Norman has sensitively and sensibly opened a can of very squirmy worms. Her question, “Should the UK Be Nominating More World Heritage Sites?” resonates with fundamental issues that will plague archaeology and heritage management with increasing virulence in the future. How are the trade-offs between economic impact and outstanding universal cultural value (OUV) to be managed? How are equities to be balanced between natural endowments and human-made locations? And what should be the essential goals of the World Heritage Sites (WHS) process—protection and conservation as absolute priorities, or economic development and cost/benefit effectiveness?

Norman’s analysis brings to these questions the sensitivity of a committed heritage manager and the cautious realism of a practitioner fresh from the trenches. Her article at least touches on all of these issues, and my comment does not attempt to offer a perspective on every one. Rather, I choose to take issue with Norman’s conclusion that “Ultimately, the argument seems to be an ethical one” (Norman, 2011: 77). Without disputing the ethical issues she raises, nor the importance of ethical considerations in this matter, I argue that her article and the underlying research to which she refers make a much stronger case for considering the economic consequences of the World Heritage Sites (WHS) process—protection and conservation as absolute priorities, or economic development and cost/benefit effectiveness.

There are four points to consider: First, the reality is that the UK, like the rest of the world, is entering into an era of constrained economic resources that will disproportionately affect heritage-related activities in favor of social services. Second, a paucity of hard data and sound evaluation has rendered impossible up-or-down judgments on the value, economic or otherwise, of WHS status. Third, Norman’s paper and related materials raise the specter that WHS “branding” may have diminishing or even negligible returns to the investment made in achieving WHS status. Fourth, therefore, the increasing need for sponsors of potential World Heritage Sites need to give far greater weight to their opportunity costs and the potential returns to investment. I would like to consider each of these matters in order.

No regular reader of the daily newspapers could fail to be aware that the present UK government’s budget has severely slashed support for heritage-related matters. English Heritage has suffered draconian budget reductions, and UK universities that underwrite so much heritage-related work are under profound pressure to demonstrate their “impact,” prominently to include economic value. And of course, the UK is not alone. Most of the world is under severe economic pressure. Greece is wrestling with a profound crisis of government financing. Facing lesser pressures, Italy has placed responsibility for heritage, museums and antiquities in the hands of a former McDonalds Corporation executive who is actively evaluating privatizing iconic sites such as the Colosseum. The United States is on a budget trajectory to reduce funding for its vast system of parks and for other forms of heritage. Japan is recovering from a natural disaster. These economic pressures are global in nature, with only a few fortunate nations in Asia seemingly immune from pressures on national budget priorities.

In this environment, any actions to preserve heritage or archaeological resources cannot be viewed in a vacuum; yet that is often precisely what heritage professionals do. Norman, in her review of the comments to the PriceWaterhouseCoopers (PWC) report, observes that some reviewers of the report felt that the study itself was “inappropriate” because “if the UK has sites of outstanding universal value, internationally recognized as significant and worth inscribing as WH status, they should be adequately protected for future generations” (Norman, 2009: 16). While not a majority view in that study, reflexive rejection of economic analysis by heritage professionals is all too common and in the present environment does not advance the discourse. One can accept the paramount importance of non-economic factors in the selection of World Heritage Sites, and even join those who criticize the increasing importance of tourism and economic “regeneration” to WHS decisions, and yet still face the fact that resources are and will be constrained, which compels consideration of costs, benefits and results.

Accepting that reality, however, one must regret the inadequate data about World Heritage Sites. For example,
Norman notes in her review that four of the six WHS projects studied by PWC were well known prior to listing, offering little useful base-line data to compare to post-listing conditions (Norman, 2009: 16). The inscription process is focused on justification of the site’s OUV as a basis for WHS status and on development of a management plan. It does not require a business plan for the site; nor does it call for a program of measurement and evaluation to enable after-the-fact appraisal of the impact, economic or social, of inscription. As a result, UNESCO and government bureaucrats and heritage professionals are compelled to operate largely without data when considering the results and impact of WHS inscription. In the absence of data, ad hominem debates and arbitrary policy actions are inevitable, and inevitably will turn out often to be wrongheaded.

Despite the paucity of real data, in the face of these universal economic constraints one must nonetheless motor on. Whether investing in further WHS sites is a prudent decision by a local or national government depends on many variables. Norman lights on a critical one in her paper: From the economic development perspective, does WHS status even “work”? Norman cites evidence from the PWC study suggesting that the incremental economic value from gaining the WHS “brand” is quite low, especially for well-established sites (Norman, 2011: 76). Indeed, PWC cites the apparently low value of the WHS “brand” as a vehicle for enticing visitation and economic regeneration (2007: 7), and concludes that “by ceasing nominations, the current value of the ‘World Heritage brand’ in the UK would be sustained and slowing nominations would slow the reduction in that brand value” (2007: 9). To economists, this is the essence of the concept of “diminishing returns”. That is, that the more of something one obtains or creates, the less value it commands in the marketplace. If in fact WHS status has reached a point of diminishing returns in the UK, which PWC at least is arguing, then the decision by any government or non-government body to pursue that status must be thought through very carefully.

This result takes one inevitably to the question of the direct costs and benefits and the opportunity costs facing communities considering investment in WHS inscription. Direct costs of engaging in the WHS inscription process are high and rising significantly (PriceWaterhouseCoopers LLP, 2007: 2-5, 10). Opportunity costs, to economists, are the costs incurred and benefits foregone by pursuing any particular course of action rather than the best available alternative. In its study, PWC limits its evaluation of opportunity costs to foregone development opportunities, which it regards as minimal, and to foregone alternative investments in other governmental activities (2007: 39-41). However, PWC makes the case repeatedly in its study that the economic development impact of WHS status is limited and, as noted above, may be subject to diminishing returns. In such circumstances, the opportunity costs of pursuing WHS status may have more sources and far greater magnitude.

The required investment in site management, marketing and promotion, and other business activities related to preserving and promoting a site are very high. If they are pursued outside of the WHS process, such investments could very well yield the same economic and social benefits at lower cost, or with even greater benefits, if planners are freed of the constraints implicit in accepting the WHS “brand” and its concomitant restrictions. Norman cites the beneficial side-effects of the WHS process to sponsor communities and groups such as Wearmouth and Jarrow (Norman, 2011: 76), but those benefits might be obtained equally through a local government- or community-driven initiative designed to promote sites to the tourist market, without submitting to the delays and intrusions of the UNESCO approval and oversight process. In an era in which funding for heritage preservation inevitably will be tightly constrained, considerations of the return on investment in different approaches to heritage preservation and tourism/economic development cannot be ignored.

In short, there is more than an ethical argument against further UK (or EU or North American) inscriptions to the World Heritage Site list. Without a doubt, restraint by the UK and other developed nations from further inscriptions would contribute to redressing the distributional imbalances identified by UNESCO and rehearsed in Norman’s paper. But even if those imbalances did not exist, one might argue that further inscriptions simply are bad policy and may, by focusing resources away from more effective strategies, undermine both economic development and heritage preservation.

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