Between accountability, efficiency and structural constraints: Advocacy in EU cultural policy

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ABSTRACT

This paper explores the working reality of interest groups aiming to influence European Union cultural policy making. Culture Action Europe as the largest transnational advocacy network for the arts and culture and their we are more campaign (2010-2013) serve as a case study. By assessing accountability and legitimacy of this civil society organisation from a deliberative understanding, limitations with regard to participation, inclusion and responsiveness become apparent. An inquiry into the particularities of the cultural sector and culture as a policy field seek to explain these shortcomings and the phenomenon of emerging regional advocacy groups. Among these explanations are elitism and limited resources, cultural and political diversity, as well as structural constraints leading to advocacy ambiguity. The paper finishes with a short evaluation of recent organisational developments and a political outlook.
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ACRONYMS AND ABBREVIATIONS

CAE  Culture Action Europe
CSCG  Civil Society Contact Group
CSO  civil society organisation
EACEA  Education, Audiovisual and Culture Executive Agency
EC  European Commission
EU  European Union
MEP  Member of the European Parliament
NGO  non-governmental organisation
UN  United Nations
UNESCO  United Nations Educational, Scientific and Cultural Organisation
WAM  we are more campaign
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1 | INTRODUCTION

In times of austerity and reinvigorated nationalist tendencies in Europe, the cultural sector in general has committed to serve as an inclusive institution. UNESCO’s Convention on the Protection and Promotion of the Diversity of Cultural Expressions (2005) is one of the central documents cherished by those active in the field calling for democracy, inclusion, participation and, of course, cultural diversity (i.a. Cremer 2014; Pouply 2014). In the political sphere, however, reality looks different and the processes of lobbying and multi-stakeholder decision making often remain opaque. What both realms have in common is the absence of effective and meaningful impact measurement frameworks. Neither the value of culture nor the actual effect of advocacy activities can be universally determined. When these two fields intersect, the question arises of how the cultural sector upholding its inclusive nature would behave in an environment of strongly diverging and often exclusive interests. This research paper seeks to explore the internal aspects of advocacy in European Union (EU) cultural policy making. On the one hand, this empirical study shall provide data and analysis adding to the academic discipline of cultural governance and cultural policy studies. On the other hand, insights shall be an indicator for the current state of cultural advocacy accountability, its efficiency trade-offs and structural constraints by enhancing informed decisions of policy-makers and sector officials to democratise and legitimise advocacy in EU cultural policy. Strongly believing that no academic can be entirely neutral, the reader should bear in mind that this research has been conducted with a positive bias towards cooperation between actors of civil society and state or supranational institutions, which could be termed a culturally extended neo-corporatist model of lobbying.

The paper will begin by describing the research rationale, posing questions and explaining the research methodology utilised. To frame the topic, an overview of cultural interest representation and the European Union’s funding programmes for culture is given in the third part. Chapter 4 is designed to explore viable frameworks of evaluating accountability and legitimacy of civil society organisations (CSO) with special attention on the cultural sector and the advocacy
organisations active in that very field. It is followed by an extensive case study of the transnational advocacy network Culture Action Europe (CAE) and their *we are more* campaign (WAM); this study will analyse internal processes and structures by applying the theoretical framework developed in the preceding chapter. Chapter 6 is an attempt to relate the findings back to the wider context of cultural policy, explains why a certain outcome was bound to happen and how recent developments alter the scene.

Before eventually exploring cultural interest representation at EU level, a few key words need further clarification and definition. *Culture* is not only an essentially contested concept (Gray 2009, pp. 576-577), but even within official EU legislation the term remains highly ambiguous as it incorporates the exclusive arts and heritage notion as well as a more sociological and anthropological understanding of the term (Gordon 2010, p. 106). As this paper is concerned with the interplay of the cultural and the political sector, here *culture* and respectively *cultural policy* shall encompass all meanings employed by either field. Another important term is *advocacy*. It describes the strategic decision, predominantly of interest groups, to influence political processes and comes in various forms and guises, of which campaigns and lobbying activities are just two. While the former is primarily a means of outbound publicity and mobilisation, the act of lobbying is directly concerned with approaching, exchanging views with, and influencing members of legislature, executive and the bureaucratic body.

2 | RESEARCH QUESTIONS AND DESIGN

In the past decades, ideas of deliberative democracy have been reconsidered. The supranational apparatus of the European Union was often at the centre of such debates criticising its democratic deficits. While it is certainly not an easy task to design a democratic, legitimate and just system, which juggles manifold demands in a complex setting such as Europe, the EU has gradually introduced measures to enhance its democratic portfolio. Open consultations and dialogues with CSOs, however effective and useful they may be, are an integral part of the EU’s and especially of the European Commission’s (EC) decision making processes nowadays. Yet, “a wide variety of very active civil-society organizations may
contribute to good governance for the people but will hardly be a valid indicator for good governance by the people”, Edler-Wollstein and Kohler-Koch (2008, pp. 204-205) point out rightly and emphasise the accountability and legitimacy challenges of the very CSOs the EC uses to generate a sense of input legitimacy. It cannot be enough that the civil society sector is being consulted. To improve EU policy making and overcome democratic shortcomings, CSOs must not merely claim to be inclusive and democratic. Figure 1 illustrates the problem of accountability and legitimacy assessment of CSOs recognised as interest groups at EU level. The overarching question is thus: Is civil society adequately represented by interest groups in EU cultural policy making?

Figure 1: Accountability and legitimacy problems of CSOs

Ritual rationality suggests that the arts are good (Røyseng 2008). The same could be said for the organisations dealing with the arts and culture. Existing literature, however, does not cover whether cultural interest groups, which as membership organisations represent a substantial part of wider European civil society, are in fact internally democratic and legitimate institutions. One of these interest groups is Culture Action Europe (CAE). With more than 100 member organisations representing several hundreds of thousands of physical members and a highly visible campaign called we are more (WAM), CAE was one of the main actors contributing to the public and political debate as well as the drafting process of the EU’s culture funding round 2014-2020 called Creative Europe. Due to the vast scope of the campaign, a notion of exclusivity could almost be attributed to this
very advocacy activity; it clearly does not withstand claims of universal validity. Such broad representation, however, is the reason for choosing CAE and WAM as a case study to analyse whether it lives up to the sector’s own ideals of inclusion and democracy and if it legitimately represents the European cultural sphere. Subsequently, the specificity of the cultural sector and structural constraints of culture as a policy field are to be examined in order to account for observed phenomena.

The research methodology includes various tools and approaches. The aforementioned case study provided empirical data, which has been analysed in both qualitative and quantitative terms. In semi-structured interviews with staff members of CAE and representatives of its member organisations, which have or have not contributed to WAM, qualitative analysis of content-based data provided valuable insights into structural and procedural conditions. This method was chosen because of the interdependence and mutual influence of culture and cultural policy (Schmitt 2011). Content is a mirror of culture, thus all-encompassing, and is constantly influencing governance structures. Furthermore, statutes, public advocacy material, official documents and other structural evidence were consulted. A quantitative approach allowed looking into statistics, which described numerical representation in geographical, sectoral and organisational terms. Applying a CSO accountability and legitimacy framework expanded by factors relevant for cultural interest groups shed light on the current state of civil society’s representation in EU cultural policy. Extensive desk research, taking into account prominent theories in the field of cultural policy studies, led to the development of a three-strand explanation illustrating practical and structural constraints that culture as a policy field confronts. Some of the theories considered originally derived from government and governance studies. This heuristic decision of their utilisation is based on the assumption that interest groups, which are part of democratisation processes of governmental decision making, would practice ideals of democracy, inclusion and legitimacy themselves. Thus, internal processes and structures should not be judged differently than the ones they seek to cooperate with.
3 | FRAMING CULTURAL INTEREST REPRESENTATION

To appropriately contextualise all collected data and conducted analyses, a historical overview and a brief review of intellectual approaches towards interest representation in general and its cultural sub-discipline at EU level in particular will be presented in this chapter. While it is not only important to grasp the diverse understandings of lobbying and advocacy in various systems and schools of thought, it is also imperative to get an idea about the emergence of a political mandate for culture at the EU. Only with that knowledge can the genesis of cultural interest representation be fully understood and structural constraints, which are to be explored later on, be adequately assessed. By considering the changes in EU funding programmes for culture over time and their respective national discourses, content-related preferences of different actors become apparent. They serve as a vital source of background material to base analyses of qualitative representation within CAE on. Finally, a summary of CAE’s aims and WAM’s development, as well as their perception by the political sphere and the media, will again emphasise the significance of the following research.

Advocacy varies considerably from national to transnational contexts. Polities allow and restrict lobbying activities very differently; equally diverse is their reception by the system and the actors involved in it. The pluralist model, for example, is characterised by competition of actors with equal opportunities to influence a neutral government. Civil society, thus, is an integral actor in competing for the best possible policy output (Knill and Tosun 2012, pp. 86-87). As a result of the competitive pluralist system, it is not uncommon for cultural organisations in the United States of America to hire professional lobbyists, who then acquire earmarked funds for them (Hall 2005, p. 236). The state corporatist model, by contrast, is based on cooperation between private and public actors. While in that model the state is coercing cooperation and hierarchy of the actors involved, participation in a neo-corporatist model is more voluntary and can include more diverse interests, rather than just the ones of labour unions and employers’ associations (ibid., pp. 87-88). Consultation, negotiation and exchange of expert knowledge are indicators of democratic neo-corporatism as it is
practiced not only in many post-war states in Europe, but also the European Union has gradually implemented and is still implementing this model of interest group integration. As a supranational institution, the EU faces additional challenges due to member states’ national interests. This might also have an impact on nationally operating CSOs and their engagement in transnational advocacy networks. Keck and Sikkink (1999, p. 90) argue that these networks can “be understood as political spaces, in which differently situated actors negotiate – formally or informally – the social, cultural and political meanings of their joint enterprises”. Even though, advocacy networks may be seen as uniform actors in the political arena, their internal negotiation processes need to be monitored in order to identify representational integrity.

Since cultural policy as a recognised field of political regulation is a fairly new concept in most states, strategic advocacy in that area happens to be an even more recent phenomenon. Despite being part of European narratives for quite some time, culture only received a legal mandate at the EU in 1992 through the Maastricht Treaty. Article 128 (later Article 151) stipulates that “[t]he Community shall contribute to the flowering of the cultures of the Member States” (European Union 1992), which encourages intra-European cooperation and the promotion of common heritage. Furthermore, the article clearly defines the EU-predecessor’s competences in regulating culture by introducing the subsidiarity principle, which leaves all competences for national, regional and local cultural policy with the member states. The Lisbon Treaty of 2007 eventually granted the EU a viable opportunity to make laws in the field of culture without having to fear single vetoes since Quality Majority Voting was adapted (European Union 2007, Art. 167). Therefore, the Lisbon Treaty really marked the beginning for meaningful cultural policy making – if still only supplementary – and active participation of private actors in these processes. Unlike other, longer established EU policy fields, these rather recent developments in the cultural sector must account for two general shortcomings. Firstly, Gordon suggests that the EC has not yet accumulated enough administrative professionalism in cultural policy making due to its often intangible aims and results (2010, pp. 110-111). Secondly, advocacy for culture amounts to only a tiny fraction of the 17.5 per cent of non-business related lobbying activities (Friedrich 2010, p. 44). Neither is territorial balance
guaranteed as actors from Germany, France and the United Kingdom are responsible for a combined total of 43.7 per cent of all lobbying, whereas new member states only account for 4.5 per cent (ibid.).

As outlined, the EU is far from being a powerful actor in designing cultural policies in Europe. Regulatory measures had only modest successes. The most influential initiatives over the years have been a range of funding programmes dedicated to culture and to the audiovisual sector. Following a few pilot programmes benefiting only certain cultural sectors such as books and translation, *Culture 2000* was the first budget round with a wide scope (Bruell 2013, p. 11; Gerth 2006, pp. 5-7). It was succeeded by *Culture Programme 2007-2013* and eventually on December 11, 2013, the regulation on *Creative Europe Programme* to enable funding for the period of 2014 to 2020 was passed. While the first two multiannual funding rounds supported cultural cooperation, artistic mobility and the creation of transnational networks to support intra-European exchange, *Creative Europe*’s wording reveals a political affinity towards the more business-oriented creative industries as well as employment and revenue generating forms of culture (Bruell 2013, pp. 22-23). Budgets rose from EUR 236.5m for *Culture 2000* (Gerth 2006, p. 7) to roughly EUR 400m for *Culture 2007-2013* (EACEA 2013) and was to culminate in a remarkable EUR 1.8bn for *Creative Europe*. Due to fierce budget negotiations the latter amount, however, was eventually reduced to EUR 1.462bn, of which at least EUR 450m were dedicated to culture (European Parliament and the Council 2013, Art. 24). The majority of the budget was allocated to the media strand financing projects in the audiovisual sector.

While this budget increase is a small yet pleasant development, member states are still reserved with regards to certain aspects of *Creative Europe*. The German government is protective of its cultural authority criticising the shift from decision to a legally binding regulation, advocating for qualitative evaluation criteria and emphasising the non-profit character of supported projects (Bruell 2013, pp. 28-29). The British government preferred a budget cut, Italy endorsed the economic focus of the proposal, and the French authorities supported more precision in financial matters (ibid., pp. 29-30). Despite the nation-focus of the anticipated project design and intrinsic territorial imbalance particularly disadvantageing
cultural organisations from new member states, Creative Europe did not stir up many intense national debates (ibid., pp. 31-34). Unlike cultural policies touching on national legislation such as copyright and universal book pricing, a simple programme providing funds for cultural organisations could not invoke feelings to an extent of a heated discussion among stakeholders (Littoz-Monnet 2007, pp. 13-14). Discourse around the programme and engagement in the consultation could be termed a “closed conversation among experts” as Holden summarises his opinion on the current state of cultural policy in general (2006, cover page). The EC’s online consultation drew responses from 589 individuals and 376 organisations as well as public authorities. A public consultation meeting was attended by 550 people (European Commission 2011, p. 3). This is in stark contrast to participation in the consultation for the media strand, which had 2,586 responses and various physical consultations (ibid., pp. 4-5).

One of the respondents of the consultations regarding the new culture funding programme and subject of the following case study is Culture Action Europe. It was founded as the European Forum for the Arts and Heritage (EFAH) in 1994 as an answer to the Treaty of Maastricht, then renamed Culture Action Europe in 2008 with a reviewed set of objectives such as to intensify advocacy activities reacting to the developments of the Lisbon Treaty (Culture Action Europe 2009, p. 8).

We have immediate access to EU decision makers and we are widely recognised as a unique resource of information and expertise on the EU and its cultural policy. The EU institutions see Culture Action Europe as the first port of call for informed opinion and debate about arts and cultural policy in Europe. We are the biggest umbrella organisation representing the cultural sector at European level. (Culture Action Europe 2014b)

On their website, CAE is not shy to proclaim their exceptionalism and alleged importance for EU cultural policy. This statement, as well as their membership in the EU Civil Society Contact Group (CSCG) alongside other large-scale European CSO networks, reflects CAE’s commitment to a cooperative model of political activity and advocacy. As one of the most recognised and largest European networks for culture with numerous other cultural networks as its members, CAE launched the we are more campaign in October 2010, which ran until December
2013 when the regulation on Creative Europe was finally passed. For these reasons of representational significance, CAE and WAM were chosen as attractive subjects to study.

4 | ACCOUNTABILITY AND LEGITIMACY

The aim of this chapter is to develop an accountability and legitimacy framework for organisations active in cultural interest representation, which can be used to analyse empirical data. The peculiarity of the cultural sector demands a critical examination of existing frameworks for CSOs in general in order to identify specific aspects for analysis. Self-imposed ideals of cultural democracy and the EU’s increasing consciousness of implementing participatory practices and transparency result in mutual effort towards internal and external accountability (Papadopoulos 2008, p. 178). Yet, the normative nature of such claims cannot be denied. An at least anticipated neo-corporatist model, thus, requires the application of such a framework on all cultural interest groups representing civil society’s wishes and concerns at EU level. Before eventually elaborating on evaluation criteria, a short account of existing frameworks and academic insights will be provided, as well as thoughts on cultural specifics within these.

In 2006, the United Nations (UN) published a book by Jem Bendell, who conducted a detailed inquiry into accountability of non-governmental organisations (NGO), which appeared to be emerging actors in international decision making. While he mainly focused on NGOs active in development assistance, donors and accountability towards global governance, one central argument shall be reiterated here. When CSOs (which is to be used as an interchangeable term to NGOs) are being held accountable, evaluation should not merely measure against formal requirements but rather adopt a policy of assessing democratic accountability (Bendell 2006, pp. 6-7). Public welfare should be central to an organisation claiming to represent civil society’s interests and, thus, social aspects have to be integrated into an accountability assessment. While the UN stressed these issues, the civil society sector had already developed their own framework called the INGO Accountability Charter Principles in 2005, which was reviewed in 2014. The ten principles include:
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<td>1</td>
<td>Respect for Human Rights</td>
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<td>2</td>
<td>Independence</td>
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<td>3</td>
<td>Transparency</td>
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<td>4</td>
<td>Good Governance</td>
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<td>Responsible Advocacy</td>
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<td>6</td>
<td>Participation</td>
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<td>9</td>
<td>Ethical Fundraising</td>
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<td>Professional Management</td>
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(INGO Accountability Charter 2014, p. 2)

Dedication to deliver public goods is strongly reflected in the sector’s own initiative as specific principles such as environmental responsibility and respect for human rights indicate. Management, fundraising, participation and transparency are just some of the principles hinting at the sector’s internal accountability assuring critical peer reviews. The EU has no formalised accountability assessment framework for CSOs in place as of yet. There is, however, the Transparency Register, for which lobbyists and lobbying organisations are supposed to sign up. Apart from funding transparency, names of represented member organisations and contacts of responsible people, not much information can be gathered. Instead, academic studies yield much more insight. Kohler-Koch and Buth (2009) found that EU’s political arena requires certain lobbying behaviour. Due to these structural constraints, CSOs tend to compromise internal practices of deliberative democracy for efficiency and practicality. Their advocacy becomes a lot more Brussels-focused than initially envisaged, which is an observation shared by Paul James, Director General of the European Union Baroque Orchestra (EUBO 2014). Equally interesting case studies on CSOs’ representational legitimacy have been conducted by Johansson (2011) and Rodekamp (2011).

So far, no case study has been carried out, which assesses accountability and legitimacy of interest groups that deal with cultural matters. The methodology used in afore-mentioned studies cannot be simply transferred to culture as there are specific challenges not present in other policy fields. An assessment framework for cultural interest groups must take into account the extraordinary position as internal mediator, filter of value-based opinions, mirror of society,
external negotiator, and expert consultant. Figure 2 depicts the multi-stakeholder challenge taking into account the following aspects:

1 | The cultural sector is extremely diverse; in terms of sectors, recipients and participants, size and resources of organisations, national and regional systems of cultural policy, definition and interpretation of culture, and, of course, values both intrinsic and on each organisation’s agenda (i.a. Gattinger 2012, p. 5).

2 | As the recognised representative of civil society in cultural terms, the organisation must be able to mirror developments and provide meaningful expert knowledge to the political system (ibid., p. 4).

3 | Advocacy must be coherent and coordinated since the EU’s notion of cultural policy is ambiguous (i.a. Gordon 2010, p. 106) and the limited legal mandate constrains its administrative resources.

4 | Subsidiarity clauses might further encourage nationalist tendencies in advocacy activity focus.

Figure 2: The role of Culture Action Europe

Since cultural interest groups must live up to the EU’s identity mantra *unity in diversity*, culture must be advocated for in all of its diversity, which poses a representational challenge. This way, input legitimacy can be achieved. Internal negotiations and consultation processes, then, must assure throughput legitimacy, while the condensed output translated into EU-accessible language, also
colloquially referred to as *eurospeak*, should contribute to output legitimacy (Schmidt 2010).

Steffek et al. developed a five-criteria assessment scheme for CSO accountability and legitimacy. Since it emphasises “the procedures of decision-making and the consultation of members, supporters and beneficiaries in this process” (2010, p. 101), it is considered to be an adequate framework to analyse the multi-stakeholder representational challenge of cultural interest groups. Recalling the normativity of such assessments as underlying rationale, Steffek et al. also stress their “deliberative conception of democracy” (ibid., p. 104). The following criteria will be briefly outlined and expanded by aspects unique to the cultural sector and cultural policy.

**PARTICIPATION**

The criterion participation is a major factor when assessing democratic legitimacy. To find out how deliberative in nature the organisation is, the following questions need to be answered: Who is allowed to participate, to what extent and with which formal rights? What means of participation exist? What are formal and informal practices? Equality of participation and access to such practices in advocacy organisations is crucial to justify legitimate representation. Steffek et al. (ibid., p. 108) correctly point out, however, that limited resources and expertise can be a severe obstacle for many member organisations to engage. It is not only important to consult members, supporters and beneficiaries in the initial stages of drafting position papers, but also to ensure their participation throughout the procedure (ibid., pp. 106-107). As Schmidt conceptualised it, throughput legitimacy is essential for deliberative democracy (2010). The cultural sector, more than other areas of civil society, is concerned with the foundations of community living affecting virtually everyone exposed to society. Unlike business policies, which create winners and losers, cultural policies are designed to deliver the greatest possible advantage for society. An organisation standing up for culture should, therefore, be accessible for everyone to participate in their strategy and decisions.
INCLUSION
For stakeholders to participate in dialogue and decision making in the first place, input legitimacy must be guaranteed by enabling all members and beneficiaries to participate. It is imperative that all relevant voices are being heard, opinions considered and those disadvantaged to be empowered (Steffek et al. 2010, p. 109). Therefore the inclusion criterion measures qualitative as opposed to quantitative representation (Michel 2008, p. 116) to identify whether unequal distribution and social elitism occur (Papadopoulos 2008, p. 183). As John Holden (2006, pp. 9-10) puts it, elitist and expert debates have become endemic to cultural policy, which should consequently democratise by engaging citizens – the disadvantaged when speaking in terms of the political debate. What is the current distribution like? Is every opinion heard? What strategies are in place to empower disadvantaged groups? Whether it is the EU’s ideal of unity in diversity, UNESCO’s wish to protect and promote cultural diversity (2005), or civil society’s wish to represent the interests of all people of all cultural backgrounds, inclusion is the key concept to enable it.

RESPONSIVENESS
Democratic legitimacy cannot be created through deliberation and the public sphere alone but requires the combination of reasonable communication and the participation of all potentially affected in the decision making process. (Habermas 2007, p. 431, own translation)

Habermas, as a prominent theorist of the public sphere, suggests that in addition to ensuring participation and inclusion, communication is a crucial factor in achieving a legitimate system. Steffek et al. enhanced this idea by considering not only “discursive processes that lead to positions, strategies and arguments” but also the actual output (2010, p. 111). The responsiveness criterion evaluates whether the inclusive representation of voices in the process of participation have been appropriately incorporated into the organisation’s work contributing to output legitimacy. While interest groups should behave as trustees rather than simply spokesmen (Papadopoulos 2008, p. 186), there is still the challenge of adjusting to diverse communication cultures reflecting sets of values, which are
likely not to be congruent. What, then, are mechanisms for the anticipated output to be beneficial to all stakeholders?

TRANSPARENCY
The EU asks interest groups to reveal certain information in a transparency register. While this is a necessary measure to be recognised as legitimate, it is not seen as sufficient (Steffek et al. 2010, p. 113). In order to fulfil the requirements of external and internal transparency, decision making processes and related data and documents must be accessible and comprehensive. Two strands of assessment are to be identified: Dimension and addressee (ibid., pp. 113-114). The former highlights precisely what is being published. Financial documents hinting at independence do no suffice; it is rather advocacy material made public and accessible internal documentation, such as conference minutes and drafts, that display a high degree of transparency considering the increasing feasibility of assessing responsiveness. The addressee of transparency in a cultural context, as mentioned before, should encompass everyone affected. In this respect, transparency is crucial to accompany sincere responsiveness since decisions on culture are generally value-based, thus not rational and presumably not universally reasonable.

INDEPENDENCE
This last criterion is to be measured in political and financial independence. Regarding the latter, CSOs are perceived to be biased in the case of one party being responsible for the majority of their financial support; increasingly so if the funding is institutional rather than project-based (ibid., pp. 115-116). Other indicators include backgrounds of the founders, selection and affiliation of staff, contractual external relations, and conditions attached to funding, as well as integrity in criticism and equality of approach to each target group or person (ibid., pp. 116-117). For cultural organisations it is particularly difficult to negotiate their position between state and market these days. In many European countries the cultural sector is heavily financed by the state and at the same time Creative Europe is focusing on economic benefits of cultural undertakings more than previously existing EU funding programmes. In particular, CSOs and cultural
interest groups must operate as non-governmental, non-partisan, non-profit enterprises in order to justifiably declare their political and financial independence.

5 | CULTURE ACTION EUROPE AND THE WE ARE MORE CAMPAIGN

In 2010 the we are more campaign was created by Culture Action Europe in strategic partnership with the European Cultural Foundation and it aimed at promoting

[…] culture, heritage and the arts, together with education, social cohesion and environmental sustainability, as key areas in which the EU has to make more bold investments if it wants to reach its growth objectives and Europe to remain a thriving democracy in the future. (We are more 2010)

After an initial consultation with their members, CAE presented a manifesto and encouraged support of the campaign through signing the document. Various position papers and a lobbying toolkit complimented the advocacy material. The manifesto drew more than 27,000 signatures and mobilised many organisations and networks, as well as individuals (Culture Action Europe 2014a, p. 13). Not all advocacy activities were deriving from CAE or aimed at influencing the EC, though. The establishment of independent regional coordination groups, which predominantly targeted national Members of the European Parliament (MEP) and national legislators negotiating in the Council, was highly encouraged and institutionally supported. With the final passing of the Regulation, WAM also came to an end in December 2013.

For this case study, data from various sources and years has been analysed, preferably from the period 2010-2013, but also some material from post-WAM. Official campaign documents, statutes, financial statements, and compositions of committees and membership accompanied a range of interviews. Julia Pouply, former Policy Officer of CAE, as well as representatives of four CAE member organisations, agreed to be interviewed and contribute to this research project. The organisations include: the European Cultural Foundation (ECF), which served
as strategic partner of WAM and facilitated the Dutch coordination group; the Baltic Sea Cultural Centre (BSCC), which did a similar job for the Polish cluster; the European Music Council (EMC), which was also active in the German coordination group; and the European Union Baroque Orchestra (EUBO) being the odd one out as small individual organisation operating at a European level. Due to the limited scope of the case study, not all good practices can be highlighted; rather potential for improvements will be pointed out.

PARTICIPATION
Capitalising on the institutional expertise of its diverse membership, CAE was determined to consult its members on the anticipated objectives for WAM. However, members were only allowed to comment after the Secretariat, in discussion with the Executive Committee, had already drafted a statement, which subsequently was slightly edited (Pouply 2014; Zakrzewska-Duda 2014). Inevitably this process was very personality-driven, although internally this was not necessarily perceived as negative (Dudt 2014). The Secretary-General decided on campaign emphases (ibid.), which made the absence of formalised veto mechanisms even more severe. As the manifesto was to be signed in support by the members, abstaining appeared to be the only formal method of objection. It should be acknowledged that CAE does offer formalised participation and dialogue through General Assemblies, public conferences and policy meetings. Additional policy consultation meetings were held in five countries (Culture Action Europe 2011, p. 4). While feedback mechanisms remained informal and rather Brussels-centred, calling the Secretariat to voice concerns was perceived to be very easy and effective (EUBO 2011). A positive is that non-members were also encouraged to support the campaign, by translating material, for example, and engaging in national dialogue, whereas only member organisations were formally consulted and held voting power. On initiative of nationally active members, regional coordination groups were founded in some countries engaging many non-members in advocacy action (Cremer 2014; Zakrzewska-Duda 2014).

Since member consultation was designed to merely check whether CAE’s draft objectives were in line with members’ wishes and concerns (Pouply 2014) and feedback mechanisms were not formalised, participatory substance and
throughput legitimacy cannot really be attributed to CAE and WAM. However, members were neither proactive nor reactive to the call for statements (ibid.). Only around a fifth of the members responded, of which the majority were transnational networks counting advocacy to their main activities already (ibid.). Similarly low was CAE member contribution in the EC’s online consultation for Creative Europe, in which only 26 organisations participated (Culture Action Europe 2011, p. 6). Presumably, these organisations were the same ones, underlining the limited activity of CAE members in both internal and external feedback. Despite its lack of formal recognition in decision making processes, participation in regional coordination groups was significantly stronger (Cremer 2014; Dudt 2014; Zakrzewska-Duda 2014). Considering the not quite so deliberative formal means of participation and the easily accessible informal means, this poses a few questions with regard to structure and quality. Were the dominating members contributing to WAM, which coincided to be represented in the Executive Committee (Pouply 2014), the ones with the best access, with the largest resources, or simply the most concerned? Or might the lack of participation have been a result of policy ambiguity and excessive trust in CAE’s work?

**INCLUSION**

Table 1: Organisational type of CAE members 2010

<table>
<thead>
<tr>
<th>Type of member</th>
<th>Amount</th>
<th>Percentage</th>
</tr>
</thead>
<tbody>
<tr>
<td>Transnational network</td>
<td>31</td>
<td>28%</td>
</tr>
<tr>
<td>Transnational organisation</td>
<td>7</td>
<td>6%</td>
</tr>
<tr>
<td>National/regional network</td>
<td>34</td>
<td>31%</td>
</tr>
<tr>
<td>National/regional organisation</td>
<td>39</td>
<td>35%</td>
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</tbody>
</table>

(Culture Action Europe 2011; own research)

Within the Civil Society Contact Group, CAE has more members than any other CSO network (Kohler-Koch and Buth 2009, p. 11). Since almost 60 per cent of its direct members are networks themselves, CAE represents more than 80,000 cultural organisations in total (Culture Action Europe 2011, p. 10). Self-evidently, the sheer variety of members and their intrinsic cultural diversity pose a great challenge to input legitimacy. Table 1 demonstrates that unlike other CSCG
networks two thirds of CAE’s direct members operate on national or regional levels rather than transnationally. Looking at these nationally and regionally operating organisations and networks, a geographical imbalance is apparent with new EU members at the end of the scale, as Figure 3 illustrates. Western European countries, such as France, Belgium, the Netherlands, Germany and the United Kingdom do particularly well accounting for more than half of all national and regional organisations. Also the sector distribution depicts disparities. Figure 4 suggests that while performing arts, music, amateur arts and certain consulting, research and governmental organisations can be found extensively, sectors such as literature, heritage, museums and festivals are underrepresented. Other indicators of diversity include size, turnover, type of enterprise (e.g. charitable, non-profit, for profit), target group (e.g. professionals, amateurs, employers, employees) and independence (e.g. independent, governmental or arm’s length organisation).

Figure 3: Countries of nationally and regionally operating CAE members 2010
Uneven distribution, however, does not exclusively describe the level of inclusion and mechanisms to empower the excluded. Considering that the majority of the around 20 members that have participated in the WAM consultation were transnational networks representing professionals in the sectors (Pouply 2014), it is to be asked whether the views of many national networks and individual organisations were taken into account into the drafting process. Generally, small organisations tend not to emphasise their viewpoints too much in internal processes and leave the arena to networks experienced in advocacy (EUBO 2014). Members, first and foremost concerned with national and regional issues, were more strongly included in regional coordination groups. Interestingly enough, no inclusion mechanisms were in place in the loosely organised regional clusters, whereas CAE at least encourages small organisations to join by linking the membership fee to each organisation’s yearly turnover (Culture Action Europe 2014c). CAE organised regional policy consultation meetings, but did not manage to empower underrepresented geographical areas and instead engaged with Germany, France, Belgium, Poland and the Netherlands (Culture Action Europe 2011, p. 4). On the positive side, CAE does allow CSOs from non-EU member states to assume membership. Inclusion of marginal groups, therefore, still proves to be a large challenge for CAE if wanting to be a legitimate representative of the European cultural sector.
RESPONSIVENESS

Responding implies dialogue which can only be realised through effective communication. CAE employed tools such as regular newsletters, news digests, policy briefings and conferences to engage in such dialogue. In many cases, however, the direction of communication turned out to be rather one-sided due to the means applied. Position papers throughout the campaign were sent out to CAE members and advocacy targets simultaneously leaving no space for internal discussion (Culture Action Europe 2012, p. 7). As a result, member organisations are proposing improvement of internal communication channels and emphasis on discursive formats (Dudt 2014; Zakrzewska-Duda 2014). Although communication between regional coordination groups failed to happen, advocacy outputs were not seen to contradict each other (Pouply 2014). Regional clusters provided an arena to discuss and put forward additional, more nationally or sector specific demands, which were easier to be voiced based on those groups’ more inclusive nature (Cremer 2014; Dudt 2014; EUBO 2014; Zakrzewska-Duda 2014). But even though special demands were discussed, they did not often translate into actual policy objectives. Instead, statements were intentionally kept as general as possible (Cremer 2014), which was certainly true for the German and Dutch outputs (Culture Action Europe - Dutch Coordination Group 2012; Culture Action Europe - German Coordination Group 2011).

Whether the WAM manifesto and position papers have adequately represented CAE’s members and civil society in general is yet another issue. While CAE perceived the manifesto as covering complex objectives (Pouply 2014), some members pointed at the mainstream character of the positions (Cremer 2014; Dudt 2014). This was not seen as a bad thing, and instead there was agreement that WAM’s objectives were so universal that the cultural sector was appropriately advocated for (Cremer 2014; Dudt 2014; EUBO 2014; Zakrzewska-Duda 2014). Such universality in form of vague and ambiguous statements is indeed featured in CAE outputs, but also more specific demands have found their way into the manifesto and other documents. Ambiguous objectives include “sustainable development of the sector through long-term partnerships and capacity building schemes” (WAM 2011, p. 5) disregarding the complex debate around the term of
sustainability and “allow[ing] their outcomes to spill over into other policy fields and be shared with other arts and culture actors, policymakers, economic and social stakeholders, and society at large” (ibid., p. 6), which does not specify the nature or anticipated effects of spill-overs. Complexity can be detected in the proposal of activities to be considered for funding. As specific as many of these actions appear, the wide scope and the neglect of compromises lead to a seemingly all-encompassing proposal. There seems to be nothing that should not be funded (ibid., pp. 4-7). Apart from these and very specific recommendations concerning the programme management (ibid., p. 8), the wide scope combined with ambiguous wording does make the manifesto a rather universal albeit to a certain extent meaningless piece of advocacy. It pleased, however, the majority of CAE members and external supporters as campaign signatures reveal. WAM might not have been overly specific in their demands, but successfully responded to the intrinsic diversity of CAE’s members.

TRANSPARENCY

CAE has made organisational and financial information available in the EU’s central Transparency Register and has signed the Code of Conduct, which shows a sincere commitment (EU Transparency Register 2014). Yet, due to a limiting request, the information is not extensive, the use of two languages impairs comprehensibility, and financial data is only available for the past two quarters of the year. Annual reports provide a satisfying amount of detail concerning institutional issues such as membership, finances, activities and partnerships. It is noteworthy that CAE has made all campaign advocacy material publicly available, has distributed a lobbying handbook and has supplied contacts whom to lobby. Due to the initiative of members and supporters, these documents could be translated into many languages, adding to accessibility. As the regional coordination groups were only loosely attached to CAE, their developed advocacy material is not in all cases freely available. Neither have regional activities been formally evaluated and documented (Dudt 2014; Zakrzewska-Duda 2014) limiting transparency of conducted advocacy. While inaccessible language has been one

1 For further information, please consult the COST research project Investigating Cultural Sustainability at http://www.culturalsustainability.eu/.
point of criticism (EUBO 2014; Zakrzewska-Duda 2014), CAE is very keen – despite a rather complicated user interface – to explain most eurospeak on their website.

Although the publication of internal documents such as committee meeting minutes, drafts and consultation forms is desirable to achieve a high level of external transparency, it is strategically understandable not to publish such information. The vast majority of CAE members rely at least partially on funds allocated to them by the EACEA, the executive agency of the EC. Not to bite the feeding hand is a serious concern for individual organisations and increasingly support CAE for the reason that they serve as buffer and mediator (EUBO 2014). For reasons of examining responsiveness and execution of anticipated participatory mechanisms, transparency in decision making and internal debate should be subject of improvement. External communication channels are well developed and transmit a lot of information through various organs, whereas internal communication is demanded to be improved, especially cross-member dialogue (Dudt 2014; Zakrzewska-Duda 2014). Financial transparency is key as a registered charity and allows anyone to monitor the monetary independence of CAE.

INDEPENDENCE

39 per cent of CAE’s income derives from one funding source: the European Commission (Culture Action Europe 2011, p. 11). Another large part comes from the European Cultural Foundation (Culture Action Europe 2014b), an independent Netherlands-based not-for-profit foundation. Apart from maintaining a network of European cultural organisations and representing their views at EU level, no instructions are attached to this institutional funding. In fact, the EC officially values cooperation with the cultural civil society representative, which was founded on initiative of the sector. CAE does not employ partisan affiliations, nor is it in contractual relationships to political entities. However, impartiality of the Executive Committee, the WAM Advisory Committee and Secretariat staff cannot be conclusively attested. Table 2 illustrates that 23 per cent of all transnational networks are represented in the Executive Committee, whereas only 9 and 8 per cent of national networks and organisations respectively provide representatives.
Although the entire membership is allowed to vote for Executive Committee members, it is again the lack of formal inclusion strategies that may limit participation of certain actors and subsequently pushes CAE into an internal dependency. The Advisory Committee also features five CAE member representatives, two of whom are also part of the Executive Committee. Regardless of contentual preferences, a conflict of interest can be suspected.

Table 2: Organisation type of Executive Committee members 2010

<table>
<thead>
<tr>
<th>Executive Committee members in</th>
<th>Amount</th>
<th>Percentage</th>
<th>Of type total</th>
</tr>
</thead>
<tbody>
<tr>
<td>Transnational networks</td>
<td>7</td>
<td>54%</td>
<td>23%</td>
</tr>
<tr>
<td>Transnational organisations</td>
<td>0</td>
<td>0%</td>
<td>0%</td>
</tr>
<tr>
<td>National/regional networks</td>
<td>3</td>
<td>23%</td>
<td>9%</td>
</tr>
<tr>
<td>National/regional organisations</td>
<td>3</td>
<td>23%</td>
<td>8%</td>
</tr>
</tbody>
</table>

(Culture Action Europe 2010; Culture Action Europe 2011)

While those marginal issues on independence do not factor significantly, staff affiliation needs to be assessed more closely as they are the main actors in advocacy performance. At least two staff members have been working or have moved on to jobs in the administrative apparatus of the European Union and many others also remained in the euro bubble. This phenomenon is not uncommon for Brussels-based organisations (Courty and Michel 2013), yet it doesn’t free those people from partiality allegations. The rather high fluctuation of staff members within CAE and personal observations (EUBO 2014) only emphasise that working at a CSO is often only one step on the career ladder in the European sphere and, thus, carries concerns about independence and sincerity with it. Generally, CAE is displaying a high level of independence with only minor points to monitor.

SUMMARY

Judging from memberships in multiple networks, which count advocacy to their activities, and discussions with various organisations and networks, CAE is far from being the only choice of political representation for many. In addition to CAE’s centralised actions and the regional coordination groups, many members also employ means of classical lobbying by building personal relationships to
politicians and EU bureaucrats (i.a. EUBO 2014; Zakrzewska-Duda 2014). While CAE is encouraging multi-channel advocacy, they also complain about the lack of proactive behaviour of their members. Regardless of the impressive number of members, demonstrated independence and a great deal of transparency, active participation in internal decision making processes remains low. The inclusion of marginalised cultural operators among its diverse membership appears equally disappointing. Interestingly enough, despite the imbalance of true deliberative participation and the absence of effective inclusion strategies, there is a very high degree of satisfaction with the content of CAE’s advocacy work. Responsiveness, in spite or possibly due to the not insignificant extent of its vagueness and ambiguity, is remarkably adequate. Rodekamp (2011, p. 107) poses the obvious question whether “adequate member representation can be realized without member participation” and further argues “that lower levels of participation serve the effectiveness but harm the equality of representation.” It is debatable whether effectiveness would be impaired. It seems rather to be a question of efficiency since the output of CAE has always met the demands of its subscribers. Rodekamp’s study (ibid.), however, is not concerned with cultural policy and thus, the peculiarities of this policy field will have to be considered to explain some of the phenomena, including the reasons why CAE is behaves the way it does and why members are reacting in the manner observed. This will be covered in the following chapter.

6 | THE REALITY OF CULTURAL POLICY

“Because networks are voluntary and horizontal, actors participate in them to the degree that they perceive mutual learning, respect and benefits”, Keck and Sikkink (1999, p. 100) postulate. It is not that straightforward, though, and certainly is not for culture as an operating sector and a policy field as the case study has vividly shown. The conceptual problems around cultural policy discussed in Matarasso and Landry’s policy note (1999) do shed light on a few ‘strategic dilemmas’ but hardly explain the ramifications of these for the sector. The level of engagement of cultural organisations and networks in activities to meaningfully advocate for their causes in the European political arena and the
reaction, as well as structures provided for them by their official representative and advocating body, are carefully described in preceding chapters. They clearly show a discrepancy between the anticipated deliberative, inclusive, legitimate, accountable and effective practice of cultural interest representation and the structural factors limiting either side’s procedural ideals. This chapter intends to provide three not mutually exclusive approaches to explain the phenomena witnessed. Both the perspectives of the advocacy network CAE and its member organisations will explore the reality of structural constraints, efficiency trade-offs and strategic limitations in cultural policy advocacy. Succeeding paragraphs will then highlight recent developments within CAE and their impact on accountability and legitimacy before a modest attempt to craft recommendations for actors in the cultural and the political sphere, with a special emphasis on their intermediaries is undertaken.

Applying the accountability and legitimacy assessment framework by Steffek et al. (2010), CAE and WAM were analysed not only in terms of structures, processes and mechanisms but also regarding actual conditions and developments based on empirical data. Among the identified phenomena are the following eight:

1 | Input rather than dialogue oriented participation mechanisms and communication tools
2 | Comparatively few individuals involved in decision making process
3 | Lack of proactive behaviour by majority of members
4 | Dominant representation of large transnational networks
5 | Numerical underrepresentation of already marginalised member organisations
6 | Successful mobilisation of and through regional coordination groups
7 | Ambiguity, vagueness and attempted universality in policy positions
8 | Overall positive reaction towards these policy positions

Clearly, some points intersect and are repercussions of others. Yet, these findings are merely symptoms of larger, specific causes. Firstly, elitism of actors and the associated debate in cultural policy, as well as the resources that actors are lacking to engage in this debate in the first place, considerably limit means of participation and impair equal representation – qualitatively as well as
quantitatively. Secondly, a myriad of national, or in some cases regional, policy making styles and governance approaches, as well as the intrinsic diversity of values and cultural expressions across the European continent, further contribute to the challenge of transnational mobilisation and effective representation. Lastly, while structural limitations emanating from the EU apparatus constrain deliberative action and nuanced advocacy, the celebration of ambiguity and vagueness in positions papers and advocacy activity is a key success factor of universalising policy messages and securing sustained support from the membership. The following paragraphs will explore these three topic areas in detail.

ELITISM AND LIMITED RESOURCES
Ruthless neo-liberalism has produced a system in which capital, class and access are inextricably linked. Unfortunately, cultural organisations are not exceptions and must deal with challenges of economic survival and socioeconomic permeability, just like the rest of society. The non-financial value of culture is difficult to determine\(^2\) and so evaluation of policy is often tied to economic assessment criteria. In the long run, this inevitably leads to a lack of participation in advocacy and decision making process, or as Mulcahy (Gattinger 2012, p. 5) describes it evolutionarily as cultural darwinism.

The European Union is practicing the maintenance of exactly that with its Creative Europe programme. Barriers such as years of existence before an organisation can apply, providing large matching funds to effectively operate, ridding grants of administrative funding and the number of project partners give large, well-established and affluent organisations a clear advantage. Subsequently, it creates a distinct inequality of actors both applying for and receiving funds, which mainly manifests itself in geographic origin, size and monetary government relationships.\(^3\) In accordance with the principle of subsidiarity, the EU can allocate funds only to collaborative projects of European character and not

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\(^2\) Developments in research exploring value of culture can be followed on the website of the Warwick Commission on the Future of Cultural Value: [http://www2.warwick.ac.uk/research/warwickcommission/futureculture/news/](http://www2.warwick.ac.uk/research/warwickcommission/futureculture/news/)

\(^3\) Selection results of funded projects, networks etc. can be found on the website of the EACEA: [http://eacea.ec.europa.eu/creative-europe/selection-results_en](http://eacea.ec.europa.eu/creative-europe/selection-results_en)
interfere in national and regional cultural policy making. Many organisations are simply not large and wealthy enough to host a *Creative Europe* project in addition to their normal operating agenda, based on the current conditions. Irrespective of mentioned obstacles in the process, in Ireland even the entry barrier of financing a funding application is too high for many cultural organisations (Carew 2013, p. 9). The non-affordability of investing time and expertise into such an endeavour had already affected marginalised actors during the 2007-2013 funding round with Northern European countries doing particularly well in funding acquisition (ibid., p. 8).

If even the process of applying for EU grants occurs to be an unsurmountable obstacle, how then could and would organisations possibly advocate in the sphere that effectively denies them entry? Understandably, due to its unquantifiable impact and yet resource intensive nature, priorities in resource allocation are to be found in project delivery rather than advocacy. Even more so because the EU culture budget is almost irrelevant in size compared to national and regional investments and subsidies. If inclined to be politically active, delegating its voice to a large CSO network is a conscious, primarily inactive but perhaps strategic decision since:

[… it is only those who are either already well established in the networks of the European cultural landscape, or even beneficiaries of the programmes, who are involved. The voices of artists and smaller associations that have few resources and little international or strategic knowledge are rarely incorporated. (Bruell 2013, p. 35)

This results in an unfortunate cycle: If you are not affluent enough to lobby, your demands for fewer resource barriers will not be heard and, hence, nothing changes. However, small organisations see their chances in changing the current funding landscape in direct engagement with the more accessible political actors. The distance of power to national and regional politicians, who might be MEPs or members of the group negotiating the position of the country’s delegation to the Council, is significantly smaller. They therefore appear more approachable – physically, linguistically as well as style-wise – and organisations will need to
invest fewer resources. In many cases, relationships are already established due to institutional or personal links (EUBO 2014; Zakrzewska-Duda 2014).

The low level of participation of small actors compared to affluent and established transnational networks in CAE’s consultation regarding WAM objectives can, thus, be explained by the EU’s intrinsically discriminating culture programmes, the state of permanently underfunded cultural organisations and the large perceived distance to policy debates and political actors. The regional coordination groups in some countries were successful as they allowed less endowed and experienced actors to actively engage in voicing concerns and demands. Whereas most Brussels-based advocacy through CSO networks often follows rather strict formal and informal procedures, looser coordination in CAE’s regional coordination groups made participation more accessible and efficient. Yet, the regional coordination groups, which evolved in countries such as the Netherlands, Germany and Sweden, could only flourish if, again, resources were available to engage in dialogue and advocacy action. The notion of cultural darwinism, the survival of the most affluent, thus, can be classified as adequate. It contributes to the challenges CAE faces and partly explains the network’s reactions to keep advocacy still operable by compromising certain elements of deliberation over efficiency.

VALUE AND STYLE DIVERSITY

Rich diversity goes hand in hand with increasing complexity. One size does certainly not fit all. Many people have failed evaluating cultural policy utilising an institutionalised set of criteria without taking the peculiarities of every single case into account (Belfiore and Bennett 2010). By expanding the scope of analysis and evaluation, more and more factors have to be considered before an informed decision can be made. With each step into a new political administrative unit or system, another geographical and cultural area, a different sector or social environment things like values, interpretations, approaches and relationships have to be re-explored and for analysis renegotiated. It is diversity that enriches and at the same time complicates matters for advocacy of transnational CSOs in EU cultural policy.
The diversity adding to the complexity finds expression in four dimensions. In the first instance it is the interpretation of the term *culture*. The concept is essentially contested (Gray 2009, p. 576) and usually oscillates between the notions of culture as the arts or as a way of life (Matarasso and Landry 1999, pp. 11-12). Problems may occur if two parties with different understandings engage in debate unknowledgeable of the counterpart’s interpretation. They can also be easily amplified if uneven power relations impact on the discussion. Secondly, the intrinsic diversity of values, languages and cultural expressions in the vague geographical unit of Europe cannot be denied even though influential figures like Huntington (1993) claim to have found the homogenous essence of culture, or *civilizations*, in distinct geographical areas. The current state of cultural diversity can be more accurately described by Welsch’s (1999) concept of *transculturality*. Constant dynamics of hybridisation explain both societal and individual diversity of culture as well as change thereof. Furthermore, European countries have operated in very diverse systems and in many cases still do display considerable differences. The historic development of polities had strong impacts on how inter alia constitutional monarchies, former Socialist states and social democracies employ individual approaches to public policy making. Styles characterised as consensus, negotiation, concerting and conflict may not be exclusively national but display national and sectoral specificities (Knill and Tosun 2012, pp. 32-37). Factors, which influence process and nature of these policy styles, include, among others, socioeconomic composition, economic situation, path dependencies, policy paradigms, coalition building and state-society relationships (ibid.). Lastly, expanding the dimension of policy styles by each polity’s unique approach to the specific policy field of culture, even more complexity is visible (i.a. Gray 2009, pp. 580-582). Littoz-Monnet (2007, pp. 22-30), for example, characterises the three predominant cultural policy models in Europe as liberal (e.g. United Kingdom, Finland), dirigiste (e.g. France, Spain) and federal (e.g. Germany, Belgium), of which each again displays sub-categories.
I think there are philosophical reasons … and they are geographical too – our relative isolation and our lack of being plugged into networks. So for example if you are a venue in Ghent you’re working with Dutch, German, Danish partners all the time. It’s in the DNA. Its [sic] not so straightforward for us to do that, both geographically and culturally, and linguistically because remember you’re moving outside of the anglophone European footprint as well. (Carew 2013, p. 10)

From an arts organisation point of view, Gerard Godley, Director of Ireland’s Improvised Music Company, reinforces here how diversity can enable and limit at the same time. While cultural operators from similar backgrounds – and that is particularly true for the arts which have value debates at their very core – find it easier to collaborate, similar challenges occur in the political sphere. Discussions among such diverse actors, thus, can be very different in shape, content and even aim. The EU as supranational organisation operates under yet another, unique polity with its own intrinsic values. Apart from the lack of resources, the communication barrier resulting from Europe’s vast diversity might be another indicator for the territorial imbalance of the EC’s public consultation regarding Creative Europe (Bruell 2013, p. 35). Mediating these clashes and misunderstandings, whether perceived or not, is a major task of cultural interest groups such as CAE. Legitimate representation can, therefore, only be achieved through translation, mediation, filtration, reflection and negotiation.

Culture influences the way culture is governed and vice versa (Schmitt 2011). Hence, CAE became increasingly a product of the Brussels sphere, the euro bubble. Professionalising and adapting to EU polity is key to be heard in the fierce and fast-paced environment of the EU, but practicing effective inclusion of one’s diverse members is equally important to be accountable to and for everyone. Although in 2008 the European Forum for the Arts and Heritage has acknowledged the need for more inclusive practices renaming itself Culture Action Europe (Culture Action Europe 2009), individual members are still not at the heart of the debate, possibly do not even understand it. By engaging in CAE’s regional coordination groups for advocacy, member organisations cherish the familiarity of the debate, the process and the system. By using trusted channels, no new cultural or political codes need to be learned. Even though CAE is increasingly engaging in the tasks mentioned above, it still cannot cater for every
single member because diversity of backgrounds is simply too large. Unfortunately, one size will never fit all.

**STRUCTURAL CONSTRAINTS AND ADVOCACY AMBIGUITY**

As pointed out multiple times, cultural policy is a field that does not adhere to the general logic of public policy. Too many ‘strategic dilemmas’ (Matarasso and Landry 1999), with interpretational sovereignty and value assessment being at the heart of the discussion, complicate production of specific and meaningful policies. Gray (2014) theorises one structural impact of such debates – whether encouraged or avoided – on the political process as *policy ambiguity*. This concept might as well be applied to CSO networks engaging in advocacy rather than to state matters exclusively. Both structural conditions as well as deliberate choice of efficiency and effectiveness considerably influence actors’ decisions. Operating within EU jurisdiction as legitimate and accountable representatives of civil society, thus, presents CSOs with multiple occasions of coercively and deliberately exercised policy or in this case advocacy ambiguity.

It has been established that the EU displays a unique polity, within which a variety of actors must play according to the rules laid out by the very bodies of the EU. These rules include mechanisms of how to involve private actors in the policy making process. While CSOs, especially members of the CSCG, are regularly consulted by the EC, they do not enjoy effective legal power to be included. They are vulnerable to personal leadership styles of the EC incarnate in the EC President, who, for what cultural policy is effectively concerned, has always been José Manuel Barroso. By urging CSOs to coordinate themselves and present opinions with one voice for the sake of efficiency (Edler-Wollstein and Kohler-Koch 2008, p. 206), he perhaps unintentionally gave them reason to generalise their policy objectives. The EC’s unwillingness to consider nuanced policy objectives resulted partly in vague, ambiguous language to please all parties involved. Relating to Gray’s second explanation of ambiguity as a deliberate policy preference (2014, pp. 6-7), CAE did generalise the claims of their vastly diverse range of members asking for a wide variety of activities to be funded, which in light of lacking specific preferences equals to a significant amount of ambiguity. This top-down approach of addressing EU legitimacy problems poses
a structural constraint that required sensitive reaction in the form of advocacy ambiguity as not to endanger the marginal importance of EU cultural policy even more.

Acknowledging the professionalism in EU matters and the centrality of CAE’s secretariat in its own decision making, it could be argued that the initially anticipated complexity of policy preferences was deliberately withheld from the drafting and subsequent consultation process. While there is no evidence for this claim, Barroso’s desire for efficiency, both content-wise and procedural, did not come as much of a disadvantage for CAE to gain widespread support from the cultural sector. Ambiguous wording made it easy and appealing for diverse cultural operators and networks to support the objectives presented by an umbrella CSO claiming to be the most important representative of the sector at EU level. CAE advocated for a higher budget and the inclusion of a vast number of activities to be funded. These objectives were easily agreeable for the majority of members and simultaneously mobilised many more non-members around the WAM manifesto. Legitimacy and support from within the membership could also be gained because “positive results, whether meant or not, can always be claimed as being the inevitable result of putting policies into practice” (ibid., p. 7). Thus, members are more inclined to continue to support CAE since their advocacy ambiguity in almost any case yields perceived or at least professionally communicated advocacy success (Culture Action Europea 2014a).

Gray (2014) also provides a viable theoretical approach to explain the emergence and effectiveness of CAE’s regional coordination groups. By leaving the manifesto in parts vague enough for interpretation, discretion thereof falls to the next lower administrative level (Gray 2014, p. 4). The regional clusters seized the opportunity to add few specific demands of national dimension and, thus, did not jeopardise CAE’s integrity in front of the EC. This more inclusive approach of allowing specificity in advocacy to happen, which on the higher level would not be feasible and perhaps even destructive, is also feeding perfectly into CAE’s new strategic direction. While acknowledging the structural constraints, advocacy ambiguity might have been a deliberate choice of efficiency in the past and
currently aims to expand CAE’s target audience and mobilise more individuals and non-members.

RECENT DEVELOPMENTS
In 2012, CAE’s General Assembly was the arena for putting the interest group on a new strategic track. As it was agreed by the Secretariat and the Executive Committee unanimously, WAM was first and foremost an experiment and a challenge to mobilise the cultural sector in Europe for political action at supranational level (Dudt 2014; Pouply 2014). Problems of limited inclusion and insufficient deliberative participation processes were addressed by opening membership to individuals, establishing partnerships outside the sector and a commitment to more participatory practices (Culture Action Europe 2013, p. 9).

CAE’s and its members’ common future shall be based on the members’ direct and active participation in the network’s development: it will enable CAE to have stronger influence on decision-making and will increase opportunities for common project-oriented activity. (ibid.)

The focus on allowing room for cooperative projects to flourish is also linked to the most remarkable development of CAE’s strategic turn.

CAE is conscious that limiting itself to voice the demands of the arts and culture sector by mainly defending the sector’s interest in the framework of the EU cultural policy is no longer enough. (ibid.)

CAE starts to embrace the deep-rooted notion of civil society organisation by assuming responsibility for all members of the public sphere. The deliberative shift from lobbying and advocacy in the more narrow sense to public affairs and “work[ing] on public opinion” (Pouply 2014) could be witnessed in WAM as hybrid between the two approaches.

With the measures taken in the aftermath of WAM, quite a few of the accountability and legitimacy concerns voiced in this research paper were addressed and effectively eased. This step towards deliberation is certainly bringing CAE closer to the basis of civil society. At the same time, however, the network is experiencing a widening gap to the political sphere and compromises its central position as main representative of the cultural sector at the EU. The
structural constraints that have limited scale and depth of CAE’s advocacy campaign might have influenced the members to embark on the restructuring operation. If CAE is not effectively recognised as a valuable partner with a consultative mandate due to its sector expertise by the EU, why should they not also change their main target? Simultaneously working with and addressing a wider public, essentially opening supranational and national fora to engage in dialogue about EU cultural policy and bigger topics such as CAE’s new objective of the introduction of culture as a concept into the debate around sustainable development (Culture Action Europe 2013, p. 9), CAE attempts to approach policy intervention from another angle. Reaching large audiences and convincing them with simple and easily agreeable objectives mobilises a significant portion of the European public sphere. While still exercising necessary lobbying tasks, CAE has swayed from intervening at the drafting stage to actively shaping EU agenda setting. And since EU cultural policy is still organised around the principle of subsidiarity, afore-mentioned national fora will extend the idea of CAE’s regional coordination groups and serve as effective institutions of lobbying via less visible channels.

SYNTHESIS AND RECOMMENDATIONS
Calling up the normativity of the deliberative concept of CSO accountability and legitimacy, participation and inclusion were the two slightly worrisome criteria with responsiveness displaying an unexpected yet understandable behaviour. Many of the points criticised were the direct reaction to structural challenges limiting the capacities of CAE to operate in a way its members and wider civil society would expect it. Elite selection through cultural darwinism in EU funding programmes and general financing as well as professionalised advocacy centrality account for systemic marginalisation of young, small and poorly funded cultural actors and considerably complicate participation. Cultural diversity as well as semantic discussions and the large variety in polities and cultural policy models create an exclusive atmosphere in the advocacy centre, which is permeable but hard to pervade without a lot of effort or empowerment practices. Political steering mechanisms of personal style preferences through EU consultation processes impair CSOs’ autonomy in responding with nuanced and meaningful
advocacy. All these structural constraints had to be addressed by CAE in order to keep functioning as an interest group for the arts and culture. Most issues the Secretariat faced could be temporarily dealt with through operational efficiency resulting in imbalanced inclusion and less deliberative participation. Essential, however, was allowing and empowering regional coordination groups as they could address many of the structural challenges that exist at EU level much more effectively on a national or regional level. Smaller power distances, greater cultural and linguistic but also policy style accessibility, freedom to include specific objectives, and looser institutional and professional structures enabled regional clusters to complement the advocacy work of CAE.

The recent strategic realignment of CAE has, at least on paper, addressed many of the shortcomings highlighted in this research paper. Some lessons from the not unsuccessful WAM were learned. Looking at the structural constraints, which have put CAE into that position in the first place, the resource limitation and resulting elitism is unlikely to change domestically and perhaps only with even more advocacy at EU level. Diversity is intrinsic to Europe, its cultural sector and political systems, for what reason change is not even anticipated. The only window of hope concerning outside factors, however, is the recent reshuffling of the EC. Both Jean-Claude Juncker as its new President and the new Directorate-General for Education and Culture Tibor Navracsics, who belongs to Hungary’s right-wing party Fidesz, can tremendously influence the way CSOs have access to and eventually impact on decision making processes. As they will inevitably shape the new funding programme for culture to be launched in 2021, their politics and policies will affect again the first point of concern, limited resources to participate. In order to improve structures and processes of cultural interest representation based on the accountability and legitimacy assessment, the exploration into particularities of cultural policy and recent organisational as well political developments, some modest recommendations were compiled:

1 | For interest groups: do not compromise lobbying in the classical sense over public affairs and campaigning entirely but instead operate in both fields; adapt communication and semantics to an accessible standard which suits each situation and addresses diversity in all forms; renegotiate with
members and other stakeholders how ambiguous policy preferences should be formulated; embrace new strategy towards more direct participation and deliberation; facilitate better communication between regional coordination groups.

2 | For cultural organisations: recognise EU cultural policy as an integral part of multilevel support mechanisms for the cultural sector; engage in sustained and comprehensive exchange of opinions, experiences, expertise and contacts in order to allow CAE its refining and dissemination; establish direct and cooperative relationships with relevant stakeholders, especially politicians and executive staff; effectively unite politically in order not to be outplayed by more economically driven forces.

3 | For the political sphere: recognise culture as a central field of public policy making, particularly financially, that requires long-term planning; design policy frameworks that empower rather than widen the participation gap; increase democratic legitimacy of the EC and, thus, decrease the influence of personalities on EC operating style and preferences.

7 | CONCLUSION

Cultural interest representation at EU level is not living up to the expectations the cultural sector and civil society cherish. Not yet at least. CAE is the largest CSO network in Europe, which operates on the intersection of the cultural and the political sphere, and bears great responsibility to a range of stakeholders. During the negotiations for the EU’s culture funding programme Creative Europe, WAM was the first attempt of combining classical lobbying activities with a large-scale campaign directed at cultural operators at national level and the European public. This research paper shows what problems CAE had to deal with and how they reacted to structural challenges. Too centralised decision making processes, a lack of effective inclusion measures and partly ambiguous policy preferences account for points of criticism in CAE’s self-imposed commitment to CSO accountability and legitimacy. As the cultural interest group operates in the often academically and politically neglected policy field of culture, specific rationales of cultural policy explain some of the phenomena not every advocacy actor faces. Limited
resources of cultural actors and one of its enabling factors, cultural darwinism that seems to be intrinsic to EU cultural policy, constitute a serious obstacle for participation. Tremendous diversity in terms of interpretational sovereignty, values and cultural expressions, polities and cultural policy styles adds to challenges of communicating effectively and, thus, including deprived actors. Structural conditions of the political environment in Brussels contribute to behaviour of compliance and calculated non-commitment. All these factors partly determined how WAM and CAE were organised and gave rise to the emergence of loosely attached regional coordination groups. CAE did compromise some ideals of deliberative democracy in order to operate efficiently in the fast-paced environment of EU public policy making. However, recent developments, both within CAE and the EU, reshuffle some determinants, wherefore the upcoming years need to be monitored closely. Cultural interest representation in 2014 is at a critical junction of balancing lobbying and public affairs or disappearing again into indiffference by both the cultural and the political sector.

As this study has only been an explorative inquiry with limited scope into cultural interest representation in EU cultural policy, several limitations should be acknowledged in order to assess the validity of the paper. Interview partners are not sufficient in quantity to produce a truly representative study. Besides, it should be considered that the few responding organisations were in most cases rather active in CAE’s consultation process and, thus, do not display a significant sample. While it makes sense considering the factor of limited resources, it reduces the validity nonetheless. As Papadopoulos (2008, p. 189) rightly points out, interviews in the context of interest representation might be biased due to interviewees’ position as insiders or outsiders, their sincerity or personal stakes in the political sphere. Such opaqueness also occurs in internal processes of negotiating policy content which complicates assessment of the criterion responsiveness. Furthermore, it should be noted that not all dimensions of diversity were explored to a satisfactory extent. Researching inclusion along factors of, inter alia, amateur or professional orientation and independent or government funding are yet to be investigated. Lastly, Gray’s concept of ambiguity in cultural policy (2014) deserves more attention and in-depth analyses than it received in this paper. Overall, the study should be understood as a first
modest attempt of enquiring into the field of interest representation in EU cultural policy rather than a comprehensive study. In addition to mentioned shortcomings, further research on these and adjacent topics should include admittedly difficult impact studies in order to improve utilisation of tools and methods for cultural advocacy, the development of the EC’s cultural policy rationales and its affecting variables as well as the relationship between local, regional, national and supranational advocacy activities.
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