

**Brussels, 01.04.2025**

**Dear Commissioner Glenn Micallef,**

**Dear Directeur General Pia Ahrenkilde Hansen,**

**Dear Deputy Directeur General Normunds Popens,**

**Dear Mme Chair o.t. Committee on Culture and Education, E.P, Nela Riehl,**

**Dear Director of Culture, Creativity and Sport, DG EAC, Georg Häusler**

Europe experiences significant challenges, which are navigated during the triple transition with the mindset of minimising risks and maximising positive impact. The three pillars supporting European prosperity—competitive energy prices through Russian gas, security through an American umbrella, a production facilitator and a seemingly unlimited market in China—are diminished. In combination with the perceived migration crisis, this might be one of the reasons that fosters and creates unease, which is mirrored in narrowing cultural freedom and the development and sustainable growth of our societies. Design has always been a stronghold in shaping our future and creating meaning, thus, we remain optimistic.

**Design skills and methods are deeply embedded in the European Industrial Ecosystem—from the transportation systems you use and the clothes you wear to the medical equipment at your dentist, the financial applications we encounter as end users or entrepreneurs, the design of public services, and the space those services are experienced in. Design constitutes a fundamental pillar of innovation, functionality, aesthetics, and experience for every European citizen. Hence, design is uniquely positioned at the intersection of industry, society, and governance.** As Designers and Researchers, we contribute to developing digital services, facilitating governmental interactions, and enhancing social cohesion through social design. Moreover, the design of communication serves as a vital tool in countering misinformation, emphasising the strategic importance of design in contemporary societal challenges.

Competitiveness and sustainable growth are part of our DNA in the cultural creative industry and every other industrial field. Design is strongly linked to Europe's industrialisation, transforming societies into a global economy. We see that Design Methods are deployed in the most innovative governments of European nations (policy by design), and their effects are becoming measurable.

However, the core principles that underpin the design field, such as diversity, freedom of speech, freedom of expression, and freedom of science, are increasingly challenged, posing a threat not only to the cultural sectors but also to the integrity, efficacy, and effectiveness of design itself.

Hence, we would like to present the following positions about the proposed topics:

**Cultural Compass First Topic:** Future-proofing EU cultural policy making

**BEDA Position:** Smart Metrics, changing the decision-making frame for culture: Embed Key Behaviour Indicators

In contemporary political decision-making, quantitative metrics—particularly Key Performance Indicators (KPIs)—dominate in shaping policy priorities and evaluating outcomes. While KPIs provide valuable data for tracking measurable outputs, they often fail to capture the qualitative, systemic, and long-term impacts of cultural and design-driven interventions. This narrow focus risks undervaluing design and culture's transformative performance and contributions to Europe's industrial and economic competitiveness, social resilience, and human and planetary well-being.

We advocate for a **paradigm shift** in policy design and evaluation: the integration of **Key Behaviour Indicators (KBIs)** alongside KPIs. KBIs are essential for capturing **qualitative, human— and planet-centred impacts, such as shifts in mindsets, behaviour, practices, and cultural norms—dimensions at the core of design and artistic interventions with implications for societal well-being and economic effects.**

Embedding KBIs within policy tools such as the **Cultural Compass**, funding mechanisms, and innovation strategies would enable a more holistic impact evaluation. This approach aligns directly with flagship EU initiatives such as **Horizon Europe** and the **New European Bauhaus (NEB), where designers must play a more decisive role.** Both programmes are driven by sustainability, inclusivity, and discovery values, and both aim to generate systemic change beyond technological outputs. However, their success depends on policy frameworks that can **recognise and reward** the nuanced, behaviour-shaping contributions that design and culture make.

We urge policymakers to adopt this **dual-metric approach**, which combines KPIs and KBIs, to better reflect the complex and often intangible value generated by design and cultural practices. Only through such a recalibration can we ensure that our policy frameworks truly support innovation, inclusivity, sustainability, and growth across all sectors of society.

**Cultural Compass Second Topic:** Does the current geopolitical context of instability and unpredictability require a *rethinking* of EU cultural policy strategy?

**BEDA Position: Culture, Design, and Democracy in an Age of Uncertainty**

European cultural policy must reaffirm its commitment to the freedom of artistic and design expression and the freedom of education and research. These undeniable elements of a democratic society are essential conditions for an open, resilient Europe capable of responding to complexity. Today, ambiguity, instability, and unpredictability define the environment in which the EU Industrial Ecosystem and national governments navigate. **We need a tangible, desirable, and executable vision for the future and the societal conviction to act accordingly.** The project of **building a Europe that drives inter-generational justice succeeds in the triple transition and demographic change. It cannot be achieved without design methods, design-driven innovation, and design literacy.** Rather than retreating in times of crisis, Europe must stand firm in its cultural confidence, ensuring that cultural and creative sectors lead innovation, uphold democratic values, and shape a sustainable and inclusive future. The five happiest countries in the world are European, proving that our commitment is a strength to be built upon—not compromised.

**Design methods—rooted in iteration, human engagement, and driving critical discourse through Speculative Design—can be deployed to support democratic thinking and institutional trust.** Media education and critical thinking are essential to countering misinformation and building resilience within democratic systems that can keep growing on discovery and knowledge. A design-literate public is not only better equipped to navigate change but also more capable of participating in shaping it.

**Design is a bridge builder between research and real-world application.** As highlighted in the Draghi report, Europe does not lack innovation in theory; the challenge lies in implementation. There is a gap between potential and practice. Strengthening design's position within the EU Industrial Ecosystem—as a connector between disciplines and a tool for cross-sectoral innovation—will strongly assist in closing this gap.

By integrating design more fully into policymaking processes, we can reduce systemic risks, improve implementation outcomes, and limit the unintended negative impacts that regulations may have on the cultural and creative sectors. Cultural policy, therefore, must not use design as one of the elements in its portfolio but as a structural component in the broader architecture of democratic and economic life. **We must shift from sporadic design integration into policymaking processes towards a mainstream strategic deployment.**

**Cultural Compass Third Topic:** How can the compass further harness the power of culture for broader societal and global goals? How can the Compass ensure that culture can play a more effective role as a strategic asset in EU policies and initiatives?

**BEDA Position:** Strengthening the Role of Design in Europe's Industrial and Innovation Ecosystems: The Case for Policy Support in Design-Driven Innovation as Vector

Design is critical to value creation across all sectors—from advanced manufacturing and digital technologies to social innovation and public services. For Design to continue playing this cross-cutting role requires a functioning, prosperous, and innovation-friendly re-industrialisation environment. When regulations unintentionally create barriers, they risk excluding the majority of actors driving innovation from design practitioners —particularly SMEs, micro-enterprises (<10 employees), and freelance professionals.

As **BEDA** we would like to highlight the following challenges:

- **Regulatory Burdens:** Legislation such as the AI Act, while essential for ensuring responsible development, risks placing disproportionate compliance burdens on micro and smaller enterprises, potentially stifling innovation agility and pushing them out of competition.
- **IP and Copyright Imbalance:** In the current intellectual property regime, creators often face asymmetrical power dynamics when their work is reused or infringed. New IP frameworks must consider these imbalances and protect the rights of creators in case of infringements, especially in digital and collaborative contexts.
- **Outdated NACE Codes:** Existing NACE classification systems do not adequately reflect the realities of today's design economy. More comprehensive and nuanced coding is needed to ensure accurate representation, better funding access, and effective policy targeting.
- **The threat of misinformation and disinformation,** an information battleground, fosters the fragmentation of societies, undermines the acceptance of science, creates an overemotionalizing and alert-driven communication, and opens new arenas of despair in society, which endanger democratic values and threaten social cohesion.

**Summary:** Given those challenges, there are opportunities to understand that Design is a pillar of the EU Industrial Ecosystem: Whether freelance, agency-based, or embedded in consultancies, corporations and Governmental bodies, designers thrive when Europe's industrial ecosystems thrive - and vice versa. Design and industry are interdependent, and policies that strengthen one inevitably benefit the other. In Democracy and Design Methods, cities like Copenhagen, with its ambitious climate plan, and Frankfurt, as World Design Capital 2026 under the motto *Design for Democracy*, demonstrate how design methods can drive democratic, inclusive, and value-based transformation.

### Cultural Compass Policy Recommendations

1. **Tailor legislation** (e.g., AI Act) to reflect the capacities of SMEs and micro-enterprises within the design sector and take the cross-sectional nature of Design into account – with the benefit of cross-pollination.
2. **Reform IP and copyright frameworks** to rebalance the power structure between creators and users.
3. **Update NACE codes** to better capture the multidimensional nature of design work in today's economy.
4. **Integrate design methods into policy development** systematically, particularly in digital, green, and democratic transitions.
5. **Strengthen the design's position within the EU Industrial Ecosystem** as a cross-sectoral connector between cultural industries, technological innovation, and sustainability initiatives.
6. **Integrate universal design**, digital accessibility, and participatory co-design methodologies into EU cultural funding programs to ensure intergenerational justice and access for people with diverse abilities.
7. **Expand Creative Europe funding** to support design-driven business innovation for cultural and creative SMEs and design research.
8. **Integrate design literacy** into EU cultural education initiatives to equip citizens with creative problem-solving skills for a changing world.
9. **Support regional design hubs** in coordinating creative SMEs in innovation and internationalisation to foster Europe's competitive edge.

We are grateful for the opportunity to provide this position paper on the cultural compass. As Designers, we support and share the challenges you and your teams face in a multi-faceted and diverse cultural area. With Design Methods and Approaches driven and underpinned by research, BEDA is a natural partner in developing and co-creating a cultural compass.

Sincerely,  
on behalf of the **BEDA** Board and its members



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### About BEDA

**BEDA** is the European Design organisation of design associations and centres.

We are 50+ members in 27 European countries and, as such, represent thousands of designers—directly and indirectly.

**BEDA** speaks for the design community, and along with its members, it influences policy development and, in turn, governments.

**BEDA** champions the role of designers in a business and social context and encourages organisations and governments to embrace design methodologies to solve complex problems and to lead innovative practices.