



OPEN LETTER to the European Commission ON THE CONSULTATION ON OPPORTUNITIES OFFERED BY DIGITAL TECHNOLOGIES FOR THE CULTURE HERITAGE SECTOR

3 September 2020

We - representative European organisations from the cultural heritage (CH) communities and institutions (CHIs) - welcome the European Commission's consultation on opportunities offered by digital technologies to the cultural heritage sector, in view to amend the [2011 Recommendation on digitising cultural material and digital preservation](#) and update the EU's toolbox.

We understand digital cultural heritage in its widest sense, including both tangible and intangible heritage. Hence, we urge the Commission to do so by also **broadening the definition of cultural heritage to include both tangible and intangible heritage.**

We indeed believe that digital technologies are a decisive factor for the relevance of Cultural Heritage in the future. However, the consultation falls short in addressing some key developments and challenges that we deem central to digital cultural heritage.

This is why, beyond responding to the public consultation, we wish to contribute to the ongoing discussion with a few additional ideas, which can be found below.

1. Digital as a tool to enhance Value of CH

- Digital tools are important factors to preserve and promote Cultural Heritage and are a key contributor to addressing societal challenging topics such as climate change, inclusion, democratization, cultural rights and Ethics. Potentially biased algorithms, however, are a growing societal challenge that could hinder cultural diversity and induce discrimination.
- New technologies can help to enhance and add value to Cultural Heritage, to have a positive impact and contribution on our shared European values and for citizens in Europe, for cultural and creative sectors, and sectors such as education and tourism.

2. Capacity building

- A **consolidated and high impact initiative in education and training for DCH specifically** is therefore needed to ensure sufficient capacity of skilled human resources at all levels of activity, to keep up with the changing socio-economic climate and pace of the rapid technological advances requires long-term investment in maintenance and development of skills, expertise and collaborative relationships. This should also involve the European funding programmes of DG CNECT (also through the Digital Education Action Plan) and DG EAC as an essential basis to cover digital education for the new generations on the tertiary level (new curricula) and lifelong training at vocational and professional, technical, academic research levels and in schools.

3. Long term preservation:

- We believe that the relationship between 'virtual and digital heritage' and 'real heritage' (tangible or intangible) should be strengthened rather than dissociated.
- Clarification is also needed to understand the potential for inherent ephemerality of e-documents directly produced from EU CH stakeholders, often without concern for



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preservation, which may significantly affect the future of social memory, institutions and communities.

- A vast amount of cultural assets, highly valuable for historical research, are now ‘digital-born’. Private digital-born archives held by CHIs create a need for further research to define authenticity and for intensive curation, quality standards, policies for long-term preservation, access rights and a code of ethics.

Moreover, Personal Digital Archives represent the largest stream of digital-born cultural content creation globally, through the recording activities of individuals using smart devices and social media. The management and preservation of the vast amount of all the content created by these means represents a daunting, perhaps impossible, task. Despite this, many specific endeavours to archive, curate and make available certain types of cultural content exist, for instance through, family history projects, community photo preservation, oral history, community-based history, thematic crowdsourcing and event archiving. The relevant EU institutions, UNESCO and other related international organisations should agree common definitions in this area.

The EU should urgently develop a new pan-European strategic plan for the sustainable future preservation of digital CH content, which should give the opportunity to all the CH stakeholders to preserve their digital assets free of charge and/or to get a fair share from the online content made available to the public.

- To ensure the sustainability of the digital CH content, it is necessary to invest in research and development of technologies and protocols (hardware and software) able to reduce the CO2 impact of the servers performance in the digitization and consumption of DCH contents as well as in the performance of Big Data and Artificial Intelligence (AI) infrastructures.
- The dissemination of best practices in the next few years in this important area can play a vital role in diffusing DCH widely and in engaging small CH stakeholders, such as museums, as well as live and contemporary performance.

4. Increasing value of CH

- Digital Cultural Heritage can be seen as a R&D lab of the cultural and creative ecosystem. It contributes to the economic advancement of the cultural and creative sectors, but it has gained larger visibility in strengthening social cohesion and **encourages a new active (digital) citizenship**. In this context, digital cultural heritage has shown its paramount importance specifically in times of crises.
- **The COVID -19 crisis underlined the role of CH for social cohesion and reassurance**, to facilitate mutual understanding and connecting people all over the world. It helps us to think outside the box to find answers that might lie beyond the usual set of answers and to learn, mitigate, adapt and integrate to an ever-changing society.
- **CHIs should be seen and treated as enablers of innovation in funding policies targeting the digital transformation in general. This requires funding that is not only project-driven, but which also supports processes and long-term objectives.** These policies include the EU’s planned funding programmes such as Horizon Europe, Digital Europe, InvestEU and the European Regional and Development Funds. For their transformative potential for the sector and society as a whole, CHIs should also be among the beneficiaries of the “Next Generation EU” Recovery Fund.
- DCH projects, however, should not necessarily be economically profitable, being rather process-driven than focused on the product. While projects should be given the opportunity to be funded also in an experimental phase, a rethinking of the legal base should be triggered to include also non-commercial artistic projects, particularly in the performing arts



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heritage, which are not oriented towards commercialisation but rather take into account a more societal aim.

- **Moving forward, harmonised metrics to measure digital activities** can facilitate benchmarking and assist decision-making and resource allocation. CHI's lag behind in the digital literacy transformation: they should be provided with skills and resources to do so in the online environment.

5. International Standards, Multilingualism, Use and ReUse:

- The reusability of digital cultural material depends not only on the quality of the visual representation of its physical counterpart, but also on the metadata and the related story and knowledge associated with it. Therefore, rich metadata regarding content, technical or administrative information is an essential accompaniment, including for 3D models. The purpose of ***a holistic 3D world is to simulate an environment and be able to transfer a person to this environment in the most realistic way.***
- For that reason, interaction with any kind of human being, in **any language** including ancient ones - and with any aspect of the environment are important features which can allow richer and more informative educational experiences.
- **Pan-European and International Standards** and guidelines/methodologies should be followed or initiated urgently, and sufficient high quality relevant metadata provided, whenever possible, for a range of different contexts and by taking into account all the aspects of AI, intellectual property rights (IPR) and ethical issues such as the transparency and accountability of algorithms and the ownership, collection, storage, use and dissemination of data. In some areas, such as the holistic documentation of 3D and Intangible Heritage, standards are still lacking, and their development should be supported.
- In addition, a Pan-European and worldwide standardised future holistic documentation in CH would definitely support the work done by all the institutions involved in the **fight against illicit traffic and looting of cultural goods** thanks to interoperability and exchange of data in DCH.

Therefore, we invite the European Commission to be active in these topics now and in the future, especially in view to update the EU's toolbox on Digital Cultural Heritage. As representatives of the sectors, we remain fully available for an active dialogue and exchange to address challenges and needs and tap the full potential of DCH in Europe.

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