heritage conservation. Local residents are integral to the preservation efforts, as their knowledge and connection to the environment contribute to the authenticity of the cultural landscape. The local community recognises the importance of maintaining ecological balance, which has led to efforts to promote and enhance local ecosystems through tree planting to restore native habitats. This not only aids in carbon sequestration but also supports the local flora and fauna.

The EU's Circular Economy Action Plan

The **EU's Circular Economy Action Plan** (CEAP), introduced in 2020 as part of the European Green Deal, aims to transition Europe towards a more sustainable, resource-efficient economy by focusing on reducing waste, promoting reuse, and encouraging sustainable product design. It prioritises sectors with significant environmental impacts, such as electronics, textiles, packaging, and construction, proposing measures to extend product life cycles, boost recycling rates, and cut down on single-use items.

A key aspect of the CEAP is the development of a "right to repair" initiative, which seeks to empower consumers by making repair information more accessible, reducing planned obsolescence, and supporting sustainable consumer choices. The plan also includes a Sustainable Product Policy Framework, designed to make products more durable, reusable, and recyclable, ultimately reducing environmental impact across the entire supply chain.

The CEAP holds potential for creating jobs in green industries, stimulating sustainable

economic growth, and reducing Europe's dependency on raw materials. As a result, it contributes to the EU's broader climate and environmental targets, supporting both ecological preservation and economic resilience across member states.

The EU's Circular Economy Action Plan (CEAP) has potential for supporting both natural and cultural heritage preservation across EU member states. As highlighted in the **European Cultural Heritage Green Paper**, the Plan's emphasis on product longevity, reuse, and repair can breathe new life into traditional craftsmanship and artisanal industries. For example, initiatives like the "right to repair" not only encourage sustainable consumer behaviour, but also revive repair-based skills associated with specific regions or cultural practices, preserving knowledge often passed down through generations. Additionally, the emphasis on recycling and reuse aligns with the concept of adaptive reuse of historical buildings, as the CEAP encourages the prolongation of a building's life by adapting or changing its main purpose to new community needs and delivering it to a different group of users. All these aforementioned ideas form proposals towards more sustainable practices through cultural heritage.

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Flanders' Circular Economy Strategy

One standout example of a regional circular economy plan in the EU, that addresses the reuse of historic buildings, is **Flanders' Circular Economy Strategy** in Belgium. This policy includes targeted initiatives within its broader circular economy plan to preserve and sustainably restore cultural heritage sites. Led by OVAM (the Public Waste Agency of Flanders), the strategy emphasises the reuse of construction materials, sustainable renovation techniques, and the incorporation of energy efficiency in historic buildings. By promoting "circular construction" specifically tailored to heritage contexts, this policy balances environmental goals with the preservation of cultural authenticity.

A notable project under this strategy is "ReconnAct," which focuses on reducing demolition waste and instead encourages the careful deconstruction and reuse of materials from older buildings, particularly those with historical value. Flanders' approach not only conserves resources but also respects and preserves architectural heritage, ensuring that renovations align with both cultural preservation and modern environmental standards.

This policy model in Flanders serves as a potential reference for integrating circular economy principles into heritage conservation at both the regional and EU levels.

The **Vorselaar Library** case study exemplifies successful adaptive reuse by transforming a former church into a modern library. This project highlights the potential of repurposing

existing structures to meet contemporary needs while preserving cultural heritage. The design retains the church's architectural features, fostering a sense of community and continuity in the space.

By integrating sustainable practices, the library promotes environmental responsibility and resource efficiency. The renovation included energy-efficient systems and materials, emphasising the importance of sustainability in building conversions. This approach reduces waste and enhances the building's longevity, aligning with circular economy principles.

The project serves as a model for other communities aiming to revitalise under-utilised buildings. It illustrates how adaptive reuse can enhance cultural identity, promote community engagement, and contribute to sustainable urban development. The Vorselaar Library not only preserves history but also provides a vital service, showcasing the transformative power of thoughtful design in heritage conservation.

The EU's Energy Performance Buildings Directive

The **EU's Energy Performance of Buildings Directive** (EPBD), part of the EU's broader Green Deal and energy transition strategy, aims to improve the energy efficiency of buildings across member states. First adopted in 2010 and revised in 2018 and 2021, the EPBD sets guidelines for nearly zero-energy buildings (NZEBs), energy performance certificates, and national renovation strategies to ensure buildings meet stricter environmental standards. By mandating energy-efficient measures for both new and existing buildings, the EPBD supports significant reductions in greenhouse gas emissions and lowers energy costs for consumers.

The directive requires member states to establish long-term renovation strategies that reduce the carbon footprint of the building sector, which is one of the largest sources of CO_2 emissions in Europe. This includes setting minimum energy performance standards for public buildings and encouraging the use of renewable energy sources in renovations. It also promotes smart technologies, like automation and digitalization, to optimise energy use.

In the broader context, the EPBD is essential for reaching the EU's climate neutrality goal by 2050. As buildings account for around 40% of Europe's energy consumption, this directive is critical for energy savings and sustainability across the EU, enhancing both environmental impact and occupant comfort.

For cultural heritage buildings, the EPBD offers opportunities to preserve historical structures while updating them for energy efficiency. By setting standards for renovations, the directive helps integrate energy-efficient solutions into heritage conservation efforts, such as insulation, sustainable heating, and renewable energy installations, without compromising architectural integrity. Additionally, promoting energy-efficient retrofitting aligns with preserving the original features of historical buildings, as energy-saving techniques can be

customised to maintain both authenticity and functionality.

The following initiative exemplifies a good practice example of local measures adopted to ease the Green Transformation.

Croatia's Energy Renovation Program for Cultural Property Buildings

Croatia's Energy Renovation Program for Buildings with the Status of Cultural Property is an initiative aimed at enhancing energy efficiency in historically significant structures while preserving their cultural integrity. Launched in December 2021, this program is designed to support the comprehensive energy renovation of buildings classified as cultural heritage. These renovations are crucial for aligning with broader EU objectives for sustainable development and climate resilience, as they target energy efficiency improvements and adaptation to climate change. Croatia's commitment to implementing the EU's Energy Performance Buildings Directive is also reflected in the more recently developed **Guidelines on implementing energy efficiency measures on built heritage**, adopted on February 9, 2023.

The Energy Renovation program categorises protected buildings into two groups: individually protected cultural assets and those within protected cultural-historical complexes. By providing guidelines and support, the program ensures that renovations do not compromise the architectural and historical values of these structures. Co-financing for these activities is made possible through European Structural and Investment Funds, as well as the Recovery and Resilience Facility under the National Recovery and Resilience Plan.

Overall, the Energy Renovation Program serves as a model for other EU member states looking to balance modern sustainability practices with the conservation of historical sites by integrating energy efficiency measures with preservation efforts.

4. Observations

Whilst the above selected examples of EU, national and regional policies present only a snapshot of a very few specific initiatives, it is pivotal to share a few overarching remarks that concern the full scope of 'green' policies identified and uploaded on the Policy Monitor.

- On an EU level, there is so far no legislation addressing the protection of the natural and cultural environment as well as the protection of cultural assets within designated 'green' areas. However, the Monitor has found numerous such instruments in EU countries, such as Luxembourg's Law of 23 August 2023 amending the amended law of 18 July

2018 on the protection of nature and natural resources, which specifically regulates the construction and reconstruction of protected historic buildings within 'green zone' areas striking a delicate balance between respect for heritage, the environment and development. Similarly, the Svalbard Environmental Protection Act in Norway lays down rules for how society is to safeguard the environment in the Svalbard archipelago in the Arctic ocean by addressing land-use planning, protected areas, flora and fauna, pollution and the preservation of cultural monuments. In Denmark, the Proposal for a Parliamentary Resolution to promote the Danish maritime cultural heritage demonstrates the importance of restoring marine biodiversity and preserving Denmark's cultural maritime legacy. Countries in Northern Europe, especially the Nordic countries, are leading in this category where specialised agencies are even established to address the conservation of natural and cultural heritage as in the case of Iceland and its Act on the Icelandic Institute for Nature Conservation and Heritage.

- Additionally, as expected, the Policy Monitor has gathered several national laws addressing regulations voted on an EU level. Whilst these policies express mostly environmental considerations, heritage concerns have been rightfully taken into account where relevant. One such example is the Austrian Federal Law on the expansion of renewable energy sources. While the law focuses on the establishment of renewable energy communities, the promotion of green hydrogen, and the creation of an integrated national energy infrastructure plan, it also promotes the use of renewable energy in ways that preserve and enhance historic landscapes and includes heritage as a factor to be considered in environmental impact assessments. Additionally, although Malta's 2030 National Energy and Climate Plan establishes the energy efficiency-first principle, it does so within reason protecting national heritage projects from obligations that threaten the authenticity and integrity of heritage. Croatia's Recommendations for implementation of energy efficiency measures on built heritage and Ireland's guidelines on Improving Energy Efficiency in Traditional Buildings both respond to the EU's 'Energy Performance of Buildings Directive'. Similarly, in Portugal, the Long-term Strategy for the Renovation of Buildings aims to meet national and EU carbon neutrality targets and energy transition goals, as well as to foster economic growth through measures such as the conservation and valorisation of built heritage.

- Looking at the regional level, in recent years the Smart Specialisation Strategies (also known as 3S), a strategic tool first used in the EU Cohesion Policy 2014-20, have shown more clearly the significant role regional authorities can play in elevating the cultural and cultural heritage field in policymaking. For instance, the Alentejo 2030 Regional Smart Specialisation Strategy in Portugal focuses on enhancing competitive advantages in renewable energy, agriculture, and cultural industries. Outside of the 3S framework, regional authorities appear to recognise the importance of blended approaches to respond to the environmental challenge. One such example is the Île-de-France Territories of sustainable culture strategy which looks into existing cultural assets and institutions, and proposes among others to measure and control their energy

consumption in a bid to ease the ecological transition, but also proposes to shape appropriate cultural messaging to help frame the climate emergency narrative.

- Interestingly enough, it appears that more than 75% of all 'green' policies gathered so far in the Monitor are binding with the rest being non-binding regional or local strategies/plans. As anticipated, there is a wide selection of policies that relate to the protection of immovable heritage or cultural/historic landscapes as these types are most often impacted by ecological degradation.

- Finally, all the green policies gathered so far are associated with certain keywords, the Top 5 are, in decreasing order: 1) Sustainability; 2) Environmental Protection; 3) Natural Heritage; 4) Biodiversity; 5) Energy Efficiency;

5. Conclusion and Next Steps

The analysis demonstrated the relevance of cultural heritage in 'green' legislation even where links are not explicitly drawn by legislators. Cultural heritage policy experts ought to be invited to those spaces where 'green' policies are being debated on and developed as the overlap between cultural heritage and green heritage is too large to be ignored. There are many countries in the European Union that have recognised the synergies between the two sectors with the Nordic countries leading this example. The most telling point is that we have found instances where both the cultural heritage and natural heritage sectors are being regulated by, managed and funded by, the same government institution. Understandably, this option is not always going to be the most appropriate for every context, and there are going to be many cases where policies will need to be developed separately; it does however indicate that the interests of cultural and natural heritage are more aligned than traditionally thought.

On a more practical note, the Policy Team has pledged to keep feeding the Policy Monitor with new legislation and policy plans until the end of the European Heritage Hub Pilot Project in April 2025. Informally, the team have agreed to do coordinated uploads in the last four months of the project (January - April 2025) on specific themes, one of which could be the green transition although there needs to be greater clarity on what the needs are in terms of policy analysis in order to guide action. One direction could be to gather all national or federal legislation across Europe responding, for example, to the European Performance of Buildings Directive or to focus on gathering all national, federal and regional Circular Economy Strategies. Another direction could be to seek and collect all National Climate Laws, so in the future an analysis can be made on their potential impacts of these regulations on cultural heritage in the respective countries. There could also be combined approaches whereby research could focus on those aspects of the digital transition that have associated environmental impacts, positive or negative, with analysis and proposals for cultural heritage institutions on how to navigate this new landscape.

Regarding the next Policy Reviews, another two are scheduled to be published, both in 2025,

on different themes. The fourth Policy Review will be dedicated to cultural heritage and the possibilities it can unleash for the Enlargement Agenda of the European Union. The fifth and last Policy Review will focus on local and regional perspectives drawing on applied policy examples from Europa Nostra's regional hubs and Hub partners, ICLEI and Eurocities.