# CREASUS

Sustainability Business Models for CCSIs

# DELIVERABLE 5.5

## CERTIFICATION VIABILITY ANALYSIS

Co-funded by
the European Union

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|---|---|---|
| **GA number** | 101131895 | |
| **Deliverable No.** | CREASUS D5.5 | |
| **Related WP** | WP 5 | |
| **Deliverable Title** | Certification Viability Analysis | |
| **Deliverable Date** | 30 Sept 2026 | |
| **Deliverable Type** | R — Document, report | |
| **Dissemination level** | Public (PU) - Open for the public, everyone | |
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| **Status** | Final | |
| **Revision** | | |

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# Table of Contents


*1. PUBLISHABLE SUMMARY ..... 4*

*2. INTRODUCTION ..... 6*

2.1 Background to CreaSus ..... 6

2.2 Purpose and scope of the Certification Viability Analysis ..... 7

2.3 Certification as a first step toward EU-level exploitation ..... 7

2.4 Methodology ..... 8

2.5 Pilot Survey Evidence ..... 8

*3. LANDSCAPE OF EXISTING AND COMPETING CERTIFICATIONS ..... 11*

3.1 Mapping of Similar/Competing Certification Schemes ..... 11

3.2 Comparative Analysis ..... 13

3.3 Gaps and Differentiation Opportunities for a CreaSus Certification ..... 15

3.4 The VSME and the Sector-Specific vs General Standard Question ..... 16

*4. STAKEHOLDER INTEREST AND RATIONALE ..... 18*

4.1 Industry Perspective: Motivations and Barriers ..... 18

4.2 General Public Perspective ..... 19

4.3 Government/Policy Perspective ..... 21

4.4 Summary of Cross-Stakeholder Interest ..... 22

4.5 EU Policy Context and the 'False Voluntariness' Risk ..... 22

*5. VALUE-ADD ASSESSMENT ..... 24*

5.1 Economic Value-Add ..... 24

5.2 Sustainability Value-Add ..... 25

5.3 Summary Value Proposition ..... 26

*6. PROMOTIONAL PROGRAMME FOR CERTIFICATION ..... 27*

6.1 Key Messages and Advantages for CCSI Entities ..... 27

6.2 Value/Benefits Communication for Other Stakeholders ..... 27

6.3 Proposed Dissemination Channels and Activities ..... 28

6.4 Draft Promotional Materials ..... 28

*7. CERTIFICATION GOVERNANCE: SUITABLE CERTIFYING BODIES ..... 29*

7.1 Criteria for Selecting a Certifying Body ..... 29

7.2 Candidate Bodies Assessed ..... 30

7.3 Recommended Certifier Model ..... 30

*8. BUSINESS MODELS FOR SUSTAINABILITY ..... 31*
8.1 Overview of Possible Funding/Revenue Models ..... 31
8.2 Cost-Benefit Considerations ..... 31
8.3 Recommended Model(s) ..... 32
*9. OVERALL CERTIFICATION VIABILITY ..... 33*
9.1 SWOT Analysis ..... 33
9.2 Viability Conclusion ..... 35
*10. ROADMAP FOR EXPLOITATION BY THE EU ..... 36*
10.1 Step-by-Step Roadmap ..... 36
10.2 Roles and Responsibilities ..... 37
10.3 EU Policy Recommendations for the 2028-2034 Multiannual Financial Framework ..... 37
*11. CONCLUSION AND RECOMMENDATIONS ..... 39*
11.1 Conclusion ..... 39
11.2 Recommendations ..... 40
*12. REFERENCES/BIBLIOGRAPHY ..... 42*

# 1. PUBLISHABLE SUMMARY

CreaSus is a Creative Europe funded project supporting Cultural and Creative Sectors and Industries (CCSIs) to embed sustainability as a competitive advantage. At the core of the project is the CreaSus Self-Assessment Tool, a free digital instrument through which CCSI organisations can evaluate and improve their performance across Environmental, Social and Governance dimensions. This report examines whether that tool, and the wider CreaSus methodology, could be formalised into a certification, and if so, what form this should take.

The analysis draws on desk research and benchmarking against existing certification schemes. Direct stakeholder consultation was not undertaken within the timeframe available for this analysis; instead, the findings are informed by feedback gathered from CreaSus Self-Assessment Tool pilot participants, with dedicated industry, public and government consultation identified as a priority next step.

Three headline conclusions emerge within this report. First, there is a genuine gap in the market: the closest precedent, Julie's Bicycle's Creative Green Certification, has been discontinued, leaving no active, EU-recognised, CCSI-specific sustainability certification.

Second, stakeholder interest appears strong, particularly from government and EU level, where emerging regulation (the CSRD, the Omnibus simplification package and the Empowering Consumers for the Green Transition Directive) is pushing businesses toward substantiated rather than self-declared sustainability claims. This picture has been sharpened by the European Commission's adoption of the Voluntary Sustainability Reporting Standard for SMEs (VSME), a sector-agnostic disclosure framework built on the same European Sustainability Reporting Standards (ESRS) as the CreaSus Self-Assessment Tool.

The VSME's basic module addresses office-based energy use far more thoroughly than the Scope 3 travel and production emissions that dominate the cultural sector's footprint, and because it is already becoming a de facto condition of EU funding and bank finance, despite its voluntary status, this report treats EU sustainability policy, and how a CreaSus certification would relate to it, as a competitiveness opportunity for CCSIs to be actively supported, rather than a compliance burden to be imposed.

Third, CreaSus is well placed to fill this gap, since it already has a live, tested assessment tool to build from, rather than needing to design criteria from scratch. Set against this, the report also identifies real risks, most notably that Creative

Green's own certification did not achieve long-term financial sustainability despite strong sector fit, and that no certifying body or governance model has yet been agreed.

Taking the evidence together, the overall conclusion is that certification is conditionally viable: viable in principle, subject to confirming genuine industry demand through direct stakeholder consultation, and to designing a business model that avoids the funding-sustainability failure seen in comparable prior schemes.

The report sets out a proposed roadmap for taking certification forward, beginning with stakeholder validation and scheme design, through certifier selection and a pilot phase, to EU-wide rollout and eventual handover to a permanent governance body beyond the life of the CreaSus project.

# 2. INTRODUCTION

## 2.1 Background to CreaSus

CreaSus is a project co-funded by the European Union, under the Creative Europe programme, designed to guide and support CCSIs to make sustainability a key part of their operations and a competitive advantage. From October 2023 to September 2026, the process will be articulated combining the delivery of outputs such as a specific system of indicators for self-assessment and a toolkit for funding schemes, as well as capacity-building activities and piloting events in Spain, Ireland, Greece, and Italy, among other actions. The project responds to the recognition that CCSIs, an industry representing over 4% of European Union GDP, are uniquely positioned to act as a fourth pillar of sustainability, alongside the environmental, social and economic pillars, given their role in shaping culture, values and public behaviour.

The CreaSus consortium is coordinated by Fundación Banco Santander (Spain) and brings together five partner organisations with complementary expertise across research, business support and cultural policy: the University of Bari (Italy), ENCATC - the European Network on Cultural Management and Policy (Belgium), Mosaic (Greece), Zabala Innovation (Spain) and WestBIC (Ireland).

At the core of CreaSus is the CreaSus Self-Assessment Tool, a free digital readiness instrument through which CCSI organisations can evaluate and improve their performance across three core dimensions: Environmental (energy use, waste prevention and carbon footprint tracking), Social (employee well-being, diversity, equity and inclusion) and Governance (transparency, compliance and ethical policies). Rather than demanding hard-to-reach absolute metrics, the tool takes a readiness approach, focusing on whether an organisation tracks and uses data for continuous improvement. The project has piloted this tool with a cohort of CCSIs across the partner countries, generating both quantitative and qualitative data on sustainability practice within the sector.

Building on this pilot work, the consortium is now examining whether the tools, indicators and methodology developed through CreaSus could be formalised into a certification. This report presents the findings of that Certification Viability Analysis.

## 2.2 Purpose and scope of the Certification Viability Analysis

The purpose of this analysis is to assess whether a formal certification, built on the CreaSus sustainability self-assessment methodology, represents a viable and valuable proposition for CCSI entities and their stakeholders across Europe.

The scope of the analysis covers six areas, as follows:

1. Identification of existing or competing certification schemes relevant to CCSIs.
2. Investigation into stakeholder interest in certification, across the triple helix of industry, general public and government.
3. Assessment of the perceived value-add of certification in both economic and sustainability terms.
4. Development of a promotional programme to communicate the benefits of certification to CCSI entities and other stakeholders.
5. Identification of bodies best positioned to act as certifiers.
6. Consideration of business models to support the long-term sustainability of the certification itself.

The analysis is deliberately exploratory rather than prescriptive at this stage. Its purpose is to establish whether certification is a credible next step, and if so, to outline what form it might take and who should carry it forward.

## 2.3 Certification as a first step toward EU-level exploitation

This Certification Viability Analysis sits within the broader exploitation strategy of the CreaSus project. Where the analysis returns a positive outcome, its findings are intended to form the basis of a roadmap for exploitation of CreaSus results by the European Union and other relevant entities beyond the life of the project.

Certification is treated here as a mechanism for exploitation rather than an end in itself. A recognised certification would give the CreaSus methodology a durable form that can outlast the project's funding period, be adopted independently by other bodies, and be scaled across CCSIs and geographies not directly involved in the original pilot. In this sense, the viability analysis is a first practical test of whether

the project's outputs can transition from a funded research and pilot activity into a self-sustaining instrument with real uptake.

The findings of this report will directly inform the consortium's recommendations to the European Union on how best to support and take forward this exploitation pathway.

## 2.4 Methodology

The Certification Viability Analysis has been conducted through the following approach:

- Desk research and benchmarking: mapping existing and competing certification schemes relevant to CCSIs, both within the EU and internationally, to establish the landscape against which a CreaSus certification would be positioned.
- Partner consultation: structured input from all CreaSus consortium partners, drawing on their respective national and sectoral expertise, to ground the analysis in practical and regional realities across the participating countries.
- CCSI engagement: direct engagement with CCSI companies through the practical pilot, capturing first-hand views on the value and demand for certification from businesses actively operating in the sector.
- Comparative and value-add analysis: synthesis of the above evidence to assess perceived economic and sustainability value, and to inform recommendations on certifying bodies and sustainable business models.

This mixed-methods approach is intended to ensure that the resulting recommendations are grounded in both the existing evidence base and the direct perspectives of those who would ultimately use, support or be affected by a CreaSus certification.

## 2.5 Pilot Survey Evidence

Thirty-eight organisations from the CreaSus pilot cohort – spanning single-person practices, freelance collectives and established cultural institutions – completed a structured feedback survey on the Self-Assessment Tool, providing the first systematic evidence of how the sector actually experiences the tool, and how it might respond to a future certification built on it.

The results are encouraging on demand, and instructive on design: strong majorities would use the tool again, and would use it for certification specifically,

but the free-text responses point to real friction for the sector's smallest organisations – friction that goes to the heart of the general-versus-sector-specific tool question raised in Sections 3.3 and 3.4.

| Measure | Result |
|---|---|
| **Willing to use the tool for periodic self-assessment** | 34 of 38 (89%) Yes |
| **Willing to use the tool as a certification tool** | 32 of 38 (84%) Yes |
| **Found questionnaire items easy/very easy to understand** | 30 of 38 (79%) |
| **Found platform easy/very easy to use** | 35 of 38 (92%) |
| **Overall satisfaction rated high/very high** | 32 of 38 (84%) |

Read together, these results show broad appetite for the tool in both its current self-assessment form and as the basis of a future certification, with particularly strong satisfaction on the usability of the platform itself (92%).

The comparatively lower score for ease of understanding questionnaire items (79%) is the clearest quantitative signal that item wording, rather than appetite, is the main barrier to a smoother experience – a theme borne out in the free-text responses below.

Recurring qualitative themes across free-text responses (illustrative, not exhaustive):

- Multiple small/micro-organisations said some items assumed a scale of staffing, structure or budget they do not have, and asked for a 'not relevant' option and/or a simplified pathway for micro-organisations.
- Several organisations are already certified elsewhere (EMAS, ISO 14001, SR10, Biosphere), raising concern about being asked to use 'too many tools' which is directly relevant to the VSME/sector-specific tool question raised in Sections 3.3 and 3.4.
- Several organisations explicitly requested training, noting that "a big obstacle… is funding" and that "most people have a misunderstanding of what being sustainable is"
- A creative company flagged that quantifying data would put "an admin strain" on freelance facilitators, who would not welcome it.

Three implications follow directly from this evidence:

- First, the repeated concern about being asked to use "too many tools" is direct pilot-level confirmation of the general-versus-sector-specific tool question raised in relation to the VSME (Sections 3.3, 3.4): any CreaSus certification needs to actively reduce, not add to, the reporting burden facing organisations already certified elsewhere.
- Second, the explicit requests for training and a simplified pathway for micro-organisations reinforce the case, set out in the Recommendations (Section 11.2), for conditioning any move to certification on proportionate accompanying support, rather than treating adoption as self-explanatory.
- Third, the concern raised about the administrative strain of quantifying data on freelance facilitators is a reminder that the sector's project-based, freelance-heavy workforce (Section 3.3) is not a peripheral design consideration but a central one.

# 3. LANDSCAPE OF EXISTING AND COMPETING CERTIFICATIONS

## 3.1 Mapping of Similar/Competing Certification Schemes

A range of certification and labelling schemes already touch on sustainability within, or adjacent to, the cultural and creative sectors. These fall broadly into three categories: sector-specific schemes designed for CCSIs, cross-sectoral sustainability certifications applied within CCSIs, and adjacent-sector schemes with transferable relevance (e.g. tourism).

**Sector-specific schemes**

- **Creative Green Certification (Julie's Bicycle, UK)**: Described as the only environmental certification scheme designed specifically for the creative and cultural industries, it supported organisations including major museums, theatres and venues in embedding environmental best practice across events, venues and offices. Notably, the certification programme has since been discontinued, though its guiding principles of Commitment, Understanding and Improvement continue to underpin Julie's Bicycle's ongoing work. This is a directly relevant precedent for CreaSus, both as evidence of stakeholder demand and as a cautionary case on long-term sustainability of a sector-specific certification. Commercial fees for achieving certification were tiered to organisational size, even though the scheme itself has since been discontinued. (https://juliesbicycle.org/)

- **SHIFT Eco-Certification for Networks**: A bespoke environmental sustainability framework and certification scheme designed specifically for international cultural network organisations. Initiated through the SHIFT project and developed with Creative Carbon Scotland and the Green Leisure Group, it targets major emission sources like travel and office energy. An Erasmus+-funded eco-certification scheme aimed at cultural networks; it is identified as a relevant comparator in EU-level assessments of green initiatives in the cultural sector. Participation carries an annual contribution (in the region of €2,000–2,500, scaled to network size and capacity to pay) with a minimum two-year commitment. (https://shift-culture.eu/shift-eco-certification/ )

**Cross-sectoral certifications applied within CCSIs**

- **B Corp Certification (B Lab)**: A global, independent certification verifying social and environmental performance, transparency and accountability,

open to businesses of all sizes and sectors, including creative agencies. Uptake in the EU has grown significantly, with over 1,800 certified B Corps by 2025 and growth of more than 40% year-on-year since 2020, though concentration remains highest in consumer-facing sectors such as fashion and food rather than CCSIs specifically. From 2026, EU regulation including the Empowering Consumers for the Green Transition Directive is pushing businesses toward third-party verified sustainability claims rather than self-declared ones, which strengthens the case for credible certification generally. Certification carries an ongoing annual fee tiered to company revenue, from roughly €2,500/year for companies under €5 million turnover, rising into the tens of thousands for larger organisations, plus a one-off verification fee, both payable annually to maintain certified status. (https://bcorporation.eu/what-is-a-b-corp/what-does-b-corp-certification-mean/ )

- **EU Voluntary Sustainability Reporting Standard for SMEs (VSME)**: the European Commission's own sustainability reporting framework for non-listed SMEs, developed by EFRAG and based on the European Sustainability Reporting Standards (ESRS) - the same standards underpinning the CreaSus Self-Assessment Tool. Adopted as a Commission recommendation in July 2025 and reinforced through 2026 alongside the Omnibus simplification package, it is not a certification or label as such, but a standardised disclosure format increasingly used as a reference point by banks, investors and funders. Unlike CreaSus, it is explicitly sector-agnostic, and its basic module gives only marginal attention to Scope 3 emissions, the category that includes most cultural-sector travel and production-related impacts (Section 3.4). The standard itself is free to use, since it is a published disclosure framework rather than a certified scheme, but organisations that externalise preparation of their disclosure (e.g. to a consultant) incur that cost separately. (https://finance.ec.europa.eu/publications/commission-presents-voluntary-sustainability-reporting-standard-ease-burden-smes_en )

- **EMAS and ISO 14001**: general environmental management standards occasionally adopted by larger cultural institutions, though rarely by SMEs or micro-enterprises typical of CCSIs. Both carry costs beyond the standard document itself: ISO 14001 typically requires a consultancy and certification fee (commonly several thousand euros for a small organisation) plus annual surveillance audits over a three-year cycle; EMAS registration fees are set nationally and are usually tiered by organisation size (e.g. Portugal charges roughly €600 for micro-enterprises rising to over €2,400 for larger organisations). (https://www.iso.org/standard/14001)

**Adjacent-sector schemes with transferable relevance**

- **EU Ecolabel, Green Key, Nordic Swan Ecolabel**: established sustainable tourism certifications assessing energy, waste and water performance, relevant given the overlap between cultural tourism and CCSIs, but not designed for creative production or content-based activities. Costs are tiered by organisation size: a one-off application fee of roughly €200–350 for micro-enterprises up to €2,000 for larger companies, plus an annual fee based on turnover (capped, with a 25% reduction for SMEs and micro-enterprises). (https://www.skaleurope.org/news/european-certifications-for-sustainable-tourism/ )

- **Tourism Sustainability Certification Alliance (TSCA)** members: represent over 30 years of collective experience delivering sustainability certification and have positioned certification as a governance and compliance mechanism rather than a branding exercise, a framing directly relevant to how a CreaSus certification might be positioned to policymakers and industry alike. ( https://tourismsustainability.org/ )

## 3.2 Comparative Analysis

| Scheme | Scope | Criteria basis | Recognition | Uptake / status | Associated Costs |
|---|---|---|---|---|---|
| **Creative Green (Julie's Bicycle)** | CCSI-specific (arts, culture, events) | Environmental reporting, self-assessment + independent review | Strong within UK arts sector | Discontinued; high historical uptake, sustainability model did not persist | Tiered to organisational size/turnover |
| **SHIFT Eco-Certification** | Cultural networks | Eco-criteria for network-level operations | Niche, Erasmus+-linked | Limited scale | ~€2,000–2,500/year, scaled to network size; 2-year minimum commitment |
| **B Corp** | Cross-sectoral, all business sizes | Full B Impact Assessment (governance, workers, community, environment, customers) | High and growing EU-wide | >1,800 EU certifications; growing 40%/year | Tiered annual fee from ~€2,500/year (under €5M turnover), rising steeply for larger organisations, |

| | | | | | |
|---|---|---|---|---|---|
| | | | | | plus a verification fee |
| **EU Ecolabel / Green Key / Nordic Swan** | Tourism and hospitality | Energy, waste, water, resource criteria | Strong, consumer-recognised | Long-established, widespread in tourism | €200–350 application fee (micro) up to €2,000 (larger firms), plus annual fee based on turnover (capped; 25% SME/micro reduction) |
| **EMAS / ISO 14001** | Cross-sectoral, generic environmental management | Formal management system standard | High in industry, low in CCSIs | Limited SME/micro-enterprise uptake | ISO 14001: typically several thousand euros (consultancy + certification) plus annual surveillance audits. EMAS registration: nationally set, tiered by size (e.g. ~€600–€2,400+) |
| **VSME (EU Voluntary Sustainability Reporting Standard for SMEs)** | Cross-sectoral, all non-listed SMEs (not CCSI-specific) | ESRS-based simplified disclosure standard (Basic and Comprehensive modules) | Official EU Commission recommendation; reference point for banks/funders EU-wide | Recently adopted (2025-26); rapidly becoming a de facto reporting reference, though not yet mandatory | Free to use (published standard, no certifying body); costs only arise if externalised to a consultant |

Four patterns emerge from this comparison that are directly relevant to CreaSus:

1. **No current EU-recognised, CCSI-specific certification exists.** The closest precedent has ceased operating, leaving a genuine gap rather than a crowded field.
2. **General cross-sectoral schemes (B Corp, EMAS) are gaining regulatory relevance but are not tailored to CCSI realities** - namely small organisation size, project-based or freelance-heavy workforces, and non-standard "production" activities (creative works, events, performances) that don't map neatly onto conventional environmental management criteria.

3. **Adjacent sectors like tourism demonstrate that consumer-recognised labels can achieve real market traction**, but their criteria are not designed for creative content or cultural production.
4. **A new EU-level, general-purpose standard (the VSME) now sits alongside these schemes**, raising the question of whether CCSIs need a sector-specific tool at all, and if so, how it should relate to a general standard that most non-listed SMEs will increasingly encounter by default.

## 3.3 Gaps and Differentiation Opportunities for a CreaSus Certification

Based on the above, a CreaSus certification could differentiate itself in the following ways:

- **Fill the vacated CCSI-specific niche.** With Creative Green discontinued, there is currently no active, sector-specific sustainability certification for CCSIs at EU level. CreaSus is well placed to fill this gap, provided lessons are drawn from why the previous scheme did not achieve long-term sustainability.
- **Address the SME/micro-enterprise reality of CCSIs.** Unlike EMAS or ISO standards, a CreaSus certification could be scaled and simplified for the small organisations, freelancers and project-based structures typical of the sector, rather than requiring formal management systems.
- **Build on an EU-funded, multi-country evidence base.** Unlike UK-centric Creative Green or globally generic B Corp, CreaSus certification would be grounded in cross-European pilot data across the partner countries, giving it a distinct claim to EU relevance and comparability.
- **Position certification as regulatory readiness, not just branding.** Emerging EU rules on green claims (e.g. the Empowering Consumers for the Green Transition Directive) mean CCSI entities will increasingly need to substantiate sustainability claims. A CreaSus certification could be positioned as helping CCSIs meet this compliance need, strengthening the case for government and industry buy-in (Section 4).
- **Learn from tourism sector credibility models.** The consumer recognition achieved by labels like the EU Ecolabel suggests that public-facing credibility is achievable for a sector-specific label, if a similarly clear and consistently applied set of criteria is developed.
- **Build from an existing, ready-made assessment foundation.** Unlike competing schemes that would need to design assessment criteria from scratch, CreaSus already has a live, EU-tested Self-Assessment Tool covering

Environmental, Social and Governance dimensions with a readiness-based (rather than rigid metrics-based) methodology. This significantly reduces the design risk and lead time for moving from self-assessment to certification.

- **Address what a general EU standard does not: sector-specific Scope 3 hotspots.** The VSME's basic module addresses Scope 1 and 2 (largely office and premises) energy use far more thoroughly than Scope 3, which is where most of the environmental footprint of live events, festivals, touring and production sits (e.g. audience, artist and equipment travel). A CreaSus certification's clearest point of differentiation from a general EU standard is in capturing these sector-specific Scope 3 hotspots, which the VSME structurally overlooks (Section 3.4).
- **Resolve, rather than duplicate, the general-versus-sector-specific tool question.** Requiring CCSI entities to complete both a general standard (the VSME) and a sector-specific one (CreaSus) risks adding administrative burden for organisations that are, by sector norm, small and resource-constrained. The business model and roadmap for a CreaSus certification (Sections 8, 10) should therefore explicitly address how it complements, cross-references or streamlines against VSME reporting, for example by mapping shared ESRS-based data points so organisations are not asked to gather the same information twice.

## 3.4 The VSME and the Sector-Specific vs General Standard Question

In July 2026, the European Commission formally adopted the Voluntary Sustainability Reporting Standard for SMEs (VSME) as an official voluntary reporting framework, intended to simplify ESG disclosure for non-listed SMEs and linked to the Corporate Sustainability Reporting Directive (CSRD) and the Omnibus simplification package. Like the CreaSus Self-Assessment Tool, the VSME is based on the European Sustainability Reporting Standards (ESRS); unlike CreaSus, it is generic across all sectors rather than designed for CCSIs.

This raises a genuine design question for CreaSus certification rather than a settled answer. The VSME's basic module excludes or only marginally addresses Scope 3 (value-chain) emissions, focusing mainly on direct site/office energy use (Scope 1 and 2). For CCSIs, this creates a real gap: a festival could register as broadly 'compliant' under a VSME-style disclosure while the emissions from transporting large audiences to and from the event, typically its largest environmental impact, go largely unmeasured. A sector-specific tool such as CreaSus's is structurally

better placed to capture this, since it can be designed around CCSI-typical impacts (audience travel, touring, temporary events) rather than office-based operations.

At the same time, asking small CCSI organisations to complete two separate assessments (VSME and a sector-specific tool) risks a real and disproportionate administrative burden, a concern echoed directly in the pilot survey. The report should therefore not present certification as a simple 'yes' but should explicitly frame the open question: whether CCSIs should use a general standard (VSME), a sector-specific tool (CreaSus), or both, and if both, how the burden of dual reporting is minimised (for example, through data mapping so a single data entry populates both frameworks).

This reframes the viability question (Section 9) usefully: CreaSus certification is most defensible not as a competitor to the VSME, but as a sector-specific complement that captures what the VSME structurally cannot, provided this is designed to minimise, not duplicate, administrative effort.

# 4. STAKEHOLDER INTEREST AND RATIONALE

This section examines why different stakeholder groups may be interested in a CreaSus certification. This analysis draws on an adapted triple helix model (industry, general public and government) rather than a quadruple helix. Civil society interest is captured here through the general public dimension rather than as a separate governance strand, reflecting the fact that CCSI entities are the direct users and applicants for certification, while public and civil society engagement operates at the level of trust, recognition and demand for the resulting mark rather than co-design of certification criteria. Should future phases involve civil society organisations directly in scheme governance or criteria-setting, a quadruple helix framing would be worth revisiting.

## 4.1 Industry Perspective: Motivations and Barriers

A feedback survey of the 38 organisations that piloted the Self-Assessment Tool found strong willingness to use it for self-assessment (89%) and for certification specifically (84%), which meaningfully addresses this open question.

However, this is pilot-cohort feedback rather than sector-wide validation, and further consultation with non-pilot CCSIs, particularly micro-organisations and freelancers, is still recommended before finalising certification criteria.

CCSI entities are the primary intended users of a CreaSus certification. Their **motivations for pursuing certification** are likely to include:

- Competitive differentiation in a market where sustainability credentials are increasingly valued by funders, partners and audiences.
- Improved access to funding and investment, as funders and public bodies place growing weight on demonstrable sustainability performance.
- Preparation for emerging EU regulation, including the Corporate Sustainability Reporting Directive (CSRD) and the Empowering Consumers for the Green Transition (ECGT) Directive, which will require substantiated rather than self-declared sustainability claims.
- Operational efficiencies identified through the self-assessment process (e.g. energy, resource use).
- Access to a peer network of certified organisations and associated learning opportunities.

**Likely barriers include:**

- Cost and time required to achieve and maintain certification, particularly for micro-enterprises and freelancers typical of the sector. Pilot survey respondents described a real risk that assessment criteria 'penalise' small organisations that cannot resource a dedicated sustainability role or formal protocols.
- Limited awareness of certification as a concept within CCSIs.
- Scepticism about return on investment in the absence of a clearly recognised, EU-wide label.
- Sector fragmentation, meaning a single certification may not suit the full diversity of CCSI sub-sectors.
- Overlap and duplication with existing certifications and, increasingly, the VSME: many pilot organisations are already certified under EMAS, ISO 14001, SR10 or Biosphere and questioned the value of adopting further tools.
- Limited in-house sustainability expertise: several respondents noted that small/micro CCSI organisations often lack dedicated admin, HR or sustainability knowhow, and explicitly requested training and guidance rather than only an assessment tool.
- A risk of "false voluntariness": even where a standard or certification is formally optional, CCSI entities that do not complete it may score lower in competitive EU funding calls (e.g. Creative Europe/AgoraEU, Horizon Europe) or struggle to meet bank due-diligence requirements linked to sustainability disclosure, compared with better-resourced organisations able to absorb the cost of certifying. This risk applies as much to EU reporting frameworks such as the VSME as to a CreaSus certification and reinforces the case for proportionate support rather than a purely compliance-driven approach.

  This dynamic cuts both ways, however. For better-resourced CCSI entities, the same perceived quasi-mandatory status is likely to function as a genuine adoption driver, creating competitive urgency to certify ahead of funder and lender expectations (see motivations above). The risk set out here applies specifically to entities without that capacity, for whom the same pressure becomes an unfunded, de facto obligation rather than a competitive opportunity, reinforcing, rather than contradicting, the case for proportionate support made throughout this section and in Section 4.5.

## 4.2 General Public Perspective

Public interest in certification is shaped by general awareness of sustainability labelling and trust in the credibility of specific schemes. Dedicated CCSI-specific public research was not feasible within the timeframe of this analysis; the

assessment below instead draws on the most recent EU-wide evidence on public awareness of, and trust in, sustainability labelling generally, which is directly relevant even though it is not sector-specific.

- Public awareness of sustainability labels is real but partial and would be a modest starting point rather than a strong tailwind. In 2023 only 38% of EU citizens recognised the EU Ecolabel logo, despite an 11% increase since 2017 and sustained Commission promotion; a new CCSI-specific label would likely start from a comparable, low base of recognition. Awareness is, however, matched by relevance: 73% of EU consumers stated a product's environmental impact is an important factor in their purchasing decisions (European Commission, Flash Eurobarometer 535, 2023).
- Trust in environmental claims and labels generally, not only in certifications, is fragile and already under strain, which raises the bar for how a CreaSus mark would need to be positioned. The European Commission's own review of environmental claims on the EU market found 53% to be vague, misleading or unfounded, 40% unsubstantiated, and half of all green labels to offer weak or non-existent verification; it also identified some 230 sustainability labels (and 100 green energy labels) already active in the EU, with widely differing levels of transparency (European Commission, Green Claims). A new, self-certified or loosely governed CCSI label would be entering an already crowded and mistrusted field; an independently verified one has a genuine opening, but only if it is clearly differentiated from the weaker end of that field.
- Public appetite for factoring sustainability into everyday consumption choices cannot be assumed to be rising - it is currently falling. EU-wide, the share of consumers who say an environmental consideration influenced a recent purchase fell 13% between 2022 and 2024, to 43%, with cost pressures and, notably, mistrust in the reliability of environmental claims cited as the main drivers; only 50% of consumers now agree that most environmental claims are reliable, down from 56% in 2022 (European Commission, 2025 Consumer Conditions Scoreboard). For CreaSus, this places the weight of the argument on the credibility of the certification rather than on assumed public enthusiasm for sustainability generally.
- A clear, simple visual mark - similar to the EU Ecolabel or B Corp logo - is likely to aid public recognition more than a technical or narrative certification, though the EU Ecolabel's own experience is a useful check on expectations: even with an EU-wide flower mark, sustained promotion and near 90,000 certified products behind it, recognition still sits at only 38%. A new, far less resourced CCSI label should expect to need sustained

promotion over several years to build comparable recognition, reinforcing the case for the promotional programme set out in Section 6.

## 4.3 Government/Policy Perspective

Government and EU policy interest in a CreaSus certification is likely to be strong, given current policy direction:

- Creative Europe has committed to dedicating a share of its budget to climate action and has commissioned prior studies on greening the programme, indicating institutional appetite for sustainability instruments within the cultural sector[1].
- National precedent exists for tying public funding to environmental reporting; for example, Arts Council England has previously required environmental reporting (via Julie's Bicycle tools) as a funding condition.
- EU regulation on green claims (CSRD, ECGT Directive) creates a policy need for credible, sector-appropriate verification mechanisms that a CreaSus certification could help meet.
- A certification could serve as a monitoring and evaluation tool for policymakers, providing sector-level sustainability data not currently available at EU scale.
- The EU's July 2026 adoption of the VSME signals a clear direction of travel toward standardised ESG disclosure for SMEs, reinforcing institutional appetite for a CCSI-specific equivalent or complement (Section 3.4).
- In practice, the VSME's voluntary status is at risk of becoming a "false voluntariness" for the sector: organisations that do not complete it, or an equivalent tool, may be scored less favourably in competitive EU funding calls (for example under Creative Europe/AgoraEU or Horizon Europe) relative to better-resourced applicants able to certify, and banks operating under EU prudential and sustainable-finance rules are increasingly likely to request this information as a condition of lending. The practical effect is an indirect obligation that penalises the least-resourced organisations, which are disproportionately common in the cultural and creative sector, even though no legal reporting duty formally applies to them.
- The ongoing negotiation of the EU's 2028-2034 Multiannual Financial Framework (MFF) is a relevant and time-limited window in which to influence how this is handled. Proposals that shift management of relevant funding

[1] European Commission, *Quality Assessment of Green Aspects in Creative Europe Projects* (2024), which confirms Creative Europe actions are expected to contribute to the EU-wide target of 30% of budget expenditure supporting climate objectives.

towards Member States, rather than direct management from Brussels, introduce a risk of political bias: cultural funding administered nationally is more exposed to shifts in domestic political alignment and local cultural rivalries than programmes managed directly and independently by the European Commission. Future EU and national programmes and calls should adopt a competitiveness-based approach to supporting the sector's adaptation to sustainability standards and tools, rather than a purely punitive one, and should explicitly allow between 5% and 10% of each year's project budget (i.e. per annum, rather than a one-off share of total project funding) to be allocated to hiring external eco-consultants or environmental mediators, or to purchasing sustainable materials, so that the cost of meeting these standards is funded rather than assumed (Section 11.2).

## 4.4 Summary of Cross-Stakeholder Interest

The following summarises anticipated interest levels pending validation through direct consultation:

| Stakeholder | Anticipated interest | Primary driver | Primary barrier/risk |
|---|---|---|---|
| Industry (CCSI entities) | Medium-High | Funding access, regulatory readiness, differentiation | Cost, capacity, awareness |
| General public | Medium | Ethical consumption, trust in credible labels | Label recognition, greenwashing scepticism |
| Government/EU | High | Policy delivery, regulatory alignment, data/monitoring | Governance and long-term funding of scheme; MFF 2028-2034 political risk and VSME "false voluntariness" |

## 4.5 EU Policy Context and the 'False Voluntariness' Risk

Although the VSME is described by the European Commission as voluntary, several mechanisms mean that CCSI organisations may experience it as a de facto requirement:

- Funding calls: organisations unable to complete VSME-aligned disclosure risk scoring less favourably in EU funding calls such as AgoraEU or Horizon Europe, relative to larger or better-resourced applicants that can produce the data.
- Access to finance: banks, operating under EU banking regulation, are likely to require VSME-aligned or equivalent sustainability data as part of loan due diligence, again disadvantaging organisations without the resources to produce it.

As set out in Section 4.1, this dynamic is not uniformly negative: for better-resourced CCSI entities it functions as a competitive driver toward early certification. The policy implication below concerns specifically the organisations for whom it does not, the smaller, less-resourced entities that make up most of the sector.

This matters directly for the certification viability question, since it means a poorly resourced or poorly supported certification scheme would not be neutral: it would risk widening the gap between well-resourced, established CCSI operators and the smaller, more precarious organisations that make up most of the sector.

Any recommendation to proceed with certification should therefore be explicitly conditioned on adequate support being available, not treated as a standalone assessment mechanism.

# 5. VALUE-ADD ASSESSMENT

This section assesses the perceived value-add of a CreaSus certification across its three sustainability dimensions, economic, environmental and social, for CCSI entities and other stakeholders. Economic value-add is addressed first and in most detail, reflecting the strength of the pilot survey evidence available on this dimension, but it sits alongside, not outside, the environmental and social dimensions covered in Section 5.2.

## 5.1 Economic Value-Add

This is borne out directly in the CreaSus pilot: asked how much value the Self-Assessment Tool added to their organisation, 27 of 38 pilot participants (71%) rated it 'valuable' or 'very valuable', against an average score of 3.9 out of 5 – a clear, if not universal, signal that the tool, and by extension a certification built on it, is seen to add real value rather than administrative overhead.

- Market differentiation: certification provides a credible, verifiable signal of sustainability performance that CCSI entities can use in funding applications, tenders and partnership discussions. Pilot participants linked this directly to credibility: one organisation said certification 'would enhance our credibility with stakeholders', and another organisation said it would 'offer credibility to our customers and partners.'
- Funding and investment access: increasingly, funders (public and private) are weighting sustainability credentials in decision-making; certification can streamline this evidencing process. This was echoed directly in the pilot: one organisation said the tool's data is 'helpful… when justifying to funders or applying for funding', and another said a certificate would help in 'promoting our organisation as an environment friendly organisation and by getting some funds for our organisation.'
- Cost efficiencies: the underlying self-assessment process typically surfaces resource and energy efficiencies with direct cost benefits. Pilot feedback suggests this value is accessible even to the most resource-constrained organisations: one organisation with 'almost no resource', described the underlying tool as 'a free tool which helps you move on through sustainability', rather than an added cost.
- Risk reduction: certification supports compliance readiness for incoming EU green-claims regulation, reducing legal and reputational risk.
- New partnership and market opportunities: certified status may open access to sustainability-focused networks, procurement lists and cross-border

collaboration. A small Irish company, put this in similar terms: 'a structured and transparent certification process can help us communicate our sustainability efforts more clearly to investors, customers, and partners.'

- Competitiveness positioning as disclosure becomes a funding filter: as VSME-aligned disclosure becomes a practical (if not formal) requirement for EU funding calls and bank lending (Section 4.3), a CCSI-appropriate certification can help organisations meet this emerging expectation in a way that is proportionate to their size and sector, turning a compliance risk into a competitive advantage rather than an added burden. One pilot participant anticipated exactly this shift, predicting that certification 'is going to become more and more relevant, maybe even mandatory, as time goes on' – direct pilot-level confirmation of the funding-filter dynamic set out in Section 4.3.

Notably, this overall value rating (3.9/5) sits higher than the average rating for item relevance (3.6/5, with 53% finding items relevant or very relevant) suggesting that even where individual questionnaire items feel imperfectly suited to an organisation's size or structure, participants still see net value in the exercise as a whole, provided those item-level concerns are addressed in any move to certification.

## 5.2 Sustainability Value-Add

Having set out the economic dimension above, this section turns to the environmental and social dimensions of value-add, completing the picture across all three pillars of sustainability.

- Environmental: reduced energy consumption, waste and resource use across CCSI operations and productions.
- Social: improved working conditions and stakeholder engagement practices, particularly relevant given the project-based and freelance-heavy CCSI workforce. This was reflected directly in pilot feedback: One organisation noted that quantifying data would put 'an admin strain' on the freelance facilitators it works with, who 'would not be pleased with it' – a reminder that social sustainability indicators need to fit freelance and project-based working patterns, not assume conventional employment structures (Section 3.3).
- Cultural sustainability: positions culture explicitly as a contributor to sustainability, reinforcing the sector's broader societal value. A youth organisation welcomed this framing directly, describing the tool as offering 'a viewpoint from the Sustainable Development Goals angle, a perspective which is important for us as a public organisation.'
- Contribution to EU climate targets: aggregated certification data could contribute to Creative Europe's own climate-related monitoring commitments.

## 5.3 Summary Value Proposition

| Stakeholder | Economic value | Sustainability value |
|---|---|---|
| CCSIs | Funding access, efficiency savings, compliance readiness | Verified environmental/social performance, credibility |
| General public | Informed consumption choices | Confidence in genuine sustainability claims |
| Government/EU | Sector-level data for policy design; reduced regulatory enforcement burden | Progress evidence toward climate and cultural policy goals |

# 6. PROMOTIONAL PROGRAMME FOR CERTIFICATION

This section sets out a draft promotional programme to communicate the advantages of certification, tailored to CCSI entities and to other stakeholder groups.

## 6.1 Key Messages and Advantages for CCSI Entities

- **Get ahead of EU regulation**: certification helps you substantiate sustainability claims before it becomes a legal requirement.
- **Unlock funding**: certified status strengthens funding and investment applications.
- **Built for CCSIs**: criteria reflect the real operating realities of small, project-based cultural organisations.
- **Join a European network**: certification connects organisations with peers across the CreaSus partner countries and beyond.
- **Stay competitive, not just compliant**: as sustainability disclosure becomes a practical condition for funding and finance, certification should be framed as a competitiveness tool that is right-sized for the sector, not a punitive administrative requirement.

## 6.2 Value/Benefits Communication for Other Stakeholders

- General public: messaging framed around trust, transparency and the ability to make informed cultural choices.
- Government/policymakers: messaging framed around measurable policy delivery, sector-level data and alignment with EU green transition goals.
- Industry bodies/networks: messaging framed around sector leadership and collective credibility.

## 6.3 Proposed Dissemination Channels and Activities

- CreaSus and partner organisation channels (Fundación Banco Santander, Zabala, Mosaic, University of Bari, WestBIC, ENCATC), social media such as LinkedIn, newsletters, websites.
- Creative Europe Desk network across member states.
- Sector-specific events and conferences (cultural policy, CCSI trade events).
- Case studies and testimonials from CreaSus pilot cohort organisations.
- Webinars targeted at CCSI entities considering certification.
- EU policy channels (e.g. briefings to Interreg Europe policy learning platform, Culture Action Europe).

## 6.4 Draft Promotional Materials

| Material/activity | Purpose |
|---|---|
| One-page certification overview (PDF/web) | Core explainer for CCSI entities |
| Pilot cohort case study video/testimonials | Build credibility through peer evidence |
| Launch webinar | Direct engagement with prospective applicants |
| LinkedIn/social content series | Ongoing awareness building |
| Policy briefing note | Government/EU stakeholder engagement |
| Certification mark and style guide | Enable recognisable public-facing labelling |

# 7. CERTIFICATION GOVERNANCE: SUITABLE CERTIFYING BODIES

The certification assessment criteria are not being designed from a blank page: they would build directly on the existing CreaSus Self-Assessment Tool, using its three established dimensions (Environmental, Social and Governance) and its readiness-based methodology as the foundation for certifiable standards. The governance questions addressed below therefore concern who administers and verifies against this existing framework, rather than who designs a new one.

## 7.1 Criteria for Selecting a Certifying Body

- Credibility and independence: perceived neutrality is essential to public and industry trust.
- Sector expertise: understanding of CCSI operating realities, not generic environmental management expertise alone.
- EU-wide reach and recognition: capacity to operate and be recognised across member states, not just nationally.
- Capacity to scale: ability to assess and re-certify a growing number of applicants over time.
- Financial sustainability: a viable long-term funding model independent of project funding.
- Accreditation potential: ability to align with recognised standards (e.g. ISO 17021-1 third-party verification) to strengthen credibility.
- Capacity to provide accompaniment, not only assessment: the certifying body (or a linked support structure) should be able to offer training, guidance and hands-on support to resource-constrained applicants, particularly micro-organisations and freelancers, rather than certification being a pass/fail assessment alone. This criterion carries particular weight for CreaSus specifically: the pilot survey confirmed that small and micro-organisations make up a substantial share of the CCSI base (Section 2.5, 4.1), so a certifying body's capacity to accompany rather than simply assess applicants is not a nice-to-have but a precondition for the scheme reaching the sector it is designed to serve.

## 7.2 Candidate Bodies Assessed

- A CreaSus consortium partner acting as interim or founding certifier.
- An existing accreditation or standards body partnering to administer a CCSI-specific scheme.
- National cultural bodies (e.g. Arts Councils) adopting certification as a funding-linked requirement, as previously done with Julie's Bicycle tools in the UK.
- A newly established, independent European certifying body or consortium, governed jointly by cultural and sustainability sector representatives.

## 7.3 Recommended Certifier Model

A hybrid, consortium-based model is likely to offer the best balance of credibility, sector expertise and neutrality: an independently governed body (potentially incubated within or spun out from the CreaSus consortium) responsible for standard-setting and assessment**,** drawing on a dedicated pool of experts and partner entities whose time is allocated to supporting applicants rather than a single fixed team, with an advisory board drawing on industry, government and academic representation to safeguard independence and cross-border recognition. This mirrors approaches seen in comparable schemes where credibility depended on visible independence from any single commercial or project interest.

# 8. BUSINESS MODELS FOR SUSTAINABILITY

## 8.1 Overview of Possible Funding/Revenue Models

- Fee-based: certification and renewal fees, ideally tiered by organisation size/turnover to remain accessible to micro-enterprises.
- Public/EU funding: continued or transitional grant support (e.g. Creative Europe, national cultural funding) particularly during scale-up.
- Hybrid model: baseline public subsidy combined with tiered fees and optional paid support services.
- Membership model: annual membership fee covering certification plus access to training, tools and network benefits.
- Value-added services: supplementary revenue from training, consultancy or advisory services to organisations preparing for certification.
- Ring-fenced support funding: in line with the policy recommendation proposed for the 2028-2034 Multiannual Financial Framework, European and national subsidies to CCSI entities should explicitly allow 5-10% of annual project budgets to be allocated to hiring external eco-consultants or environmental mediators, or to purchasing sustainable materials. Where available, this funding stream could also underwrite the accompaniment and training support attached to certification, reducing the net cost burden on applicant organisations.

## 8.2 Cost-Benefit Considerations

The discontinuation of Julie's Bicycle's Creative Green Certification is an important cautionary precedent: even a well-established, sector-specific scheme did not sustain itself as a standalone certification model over the long term. This suggests that reliance on a single revenue stream, particularly grant funding alone, carries significant sustainability risk.

A CreaSus certification business model should be diversified from the outset and should build in a realistic assessment of the administrative cost of assessment and re-certification against likely fee income, particularly given the small scale of many CCSI entities.

Given the precariousness and small scale of most CCSI organisations, evidenced directly in the pilot survey feedback, the business model for certification should not rely solely on fee income from applicants. A funding model that pairs a modest,

tiered fee with ring-fenced external support funding is more likely to avoid excluding exactly the organisations the certification is intended to support.

## 8.3 Recommended Model(s)

A diversified, tiered model is recommended:

- Tiered certification fees scaled to organisational size/turnover, keeping entry-level certification accessible to micro-enterprises and freelancers.
- Transitional EU/public co-funding during a pilot and scale-up phase, reducing entry cost while the scheme builds recognition and a fee base.
- Supplementary revenue from training, consultancy and advisory services linked to certification preparation.
- Potential corporate or philanthropic sponsorship of the scheme's public-facing promotional activity provided this does not compromise perceived independence.

# 9. OVERALL CERTIFICATION VIABILITY

This section brings together the information into an overall assessment of whether a CreaSus certification is a viable proposition.

## 9.1 SWOT Analysis

The following SWOT analysis summarises the internal and external factors most relevant to the certification viability question, drawn from the landscape, stakeholder, value-add, governance and business model analysis above.

| Category | Key Points |
|---|---|
| **Strengths** | • Existing, EU-tested CreaSus Self-Assessment Tool already covers Environmental, Social and Governance dimensions with a readiness-based methodology (Sections 2.1, 3.3)<br>• Multi-country, EU-funded evidence base across five partner countries, unlike single-country precedents such as Creative Green (Section 3.3)<br>• Clear economic and sustainability value-add identified: funding access, compliance readiness, cost efficiencies (Section 5.1)<br>• Genuine market gap: no active EU CCSI-specific certification since Creative Green was discontinued (Sections 3.2, 3.3)<br>• Pilot survey evidence of demand: 89% of 38 pilot organisations said they would use the tool for self-assessment, and 84% for certification specifically, meaningfully addressing the earlier lack of empirical validation. This is pilot-cohort evidence rather than full sector-wide validation and should be read as an encouraging signal rather than final confirmation. |
| **Weaknesses** | • No confirmed empirical validation of demand yet: analysis to date is largely desk-based rather than confirmed through direct stakeholder consultation (Section 4.1, 4.2)<br>• Certification design and administration costs may be disproportionate for the SME, micro-enterprise and freelance-heavy CCSI base (Sections 4.1, 8.2)<br>• No certifying body yet identified or committed; governance model still to be agreed (Section 7.2)<br>• No existing public brand recognition; a new label starts from zero awareness (Section 4.2) |

| | |
|---|---|
| | • Dual-tool administrative burden risk: without deliberate design to minimise duplication with the VSME, a CreaSus certification could add to, rather than relieve, the reporting burden on small CCSI organisations (Section 3.4). |
| **Opportunities** | • EU regulatory elements: the CSRD and Empowering Consumers for the Green Transition Directive push businesses toward substantiated, third-party verified sustainability claims (Sections 4.1, 4.3)<br>• Creative Europe's own policy commitment to climate action and greening indicates institutional appetite already exists (Section 4.3)<br>• Precedent for funding-linked environmental reporting (e.g. Arts Council England/Julie's Bicycle) suggests a pathway to embed certification in EU or national funding conditions (Sections 4.3, 7.2)<br>• Potential to position CreaSus as the EU-wide successor to the discontinued Creative Green, capturing latent recognition and demand (Section 3.3)<br>• The VSME's limited treatment of Scope 3 emissions and its generic (non-sector) design leave a clear positioning space for a CCSI-specific certification that captures audience travel, touring and event-related impacts that the EU's own general standard does not (Section 3.4). |
| **Threats** | • Direct precedent for failure: Creative Green's certification did not achieve long-term financial sustainability despite strong sector fit (Sections 3.1, 8.2)<br>• Risk of scepticism or a greenwashing perception if the certifying body or criteria are not seen as independent (Section 4.2)<br>• Competing or adjacent schemes (B Corp, EMAS, tourism ecolabels) could be adopted instead if launch is delayed (Section 3.2)<br>• Sector fragmentation across CCSI sub-sectors may limit uptake of a one-size-fits-all scheme (Section 4.1)<br>•"'False voluntariness' risk (Section 4.5): if EU funders and lenders come to treat VSME-aligned disclosure as the default reference point, a sector-specific CreaSus certification could be overlooked or under-recognised unless actively positioned as an accepted equivalent or complement within funding and lending criteria. |

## 9.2 Viability Conclusion

Based on the evidence gathered to date, certification appears conditionally viable: there is a clear gap in the market following the discontinuation of Creative Green, strong policy alignment with emerging EU green-claims regulation, and identifiable economic and sustainability value-add for CCSI entities.
Viability is conditional on:

(i) Confirmation of genuine industry demand through direct stakeholder consultation.
(ii) Design of a business model that avoids the long-term sustainability failure of comparable prior schemes.
(iii) Explicit resourcing and support for CCSI entities to adopt certification, or the underlying self-assessment tool - for example through the training, accompaniment and ring-fenced budget provision proposed in Section 11.2 - so that certification does not become an additional, unfunded burden for the smallest and least-resourced organisations, particularly given that the EU's own VSME standard already places similar demands on the sector (Section 4.3).

This conclusion should also be read against the current EU policy context. The July 2026 adoption of the VSME confirms that sustainability disclosure is moving from optional to practically expected for SMEs, including CCSIs, whether through funding scoring or lending conditions.

Positioning CreaSus certification as a sector-appropriate route to meeting this expectation, rather than an additional burden alongside it, is central to the viability case. Consistent with the precarious and small-scale nature of most CCSI organisations, viability should also be treated as conditional on certification being accompanied by adequate support (training, accompaniment, and where possible ring-fenced funding), rather than being adopted as a stand-alone assessment requirement.

# 10. ROADMAP FOR EXPLOITATION BY THE EU

Following the viability conclusion set out in Section 9, this section sets out the practical roadmap, roles and timeline for taking a CreaSus certification forward.

## 10.1 Step-by-Step Roadmap

| Phase | Activity | Output |
|---|---|---|
| 1. Validation | Stakeholder consultation (industry, public, government) to confirm demand and refine criteria. | Validated case for certification |
| 2. Scheme design | Finalise certification criteria by formalising the existing Self-Assessment Tool's ESG dimensions into certifiable standards, plus assessment methodology and governance structure. | Certification standard and assessment framework |
| 3. Certifier selection | Confirm certifying body/consortium and governance model. | Appointed certifying body with agreed mandate |
| 4. Pilot certification | Certify an initial cohort (e.g. existing CreaSus pilot participants). | First certified organisations; test of process and cost model |
| 5. Business model finalisation | Confirm fee structure, funding mix and financial sustainability plan. | Approved sustainable funding model |
| 6. EU-wide rollout | Open certification beyond pilot cohort; scale promotional programme. | Growing base of certified CCSI entities across member states |
| 7. Handover/ institutionalisation | Transition certification to permanent governance body beyond project lifetime. | Certification operating independently of CreaSus project funding |

## 10.2 Roles and Responsibilities

| Actor | Role |
|---|---|
| CreaSus consortium partners | Design certification criteria, provide pilot cohort access, lead initial dissemination. |
| European Union / Creative Europe | Policy alignment, potential transitional funding, EU-wide legitimacy and endorsement. |
| Certifying body | Independent assessment, standard maintenance, re-certification. |
| National cultural bodies | Potential adoption of certification as a funding-linked requirement; national dissemination. |
| CCSI entities | Applicants and certification holders; feedback into ongoing scheme refinement. |

## 10.3 EU Policy Recommendations for the 2028-2034 Multiannual Financial Framework

As the EU negotiates the 2028-2034 Multiannual Financial Framework (MFF), this report recommends that CreaSus partners advocate for the following, building on the analysis in the report so far:

- Ring-fenced support funding: European and national subsidies to the cultural sector should explicitly allow 5-10% of annual project budgets to be allocated to hiring external eco-consultants or environmental mediators, or to purchasing sustainable materials, recognising that most CCSI organisations cannot absorb sustainability compliance costs from existing budgets.
- Guard against political-bias risk in centralised management: proposals to shift cultural funding toward greater Member State-level (rather than direct Brussels) management risk exposing cultural funding decisions to shifting political alignments and local cultural rivalries. Direct, independently managed EU programmes have historically offered some protection from this; CreaSus partners should advocate for retaining independent, Brussels-level management wherever the MFF negotiation puts this at risk.
- Competitiveness framing over compliance framing: sustainability-related conditions attached to cultural funding should be designed and communicated as competitiveness support (helping the sector access funding and finance it would otherwise struggle to reach) rather than as compliance obligations, consistent with the tone recommended throughout this report.

- Recognition of sector-specific certification: EU funding scoring criteria (e.g. AgoraEU, Horizon Europe) and banking due-diligence frameworks should explicitly recognise sector-specific certifications such as CreaSus as valid equivalents to general standards like the VSME, so that CCSI organisations are not penalised for using a tool designed for their sector rather than a generic one (Section 4.5).

# 11. CONCLUSION AND RECOMMENDATIONS

## 11.1 Conclusion

This report has assessed the viability of formalising the CreaSus Self-Assessment Tool into a certification for Cultural and Creative Sectors and Industries (CCSIs). Drawing on the landscape review, stakeholder analysis, value-add assessment, governance options and business model analysis in Sections 3 to 8 and brought together in the SWOT analysis in Section 9, the overall conclusion is that certification is conditionally viable.

There is a clear market gap, since no active, EU-recognised, CCSI-specific sustainability certification currently exists following the discontinuation of Julie's Bicycle's Creative Green Certification.

CreaSus is well positioned to fill this gap, having already built and piloted a self-assessment tool covering the same core Environmental, Social and Governance dimensions that any certification standard would rely on, rather than needing to design a new framework from scratch. Regulatory tailwinds, particularly the Corporate Sustainability Reporting Directive and the Empowering Consumers for the Green Transition Directive, are increasing pressure on CCSI entities to substantiate rather than self-declare sustainability claims, and Creative Europe's own climate commitments suggest institutional appetite for such an instrument already exists.

A policy-level risk has also become clearer over the course of this analysis: the EU's own VSME standard is at risk of functioning as a "false voluntariness" for the sector, becoming a de facto condition of funding and finance despite its voluntary status (Section 4.3). Any CreaSus certification, and the wider EU policy environment it sits within, should therefore be framed around competitiveness and proportionate support for CCSI entities rather than compliance for its own sake.

This conclusion is conditional, not unconditional. Two risks in particular need to be actively managed rather than assumed away: first, the evidence gathered to date is largely desk-based rather than confirmed through direct stakeholder consultation; second, Creative Green's own certification, despite strong sector fit and UK market traction, did not achieve long-term financial sustainability. This is a direct and instructive precedent for CreaSus to learn from, not repeat.

## 11.2 Recommendations

On this basis, the consortium recommends the following actions:

- **Validate demand before committing further resource.** Commission direct stakeholder consultation, through interviews and/or surveys, with pilot CCSIs, a public sample, and government/policy contacts, to test the assumptions set out in Sections 4.1 and 4.2 before finalising the certification scheme.
- **Build certification criteria directly from the existing Self-Assessment Tool.** Formalise the tool's Environmental, Social and Governance dimensions and readiness-based methodology into certifiable standards, rather than designing a new framework from scratch (Section 7).
- **Resolve the certifying body and governance model early.** Bring the candidate models set out in Sections 7.2 and 7.3 to the CreaSus Advisory Board and Consortium for a decision, since governance uncertainty is currently the largest single gap identified in the SWOT analysis (Section 9.1).
- **Design the business model to explicitly avoid Creative Green's failure mode.** Adopt a diversified, tiered funding model (Section 8.3) combining fee income, transitional EU/public co-funding and value-added services, with a realistic administrative cost assessment built in from the outset (Section 8.2).
- **Pilot before scaling.** Certify the existing CreaSus pilot cohort first (Section 10.1, Phase 4) to test the assessment process and cost model at a small scale before opening certification EU-wide.
- **Launch a targeted promotional and dissemination programme in parallel.** Use the messaging and channels set out in Section 6 to build awareness among CCSI entities, the public and policymakers from the outset, since a new certification starts from zero public recognition.
- **Plan for institutional handover from day one.** Agree, at the outset, how the certification and its governance body will be sustained and administered beyond the life of the CreaSus project (Sections 10.2, 10.3), rather than leaving this to be resolved at the point of project closure.
- **Condition certification adoption on guaranteed support.** Do not roll out certification as a stand-alone assessment requirement. Pair it with proportionate, funded support, training, accompaniment and, where possible, the ring-fenced budget allocation proposed for the 2028-2034 MFF (Section 10.3), particularly for micro-organisations and freelancers.
- **Advocate for a ring-fenced budget line within the 2028-2034 Multiannual Financial Framework.** Specifically, that EU and national cultural funding and subsidy schemes explicitly allow between 5% and 10% of project budgets to be allocated to external eco-consultants, environmental mediators, or the

purchase of sustainable materials, so that the cost of meeting sustainability standards and tools (VSME or CreaSus) is funded rather than assumed. The consortium should also flag, through its EU-level contacts, the risk that shifting fund management toward Member States rather than direct EU management exposes cultural sustainability funding to the political and local-rivalry risk that direct, independent EU management has historically avoided (Section 4.3).

- **Clarify the relationship between a CreaSus certification and the EU's VSME standard before finalising scheme design.** Determine whether CreaSus should complement, cross-reference or fully substitute for VSME reporting for CCSI entities, to avoid asking the sector's smallest organisations to maintain two parallel sustainability reporting processes (Section 3.3).

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