

**Communication on a European agenda for culture
in a globalizing world**

**UK Film Council response to the Department for
Culture, Media and Sport consultation**

September 2007

Executive summary

The objectives set out by the European Commission in its Communication on a European agenda for culture in a globalizing world are too broad and diffuse and should be more tightly-defined. The objectives also need to be underpinned with appropriate resources, including financial resources, if the European agenda for culture is to have any real impact. They should also build on activities associated with other parts of the Commission, not just with DG Education and Culture. For example the UK Film Council believes that it is extremely important to ensure that the application of rules relating to public funding – state aids – be made consistent with the terms and objectives of the cultural agenda. This should be done as a matter of urgency.

Overview

1. The Communication clarifies the political context in which the European Commission intervenes in the cultural sphere and sets out three sets of objectives: to promote the inter-cultural dialogue, to realise the contribution of culture to the advancement of the Lisbon Agenda, and to increase the cultural component in the European Union's dealings with third countries. These three sets of objectives constitute the European agenda for culture.
2. The key proposal for implementing this cultural agenda is the improvement of the co-ordination of cultural initiatives whether between member states, regions and localities, or between different European institutions and within the European Commission.
3. In principle, the UK Film Council welcomes the three sets of objectives: these objectives mirror those set for the UK Film Council and UK film policy notably to promote diversity, to increase the economic impact of the UK film industry and to realise the full potential of partnerships and co-operation between the UK and countries around the globe. The benefits of improved co-ordination are unarguable. Through our contribution over the last five years to the European Film Agency Directors' network (the EFADs), an informal group, we have built up close working relationships across the European Union and developed an active dialogue with the European Commission. Our participation with other UK non-departmental public bodies in the Department for Culture Media and Sport "family" in the Department's International Board has also been constructive.
4. However, our experience – whether it is in relation to the fight against film theft and copyright infringement, to the state aids regime or to the UK's Creative Economy programme – has made us aware of how far we still have to go to achieve co-ordination at the

policy level, let alone at the practical level. In common with most cultural organisations, we do not have the resources to devote to co-ordination efforts that do not directly feed into our core activities. We also frequently encounter obstacles to co-ordination, in Europe as in the UK, to do with the boundaries between organisations and sensitivities over responsibilities. We are therefore extremely sceptical that the ambitions set out in the Communication to foster joint-working across Europe and between organisations in different parts of the cultural sphere can be fulfilled if the resources to promote such joint-working are not made available.

5. This is true for at least two areas of work evoked in the Communication: development of a stronger evidence base for policy-making and international partnerships. It is also true, for example, of the work already going across Europe to promote media literacy, of which there is no mention in the Communication. The limited scope for joint-working is evident when we consider what, for the UK Film Council and for other film bodies across Europe, is one of the biggest challenges we face: the safeguarding of and the improvement of access to our audiovisual heritage.
6. The UK Film Council would like to play a full role in taking forward the European agenda for culture. We consider we have a valuable contribution to make but we can see everyone's good intentions foundering if stepping up our work with other cultural organisations across the European Union and beyond involves moving resources that are already over-stretched.
7. We therefore propose that the ambitions set out in the Communication are focused on more tightly-defined tasks. These tasks might include:
 - Developing their own cultural agendas that extend to all departments and authorities within their purview; thus a UK national cultural agenda would draw in education, trade and industry, regional government as well as culture itself. A unified cultural agenda would also be a feature of regional offices and local government;
 - The European institutions, especially the Commission, articulating their unified cultural agendas;
 - Identifying and communicating for each of the three areas specified in the Communication (inter-cultural dialogue, increased creativity and international relations) SMART objectives¹;
 - Incentivising cultural organisations to deliver on those objectives.

¹ SMART stands for Specific, Measurable, Achievable, Realistic and Timed

The audiovisual sector is a crucial component of the European cultural agenda

8. The UK Film Council is pleased to see the prominence given in the Communication to cinema and the audiovisual sector: it highlights the contribution of the MEDIA Programme to the promotion of competitiveness and the intercultural dialogue. The Communication could also acknowledge the role of the MEDIA Programme in strengthening links between Europe and third countries by supporting film festivals and market events inside Europe and enhancing the presence of European films at events throughout the world. The Communication also highlights the importance of protecting rights while facilitating access to Europe's cultural heritage: these issues are crucial to the audiovisual sector. It stresses the importance of the "Television without Frontiers" Directive for strengthening cultural diversity.
9. We think, however, that the Communication does not recognise the extent to which the audiovisual sector is largely absent from initiatives that are intended to address the cultural sector as a whole. For example, Section 2.2 on the EU's external relations cites the Anna Lindh Euro-Mediterranean Foundation for the Dialogue between Cultures; Section 3.3 invokes the work of the United Nations 'Alliance of Civilisations' process. The audiovisual sector does not figure in either.
10. An unstated but nevertheless active principle has operated in European cultural activities: because the audiovisual sector has its own dedicated programme through MEDIA, it is not eligible for support from, and is therefore uninvolved in, initiatives that address the cultural sector as a whole. Thus the audiovisual sector is unrepresented in Culture 2007 and it scarcely figures in the Digital Library initiative. For the UK Film Council, this is less a question about the audiovisual sector being able to access additional resources and much more about joined-up working across the cultural sphere. Cinema and the audiovisual sector are extremely important ways of promoting contact between cultures and reaching the widest audience; they are vital as a means of communicating all artistic and cultural expressions: visual and performing arts, language and heritage. If they are not explicitly included – if they are effectively excluded – it is at the expense of the Communication's endeavours as a whole.
11. The extent of cinema's and the audiovisual sector's central role can be gauged by the fact that the Council of Europe, in determining how best to take forward the *UNESCO Convention on the Protection and Promotion of the Diversity of Cultural Expressions*, has decided to focus on film's contribution by setting up a consultation, in conjunction with Eurimages and the European Audiovisual

Observatory, precisely on the contribution of national film policies across Europe to furthering the objectives of the Convention.

The objectives for a European agenda for culture

12. Section 3 of the Communication is devoted to the objectives for a European agenda for culture. It is proposed that these would comprise three interrelated sets of objectives: promotion of cultural diversity and intercultural dialogue, promotion of culture as a catalyst for creativity in the framework of the Lisbon Strategy for growth and jobs, and promotion of culture as a vital element in the Union's international relations. The UK Film Council welcomes the objectives identified but would propose that the objectives would benefit from being more tightly defined. At the same time, we are concerned that the "on-going activities" the Commission proposes to build upon and reinforce are concentrated overwhelmingly on initiatives under the aegis of Directorate General Education and Culture (DGEAC) seemingly to the exclusion of initiatives taking place elsewhere. We would particularly highlight two areas promoted by the Directorate General for the Information Society (DGInfosoc) that for us go the core of the agenda for culture: the Digital Library (in relation to archives) and media literacy.
13. Media literacy is driven through the MEDIA Programme and its legal basis is in both the MEDIA Programme decision and the Audiovisual Media Services Directive. However, the objectives set out in the second bullet of 3.1 (Cultural diversity and intercultural dialogue) is directly addressed through the established activities being undertaken to promote media literacy, namely "developing 'cultural awareness and expression [and] 'social and civic competences'." The UK Media Literacy Charter talks of "[making] effective use of media in the exercise of [people's] democratic rights and civic responsibilities" and the Charter signatories' commit to "[helping] develop a media literate population by encouraging, enabling or offering opportunities for people to:
 - Broaden their experience of different kinds of media forms and content
 - Develop critical skills in analysing and assessing the media
 - Develop creative skills in using media for expression and communication and participation in public debate."
14. We would further suggest that the comparatively narrow notion of 'cultural diversity' that, for example, is closely associated with language, should be broadened to accommodate other kinds of diversity such as those addressed by the EQUAL programme: diversity associated with disability, issues around representation, and access to cultural life and resources for disadvantaged groups and communities. In short, the UK Film Council would press for a cultural

agenda that recognises, in line with UK policy, the full range of sources, causes and challenges of diversity.

15. We would also like to see this set of objectives building upon the achievements and reinforcing on-going activities in the area of cultural heritage, especially those devoted to exploiting the potential of digital technologies to improve access to that heritage. We believe that this is more critical, even, than the issue of artists' mobility which is singled out in the Communication.
16. Media literacy and improved access to the heritage are also key to the second set of objectives relating to culture as a catalyst for creativity. Again, the specific objectives for culture as a catalyst for creativity set out by the Communication major are in areas within DGEAC's competence: life-long learning, capacity building and partnerships between the cultural and other sectors. They are silent about initiatives taking place in DG Enterprise, DG Infosoc and DG Regions, for example, around access to finance. They also fail to refer to initiatives around intellectual property rights that could be considered key to any effective strategy to enhance culture's contribution to Europe's competitiveness.
17. The UK Film Council believes that it is extremely important to ensure that the application of rules relating to public funding – state aids – be made consistent with the terms and objectives of the cultural agenda. This should be done as soon as possible. The Commission is currently in the middle of reviewing these rules and has even been contemplating a block exemption for public support of culture. But it is far from obvious to us that the new rules, when these are defined, will take into account the importance for Europe's economy of a regime that encourages public funding to invest in the cultural industries. We are concerned that it is likely that DG Competition would seek an increasingly restrictive definition of the scope of such funding which is anchored in a perspective of only allowing intervention that addresses "market failure" rather than a perspective that takes into account the full extent of social and economic benefits of cultural intervention.
18. The theme of the economic context of cultural intervention looms large in the Communication's discussion of culture as a vital element in international relations (Section 3.3): the second of the specific objectives relates to market access and the third to the role of financial and technical support for the preservation of and access to cultural heritage and of [European] cultural activities across the world. In other words, the logic is that of trade more than of cultural diplomacy.
19. The UK Film Council is especially committed to a clear "European audiovisual foreign policy" as part of a wider, "European cultural foreign policy", having been active in the discussions that led to the adoption of the UNESCO Convention. The Convention took as its

point of departure the need to preserve the right of countries to intervene to safeguard and promote their audiovisual culture, a right that had been challenged during the Uruguay round of GATS negotiations in the 1990s by proponents, led by the United States, of a liberalised market for audiovisual goods and services. We would like to see among the specific objectives the topic – now being pursued by the Council of Europe and by UNESCO itself – of how to put into practice the principles set out in the Convention.

20. We would particularly like to see how Europe can improve its openness to cinema and audiovisual services from around the world (and within the Union), and how co-operation with other regions that share many of Europe's pre-occupations and aspirations, for example South America, can be improved.

New partnerships and working methods

21. Section 4 of the Communication focuses on four initiatives: mapping the cultural sector, setting up the "Cultural Forum", "cultural ambassadors" and open method of coordination. All of these seem valid to us but we think greater prominence should be given to promoting better coordination *within* the cultural sector.
22. Cinema and the audiovisual sector are better catered for than most, if not all, other parts of the broader cultural sector. They benefit from the work of the European Audiovisual Observatory which enjoys the active support of countries extending outside of the Union. National agencies (like the UK Film Council) are very active in providing transparency about audiovisual markets. They are able to draw on a wide body of market data and analysis. Exchange of information between member states, such as through the European Film Agencies Research Network (EFARN) is well-developed. This experience, however, makes us acutely aware of the limitations of existing sectoral data and of the challenges involved in addressing those limitations. We believe that the benefits of mapping would be enhanced by developing the exchange of information *between* cultural sectors. For example, we believe we could learn a great deal about film audiences were we to relate film market data to data, *inter alia*, about music, books, magazines and other cultural goods consumption; attendance at arts events, museums, galleries and libraries. It is hard enough to do this at a national level, at a European level it is nigh on impossible.
23. The UK Film Council welcomes the launch of the Cultural Forum and looks forward to attending its inaugural meeting in Lisbon later in September 2007. Based on recent events, including the November 2006 consultation in Brussels about the Culture Communication, as well as discussions we have had with representatives of other parts of the cultural sector across Europe, we are doubtful that one of the Cultural Forum's main aims – to involve practitioners and other stakeholders in the discussion of Europe's cultural agenda – will be

achieved. The tendency is for practitioners to leave it up to their European trade organisations the task of representing their views at a European level. There emerges a detachment between the day-to-day activity of “making culture” and the activity of policy-making. We have seen that the main motivation to take part in policy discussions is the hope of gaining better access to funding rather than to promote effective practices and to improve the overall performance of funders and the organisations they back. It needs to be recognised that the incentives to take part in such exchanges are insufficient when set against the costs. Practitioners do not see it as a priority any more than national bodies which, for the most part, are focused on activities that directly contribute to the discharge of their duties.

24. It will take much more than a well-intentioned wish to remedy this state of affairs. We consider that one approach would be to identify and assist individual practitioners to develop their confidence and ability to take part in such fora. In some ways this could be seen as an extension of the “cultural ambassadors” concept detailed in the Communication. Cultural organisations would be encouraged to nominate individuals who, with support from national, regional or local funders as well as from the Commission, would take part in these exchanges.
25. The DCMS in the document it produced to accompany this consultation endorsed the proposal to use the Open Method of Coordination (OMC) to take forward the proposals set out in the Communication, but expressed the concern that the OMC risked “becoming complicated and bureaucratic.” The UK Film Council has no experience of OMC but we note that it is much more an affair between governments (and presumably their representatives in Brussels) than it is something that involves those closer to the ground. We would therefore think it worthwhile looking at other models that more directly engage with and involve the input of organisations active in the delivery and funding of cultural activities.

Conclusions

26. The UK Film Council considers the Communication a necessary and important step forward in developing at a European level a cogent and coherent approach to cultural policy that draws in all parts of the cultural sector. For this step to be fruitful, we consider that, at one and the same time, the specific objectives need to be more tightly defined and to draw in activities that, although not the domain of DG EAC, should be considered central to the achievement of the ambitions set out in the Communication.
27. A measure of the seriousness and success of the Communication will be that it ends any ambivalence about the contribution of cinema and the audiovisual sector to Europe’s cultural agenda. Cinema and

the audiovisual sector should be seen as indispensable to the pursuit of the Communication's objectives.

28. The UK Film Council sees the work to take forward the Communication and implement its proposals as an important way of our fulfilling both the tasks set for us by government and the expectations of our other stakeholders. For us to discharge this responsibility will require resources – some already committed, others currently devoted to other priorities – but in any case insufficient. We recognise, however, that the UK Film Council is better placed than many other organisations: we already have a very active engagement with Europe and we work closely with colleagues across the Union. We aspire to leverage this commitment by working closely with other parts of the cultural sector in the UK in order to increase our coverage and understanding of the challenges we share.