

# Regulatory scope for culture-related support under European Structural and Investment Funds: are we moving backwards?

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## Abstract

*This article provides an overview of the scope for ESIF support to culture-related investment, as provided for under the Cohesion policy regulatory framework, and its evolution over the 2007-13 and 2014-20 periods. It also reflects on the alignment (or lack thereof) of the scope for support to culture-related investment under ESIF provisions with the recent trends in European policy-making and academic debate on the role of culture in territorial development. It provides examples of interesting and innovative approaches to translating ESIF regulatory provisions on culture into domestic strategic frameworks, building on a more comprehensive understanding of the role of culture and creativity in territorial development, despite the arguably limiting treatment of culture in current ESIF regulations. The article argues for the need to incorporate and mainstream a broader understanding of the potential of culture in promoting territorial development, growth and cohesion and the pervasive nature of culture-related investment into future cycles of Cohesion policy programming, by including more explicit and comprehensive references to culture under ESIF regulatory provisions.*

## I. Introduction: contextualising support for culture-related investment under Cohesion policy

In recent years, the academic and applied research and policy debates at EU and EU Member States (MS) levels, as well as internationally, have demonstrated a trend towards a more comprehensive understanding of the role of culture and creativity in territorial development. The pervasive nature of culture-related investment and its potential for promoting territorial growth and cohesion is increasingly recognised.

Generally, there is growing awareness of the role culture-related investment can play in supporting regional policy objectives, accompanied by a more comprehensive conceptualisation of the scope for such investment to contribute to various dimensions of economic, social and territorial development. Policymakers increasingly acknowledge the positive spill-over effects of culture-related investment and culture-based creativity on various economic sectors, as well as the strong links with other societal domains including innovation, RTD, sustainability, social cohesion and inclusion, participation, lifelong learning and skills development. Measures introduced across a range of policy fields, both at EU and domestic level, seek to strengthen these spill-overs.

The growing recognition of the important role of culture in the context of territorial development is evidenced by trends in both the academic and policy debates. In theoretical terms, culture, along with culture-based creativity, has been increasingly conceptualised as an important driver of territorial economic development and transformation.<sup>2</sup> In a similar vein, regions and cities have been more widely implementing culture and creativity-related policies and activities in pursuit of economic vibrancy,

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<sup>2</sup> This trend is highlighted in a wide range of studies (e.g. Bassett K (1993) Urban cultural strategies and urban regeneration: a case study and critique. *Environment and Planning A*. Vol. 25; Bianchini F (1999) Cultural planning for urban sustainability, in: Nyström L & Fudge C (Eds) *Culture and Cities. Cultural Processes and Urban Sustainability* (Stockholm: The Swedish Urban Development Council); Christopherson S (2004) *Creative Economy Strategies for Small and Medium Size Cities: Options for New York State*. Department of City and Regional Planning, Cornell University; García B (2004) *Cultural Policy and Urban Regeneration in Western European Cities: Lessons from Experience, Prospects for the Future*. *Local Economy*. Vol. 19, No. 4; Kunzmann K (2004) Culture, creativity and spatial planning. *Town Planning Review* 75(4); Scott A J (2004) Cultural-Products Industries and Urban Economic Development: Prospects for Growth and Market Contestation in Global Context. *Urban Affairs Review*. Vol. 39, No. 4; Binns L (2005) Capitalising on culture: an evaluation of culture-led urban regeneration policy. *Futures Academy, Dublin Institute of Technology*; Lazzarotti L (2008) The cultural districtalization model. In: Cooke P & Lazzarotti L (eds.) *Creative Cities, Cultural Clusters and Local Economic Development*, Edward Elgar, Cheltenham, UK; Lorentzen A (2012) Sustaining small cities through leisure, culture and the experience economy. In: Lorentzen A and van Heur B (eds.) (2012) *Cultural Political Economy of Small Cities*. London and New York: Routledge; to mention just a few).

structural changes in declining regions, social cohesion, urban regeneration and other territorial development objectives.

Policy research and discussions at EU and MS levels have outlined the scope for culture-related investment to contribute to regional development, including through making regions more attractive places in which to invest, work and live, developing the physical environment of towns and cities and rehabilitating old industrial sites, attracting and retaining high-skilled people, or developing rural areas, including through contributions to tourism.<sup>3</sup>

The trend has also found reflection in EU and domestic policy papers and statements. They emphasise the potential of culture and creativity in promoting territorial development, growth and cohesion, including through enhancing the image and attractiveness of regions and cities, boosting local economies in decline, creating new and sustainable jobs and stimulating new economic activities, driving economic and social innovation in other sectors, fostering cultural diversity, participation and intercultural dialogue and promoting social inclusion.<sup>4</sup>

In this context, the role of ESIF as a potentially crucial source of EU investment is apparent. An awareness of this is reflected in Commission initiatives and guidance for ESIF, outlining some of the key areas where ESIF investment in culture can support regional development, including:

- ERDF investments in cultural infrastructure as part of territorial strategies improve access to cultural, recreational services, contributing to the development of endogenous potential, social inclusion and quality of life.<sup>5</sup>
- Support for cultural and creative industries (CCI) can have a wide positive impact on regional development, contributing to the wider regional economy, innovation and social well-being. CCI, situated at the interface of arts, business and technology, are in a strategic position for promoting creative spill-overs and innovation in other industries.<sup>6</sup>
- Direct impacts on sectors such as tourism and design that can be key to regional economies.<sup>7</sup>
- Leverage on urban development, creating physical, social and economic legacy.<sup>8</sup>

Although an awareness of the role of ESIF as an important source of investment in culture is present in the EU policy debate, the actual use of Structural Funds for supporting culture-related projects, as well as the scope for ESIF support to culture, are defined by a wider range of factors. These include a number of strategic, regulatory and operational factors at EU and domestic levels.

In EU-level strategic and regulatory terms, scope for culture-related support under ESIF is shaped by the broader EU policy narratives, strategies and agendas (e.g. the Lisbon agenda or the Europe 2020 strategy), relevant EU regulations and potential synergetic links, at the strategic and regulatory level, among various policy instruments. At domestic level, the impact of the strategic and regulatory

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<sup>3</sup> Centre for Strategy and Evaluation Services (CSES) (2010) *Study on the contribution of culture to local and regional development - evidence from the Structural Funds*. European Commission, DG Education and Culture, Brussels.

<sup>4</sup> For example, European Commission (2007) *Communication on a European agenda for culture in a globalizing world*, COM/2007/0242 final (<https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A52007DC0242>); Council of the European Union (2009) *Council Conclusions on Culture as a Catalyst for Creativity and Innovation*, Brussels, 12 May 2009 ([http://www.consilium.europa.eu/uedocs/cms\\_Data/docs/pressdata/en/educ/107642.pdf](http://www.consilium.europa.eu/uedocs/cms_Data/docs/pressdata/en/educ/107642.pdf)); European Commission (2010) *Green Paper 'Unlocking the potential of cultural and creative industries'*, COM(2010) 183 final (<https://eur-lex.europa.eu/legal-content/EN/ALL/?uri=CELEX%3A52010DC0183>); European Parliament (2013) *Resolution of 12 September 2013 on promoting the European cultural and creative sectors as sources of economic growth and jobs* (<http://www.europarl.europa.eu/sides/getDoc.do?type=TA&language=EN&reference=P7-TA-2013-368>)

<sup>5</sup> European Commission (2014a) *Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions: Towards an Integrated Approach to Cultural Heritage for Europe*, COM(2014) 477 final (<https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=COM:2014:0477:FIN>); European Parliament (2009) *Resolution on the role of culture in the development of European regions*, B6-0166-0168/2009, Brussels (<http://www.europarl.europa.eu/sides/getDoc.do?type=MOTION&reference=P6-RC-2009-0166&language=EN>)

<sup>6</sup> Working Group of EU Member States Experts on Cultural and Creative Industries (2012) *How to strategically use the EU support programmes, including Structural Funds, to foster the potential of culture for local, regional and national development and the spill-over effects on the wider economy?* April 2012 ([http://ec.europa.eu/assets/eac/culture/library/publications/cci-policy-handbook\\_en.pdf](http://ec.europa.eu/assets/eac/culture/library/publications/cci-policy-handbook_en.pdf))

<sup>7</sup> European Commission (2013) *Implementing an Action Plan for Design-Driven Innovation*, SWD(2013) 380 final (<http://ec.europa.eu/DocsRoom/documents/13203/attachments/1/translations>)

<sup>8</sup> European Commission (2014b) *Draft Thematic Guidance Fiche for Desk Officers: Support to Culture and Sport Related Investments* Version 2, 10/03/2014 ([http://ec.europa.eu/regional\\_policy/sources/docgener/informat/2014/guidance\\_culture\\_sport.pdf](http://ec.europa.eu/regional_policy/sources/docgener/informat/2014/guidance_culture_sport.pdf))

frameworks is largely defined by how the broader EU policy strategies and regulations are translated into domestic policy discourses, priorities, strategies and programming documents as well as domestic regulatory frames. On the other hand, specific implementation mechanisms and challenges, governance arrangements and administrative capacity are some of the operational factors defining the use of ESIF for culture on the ground. Moreover, broader factors including domestic territorial structures and economic profiles, wider socio-economic trends at EU and MS level and evidence from relevant policy evaluations can all exert an impact on the scope and use of ESIF support for culture.

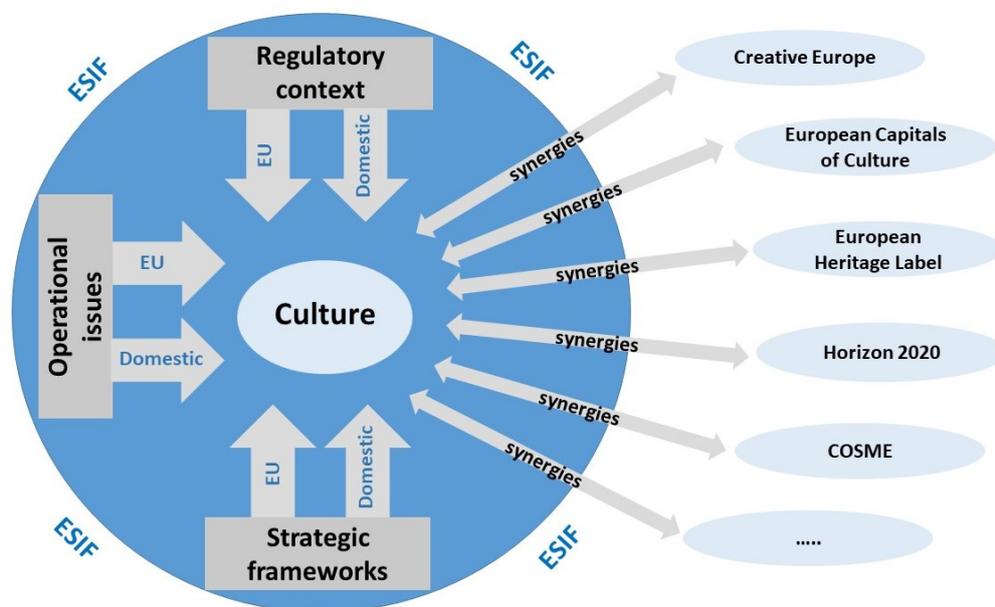


Figure 1: Factors defining the scope and use of ESIF support for culture  
Source: EPRC

In strategic terms, the recognition of the potential contribution of culture to the objectives at the core of broader EU policy strategies shaping various policy areas, including Cohesion policy, may to some extent define the scope of ESIF support for culture. For example, the potential for culture and CCI to contribute to the Lisbon and Gothenburg objectives for growth, jobs and sustainable development was recognised at EU level and corroborated by evaluation evidence,<sup>9</sup> highlighting their contribution to improving attractiveness and competitiveness of territories, boosting innovation and entrepreneurship in the knowledge economy, creating more and better jobs, and supporting sustainable development objectives. A range of EU policy papers and statements, including the Commission Communications or European Council conclusions,<sup>10</sup> emphasised the cultural and creative sectors and culture-based creativity as important drivers of growth, innovation, competitiveness and job creation in the EU and crucial contributors to the aims of the Lisbon Agenda, calling for efforts to further reinforce their potential. On the other hand, evidence from ESIF implementation in 2007-13 has shown that programmes often worked towards integrating both the Lisbon and Gothenburg agendas in pursuing synergies among investments supporting tourism, job creation and cultural heritage.<sup>11</sup> Subsequently, the

<sup>9</sup> European Parliament (2007) Briefing Paper on the Implementation of Article 151.4 of the EC Treaty IP/B/CULT/FWC/2006\_169 ([http://www.europarl.europa.eu/RegData/etudes/etudes/join/2007/389585/IPOL-CULT\\_ET%282007%29389585\\_EN.pdf](http://www.europarl.europa.eu/RegData/etudes/etudes/join/2007/389585/IPOL-CULT_ET%282007%29389585_EN.pdf))

<sup>10</sup> E.g. European Commission (2007); Council of the EU (2007a) Presidency Conclusions 8/9 March 2007, 7224/07 ([http://europa.eu/rapid/press-release\\_DOC-07-1\\_en.doc](http://europa.eu/rapid/press-release_DOC-07-1_en.doc)); Council of the EU (2007b) Council conclusions of 24 May 2007 on the contribution of the cultural and creative sectors to the achievement of the Lisbon objectives, 2007/C 311/07 ([http://eur-lex.europa.eu/legal-content/EN/TXT/?uri=uriserv:OJ.C\\_.2007.311.01.0007.01.ENG&toc=OJ.C:2007:311:TOC](http://eur-lex.europa.eu/legal-content/EN/TXT/?uri=uriserv:OJ.C_.2007.311.01.0007.01.ENG&toc=OJ.C:2007:311:TOC)); Council of the EU (2008) Presidency Conclusions 14 December 2007, 16616/1/07 ([http://www.consilium.europa.eu/ueDocs/cms\\_Data/docs/pressData/en/ec/97669.pdf](http://www.consilium.europa.eu/ueDocs/cms_Data/docs/pressData/en/ec/97669.pdf))

<sup>11</sup> Nordregio (2009) The Potential for regional Policy Instruments, 2007-2013, to contribute to the Lisbon and Göteborg objectives for growth, jobs and sustainable development, Final Report to the European Commission, Directorate General for Regional Policy, Evaluation Unit, No 2007.CE.16.0.AT.041 ([http://ec.europa.eu/regional\\_policy/sources/docgener/evaluation/pdf/lisbon\\_gothenburg\\_study\\_22072009.pdf](http://ec.europa.eu/regional_policy/sources/docgener/evaluation/pdf/lisbon_gothenburg_study_22072009.pdf))

contribution of culture and creativity to the Lisbon strategy successor – the Europe 2020 strategy as the core EU’s agenda for growth and jobs – has been similarly recognised, along with their contribution to key Europe 2020 flagship initiatives.<sup>12</sup> Such contribution is seen across a number of dimensions, some of which are summarised in the table below.

*Table 1. Contribution of culture and creativity to the Europe 2020 strategy objectives – examples*

<p>Smart growth</p> 	<ul style="list-style-type: none"> <li>- serving as an important source of employment potential, creating new and sustainable jobs</li> <li>- contributing to the emergence of new economic activities due to strong spill-over effects and synergies with various economic sectors</li> <li>- serving as a driver for creativity and innovation (including non-technological, economic and social innovation) throughout the economy, producing high-quality and competitive services and goods</li> <li>- contributing to the training of a skilled and adaptable workforce through links with education and life-long learning</li> <li>- enhancing the attractiveness of regions and cities and attracting creative talent, crucial for fostering innovation and economic growth</li> </ul>
<p>Sustainable growth</p> 	<ul style="list-style-type: none"> <li>- fostering greener mobility and the use of cutting edge sustainable technologies, incl. digitisation assuring the on-line availability of cultural content</li> <li>- the knowledge-based – including the creative – economy bearing low carbon footprint due to the strong focus on intangible products</li> <li>- artists / cultural sector capable of changing people’s attitudes to the environment</li> </ul>
<p>Inclusive growth</p> 	<ul style="list-style-type: none"> <li>- fostering cultural diversity and promoting social inclusion</li> <li>- promoting participation and intercultural dialogue in full respect for cultural diversity</li> <li>- cultural activities and programmes strengthening social cohesion and community development and enabling individuals / communities to fully engage in the social, cultural and economic life</li> </ul>

*Source: author’s own elaboration, based on Council of the EU (2011) and European Commission (2010)*

Overall, the overarching policy strategies at EU level, over both the 2007-13 and 2014-20 periods, in principle provide for a strong justification and thus a potentially broad scope for supporting culture-related investment under EU policies, including Cohesion policy, as the potential effects of such investment are consistent with their underlying rationale. At the same time, it is necessary to look at whether and how this reasoning translates into the EU regulatory frames, which to a significant extent define the scope of ESIF support for culture. There are several important questions arising:

- Do the regulations provide the necessary scope to justify and enable support to culture-related activities in pursuit of these broader strategic objectives?
- Is there a link between the acknowledgement of culture’s potential in contributing to these goals and the actual opportunities stemming from the regulations?

This article seeks to understand how the EU regulatory dimension frames the scope for culture-related investment under ESIF, looking at the relevant trends in the development of the EU regulatory context over the last two periods.

## **II. ESIF provisions for culture-related support in 2007-13**

Cohesion policy provisions for culture-related support in 2007-13 presented some positive evolution from the 2000-06 period.<sup>13</sup> A series of references throughout the ESIF guidance at various levels referred to the role of culture within Cohesion policy, and culture-based interventions could be financed under all three objectives (Convergence, Regional Competitiveness and Employment, and Territorial

<sup>12</sup> Including the Innovation Union, the Digital Agenda, the Agenda for new skills and new jobs or an industrial policy for the globalisation era. See, e.g. Council of the European Union (2011) *Council conclusions on the contribution of culture to the implementation of the Europe 2020 strategy*, 2011/C 175/01 ([http://eur-lex.europa.eu/legal-content/EN/ALL/?uri=CELEX:52011XG0615\(02\)](http://eur-lex.europa.eu/legal-content/EN/ALL/?uri=CELEX:52011XG0615(02))); European Commission (2010)

<sup>13</sup> CSES (2010)

Cooperation). The 2007-13 **Community Strategic Guidelines** mainstreamed culture under two of the three Investment Priorities (IPs). Overall it was seen as:

- a driver for tourism-led development, particularly through protecting and enhancing endogenous cultural heritage and developing and promoting cultural assets,
- an attractiveness factor for regions and cities, attracting and retaining talent, businesses and local residents, particularly through promoting cultural assets and supplying cultural services, and
- a contributor to encouraging entrepreneurship and creating more and better jobs.<sup>14</sup>

However, references to the innovation-driving potential of culture or its role in contributing to the knowledge-based economy, including through the links with creativity, were largely absent.<sup>15</sup>

Furthermore, references to culture in the regulations were limited to specific areas – the regulations mainly (although not exclusively) linking culture to the protection and promotion of cultural heritage, development of cultural infrastructure and supply of cultural services in view of enhancing local and regional attractiveness and boosting tourism. There was limited acknowledgement of the potential of the creative sector and its close relationship with the development of the knowledge economy. A more comprehensive recognition of the versatile nature of culture-related investment was generally lacking. The regulations did not embrace the potential of culture as an important source of non-technological, including social, innovation, its impact on the green economy or its contribution to urban regeneration and renewal.<sup>16</sup> There was no ‘overall vision for a coherent and systematic contribution’ from the cultural domain ‘to the resolution of the issues addressed by Cohesion policy’.<sup>17</sup>

Under the **ERDF** regulation, there were several specific references to culture as an IP or investment action, relevant provisions being present under each of the main priorities.<sup>18</sup> At the same time, the scope for cultural investment remained quite limited to cultural heritage, infrastructure and services. The focus was mainly on cultural heritage and infrastructure for regional attractiveness and tourism development for Convergence regions, and protection and enhancement of heritage and promotion of cultural assets for socioeconomic development and tourism in Competitiveness regions. Development of entrepreneurship, joint protection and management of cultural resources and joint use of cultural infrastructures was a major priority for areas supported by the Territorial Cooperation objective. Overall, culture was largely seen as an attractiveness factor, particularly in relation to tourism development capitalising on endogenous cultural resources and heritage and cultural infrastructure development. At the same time, wider references to ‘socioeconomic development’ as well as ‘the supply of cultural services through new higher added-value services’ were made in an attempt to overcome the narrow heritage preservation and cultural tourism approach,<sup>19</sup> and scope was provided for encouraging entrepreneurship within the cultural domain. Studies show that this priority enabled ERDF investment in ICT infrastructures delivering cultural and creative contents through innovative high-value services.<sup>20</sup>

The **ESF** regulation did not include specific references to culture-related provisions, whereas both the scope of the **EAFRD** and **EFF** regulations remained largely limited to the protection and enhancement of heritage and promotion of tourism activities.

### **III. ESIF provisions for culture-related support in 2014-20**

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<sup>14</sup> KEA (2012)

<sup>15</sup> Ibid.

<sup>16</sup> KEA (2012)

<sup>17</sup> CSES (2010)

<sup>18</sup> Ibid.

<sup>19</sup> KEA (2012)

<sup>20</sup> Ibid.

An overview of key regulatory provisions for Cohesion policy in 2014-20 demonstrates a scarcity of direct references to culture-related domains, a lack of explicit recognition of the cross-cutting contribution of culture to various aspects of territorial development and, arguably, a lack of positive evolution over time. This is in contrast to the evolution of the theoretical and policy debate. As noted by KEA (2012), contrary to the recent trends in the European debate, ‘where culture is given a prominent role beyond the cultural realm, and notably in innovation and regional fields’, the 2014-20 ESIF regulatory framework ‘builds upon a limited approach to culture’, which only partially captures ‘the pervasiveness of cultural investment’.<sup>21</sup>

Thus, culture is mentioned in 2014-20 ESIF regulations ‘more diffusely’:<sup>22</sup> explicit references are scarce (investment in culture is mainly linked to the protection and promotion of cultural heritage), and most references are either indirect or implicit. Whereas the 2007-13 regulations embraced specific references to concrete culture-related aspects (including heritage, infrastructure, services and tourism), the 2014-20 regulations are less detailed. For instance, the ERDF regulation makes only one direct reference to a specific kind of culture-related intervention (cultural heritage) under the IP related to the protection of the environment and promotion of resource efficiency.

Culture is not directly included among the ESIF thematic objectives (TO), being treated more as means rather than an objective in its own right. References to the contribution of culture to the Europe 2020 strategy remain largely unelaborated. For instance, the innovative or business-stimulating potential of culture and creativity (e.g. support of cultural and creative industries) is treated as implicit to the thematic objectives (e.g. regarding innovation and SME competitiveness), and references to the spillover effects of culture on various economic sectors are scarce. The CPR largely overlook the links of culture with areas such as entrepreneurship and job creation, non-technological and social innovation, or ICT infrastructure. The ESF regulation does not explicitly refer to the contribution of culture-based activities and competences to social innovation and inclusive growth. Generally, the Fund-specific regulations ‘fail to grasp’ in full ‘the multidimensional nature’ of culture and creativity and their ‘potential for social cohesion and experimentation’ in the new, knowledge-based economy.<sup>23</sup>

At the same time, one may take a broader reading of relevant ESIF provisions in seeking to grasp their actual scope for supporting culture-related investment, going beyond direct references to culture and taking into account the whole panoply of Cohesion policy instruments under which such investment can be promoted.

A broader reading of the core ESI Funds regulations allows the identification of the potentially wider scope for such support, as references to culture are often diffused around or implicit to various IPs and TOs. For instance, under the **ERDF Regulation** (1301/2013), although direct references to culture in terms of specific TOs and IPs are limited (only IP 6c explicitly refers to the ‘conservation, protection, promotion and development of cultural heritage’ due to the specific nature of heritage as a resource)<sup>24</sup>, such references may be regarded implicit to other TOs, including TO1 (RTDI) and TO3 (SMEs), CCI being relevant in terms of strengthening RTDI or SME competitiveness. Furthermore, if contributing to specific TOs and IPs in a targeted way, investments in culture can potentially have a positive impact on promoting growth and jobs and thus be supported.<sup>25</sup> Relevant references in this regard include:

- ‘e-culture’ applications and services (digital content related to culture and digital heritage) under IP 2c
- enhanced accessibility to, and development of, specific cultural resources as part of territorial strategies for specific areas in support of endogenous potential and employment-friendly growth under IP 8b

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<sup>21</sup> The article takes into account that KEA (2012) analysed the 2014-20 Cohesion policy proposals and considers the changes introduced into the finalised version of the regulatory provisions.

<sup>22</sup> KEA (2012)

<sup>23</sup> Ibid.

<sup>24</sup> European Commission (2014b)

<sup>25</sup> Ibid.

- promotion of social inclusion through improved access to social, cultural and recreational services under IP 9a.

Moreover, Article 3 specifies that ERDF physical investments in culture and tourism-related infrastructure should be limited to small-scale infrastructures that are part of endogenous potential development efforts. Furthermore, a number of sections include either direct or implicit references to the cultural domain, including with regards to:

- creative and cultural industries (Recital 8), emphasising the need to promote innovation and SME development in this area, seen as closely ‘linked to European and regional challenges’;
- activities supporting culture as part of territorial strategies for specific areas (Recital 11), seen as able to contribute to promoting innovation and the use of ICT, SMEs, environment and resource efficiency or social inclusion;
- access to cultural services (Recital 15) as a means of promoting social inclusion; or
- sustainable urban development (Article 7).

Whereas not being explicitly included as part of the Investment Priorities under the **ESF Regulation** (1304/2013), culture is referred to under Recital 10 in the context of ‘cultural and creative skills’, to which the ESF is encouraged to contribute, and ‘socio-cultural, creative and cultural sectors’, the potential of which ESF projects and programmes are encouraged to integrate.

Under the **EAFRD Regulation** (1305/2013), the scope for culture support embraces cultural heritage, services and infrastructure dimensions. The EAFRD supports the restoration, maintenance and upgrading of cultural heritage of villages, rural landscapes and high nature value sites, also addressing related socio-economic aspects and environmental awareness actions, along with supporting local cultural services and the related infrastructure (Article 20; Recitals 18 and 19). This is complemented by the LEADER measures supporting Community-Led Local Development actions (CLLD), including in relation to upgrading rural cultural heritage and improving access to cultural services in rural areas. The diffuse references to ‘related socio-economic aspects’ imply that EAFRD culture-related support can potentially take into account wider considerations including e.g. business development and diversification, training and other local development priorities.

The **EMFF Regulation** (508/2014) mainly covers cultural heritage-related support, including as part of CLLD strategies (e.g. Article 63), potentially providing scope for both heritage preservation activities and those aiming to capitalise on cultural resources (e.g. in the context of tourism-promotion and diversification of the tourism offer).

References to further opportunities can be found in additional pieces of legislation and policy guidance / communications, for instance relating to specific Cohesion policy instruments<sup>26</sup> or specific sectors with relevance to cultural investment in the context of territorial development. For example, the EC Communication on cultural and creative sectors<sup>27</sup> reiterates ESIF support to investments in these sectors, in order to ‘maximise the contribution of culture as a tool for local and regional development, urban regeneration, rural development, employability and social inclusion’. Apart from the protection and enhancement of cultural heritage and landscapes, potential investments relate to dimensions such as research, innovation, entrepreneurship or SME competitiveness.

Furthermore, potentially wide-ranging opportunities for culture-related support exist under a number of specific ESIF instruments, some of which are new in 2014-20. The current period has seen the introduction of new ESIF instruments that can be enabling and valuable for integrating culture-related investments on a territorial basis (e.g. Smart Specialisation Strategies or the new territorial instruments). In addition, instruments offering support for culture-related investment which already existed in previous

<sup>26</sup> e.g. European Commission (2012b) Guide to Research and Innovation Strategies for Smart Specialisations (RIS 3), May 2012 (<http://s3platform.jrc.ec.europa.eu/documents/20182/84453/RIS3+Guide.pdf/fceb8c58-73a9-4863-8107-752aef77e7b4>)

<sup>27</sup> European Commission (2012a) Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions ‘Promoting Cultural and Creative Sectors for Growth and Jobs in the EU’, COM(2012) 537 final (<http://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex:52012DC0537>)

programming periods have further evolved in 2014-20 (e.g. financial instruments), sometimes broadening the scope for ESIF support to culture.

### ***1. Smart Specialisation Strategies***

The introduction of ex-ante conditionalities, including the requirement for approval of Smart Specialisation Strategies (S3) as a strategic basis for ESIF programmes, has been a novelty in the 2014-20 period. The S3 conditionality requires that a national or regional smart specialisation strategy is in place, concentrating resources on a limited set of RTDI priorities. Cultural resources constitute an important place-based, endogenous resource, playing a potentially important role in unlocking the creative and innovative potentials of a territory. New opportunities can emerge for capitalising on culture-related assets as a territorial competitive advantage and integrating them into place-based strategies in the context of S3.

The important role of culture in the context of S3 is emphasised in a number of policy and guidance documents. The European Commission highlights CCIs in this context, and supports the promotion of creative industries within regional development plans. The Commission Guide to Research and Innovation Strategies for Smart Specialisations (2012) reiterates that MS and regions are invited to finance their CCI under the ERDF and EAFRD through IPs closely linked to the objectives of the Europe 2020 Strategy, including in relation to clusters, business incubators, new business models, entrepreneurship and ICT development, as well as urban environment improvement and support to the physical and economic regeneration of urban and rural areas and communities. Reiterating that the culture-related – symbolic and art-based – knowledge base is among the core types of knowledge bases underpinning territorial policies, the guidance encourages MS and regions to strive for balance between hard (involving creative hubs, clusters, incubators, networks and related infrastructures) and soft investment (human capital addressing skills and training issues, or development of the ‘innovative image of the region’ in pursuit of economic renewal and regional transformation). Investments related to the development and use of new information technologies (promoting the digitisation of cultural heritage) or ICT-based cultural products, applications and services, support to new business models for CCI SMEs and strengthening of entrepreneurship, support to urban regeneration with a strong anchor in the cultural component (notably cultural infrastructure and heritage) are among the types of investment that could be promoted in the context of national and regional S3.

A range of other policy documents emphasises the importance of assessing the potential of the cultural and creative sectors in national and regional strategic documents and elaborates on how ESIF can be used for developing CCIs at local, regional and national level.<sup>28</sup> Importantly, references are made to the pervasive nature and strong spill-over potential of culture-related investment, with the emphasis on the ‘dynamic links between traditional cultural assets, the development of creative businesses and the response to social and environmental challenges’, facilitated by a ‘mix of investments in infrastructure and human capital’.<sup>29</sup>

It remains to be seen how the regulatory scope for culture-related support under S3 has been explored in practice, but initial evidence points to potentially broad capitalisation on existing opportunities. Recent research indicates that in some regions the process of developing RIS3 strategies has led to the identification of investment opportunities in culture and creative industries.<sup>30</sup> In 2016, a Smart Specialisation Platform, established to foster cooperation across European regions, identified over 70 regions registered on the platform that indicated CCIs as one of their S3 priorities, and 49 regions that showed an interest in cultural heritage.<sup>31</sup>

### ***2. New territorial instruments***

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<sup>28</sup> e.g. European Commission (2012a); Working Group of EU Member States Experts on Cultural and Creative Industries (2012)

<sup>29</sup> European Commission (2012a)

<sup>30</sup> Polverari, L. (2016) ‘The implementation of Smart Specialisation Strategies in 2014-20 ESIF programmes: turning intelligence into performance’, IQ-Net Thematic Paper 39(2), European Policies Research Centre, University of Strathclyde, Glasgow.

<sup>31</sup> Pertoldi M (2016) *Smart Specialisation and Cultural Heritage: an overview Smart Specialisation and Cultural Heritage: an engine for Innovation and Growth*, presentation, Rome, 25 November 2016.

The ESIF regulatory provisions in 2014-20 gave MS and regions new opportunities to use ESIF for integrated territorial strategies (Sustainable Urban Development (SUD), Integrated Territorial Investment (ITI), CLLD). Due to cultural assets being an important place-based, endogenous resource, additional opportunities for capitalising on these assets emerge in terms of integrating them into such territorial strategies. In 2014-20, ITI allow drawing funds from at least two priority axes in the same or different ESIF programmes to implement territorial strategies in an integrated manner. ITI can be used to meet the compulsory Sustainable Urban Development requirements under Article 7 of the ERDF. CLLD supports implementation of joint bottom-up local development strategies. These new tools provide frameworks for thematic and sectoral integration and potentially for capitalising on culture-based assets in support of endogenous potential and growth. Initial analysis indicates that some of these strategies integrate investments under culture-related headings in specific territories.<sup>32</sup>

### ***3. European Territorial Cooperation (ETC)***

ETC remains a key ESIF objective in the 2014-20 period and ETC programmes have previously proven to be useful instruments for culture-related investment. For instance, support for culture was a prominent strand in ETC in the 2007-13 period, accounting for 1,216 projects and 5,866 partners.<sup>33</sup> Although the 2014-20 CSF does not contain specific references to culture in ETC provisions, scope for supporting cultural investment under a range of IPs remains, and a number of 2014-20 ETC programmes integrate support for culture-related activities.

### ***4. Financial instruments***

Albeit not a new tool in 2014-20, FIs represent a minor but growing proportion of ESIF programme spending, and have been important tools for promoting investment in sectors relevant to culture. For instance, in 2007-13, FIs offered support to SMEs in a wide range of sectors, including those in culture-related industries, while heritage or cultural sites were an eligible project type under urban development FIs. Similar investments can be pursued in 2014-20, although potential FI use has been broadened to cover all Structural Funds and all TOs, which may imply extended opportunities for culture-related support. Apart from ESIF, FIs at EU level are an important feature of EU support for the creative sector, and synergies between ESIF co-funded and EU-level FIs could open up new opportunities.

### ***5. Pursuit of policy synergies***

Greater focus in 2014-20 on pursuing policy synergies arguably provides new opportunities for culture-related investment, by opening up scope for complementary and mutually-reinforcing actions. The push for greater synergies is particularly relevant to ESIF due to the increasing emphasis on their contribution to Europe 2020 development goals.<sup>34</sup> Given the plurality of measures to support culture-related headings across instruments, Funds, thematic objectives and levels of governance, their positive effects can be maximised through a greater pursuit of complementarities and coherence of initiatives between different ESI funds, as well as between ESIF and other EU instruments. A recent study identifies different arenas for the pursuit of such synergies, noting a shift in 2014-20 from focusing on the demarcation of Funds and instruments to avoid overlaps and duplication towards a push for more synergistic working in the design and implementation of initiatives under specific themes and objectives.<sup>35</sup>

A range of EU funding programmes dedicate significant resources to culture, including the Creative Europe Programme, European Capitals of Culture, the European Heritage Label and Horizon 2020. Synergies between ESIF and these instruments are potentially crucial for widening the scope for culture-related support. For instance, ESIF can play a strong enabling role in designing and implementing grant

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<sup>32</sup> van der Zwet, A et al. (2017) *Integrated territorial and urban strategies: how are ESIF adding value in 2014-2020?* Final Report [http://ec.europa.eu/regional\\_policy/sources/docgener/studies/pdf/integrated\\_strategies/integrated\\_strategies\\_en.pdf](http://ec.europa.eu/regional_policy/sources/docgener/studies/pdf/integrated_strategies/integrated_strategies_en.pdf)

<sup>33</sup> Universidade do Minho, Núcleo de Investigação em Políticas Económicas – NIPE (2014) *European Territorial Cooperation and Culture*.

<sup>34</sup> Ferry M, Kah S and Bachtler J (2016) Maximisation of synergies between European Structural and Investment Funds and other EU Instruments to Attain Europe 2020 Goals, Research for REGI Committee, Brussels.

[http://www.europarl.europa.eu/RegData/etudes/STUD/2016/585872/IPOL\\_STU\(2016\)585872\\_EN.pdf](http://www.europarl.europa.eu/RegData/etudes/STUD/2016/585872/IPOL_STU(2016)585872_EN.pdf)

<sup>35</sup> Ibid.

schemes which scale-up successful innovative initiatives supported by Creative Europe at the regional level.<sup>36</sup>

The importance of developing synergies in the use of ESIF and other EU funding sources in support of cultural investment is emphasised in a range of policy documents, while scope for pursuing such synergies can be found across a number of fields and initiatives. For instance, ESIF managing authorities are invited to contribute to FIs set up at EU level under the Creative Europe Programme.<sup>37</sup> This Programme is set to complement other EU programmes, including ESIF support ‘for investment in the cultural and creative sectors, heritage restoration, cultural infrastructure and services, digitisation funds for cultural heritage and the enlargement and external relations instruments’, and run a financial facility for the cultural and creative sectors, ‘complementary to other EU facilities’ under ESIF.<sup>38</sup> Evaluation evidence from 2007-13 has shown that the European Capitals of Culture initiative has the potential to be reinforced by and add value to investments made by ESIF,<sup>39</sup> and many Capitals of Culture have made use of the Structural Funds to support culture-related investment.<sup>40</sup> This opportunity could be further strengthened in 2014-20. The European Creative Industries Alliance and its Policy Learning Platform are expected to be a potentially useful forum for ESIF managers in terms of raising the awareness of CCIs, sharing best practices and drawing practical knowledge from concrete culture and creativity-supporting actions.<sup>41</sup>

#### IV. Translating ESIF regulatory provisions into domestic strategic frames: examples

Overall, there appears to be a potentially broad scope for supporting culture-related investment under 2014-20 ESIF provisions, if the whole range of references to culture in the relevant EU regulations is taken into account as well as the whole spectrum of Cohesion policy tools under which such investment can be supported. It can be argued, therefore, that despite the relatively narrow explicit framing of culture under the current ESIF provisions, there is scope for wider interpretation and adoption of more comprehensive approaches, embracing the pervasive nature of culture-related activities and investments. This is more in line with the current trends in the EU policy and academic debate on the role of culture in territorial development than the narrow reading of the regulations might suggest.

This is corroborated by evidence from concrete examples of how MS and regions have translated ESIF provisions into their strategic frames, including strategic documents at national or regional level. Some regions have adopted a relatively comprehensive or innovative approach to culture-related investment under ESIF, going beyond the narrow heritage preservation and/or cultural tourism approach and seeking to support activities at the interface of various socio-economic domains. These sometimes have significant potential for spill-over effects across sectors, economic activities, territories and funding sources. Examples of strategies mobilising ESIF support and adopting these wider approaches are found across a range of Cohesion policy implementation tools, including examples such as the following:

- The **Integrated Territorial Investment** strategy for **Matera**, Italy, draws on co-funding from ERDF, ESF and EAFRD and intends to embark on a wide approach to culture by using culture-based resources and potentials as a driver for the process of economic transition, actively contributing to the investment plan of the 2019 European Capital of Culture.<sup>42</sup> This approach fits

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<sup>36</sup> Austrian Institute for SME Research and VVA Europe (2016) *Boosting the competitiveness of cultural and creative industries for growth and jobs*. Directorate-General for Internal Market, Industry, Entrepreneurship and SMEs; European Commission (2014) *op. cit.*

<sup>37</sup> European Commission (2012b)

<sup>38</sup> European Commission (2011) Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions *Creative Europe – A new framework programme for the cultural and creative sectors* (2014-2020), COM/2011/0786 final (<http://eur-lex.europa.eu/legal-content/en/TXT/HTML/?uri=CELEX:52011DC0786>)

<sup>39</sup> Working Group of EU Member States Experts on Cultural and Creative Industries (2012)

<sup>40</sup> CSES (2010)

<sup>41</sup> European Commission (2012b)

<sup>42</sup> EPRC (2017) *Integrated territorial and urban strategies: how are ESIF adding value in 2014-2020?* Annex 4 – Strategy Fiches. European Commission, Directorate-General for Regional and Urban Policy ([http://ec.europa.eu/regional\\_policy/sources/docgener/studies/pdf/integrated\\_strategies/annex\\_4\\_strategy\\_fiches.pdf](http://ec.europa.eu/regional_policy/sources/docgener/studies/pdf/integrated_strategies/annex_4_strategy_fiches.pdf))

in to the wider process of regional economic transition from traditional industries to new areas such as tourism supported by cultural, digital and recreational services.<sup>43</sup> The process of productive reorientation to an economy based on CCI, innovative communication activities and tourism, backed up by dedicated urban development projects, has been supported by Cohesion policy programmes over both the 2000-06 and 2007-13 periods. The 2014-20 ESIF interventions, including under the Matera ITI, ensure continuity of such investment, intending to achieve the completion of the transition to an economy based around its status of international ‘tourist-cultural attractor’.<sup>44</sup> The combination of resources intends to achieve greater policy synergies across domains related to e.g. RTDI, the digital agenda, competitiveness and innovative start-up support, environmental protection and efficient use of resources.

- The **Greek National Research and Innovation Strategy for Smart Specialisation 2014-20**<sup>45</sup> identifies culture, tourism and creative industries as one of the eight sectors where competitive advantage can be achieved through research excellence – the priority which is further translated into regional S3 strategies. Recognising the value of culture and cultural heritage and the close interlinkage between culture, tourism, arts and CCI, the strategy emphasises the strong interdisciplinary character of research infrastructures that support the ‘culture – tourism – CCI’ complex and their links with other sectors such as materials, environment and ICT.<sup>46</sup> Significant opportunities in terms of regional R&I excellence are seen in the capitalisation on cultural heritage, with significant multiplier effects from the application of interdisciplinary research, implementation and use of ICT and interrelation with tourism in the context of the creative economy.<sup>47</sup> Interventions at the interface of culture, CCI, research and innovation, education and training, digital entrepreneurship and tourism are foreseen.
- The **Regional Research and Innovation Strategy for Smart Specialisation of the Norte region in Portugal**<sup>48</sup> identifies ‘Culture, Creation and Fashion’ and ‘Symbolic Capital, Technologies and Tourism Services’ among the eight smart specialisation domains. The first area seeks to capitalise on the potential of the creative industries (particularly in the fields of design and architecture), new materials and technologies in innovative production, and create new competitive advantages in sectors related to the production of consumer goods with a strong link to design (e.g. textiles and clothing, footwear, accessories, furniture, jewellery). The second domain aims to make use of the links between the tourism sector with ICT and the creative industries, by capitalising on cultural territorial resources and scientific and technological capacities, particularly in the areas of management, marketing and ICT and in relation to tourism.
- Another interesting example is the joint **cross-border RIS3 of Galicia – North of Portugal**,<sup>49</sup> set to draw funding from a range of sources including Interreg, ESIF regional OPs, Horizon 2020 and other EU programmes, and identifying ‘modernisation of the tourism and creative industries, also by means of ICT’ as one of the strategic collaboration areas. The two regions share a series of endogenous resources, including cultural and natural heritage, and identify the creative industries, ICT and tourism among priority areas in the framework of their regional S3 strategies. The cross-border RIS3, acting as a strategic umbrella for implementing joint priorities for innovation-driven growth, also applies a comprehensive approach to capitalising on culture-

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<sup>43</sup> Ibid.

<sup>44</sup> Ibid.

<sup>45</sup> ESPA.gr: Research and Technology for Smart Specialization (RIS3) (<https://www.espa.gr/el/Pages/staticRIS3.aspx>)

<sup>46</sup> GSRT (2015) National Research and Innovation Strategy for Smart Specialization 2014-2020 (<http://www.gsrt.gr/News/Files/New1034/Executive%20Summary-2015-09-17-v04.pdf>)

<sup>47</sup> Ibid.

<sup>48</sup> CCDR-N (2015) Estratégia Regional de Especialização Inteligente (<https://www.portugal2020.pt/Portal2020/Media/Default/Docs/EstrategiasElInteligente/EREI%20Norte.pdf>)

<sup>49</sup> RIS3T (2016) Estratégia de Especialização Inteligente Transfronteiriça Galiza - Norte de Portugal (RIS3T) ([http://www.ris3galicia.es/wp-content/uploads/2016/07/RIS3T\\_PORTUGUES.pdf](http://www.ris3galicia.es/wp-content/uploads/2016/07/RIS3T_PORTUGUES.pdf)) and Polverari (2016)

related potentials, pursuing actions at the interface of tourism, CCI, ICT and business development. It focuses on joint actions that apply ICT for tourism and the cultural industry and improve all production chain stages focused on innovative content, new tourism products and new economic activities in creative industries and tourism. It also supports actions promoting health and welfare tourism supported by cultural infrastructures, along with initiatives providing value to endogenous natural and cultural resources and creating new business models through the application of ICT.

- In the **Slovak Integrated Regional Operational Programme 2014-20**,<sup>50</sup> the cultural and creative sector is seen as an important catalyst for innovation, including non-technological innovation. The ROP aims to support the development of regional creative potentials through ‘stimulating the promotion of sustainable employment and job creation in the CCI by creating a conducive environment for the development of creative talent and non-technological innovation’.
- The **Italian National Operational Programme on Culture**<sup>51</sup> aims to overcome the under-utilisation of cultural resources and reinforce the productive sector linked to the exploitation of the cultural heritage of the less developed regions of Italy, shaping a more consistent touristic demand and adequate cultural activity, by sustaining and promoting entrepreneurship, cultural and creative SMEs and enterprises of the non-profit sector.

These examples demonstrate the variety of approaches with which MS and regions can incorporate and frame culture-related investment in support of territorial development goals. Despite the existence of a uniform overarching regulatory framework, these examples show the wider opportunities available for capitalising on culture in pursuit of regional growth and cohesion.

## V. Conclusions

The 2014-20 Cohesion policy regulations arguably provide limited scope for supporting culture-related investment. Direct references to culture are scarce, with only implicit references in some crucial areas (e.g. innovation and SME support). It could be argued that there has not been a positive evolution from the 2007-13 period, and that the broadening understanding of the role of support for culture-related initiatives, apparent in the academic and policy debates, has not been reflected ‘in more explicit or comprehensive treatment in ESIF regulations’.<sup>52</sup> The limitations of the current approach could be seen as a consequence of a ‘persisting gap in the conceptualisation of the role of culture in an advanced, knowledge based economy’,<sup>53</sup> or at least a lack of explicit reflection of a more comprehensive understanding of the role of culture within the current regulatory frame.

At the same time, broader references to culture-related activities in the regulations, combined with the introduction of some novel policy mechanisms and new instruments under Cohesion policy, arguably open up further opportunities for supporting culture under ESIF. In particular, the introduction of the S3 conditionality and instruments for integrated territorial investment increase the scope for investment in culture. In addition, some of the previously existing Cohesion policy instruments, which have been important in terms of culture-related support (e.g. ETC programmes, FIs, ESIF co-funded integrated urban development projects), have been maintained and, in some cases, re-structured. This has provided broader opportunities for ESIF-supported cultural investment (e.g. with the extension of FIs to all ESIF and TOs).

Evidence from the two periods suggests that, within the uniform regulatory framework, MS and regions pursue approaches which vary in the degree of comprehensiveness in conceptualising – and capitalising on – the potential of culture for territorial development. We find examples of MS and regions utilising

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<sup>50</sup> Integrated regional operational programme 2014-2020, Slovakia (<http://www.mpsr.sk/download.php?start&fid=14832>)

<sup>51</sup> National Operational Programme on Culture 2014-2020, Italy ([http://ec.europa.eu/regional\\_policy/en/atlas/programmes/2014-2020/italy/2014it16rfop001](http://ec.europa.eu/regional_policy/en/atlas/programmes/2014-2020/italy/2014it16rfop001)) and <http://ponculturaesviluppo.beniculturali.it>

<sup>52</sup> KEA (2012)

<sup>53</sup> Sacco P L (2011) *Culture 3.0: A new perspective for the EU 2014-2020 Structural Funds programming*, EENC Paper, April 2011

ESIF support for culture-related domains that stretch beyond the scope that explicit references in the regulations may imply. While direct references to culture under 2007-13 ESIF were largely limited to three specific areas (cultural infrastructure, services and heritage), data shows that actual ESIF investment in the cultural domain stretched beyond these areas. They represented only about half of the total amount that culture-related projects were receiving from ESIF.<sup>54</sup> Support to projects incorporating a cultural dimension also related to areas such as R&I (entrepreneurship, SME, networks and clusters), information society (digitisation), urban regeneration, youth, education and skills development, or improvement of human and social capital.<sup>55</sup> At the same time, analysis of the 2007-13 data identifies an overall scant awareness and responsiveness of ESIF programmes to new, emergent and growing needs in the culture sector<sup>56</sup> and the evolving trends in the academic and policy debate. ESIF funding had a strong bias towards cultural infrastructure-related investment while providing only limited support to interventions that could be labelled as ‘creative industries’, with an overall low number of culture-related interventions focusing on innovation and economic diversification<sup>57</sup> (albeit with significant cross-regional variations). In 2014-20, examples of comprehensive approaches to framing ESIF co-funded support for culture under domestic strategic frameworks can be found, despite the limitations seemingly inherent in the regulatory framework. However, further research is needed into the actual use of ESIF to understand how such strategic framing translates into ESIF use on the ground, and to enable comparisons with the 2007-13 period.

In the meantime, one can hypothesise on the impact of the current approach. On the one hand, scarcity of direct references to culture and diffused character of further links under the 2014-20 regulatory frame may demonstrate decreased priority being given to the domain in the new Cohesion policy cycle, and could be potentially discouraging for MS and regions. On the other hand, such framing may stimulate (or at least does not necessarily preclude) more creative thinking and experimentation, wider interpretation of opportunities and adoption of more comprehensive approaches to incorporating culture-related support under ESIF programmes and projects.

Further research is therefore needed to understand how the current largely implicit approach to culture is offset by potential benefits in interpreting regulations, as well as to grasp how the ESIF regulatory provisions in both periods have framed the use of ESIF for culture on the ground. Research should also look at the actual use of ESIF for culture across MS and regions, identifying the main factors defining its use and effectiveness, along with the operational factors accounting for cross-EU variations.

Additional research may highlight that a stronger regulatory anchorage of culture in ESIF provisions could be beneficial. More explicit references to culture as a driver of innovation, regional development and growth in future Cohesion policy regulatory frameworks could facilitate support for culture-related projects, as the lack of such explicit mentioning is seen as one of the key barriers to fostering cultural investments.<sup>58</sup> The adoption, at EU strategic and regulatory levels, of a broader vision on the role of culture in territorial development – going beyond the narrow cultural heritage approach and recognising the significant spill-over effects and synergies with other sectors – is potentially important for maximising the contribution of culture-related investment to regional development and growth. In the absence of a strong anchorage of such vision in ESIF regulations, the initiative of seeking ways to pursue more progressive approaches is often left to national, regional and local authorities, who can be constrained by a range of operational challenges. As shown, a number of wider EU strategic documents already adopt such a broader vision, and there is a case for justifying the need for key ESIF provisions to be in line with the progressive trends in the academic and policy debates on culture.

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<sup>54</sup> Working Group of EU Member States Experts on Cultural and Creative Industries (2012)

<sup>55</sup> Ibid.

<sup>56</sup> IRS, Csil, Ciset, BOP Consulting (2015) Ex post evaluation of Cohesion Policy programmes 2007-2013, focusing on the European Regional Development Fund (ERDF) and the Cohesion Fund (CF). Culture and Tourism. Final Report. Work Package 9

<sup>57</sup> Ibid.

<sup>58</sup> KEA (2012)

The diffusion of culture-related provisions can lead to the fragmentation of support, including a distribution of funding over a large number of policy areas or objectives. Further strengthening of policy **synergies** is important for maximising the effect of support. In addition, it might be beneficial to streamline the panoply of existing policy options currently scattered through additional pieces of legislation and policy guidance into a consolidated and coherent regulatory carcass, which would build on a progressive view on the role of culture in regional development

It remains to be seen whether post-2020 ESIF regulatory provisions will be significantly broadened to accommodate a more comprehensive view on culture. In the meantime, it is important to showcase good practice examples of comprehensive and innovative approaches to capitalising on culture-based assets and activities in support of wider regional development goals. It is also pertinent that such approaches are mainstreamed in future cycles of Cohesion policy programming, serving as an evidence-base for informing their design.