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CONVENTION CONCERNING THE PROTECTION OF THE WORLD CULTURAL AND NATURAL HERITAGE

WORLD HERITAGE COMMITTEE

Forty-third session

Baku, Republic of Azerbaijan

30 June - 10 July 2019

**Item 8 of the Provisional Agenda: Establishment of the World Heritage List
and of the List of World Heritage in Danger**

8. Nomination Process

SUMMARY

At its 42nd session, in its Decision **42 COM 8**, the Committee decided to include in the draft agenda of its 43rd session a general item 8 to allow discussion on the nomination process. This document presents overall topics concerning the nomination process for inscription on the World Heritage List.

Besides its introduction, the document is divided into four parts:

- Part A Ongoing reflection on the reform of the nomination process
- Part B Expert Meeting on Sites Associated with Memories of Recent Conflicts
- Part C 25th Anniversary of the Global Strategy
- Part D Draft Decision

Draft Decision: 43 COM 8, see part D.

BACKGROUND

1. At its 42nd session (Manama, 2018), the World Heritage Committee decided to review the nomination process, bearing in mind the Global Strategy. Its Decision **42 COM 12A** took into account the recommendations of the 2017-2018 ad-hoc Working Group. It also made a specific reference to Recommendation N°3 of the IOS Comparative Mapping Study of Forms and Models for Use of Advisory Services by International Instruments and Programmes (WHC/17/41.COM/INF.14.II) which had recommended that the World Heritage Committee take action to address the deviations between recommendations of the Advisory Bodies and decisions made by the Committee.
2. With regard to the deviations, a comparison is made between the Advisory Bodies recommendations and World Heritage Committee decisions with regard to nominations, which have not been directly recommended for inscription by the Advisory Bodies and a very clear tendency of amending draft decisions towards inscription can be identified. Over the last years, the overall trend has been to amend a majority of the draft Committee decisions and move them directly or closer to the category of inscription: from referral to inscription on a very regular basis; from deferral to inscription on a quite regular basis; from a non-inscription to referral etc. quite often. Table 1 below presents the percentage of World Heritage Committee decisions deviating from the original Advisory Body's recommendations over the last nine sessions.

2010	2011	2012	2013	2014	2015	2016	2017	2018
81%	91%	90%	72%	89%	71%	86%	87%	87%

TABLE 1 - For the purpose of these statistics, nominations directly recommended for inscription were not considered, as it is assumed that the Committee customarily inscribes properties, which are recommended for inscription. The resulting average is **83,7%** of Committee's decisions deviating from the Advisory Bodies recommendations.

3. This trend has led also to the direct inscription, for the first time in the history of the *Convention*, of two properties, which were recommended for non-inscription by the Advisory Bodies at the last session of the Committee (Manama, 2018).
4. It is expected therefore that the changes to the nomination process and other measures to be introduced by the Committee taking into account the outcomes of the reflection on the nomination process, will address the tendency of systematic overlooking of the Advisory Bodies' recommendations when they do not favor inscription. This not only impacts on the relevance of the Committee's work, but more importantly, is extremely detrimental for the credibility of the World Heritage system.

A. ONGOING REFLECTION ON THE REVISION OF THE NOMINATION PROCESS

5. In Decision **42 COM 12A**, in view of providing the reflection with the widest possible range of comments and suggestions, the Committee, at its 42nd session, had requested the Secretariat to "consult with States Parties and other relevant stakeholders of the *Convention* on the matters that should be addressed at the reflection meeting". A survey on the nomination process was prepared by the World Heritage Centre in consultation with the Advisory Bodies and was launched online on the World Heritage Centre's website. The outcome of the online consultation survey on the reflection concerning the nomination process is presented as Annex I to this document.

6. The Committee also considered that a reform would benefit from further reflection by a representative panel of experts drawn from the ad-hoc Working Group, the World Heritage Centre, the Advisory Bodies and other experts, to feed into the work of the ad-hoc Working Group. In this regard, in January 2019, a reflection meeting of experts was organized to examine different possibilities for reforming the nomination process including evaluations and to propose recommendations for consideration by the World Heritage Committee with a view of increasing the balance and credibility of the World Heritage List.
7. The meeting was held in Tunis from 23 to 25 January 2019 (the final report of the meeting is presented as Document WHC/19/43.COM/INF.8), thanks to the invitation of the Tunisian Government and with financial support from the Australian Government. The debates of the Experts meeting took into consideration the overarching objective of the reform, as defined by the Committee, which specifically referred to the balance and credibility of the *Convention*. The group considered that remaining true to the spirit of the *Convention* was very important for the nomination process, as for all other statutory processes of the *Convention*. The meeting also noted that the notions of “representativity” and “balance” within the Global Strategy lack a clear definition and this might deserve further reflection in the future.
8. In February 2019, the outcome of the Tunis meeting was presented to the ad-hoc Working Group. During its following meetings, the ad-hoc Working Group, under the Chairmanship of Azerbaijan and guided by the set of principles and recommendations of the expert meeting, further debated, refined and elaborated on the relevant aspects of the reform such as the preliminary assessment, the formats, the evaluation process, the tentative lists and the decision making procedures. In April 2019, the ad-hoc Working Group organized an open-ended meeting to present its work also to States Parties not participating at its meetings. The work and recommendations of the 2018-2019 ad-hoc Working Group are presented as Document WHC/19/43.COM/12.
9. It is important to note that, in its Decision **42 COM 8**, the Committee decided to include the review of the referral procedure and its application for examination in the framework of the revision of the *Operational Guidelines* at its 43rd session in 2019. However, in view of ensuring a holistic approach and consistency with other elements of the process that will undergo changes, both the experts of the Tunis Meeting and the ad-hoc Working Group considered that the review of the referral procedure should be postponed in order to be done at the same time as the reform of the nomination process. It was considered premature to recommend amendments in isolation of a full package of integrated reforms, all of which are interlinked and in due course need to be operationalized through reformed working methods.
10. Following the set of recommendations coming from the principles on which the reform should be based, the Committee at its current session is expected to examine the outcome of the work of the ad-hoc Working Group, in view of translating the results of the ongoing reflection into provisions for examination and potential integration in the *Operational Guidelines* by the Committee at its 44th session in 2020.

B. EXPERT MEETING ON SITES ASSOCIATED WITH MEMORIES OF RECENT CONFLICTS

11. At its 42nd session (Manama, 2018), noting the discussion paper by ICOMOS on Evaluations of World Heritage Nominations related to Sites Associated with Memories of Recent Conflicts, the World Heritage Committee decided to convene an Expert Meeting on sites associated with memories of recent conflicts to allow for both philosophical and practical reflections on the nature of memorialization, the value of evolving memories, the inter-relationship between material and immaterial attributes in relation to memory, and the issue of stakeholder consultation; and to develop guidance on whether and how these sites might relate to the purpose and scope of the *World Heritage Convention*. The World Heritage Centre is prepared to organize the expert meeting, however, as noted in Document WHC/19/43.COM/5A, so far, only limited voluntary contribution have been committed by States Parties.

12. In the meantime, ICOMOS has been encouraged to further improve its paper by broadening the participation of experts in this new thematic area, including from the African region (Decision **42 COM 5B**). It is currently in the process of widening its reflection by consulting international experts specialized in questions related to collective memory and sites of memory. The process includes experts in the implementation of the World Heritage Convention, but also experts in relevant disciplines (such as law and anthropology), from all regions.

C. 25TH ANNIVERSARY OF THE ADOPTION OF THE GLOBAL STRATEGY

13. A number of interventions made at the Expert Meeting in Tunis and at the open-ended meeting organized by the ad-hoc Working Group in April 2019, indicated that it would be opportune to promote a reflection on the Global Strategy in the future. The same need was noted during the debates of the 2018-2019 ad-hoc Working Group whose mandate was to examine different possibilities of reforming the nomination process and propose recommendations bearing in mind the Global Strategy in view of increasing the balance and credibility of the World Heritage List.
14. Twenty-five years ago, the Committee adopted the Global Strategy which aspires to a future World Heritage List that is representative, balanced, and credible. The outcomes of the Global Strategy, including areas of successes and shortcomings, were assessed in 2011 through an Audit the results of which were presented to the 35th session of the World Heritage Committee.
15. Nevertheless, while the objectives of the Global Strategy make an apparent consensus, they are not accompanied by clear strategies and outcomes, and are often the subject of divergent interpretations in the absence of defined notions of reference in the *Operational Guidelines*. The absence of such definitions in the *Operational Guidelines* leads to the absence of indicators. In fact, despite the importance accorded to the Global Strategy, no indicator has been established to monitor its results in an objective manner.
16. A simple statistical evaluation of the Global Strategy to address the notions of balance, representativity and credibility, using numbers and zones may therefore not be helpful. While providing some factual information, such approach moves the attention away from **the only key condition for inscription on the List which is the Outstanding Universal Value**.
17. It is suggested that the 50th anniversary of the *World Heritage Convention* in 2022, may provide a good opportunity to undertake a reflection on the Global Strategy.

D. DRAFT DECISION

Draft Decision: 43 COM 8

The World Heritage Committee,

1. *Having examined Document WHC/19/43.COM/8,*
2. *Notes with concern the trend concerning decisions deviating from the recommendations of the Advisory Bodies;*
3. *Expresses its appreciation for the work of the ad-hoc Working Group, the experts that have participated to the Tunis Meeting, the Advisory Bodies and the World Heritage Centre for their work on the ongoing reflection on the revision of the nomination process;*
4. *Recommends that consideration is given to using the opportunity of the 50th anniversary of the World Heritage Convention in 2022 to undertake a reflection on the Global Strategy.*

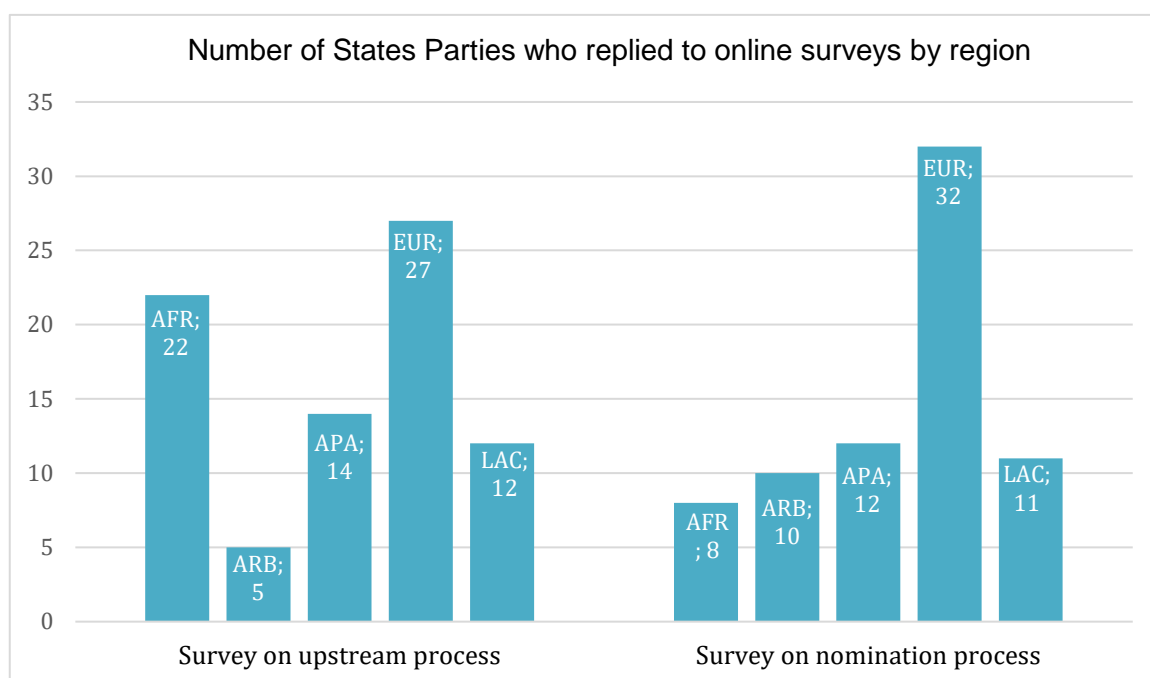
Outcome of the online consultation survey on the reflection concerning the nomination process

A. BACKGROUND INFORMATION

1. At its 41st session in 2017, the World Heritage Committee took note of the Recommendation N°3 of the IOS Comparative Mapping Study of Forms and Models for Use of Advisory Services by International Instruments and Programmes (see Document [WHC/17/41.COM/INF.14.II](#)), which addressed deviations between recommendations of the Advisory Bodies and decisions taken by the World Heritage Committee. At its 42nd session, the Committee also took into account the recommendations of the Ad hoc working group (see document [WHC/18/42.COM/12A](#)), and subsequently decided (see Decision [42 COM 12A](#)) to review the nomination process, tentative lists and upstream process, bearing in mind the Global Strategy, and to consider other possible measures, such as a Code of conduct of the World Heritage Committee. It also decided to extend the mandate of the ad hoc Working Group to examine different possibilities of reforming the nomination process.
2. The Committee considered that this reform would benefit from further reflection from a representative panel of experts drawn from the ad-hoc Working Group, the World Heritage Centre, the Advisory Bodies and other experts, to feed into the work of the ad-hoc working group. In this regard, the Committee requested the World Heritage Centre to organize, by March 2019, a reflection meeting to examine different possibilities for reforming the nomination and evaluation process and to propose recommendations for consideration by the World Heritage Committee in view of increasing the balance and credibility of the World Heritage List (see Decision [42 COM 12A](#)). In view of feeding this reflection with the widest possible range of comments and suggestions, the Committee also requested the Secretariat to “consult with States Parties and other relevant stakeholders of the Convention on the **matters that should be addressed at the reflection meeting**”.
3. A survey on the nomination process was prepared by the World Heritage Centre in consultation with the Advisory Bodies and was launched online on the World Heritage Centre’s website in both English and French on 20 November 2018. In line with the already established practice for more inclusive and participative consultations, along with the States Parties, other World Heritage stakeholders, such as Category 2 Centres and civil society, were invited to participate. The deadline for reply was set initially to 14 December 2018 and subsequently extended to 21 December 2018 to allow for a larger number of respondents.
4. It should be noted that this survey is meant only as a step in the wider setting of the reflection on the nomination process, requested by the Committee. In line with the World Heritage Committee’s Decision [42 COM 12A](#) in which it considered that “it is necessary to review the nomination process, tentative lists and upstream process, bearing in mind the Global Strategy, and to consider other possible measures, such as a Code of conduct of the World Heritage Committee”, the questions in the survey touch upon different aspects of the multifaceted nomination process, including technical, procedural and ethical ones.
5. It is to be noted that questions concerning financial aspects were not included in the survey, as it had been rightly indicated by a number of respondents. It is obvious that any change in the nomination process is bound to have financial implications, for the World Heritage Fund, for the States Parties or otherwise, and that the World Heritage Fund has been experiencing increasing pressure and difficulties over the years. It was considered however that while financial aspects are highly relevant, they should be carefully considered at next stages of the overall reflection, in conjunction with each of the concrete options, changes and measures that will emerge and that will be discussed within the framework of the overall reflection on the nomination process.

B. SURVEY OVERVIEW

6. The Secretariat received **replies** from **73 States Parties** (out of the 193 States Parties to the Convention). This represents **37.8%** of all States Parties, which is comparable with the number of replies to the 2017 survey on the upstream process to which 80 States Parties (i.e. 41%) had replied. With regard to Category 2 Centres and civil society, **4** replies were received, this bringing the overall number of replies to 77.
7. The consultation survey on nomination process registered the participation of 11 Committee members and 9 States Parties which are Small Island Developing States (SIDS). In comparison with the 2017 survey on the upstream process, the regional breakdown of the States Parties' replies shows a somewhat different distribution between the five regions. Africa, which had widely participated in the upstream process survey, was not so responsive in the nomination process one, with a two-third drop in its participation, whereas the number of replies from the Arab States has doubled. The other regions participated more or less in the same way, with a slight increase of the number of replies from the Europe & North America region.



C. OUTCOMES OF THE SURVEY

8. The consultation survey on the nomination process comprised 7 questions.
9. **Question 1** invited the respondents to indicate the areas “on which a reform in the nomination process should focus”. While in retrospect we believe that the question might have been formulated with more clarity, and should have also indicated that the list included in the Question was a non-exhaustive one, the narrative comments following the question demonstrate that the respondents have nonetheless understood the question correctly as a selection of main elements on which the reform should be based and which should be discussed in the context of the reform as a whole, and not as specific separate reforms of each of these areas. Multiple choices were possible among the proposals below (first column); the second column indicates how often a given area was selected:

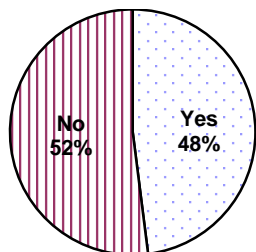
Question 1 - In your opinion, on which of the following areas should the reform of the nomination process focus? (multiple choices possible)

a) Upstream Process	63.3%
b) Tentative Lists	57.1%
c) Nomination format	35%
d) Voluntary submission of draft nominations for review	29.9%
e) Evaluation by the Advisory Bodies	54.5%
f) Interactions and linkages between different steps of the process	42.9%
g) Timeline of the evaluation process	33.8%
h) Evaluation report	29.9%
i) Referral and/or deferral provisions	35%
j) Examination of nominations by the World Heritage Committee	35%
k) Decision making process by the World Heritage Committee	49.3%
l) Code of conduct of the World Heritage Committee	45.4%
m) Other (pls specify) – max. 200 characters	20.8%

10. The replies received demonstrate that there is not a single area that has been entirely left out, with however a very clear indication of the areas on which the reform should build. The emphasis is on the upstream process (63.3% of the respondents included it in their selection), which is aligned to the results of 2017 upstream process survey. Also aligned with the upstream process survey is the importance given to Tentative Lists (57.1%).
11. Evaluations by the Advisory Bodies were also considered an important area for the reform by more than half of the respondents (54.5%).
12. Close to half of the replies show an interest in addressing the way the World Heritage Committee operates, identifying its decision-making process as an area for improvement as well as the possibility of introducing a “code of conduct”. To recall, a “code of conduct” for the Committee was suggested by the Ad hoc working group in 2018 as a possible way to avoid deviations between Advisory Bodies evaluations and Committee decisions and was referred to by the Committee in its Decision **42 COM 12A** which launched the reflection on the reform of the nomination process.
13. As indicated above, there is no single area of those included in the non-exhaustive list of **Question 1**, which considered irrelevant for the reform. While the percentage is lower for some areas, it seems clear that the reflection, while focusing on the areas for which a strong indication of interest and support has been given, needs also to keep in mind those areas which have not been considered of primary importance but which have been inherently associated with the reform by more than 25% of the respondents.
14. Respondents had also the possibility to provide additional remarks and comments, related to **Question 1**. However, as **Questions 5 & 7** also gave the possibility to provide additional remarks and comments, and taking into account the fact that most of the remarks were rarely focused only on the specific question but had more encompassing and cross-cutting nature, a summary of all comments is included at the end of the document. (see below § 24 onwards).
15. This said, it may however be worth mentioning that in their majority, the comments made in relation of **Question 1** are largely aligned with the replies to the question itself, i.e. the selection of areas. It appears that if a reform is to be successful, this should be based on high quality nominations for

Committee review, as a major outcome of the reform, and that the mechanism to achieve this outcome should include advice provided in the early stage of the nomination process to States Parties with regard to possible nominations and establishment or revision of Tentative lists as well as improved dialogue between States Parties and Advisory Bodies.

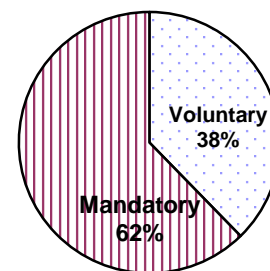
16. **Question 2** on enhanced dialogue through a possible extension of the duration of the current evaluation process showed a more divided opinion. Both options (extend – not extend) received more or less an equal attention from the respondents.



Question 2: Over the last years, more time for dialogue during the evaluation of nomination files has been requested by some States Parties. Do you think that the extension of the current evaluation process with an additional period (i.e. 12 months) can be the solution to the current problems?

17. In reply to **Question 3**, a clear majority of the respondents considered that a preliminary assessment of the potential for Outstanding Universal Value (OUV) of sites on the Tentative Lists by the relevant Advisory Body(ies), before a full nomination for inscription on the World Heritage List is developed and submitted, should be mandatory. This appears consistent with the emphasis on upstream process and Tentative Lists as underpinning areas for the reform expressed in **Question 1** above.

Question 3: The overwhelming majority of respondents to the “Online consultation survey on the Upstream process” (see Document WHC/17/41.COM/9A) considered that the preliminary assessment of the potential for Outstanding Universal Value (OUV) of a site or sites on the Tentative Lists (TL) by the relevant Advisory Body(ies), before a full nomination for inscription on the World Heritage List is developed and submitted, would contribute towards a more representative, balanced and credible World Heritage List. Do you consider that such preliminary assessment should be mandatory or voluntary?



18. **Question 4** focused specifically on the upstream process.

Question 4: Do you think that a systematic, fair and equitable application of the Upstream Process could improve the current situation and contribute towards a more representative, balanced and credible World Heritage List, in line with the Global Strategy?

Yes, very much	38.9%
It could help	53.3%
It won't change anything substantially	5.2%
No, not at all	2.6%
It could worsen the situation	0%

19. The replies to **Question 4** confirm the outcomes of the 2017 upstream process survey and demonstrate that the upstream process is overwhelmingly believed to be a valuable tool towards achieving the goals of the Global Strategy, with more than 90% of the respondents having replied positively to the questions (Yes, very much – It could help).

20. In **Question 5**, the respondents were invited to identify which measure(s) they would consider relevant in view of the reform of the nomination process. It is to be noted that the list of measures is not exhaustive and includes measures of different nature which have been discussed on different

occasions by States Parties and other World Heritage stakeholders, e.g. by the Ad hoc group, at previous expert meetings, proposed by auditors etc. A possibility to provide additional remarks and comments was also given to the respondents.

Question 5 - Which of the following measures in the list below you would consider relevant? (multiple choice possible).

a) Request the most represented States Parties to refrain from nominating more sites (see Operational Guidelines paragraph 59)	40.3%
b) Support the least represented States Parties to submit a higher quantity and quality of nominations	85.7%
c) Give absolute priority to nominations of States Parties falling under the category of Least Developed Countries, Low-Income and Lower Middle Income Countries and Small Islands Developing States	36.4%
d) Further strengthen the limitations indicated in paragraph 61 of the Operational Guidelines	20.8%
e) Prioritize nominations of sites that would undergo a preliminary assessment of their potential OUV	57.1%
f) Introduction of a “code of conduct for Committee Members” whereby they refrain from submitting nominations while serving on the Committee (as recommended by the Auditors)	46.7%
g) Undertake more capacity building activities especially on preparing nominations and management plans	83.1%
h) Other (max. 300 characters)	23.4%

21. For a very large majority of respondents, the critical measures appear to be the support provided to least represented States Parties (85.7%) and capacity-building for the preparation of nominations (83.1%). Giving a priority to sites which have undergone a preliminary assessment of their potential of Outstanding Universal Value is also considered important in more than half of the replies. It is to be noted however that this measure (prioritization) could be applicable only if the preliminary assessment is undertaken on a voluntary basis. This will obviously need to be discussed in conjunction with the replies to **Question 3**, where preference was given by the majority of respondents to a mandatory preliminary assessment of the OUV of sites.
22. In reply to **Question 6**, the overwhelming majority of respondents considered that the World Heritage List can continue to grow, with a large majority indicating that new inscriptions should focus more on under-represented regions and types of heritage.

Question 6: Over the years, it has been repeatedly affirmed that States Parties of the 1972 World Heritage Convention should focus their efforts more on conservation than on nomination of new sites. Currently, with almost 1,100 inscribed on the World Heritage List, do you think that:

a) The List is already well beyond the limit of what it should look like, in order to be credible	2.6%
b) The List has just reached its ideal size	0%
c) In order to complete the List the focus should be on under-represented Regions of the world and types of heritage	65%
d) There are still hundreds of sites of potential Outstanding Universal Value	32.4%

23. **Question 7** was an open one to allow respondents to put forward any further suggestions/comments beyond the answers they would have already provided. Sixty-one comments were made, i.e. 79.2% of all respondents have considered it necessary to provide additional remarks. Most of all the comments however concern matters which have been included in other questions of the survey – these either clarify the views on a specific matter, or provide additional details as to how the matter in question could be handled. A relatively limited number of comments concern areas, mechanisms, measures or other aspects that have not been addressed at all in the survey. Finally, some critical comments concerning the consultation survey itself have also been made. The comments are summarized below, in the same order. The comments made under **Questions 1** and **Question 5** are also taken into account.

D. SUMMARY OF NARRATIVE COMMENTS

24. **Preliminary assessment** of potential Outstanding Universal Value of sites before starting the preparation of a nomination file (also called in some of the replies “early advice” or “prescreening” or otherwise) has been addressed by at least half of the comments provided to **Question 7** and **Question 1** and appears to be considered overwhelmingly as a key element of the reform. This confirms the interest expressed in **Question 1** for the area of upstream process and is also consistent with the outcomes of the 2017 upstream process survey, whereby 80% of the respondents had considered that in order to avoid the use of resources on preparing nominations that may be unlikely to succeed, the Advisory Body(ies)’s and the Secretariat’s advice would be effective before starting the preparation of a nomination (see document [WHC/17/41.COM/9A](#) §26).
25. While some of the comments asserted further or explained in further detail the respondents’ views as to whether the preliminary assessment should be mandatory or voluntary (see replies to **Question 3**), it seems that most of them concurred in bringing forward the need for **quality** nominations in order to achieve credibility and a balanced and representative World Heritage List and in considering **advice provided early in the process** as a key mechanism for achieving this objective. In this regard, **capacity-building** for the preparation of Tentative Lists and nomination files has been emphasized quite often, in relation to ensuring quality nominations.
26. Many comments specifically highlighted that advice should be given by the Advisory Bodies at the **stage of establishment or revision of the Tentative Lists**.
27. In this regard, some risks have also been highlighted in the comments. One respondent pointed out the risk of **States Parties bypassing the advice** of the Advisory Bodies, in the same way as the recommendations of the Advisory Bodies were regularly bypassed by the Committee. Another respondent considered that undertaking preliminary assessments could give a kind of “**indirect power**” to the Advisory Bodies.
28. A **staged approach** is proposed as a solution by a number of respondents, with only sites for which a technical evaluation has confirmed the existence of Outstanding Universal Value going for examination by the Committee which in turn will have to examine the management aspects, further to the preliminary technical evaluation.
29. The need for **enhanced dialogue and quality engagement** (albeit not necessarily through an extension of the timeline of the process) of States Parties/ Advisory Bodies/Committee in the nomination process also comes quite strongly in the comments.
30. **Consistency** in relation to the evaluation process is another aspect that is mentioned in a number of comments. It would not be overstated to say that there is a call for consistency in the way nominations are evaluated, and more specifically **for a consistent approach in the evaluation of the Outstanding Universal Value**, across similar types of properties or situations, especially with regard to the evaluation of cultural sites. The need for **ensuring consistency between the nomination format and evaluation reports** has also been highlighted in some comments.

31. The absence of mechanisms for an **effective review and appeal procedures** with regard to the Advisory Bodies' recommendations was also questioned by few respondents.
32. While the **nomination format** was not among the areas which have been considered among the most important ones on which the reform should focus under **Question 1**, it comes up regularly as a topic addressed in the comments.
33. The mechanisms of **referral and deferral** need revisiting and possibly combining into a single category, according to some of the respondents' comments. (It is to be noted in this regard that the Committee has specifically asked for a review of these two mechanisms and that a proposal for their respective revision should be submitted for examination at the next 43rd Committee session, in the framework of the revision of the Operational Guidelines).
34. The topics summarized above, regardless of whether the respective comments have been made in relation to **Questions 1, 5 or 7**, bear on issues that have been addressed by the survey. Some comments make new proposals or address topics that have not been explicitly included in the survey.
35. **Priority for conservation and maintaining Outstanding Universal Value after inscription** are among the topics which have been addressed by many comments. A question on these matters had not been considered necessary to be included in the survey as it did not address directly the issues at hand, with regard to the nomination process reform. Nonetheless, it is worth noting that many respondents, from developing and developed countries alike, have highlighted and reconfirmed this priority and have recalled that conservation is the ultimate objective of the World Heritage List and that inscriptions on the List were only a tool towards this end. This makes it thus an important consideration to be taken into account in the reflection concerning the nomination process as such.
36. A number of comments aims to pass the message that no matter what changes the nomination process may need to undergo, it is essential that this be done in line with a **set of meaningful underpinning principles**, in order to avoid the loss of credibility of the List and the collapse of the World Heritage system as a whole. Thus, some of the respondents specifically indicated that it is of utmost importance that any proposed changes allow for retaining a **high level of quality in the nomination process, with scientific evaluations and a transparent and inclusive process, while eliminating conflicts of interest**. In this regard, it is worth noting that if a question on these matters was not included in the survey by the Secretariat and the Advisory Bodies, the reason was the understanding that the respect for these principle is the building block for the proper processes and for the integrity of the List and therefore there was no need to question it. Nonetheless, in retrospect the Secretariat believes that a question in this regard should have been included and is much appreciative of the respondents' replies that have brought these overarching matters to the fore.
37. The reason for the **absence of a question on budget issues** in the survey was already explained in the beginning of this document. It is indeed worth recalling that any change in the nomination process is likely to have serious financial implications and that financial implications should be a central part in the discussion of all possible changes to the system.
38. The financial implications of the reform have been addressed in a number of comments. Altogether, the underlying message is that the nomination process reform should not be done at the expense of conservation activities. More specifically, the possibility of introducing a **processing fee** by States Parties for nominations or covering additional cost for preliminary assessment (as relevant) was put forward in several comments.(It should be recalled in this regard that a non-paper submitted by Norway in 2018 proposed, within the discussions of the Ad hoc group, a cost-sharing model for the evaluations of nominations and was discussed by the Budget group during the 42nd session of the World Heritage Committee; details in this regard can be found in Annex E of document [WHC/18/42.COM/12A](#).The possibility that **over-represented or developed (in some cases called wealthy) countries support the preparation of nominations of under-represented or developing countries** was also mentioned in several comments.

39. A limited number of comments put forward the idea that the Committee could examine nominations on a **bi-annual basis**, or focus on the examination of nominations in certain years only on **specific types of heritage or on heritage from specific areas**.
40. Finally, as was indicated previously in this document, a few respondents made some **critical comments** concerning the questions included in the survey and the survey as a whole, suggesting that it has been conceived to include a **blend of leading questions and broad statements** about current practices and credibility of Committee practices and thus, it does not adequately capture the breadth of the discussion on the topic of nomination and evaluation reform for World Heritage.
41. More specifically, several matters have been highlighted in these critical remarks – the absence of questions about the **role and responsibilities of the Advisory Bodies** and the need to see the **discussion on nomination process in 2019** related to discussions and decisions of previous expert meetings, Committee sessions, Ad hoc working group meetings, the 2017 IOS Comparative Mapping Study, auditors report on the Global Strategy etc.
42. The Secretariat and the Advisory Bodies take due note of these comments and regret that their efforts to include a multitude of questions relevant to the reform, in a succinct manner and in line with previously discussed issues or options suggested on different occasions by different World Heritage stakeholders, e.g. expert meetings, Ad hoc, auditors etc, have been perceived as “leading” questions and as “broad statements” by some. While recognizing that there is always a possibility “to do better”, there has been no intention on our side to include questions of “leading” nature, or to omit relevant questions, with a hidden agenda. While we have ourselves been concerned that the matters at hand were of rather diverse, complex and somewhat eclectic nature and that the survey had to be relatively brief and hence questions could not be developed in depth, we have opted for this approach as we aimed for efficiency, comprehensiveness and receiving as much feedback as possible (the practice shows that overly extensive and complex questionnaires do not bring as much replies as relatively concise surveys). Choices needed therefore to be made and we are pleased that the selected approach (which we recognize might not be ideal) has “paid off” by attracting a large number of replies and comments.
43. With regard to the specific comment on the lack of questions about the Advisory Bodies’ role and responsibilities, it has been suggested in a few comments that the rationale for not including a specific question was to intentionally keep the Advisory Bodies out of the discussion and the overall reflection. It needs therefore to be clarified that there has been no such intention. Rather, different aspects about the role and responsibilities of the Advisory Bodies are implicitly related to many of the processes, mechanisms and measures addressed in the survey, in which the Advisory Bodies are among the main actors. The “evaluation procedure by the Advisory Bodies” (exact wording of one of the areas in **Question 1**), the upstream process or the establishment or revision of Tentative Lists are just a few examples. Therefore, it has not been considered necessary to include a specific question on the role and responsibilities of the Advisory Bodies as it was expected that these will be addressed in reply to the relevant questions. Moreover, it is also to be noted that not including a specific question about the Advisory Bodies will not have succeeded to keep them out of the discussion, given that such a discussion is already ongoing in the Ad hoc group, at even larger scale (i.e. covering all World Heritage processes and not only the nomination process).
44. As to the need to position the discussion on reform of the nomination process within the framework of the **larger policy debate**, the Secretariat and the Advisory Bodies are fully in agreement.
45. Finally, some States Parties considered that the survey aims to limit the reform to adjustments of the current system while it would have been preferable to open the discussion to **adjustments going beyond the current system** and providing ground for exploring completely **new processes and procedures**. The Secretariat wishes therefore to clarify that this survey is not intended to prevent any discussion on relevant matters which go beyond the survey’s scope and that the States Parties, Ad hoc group, the Committee and other stakeholders can discuss any option they consider suitable for improving the nomination process and the credibility of the List and the *Convention*.