INFORMATION POLICY AND THE PUBLIC SPHERE

EU COMMUNICATIONS AND THE PROMISES OF DIALOGUE AND TRANSPARENCY

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Abstract

Taking EU communications as a case study this article deals with the relationship between communication activities of public authorities and the public sphere. Traditional theories of the public sphere regard government communications as an unwelcome intervention that distorts free and open debates. This article argues that public relations activities of governments should be analysed as being part of the implementation of an information policy that also comprises citizen's rights of access to documents and information. Whether information policy distorts or supports free deliberation is an empirical question that is answered by looking at the information policy of the European Commission since the year 2000. In response to the challenge of communicating Europe to largely disinterested audiences, the European Commission has reformed its communications in order to foster a European public sphere through enhancing the transparency of European governance and starting a dialogue with the citizens. The study shows that the EU fails on its promise of dialogue and that transparency could still be improved. The information policy of the Commission aims at normatively acceptable goals while using ineffective means. Information policy does not turn out to be propagandistic but ineffective. Focussing on media relations could make PR more effective in reaching out to the wider public. If journalism functions as its necessary corrective and citizens are empowered through strong rights of access to information, than information policy could contribute to a vivid transnational public sphere.

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Introduction

The European Union has a long-standing tradition of *not* communicating with the broader public. Until the 1990s, political elites have pursued their agenda of political and economic integration, while most citizens remained uninformed and by and large uninterested in what was happening in Brussels. The rejection of the constitutional treaty by the French and the Dutch voters in 2005, the Irish "No" to the Lisbon treaty in 2008 and the record low voter turn-out in the 2009 European elections are indications of the end of the traditional mode of European governance. From the perspective of the EU elites, the legitimacy crisis of the EU at least partly results from a "communication deficit" (Meyer 1999). According to policy papers from Brussels (e.g. European Commission 2006), the key for tackling this challenge is to foster the development of a European public sphere. To further this purpose, the European Commission has intensified its communication activities since the mid-1990s. From 2004 until 2009, communication even became part of the portfolio of a Commissioner. Margot Wallström who was appointed to this post initiated a comprehensive reform of the communication activities of the Commission (European Commission 2005a, 2006). Communication was supposed to become more than just an appendix to politics: "This Commission has made communication one of the strategic objectives for its term of office, recognising it fully as a policy in its own right" (European Commission 2005a, 2). The new policy aimed at enhancing the *transparency* of EU policy-making. Furthermore, it was designed to promote a *dialogue* with the citizens and thus prepare the ground of a thrivint *European public sphere* (European Commission 2006, 4-5). The promise of fostering a European public sphere understood as a transnational network of communication arenas where European citizens can participate in public debates about issues of common concern provides the research question for this article: Does the information policy of the European Commission effectively pursue this ambitious aim? Responding to this question requires the exploration of new grounds in political communication theory and research. The first challenge is to develop a framework for analysing information and communication activities as a *policy* and relating it to the notion of a democratic public sphere. The second challenge exists with regards to the operationalisation of this concept for analysing the case of the European public sphere and the information policy of the Commission. On a theoretical level, the empirical findings should allow for a better conceptualisation of the relationship between the public sphere and government communication activities.[1]

Information Policy: Connecting Public Relations and the Public Sphere

In everyday talk, journalists might write about the "information policy" of an energy company after an incident at a nuclear power plant. This use of the term equals information policy with public relations, which may be defined as "part of the management of communication between an organisation and its publics" (Grunig and Hunt 1984, 6). For the purposes of this article, however, the concept of information policy is meant to provide an integrative framework for analysing information and communication activities as *a policy*. Policy is understood as a set of governmental decisions (Dye 1972, 2; Jenkins 1978, 5). PR activities can thus be

analyzed as being part of the implementation of a policy governing all activities related to the exchange of all sorts of information, facts as well as opinions, between a public body and its environment. Therefore, this area of political activity may be defined as follows: *Information policy is a set of political decisions, which determine the goals, rules and activities of an organisation's communication with its constituency.* In contrast to private actors, who might limit their communication to address important stake holders, the constituency of democratic government bodies is the general public.

Information policy does not only result in certain strategies and means of active communication (*public relations*), but also in regulations of access to information (*transparency regime*). Viewing PR and transparency rules as belonging to the same policy enables us to explore the relationship between the two. While PR deals with communication understood as active and purposeful exchange of information and opinion which includes strategic persuasive communication campaigns, transparency rules define the right of the citizens to access all sorts of sources and not only the purposefully prepared messages of PR agents. PR might facilitate broad access to information but tensions might also arise between efforts of PR to withhold information and give it a certain "spin" and regulations that provide rights of full access to information. Having defined information policy, I will now briefly introduce the concept of the public sphere applied here and discuss the relationship between European information policy and European public sphere.

The term public sphere has numerous meanings. First of all, the adjective "public" describes objects which are neither secret nor private (Peters 2008/1994); "public" means, being accessible for everyone and being relevant to the political community as a whole. Discussion about what should concern the political community as a whole is one of the main functions of a public sphere. In this article, the public sphere is understood as a public space of communication with vital functions for democracy. It is a sphere of social interaction that is structured as a network of spaces of political communication (Habermas 1962/1989; 1992/1996). The various arenas of public communication are connected by communication flows (Hilgartner and Bosk 1988; Gerhards and Neidhardt 1991). Central junctions of this network are the mass media, which make the debates of smaller arenas of public communication accessible to the broader public. The notion of a public sphere differs from descriptive concepts such as "political communication" by its normative implications and its reference to the political community. Normatively, the public sphere is conceptualised as being an integral part of democracy. It serves two basic functions: Public debates have an informative function and they establish the *transparency* of the political process. Beyond that, they have a discursive function: they are the place of *exchange* of ideas, opinions and arguments (Peters 2005, 104).

This concept of a public sphere (see Ferree et al. 2002 for a typology of different approaches, and Splichal 2006 for an analysis of different philosophical roots of public sphere theory) may be transferred from the national to the transnational level: A *transnational public sphere* is a space of communication which is comprised of a set of national public spheres connected by communication flows: "a cosmopolitan public sphere is created when at least two culturally rooted public spheres begin to overlap. [...] It will be a public of publics, a decentred public sphere that permits many different levels without an implied universal audience" (Bohman 2004, 138-139).

The *European public sphere* is a network of national spaces of communication in Europe. The particularity of a European public sphere, in contrast to other big transnational communicative spaces, is the existence of the common political framework of the European Union. This common political authority can be addressed when actors in the public sphere make their claims. And EU politics can be expected to be responsive to public opinions expressed within this sphere of publics. This is why this transnational space of communication can become a *political* public sphere.

The question still arises, however, whether the social infrastructures are in place, which can carry transnational debates in Europe. In the absence of strong transnational media (Schlesinger 1999), the European public sphere evolves from activities in the existing national arenas of communication. This is not to say that a European public sphere exists just because there are mass media in all European countries. The European public sphere exists only to the extent that national public spheres open up for transnational flows of communication of a European scope. This process of Europeanisation encompasses different dimensions. Different approaches converge to put the following three dimensions at the heart of a developing European public sphere (Wessler et al. 2008; Koopmans and Erbe 2004):

1. Increasing discussion about EU issues (vertical dimension);
2. Intensifying connections between national public spheres (horizontal dimension);
3. Development of a perspective as participants of a common debate (identity dimension).

Empirical research on the European public sphere has brought to light the ambivalent finding of a *national segmentation of public spheres* in Europe: a trend of vertical Europeanisation with stagnation on the horizontal and the identity dimension (see Wessler et al. 2008 for a comprehensive account drawing on content analysis of newspapers in five EU countries).[2]

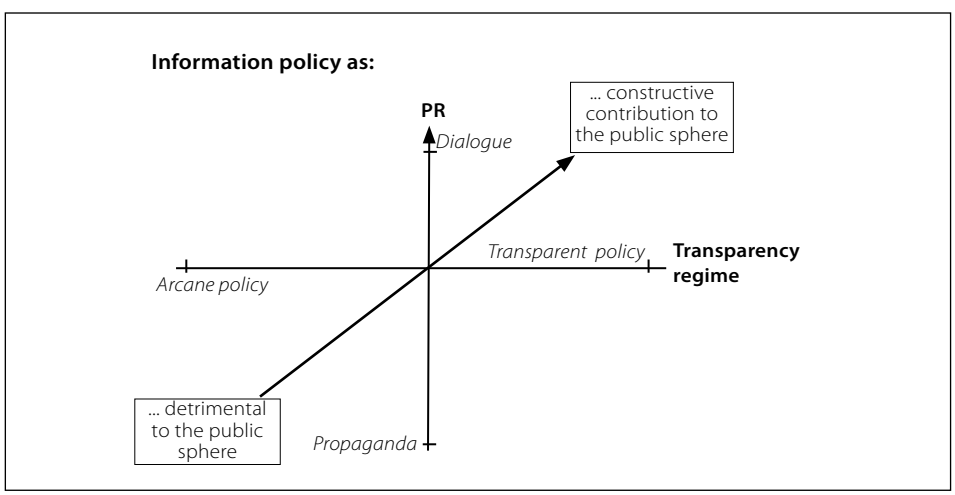
Ethics and Efficiency of a European Information Policy

So far, we have defined information policy as a set of decisions governing PR and the transparency rules of an organisation. We have defined the European public sphere as a network of national networks of public communication which forms an important precondition for democratic governance on a transnational level. Now, in what way could information policy influence the public sphere? If one follows the reasoning of the public sphere theory of Habermas, public debates should be autonomous from state control in order to enable critical reasoning (Habermas 2006). PR activities of the state and of big companies would transform the citizen's sphere into an arena of mere affirmation of power (Habermas 1962/1990). EU information policy would thus only contribute to the "re-feudalisation" of the European public sphere which would only serve the acclamation of political rule. This is the exact opposite of what the European Commission promises in terms of introducing transparency and dialogue with the citizens. If information policy was really about facilitating access to and free exchange of information and opinion, than it would be a substantial contribution to a thriving public sphere. In order to be able to evaluate whether the information policy of the Commission promotes a democratic public sphere, one has to look at both pillars of information policy: PR and transparency rules.

The analysis of the transparency regulation and its implementation will reveal whether the rules grant the citizens well-secured rights of access or rather shield state actions from public scrutiny by means of secrecy laws. Therefore, conceptually transparency regimes can be located between the poles of *transparency and arcane policy*.

Then, PR activities may also serve or distort free public discussion. PR influences public debates through strategic diffusion of themes and opinions, through the promotion of certain speakers in public debates, and sometimes also through the establishment of new communication arenas such as web platforms for an exchange of opinions on selected topics. All of this is an intervention into the structures of public debates. The question is, whether it serves to improve the chances of citizens to come to an "enlightened understanding" (Dahl 1989, 111) of politics and exercise their "right to communicate" in public which lies at the heart of the idea of publicity (Splichal 2006, 711). Thus, the contribution of PR to a functioning public sphere is not to be determined a priori: PR might or might not promote democratic communication. It could promote the debate of topics that would have otherwise been neglected by today's highly commercialised media system. It could also spread lies and silence critical discussion of policies. The extreme forms of PR may be labelled *propaganda and dialogue*. Propaganda as a concept of information policy pursues persuasive goals and employs manipulative means. In contrast to legitimate forms of persuasion, propaganda ignores generally accepted norms of communication such as truthfulness and a minimum of respect towards diverging opinions. Dialogue as a concept of information policy generates a communicative exchange with some kind of connection to political decisions (see below for its concrete operationalisation for this study). A policy orientated towards the strategies of transparency and dialogue is a constructive contribution to a democratic public sphere because it strengthens citizens' ability to form rational opinions and to participate in the political process in a meaningful way. Arcane policy and propaganda are clearly not appropriate for promoting democratic public debates.

Figure 1: Information Policy and the Public Sphere



In order to assess the actual impact of information policy on the public sphere it is not sufficient to test whether it pursues the normatively *acceptable aims* of promoting transparency and dialogue. The question is whether the policy is *effective* in pursuing these goals. Effectiveness would be the third dimension that needs to be added to Figure 1 in order to adequately locate information policy with regards to the public sphere. If the information policy of the EU actually wants to influence the transnational European public sphere, it would have to be able to operate effectively in such an expanded and complex space of communication. The communication of the EU must reach millions of citizens. Thus, besides the normative criteria, the analysis of the European information policy must also include criteria which test whether the information policy is suitable to reach out to this vast space of communication. Information policy will become effective – in the normatively desired or undesired ways – only if it reaches out to its addressees. When critics assume that PR activities of authorities lead to a re-feudalisation of the public sphere, they implicitly presuppose that the PR actually reaches the citizens and that it has effects on them. These presuppositions, especially when applied to the PR of the European Commission, should not be taken for granted.

Empirical Analysis of European Information Policy

The empirical study focuses on the development of the information policy of the European Commission since the turn of the millennium. The PR of the European Commission and the EU transparency regime will be discussed as to whether (1) they follow normatively acceptable strategies of a democratic information policy, and whether (2) the policy fulfils the preconditions for being effective with regards to the European space of communication. The analysis of the transparency rules will discuss whether they in fact are designed and implemented in a way that fosters the transparency of EU policy-making. The analysis of the PR will focus on the question of whether a political dialogue with the citizens was effectively promoted.

As for the PR, in the light of the diversity of the PR-instruments and activities by the different directorates and representations of the Commission, it was necessary to further limit the case study. The analysis has focused on the information activities around EU enlargement as this campaign became the biggest information campaign of the Commission in recent years. The analysis of the information activities related to enlargement required a multi-level analysis: it had to include the central activities in Brussels and the activities of the Commission on the national levels that was organised via its Representations in each of the member states.

The data collection was based on three pillars: expert interviews, document analysis and a standardised survey. The main data source were 59 expert interviews with officials of the Commission, the European Parliament, the European Council and the national governments, as well as with PR agencies involved, which were conducted successively between 2003 and 2006. The EU-wide overview was provided by two standardised surveys among all national representations of the European Commission and among the receivers of grants for information projects of the EU. In addition, almost 300 documents were analysed. Besides the policy documents (reports and policy papers of the Commission) also selected PR products (brochures, websites of the Commission in Brussels) and products of media relations work (interviews with Günter Verheugen, at the time Commissioner responsible

for managing EU enlargement) were included. The different sources of data were analysed using qualitative content analysis. In the following, only some of the main results can be presented here (see Brüggemann 2008 for details).

The European Commission's traditions of information policy clearly lie in a bureaucratic form of arcane policy: communication and information were neglected, though predominantly as a consequence of a bureaucratic communication culture, not as a consequence of a politically motivated conspiracy, which would consciously want to keep EU politics secret (Gramberger 1997, 100). A new, effective information policy heading for transparency and dialogue would constitute a fundamental change of the "policy paradigm" (Hall 1993), away from the structures and the organisational culture which have shaped the Commission since the 1950s. In the following, we will first turn towards the transparency rules and then move on towards the analysis of PR activities.

Towards Transparency?

The EU's transparency regime will be evaluated against criteria for a robust transparency regime according to international standards as established by a comprehensive comparison of international transparency rules in a report issued by the non-governmental organisation *Article 19*. According to international best practice, general access to all existing documents of an institution should be available with only a limited set of exceptions. A good transparency regime goes beyond the right of access to documents and also includes the routine, direct release of information, public meetings of institutions, and the introduction of registers listing all documents that the respective organisation holds. Active communication (PR) can contribute positively to realise transparency by facilitating access to information for all citizens (Mendel 2003). We will now briefly discuss how the different EU institutions perform on these criteria starting with the demand for public meetings. The discussion will then proceed from the evaluation of the formulation of the transparency rules to an analysis concerning the implementation of these rules.

Opening up council meetings. Traditionally, only the European Parliament (EP) had public meetings. The Commission and the Council met behind closed doors. For this reason, the Council has been widely criticised, since the secret meetings made it possible for national governments to lie about the policies they pursued in Brussels, and for using the EU as a scapegoat for everything that went wrong in Europe while claiming all the good for the national government. Since September 2006, many sessions of the Council and particularly the voting of the government representatives became public (Council of the European Union 2006). Today, meetings with legislative decisions are public as well as every session related to policies that fall under the co-decision regime with the EP. The citizens can follow these meetings via Live Stream on the Web.[3] There is a change towards more openness, but there are still a number of meetings (those without legislative decisions) which are not public.

A comprehensive right of access to documents. Likewise, after the turn of the millennium there was a move towards more transparency regarding the right of access to documents. Until 2001 there was no right for the citizens to access documents. The new EU-legislation (Regulation 1049/2001) is a thorough and robust regulation, which grants a general right of access to documents to all residents of the EU.

If the Commission or the Council decline the release of documents, citizens can demand an examination of this decision and ultimately also appeal to the European Court of First Instance or to the European Ombudsman. A refusal of documents can only be justified with reference to the reasons for exceptions that are provided in the regulation. The EU institutions always have to weigh their refusal against a potentially overriding public interest in the release of information.

Limited set of exceptions. The exceptions concern documents withheld for reasons of public safety, for keeping professional secrets and privacy, but also, whole areas of politics (security, finance, and economy) are exempted (Article 4). Civil society organisations such as *Statewatch* (Bunyan 2002) also criticise that the institutions are allowed to reject documents whose publication would "seriously undermine" (Article 4.3) the internal decision-making process of the EU institutions (Bunyan 2002).

Register of documents. With regards to transparency, practical questions also come into view. In order to request a document, one must be able to find out what documents there are. Therefore, the transparency regulations oblige the EU institutions to create public registers of all of their documents. This obligation corresponds to the "best practice" of international transparency regimes. Having said that, it is nevertheless important to distinguish between well-formulated rules and good implementation. In the following, we will see that the Commission, in contrast to the EP and the Council, does not always perform well in implementing the rules.

Implementation of regulations. The EU institutions have to regularly report on the state of the implementation of the transparency regulation. Table 1 compares the information gathered from the reports of the EP, the Council and the Commission.

Table 1: Implementing the Rules: Comparing the Performance of the EU Institutions

	EP	Council	Commission
Documents in register	1,022,000	850,000	74,000
Number of requests	1,900	2,200	3,800
Critical remarks from the European Ombudsman as opposed to number of complaints by citizens	1 1	0 0	5 7
Rate of documents disclosed after inquiry (2006)	98%	85%	77%

Note: The figures refer to the 2006 reports from the EU institutions as summarised by a paper issued by the EP (2008).

Quite to the contrary of common expectations that the Council is the most secretive of all institutions, the Commission shows most weaknesses in implementing the transparency regulation. The main weakness is the absence of a functioning register of documents held by the Commission.[4] Whilst the Commission produces by far more documents than the Council and the EP, the registers of these institutions are ten times more extensive than the one from the Commission. Thus, citizens cannot find out which documents they can request from the Commission – a fact, which has been labelled a case of "maladministration" by the European Ombudsman.[5] Also, with regards to other criteria, the Commission does not fare well in comparison with the Council and the EP: The EP and the Council give green light for access in response to a higher proportion of inquiries. And the Commission received critical remarks from the European Ombudsman in five cases in 2006.

The research process for this study also depended on free access to a multitude of documents. Therefore, the author could gain first hand experience with the implementation of the transparency regulations by the officials working with the Commission and the Council. Officials from the Commission followed quite diverse approaches towards transparency when being asked for documents and information for the purpose of conducting this research project. While some officials were very open and helpful in providing documents, others claimed that all the "public" documents of the Commission were already published online, whereas all other documents were "internal" and not accessible for outsiders. This does not go well with the transparency rules, which grant a general right for access to all documents. And for all documents, they can be only refused on the grounds of the exceptions in the regulation. Despite repeated e-mails, a query for documents from one of the Representations of the Commission remained unanswered for five months and then access was refused. The author gained access to the requested (two-year-old) activity reports only after an appeal to the Secretariat General of the Commission and after declaring that the next step will be to appeal to the Court of First Instance or complain to the European Ombudsman. Apparently, the spirit of official secrecy still pervades some corridors of the Commission. It seems crucial that political organisations not only have well-formulated rules for access to documents but that they also develop a culture of transparency in their daily work. Evidently, this has been more successful in the Council than in the Commission.

Another important finding concerns the question of who actually uses the transparency procedure. It comes as no surprise that ordinary citizens are not the main users of this kind of procedure. Lobbyists, NGO representatives, lawyers, scientists and representatives of other public institutions are the main users of the transparency regulations (European Parliament 2008). An important group is represented with less than three percent of the inquiries: the journalists. They cannot wait for two weeks to access to documents. However, they would be the group which could make the information contained in documents available to the general public in a language that citizens can understand.

The conclusion must remain ambivalent. Looking only at the formulation of the transparency rules, we could conclude that the EU is indeed one of the most transparent public institutions in the world. But looking at the implementation of the transparency rules, it still seems too early to talk about a fundamental change of policy paradigm. There seems to be a co-existence of strong rules opening up access to information and the traditions of bureaucratic arcane culture limiting their implementation.

Dialogue Desired?

Access to information and documents may be complemented by public relations measures of actively disseminating information. Furthermore, the Commission even wants to go beyond dissemination of information and start a dialogue with the citizens in order to vitalise the European public sphere. Whether the information policy of the Commission incites such a political dialogue, was explored through a case study of the PR campaign on the EU's big fifth enlargement round. With a budget of 150 million Euros between the years 2000 and 2006, the activities on EU enlargement constituted an important focus of the Commission's communication work. The PR was partly managed from the headquarters in Brussels and partly

from the Commission's Representations in the EU member states. The Representations administered a large part of the budget and had a (limited) degree of autonomy in spending the funds.

Did the activities inspire a dialogue with the citizens? In order to respond to this question, one has to further clarify the concept of "political dialogue" first. The concept of a political dialogue with the citizens goes far beyond the demand for transparency. In fact, transparency is only one of the preconditions for a dialogue to work out. The central feature of dialogue is the exchange of ideas, opinions and arguments. A dialogue becomes political not only by dealing with political topics but also because there is some kind of connection to political decision-making. The connection to the decision-making process has a temporal component: the dialogue should precede the political decision in order to be plausibly able to have some kind of relevance for politics. In the case of "dialogue after decision-making," PR would use dialogue merely as a means of persuasion. This may be effective and also politically legitimate; however, it is not consistent with the concept of dialogue in a political sense. Then, a political dialogue would also have an institutional component: there would have to be procedures and routines which feed the results of the dialogue back into the political decision-making arena, thereby providing for responsive politics. First of all, we will look at the temporal condition for the possibility of political dialogue, i.e. the relationship between political decision-making and public communication activities. In retrospect, three phases can be distinguished.

(1) *Politics without public communication*. After the fall of the iron curtain in 1989 the EU faced the question of how to relate to the Central and East European countries (CEE). The political project of enlargement developed as an answer to that question. In 1993, the accession criteria were formulated in Copenhagen. Until 1997, three CEE countries, Cyprus and Malta had submitted applications and struck association agreements. De facto, the general course for a big enlargement round of the EU including a number of CEE countries was set by the year 1997. It took five more years, however, to develop a communication strategy paper on EU enlargement.

(2) *Information for experts and the slow establishment of an information policy on enlargement*. From 1998 to 2002 the crucial negotiations towards accession took place. The political process was transparent only for policy experts who were able to interpret the policy papers issued by the Commission, such as the progress reports about each candidate countries' preparedness for enlargement. The Commission did not publish information about the negotiations themselves. One of the interviewees remarked:

> *The Commission strictly adhered to the principle of confidentiality. However, since so many participants were involved in the negotiations the journalists did always find ways to get information. [...] In this situation, those who leaked the information set the tone and the Commission played the second fiddle.*

All in all, the Commission did not act as a political communicator, but disseminated expert information about the state of the accession process in the different candidate countries. At the same time, the structures of an EU information policy on enlargement were established: the Directorate General of Enlargement set up an information unit and issued a strategy paper in 2002.

(3) *Delayed implementation of PR activities for the general public*. It was not before 2003 that concrete PR activities were planned and realised on a bigger scale. Due to delays in implementing communication plans, many projects could only be realised in the years after the accession date (1 May 2004).

Overall, communication was clearly lacking behind political decision-making. De facto, the PR of the Commission served to clean up after political decisions. It served to communicate political decisions rather than generate a political dialogue preceding political decisions. The uncoupling of the policy process and communication activities might be interpreted as a political strategy. In line with the spirit of the traditional functional logic of European integration (Haas 1968), progress in the integration process preceded public discussions. EU enlargement became a "fait accompli" before the citizens took notice of it.

The analysis of policy documents and the expert interviews conducted with officials show that this was not necessarily a voluntary decision or a strategic move by the Commission. One explanatory factor was the bureaucratic culture of the Commission. Following this logic, some of the interviewees argued, that the Commission was not able to disseminate information before the final agreement on the list of the joining countries and the precise time plan for accession was agreed. Otherwise one would presumably not know what to communicate. Other reasons for delays in communication as pointed out by most interviewees are related to implementation problems that the Commission faced due to strict and changing budgetary rules and a lack of adequate staffing for the administration and implementation of communication measures with the broader public.

Even with this lagging behind of the communication process in mind, it would still be conceivable that the Commission has kicked off a "dialogue" about the topic of EU enlargement in 2004 with some kind of political relevance for the following enlargement round to include Bulgaria and Romania in 2007. Therefore, it still makes sense to determine whether there was some kind of broad debate with citizens at all. Then, at least, the PR would have been *dialogic*. As pointed out above, it would constitute a political dialogue only if some kind of link to political decision making could be detected.

The empirical quest for dialogue will be pursued focussing on the case of Germany since here, unlike in other member states, the PR activities were documented in a very thorough and consistent way, e.g. giving details on the groups targeted by the PR measures, the number of participants and the degree of media coverage about the Commission's activities. The Representation in Berlin provided monthly reports from 2002 until 2004 and in this time period it described 159 information activities, which are the units of analysis. In the first step, various types of activities were assigned to different strategies of information policy. The underlying assumption is that different communication activities have a varying potential to inspire a dialogue. In a discussion forum where people representing different opinions sit on the podium and the audience can ask questions and express opinions, the structural conditions for a dialogue are better than in the case of marketing activities such as organising entertaining events, performances, games or putting up posters along the road. Of course, this classification is very rough because it is not guaranteed that a speaker uses valid arguments instead of sheer propaganda lies. Also, at a public round table discussion, the only thing that is certain is that the setting of the

event allowed for the exchange of different positions and arguments but we do not know whether there actually was an exchange of different opinions.

Table 2: Profile of PR Activities in Germany (2002-2004)

PR activities	Frequency (%)
Seminars, exhibitions, political education	26
Political speeches / appearance of single speakers	13
Discussion forums	46
Social events, games, advertisements	15
Analysis of the monthly reports of the German Representation of the Commission by the type of activities mentioned; N = 159.	100

Table 2 shows that nearly every second PR action mentioned was a discussion forum. This most frequent type of activity was followed by measures which convey background information like seminars, exhibitions, and activities of political education. Hence, many actions had a high potential of dialogue and transparency. There were fewer activities which fall into the category of one-sided justification. Political marketing in the forms of social events, games and advertisements plays only a negligible role.

Dialogical forms were at the heart of the PR activities organised by the Commission. It was not possible, however, to determine an institutional feedback-channel through which the results of these dialogues were able to systematically flow back into the political decision-making. Thus, the communication of the Commission on the topic of enlargement turns out to have been dialogic. In the absence of an institutionalised or at least a temporal connection to the political decision-making process this should not be interpreted as a political dialogue, but rather as a dialogic means of explaining a political decision already taken. Its aim is to bring the topic of enlargement onto the agenda of public debates.

So far, we have argued that the dialogic PR of the Commission was *not a political dialogue*. We will now show that it was not a dialogue *with the citizens* either, since the Commission failed to reach out to the broader public. Again, this will be demonstrated drawing on an analysis of the data from Germany. We assume that debates with a broader outreach call for one or (rather) several of the following conditions to be fulfilled: (a) there are many participants; (b) activities primarily address professional multipliers such as teachers, politicians, and journalists among the participants; (c) important media outlets follow the debate and serve as amplifiers.

Table 3: The Reach of PR Activities in Germany (2002-2004)

"Micro-activities": activities that reached less than 50 people and did not focus on professional multipliers (journalists, teachers, politicians)	22%
"Media-centred activities": News coverage in several regional or one national media outlet	22%
Typical number of people attending (median)	85

Note: Analysis of the monthly reports of the German representation of the European Commission N = 159 (activities mentioned)

Almost one-fourth of all activities mentioned in the reports by the Commission reached less than fifty people and did not primarily address professional multipliers (see Table 3). These types of activities were therefore categorised as "micro-activities" from which no effect on the broader public space can plausibly be expected. Typically, the activities of the Commission drew only slightly more than eighty participants. According to the reports, only less than one-fourth of all activities received intense media attention. Overall, these figures show that (at least if the case of Germany was representative for the PR of the Representations of the Commission) the Commission was not able to reach out to hundreds of millions of EU citizens drawing on the small scale PR activities that were at the heart of the EU enlargement campaign.

As the Commission has no direct way to address hundreds of millions of citizens, it would still be possible to focus PR activities on media relations in order to enhance outreach. Unfortunately, media were clearly not at the centre of communication on EU enlargement. This can be shown by looking at the resources available for projects with the media. Table 4 classifies the various posts from the budget administered in Brussels by primary target group as "media relations" or "direct PR": barely thirty percent of the expenditures went to media-cantered activities (Table 4).

Table 4: The Central Budget for PR Activities (2001-2004)

Share of PR budget [%]	Media relations	Direct PR	
Publications		6	
Events		1	
Discussion Forums		2	
Information Centre in Brussels		4	Centrally managed PR expenditures of DG Enlargement: 35 Million Euro in total.
Calls for Proposals: NGOs*		56	
Calls for Proposals: Media	24		
Other Broadcasting Projects	2		
Journalist Seminars	3		
Overall Percentage	29	69	

Note: Calculations based on Commission documents (European Commission 2004; European Commission 2005b). The data are rounded to one percent.

*The largest tender of fourteen million Euros in 2004 was not only available to NGOs but also to public bodies.

The finding that the Commission neglected media relations is also supported by looking at human resources; a good press work does not necessarily require a huge budget but certainly adequate staffing. Specific media relations work on EU enlargement in Brussels was basically handled by one press officer, the spokesman of Günter Verheugen, who was supported by one secretary and a part-time assistant – facing one of the biggest press corps in the world.

The case study on EU enlargement has shown that the human and financial resources of the Commission for communication were centred on PR activities that

aim to reach out directly to citizens. They did reach some citizens but mostly those already interested in the EU who were willing to attend informational seminars or public roundtable discussions. The PR of the Commission failed to reach the public at large. Media work was structurally weak and therefore could not compensate for the failure of direct PR activities.

Perspectives for the Information Policy of the EU

Overall, the information policy since the turn of the century has turned into a road heading for more transparency and dialogical forms of communication. The introduction of new transparency rules as well as other measures, namely the introduction and the improvement of the Web site "EUROPA" (see Brüggemann 2008 for details), are certainly milestones on this way. As regards the question of dialogue, there was a multitude of discussion meetings funded by the Commission and often organised independently by civil society organisations. As these measures were lagging behind the decision-making process, they can hardly be viewed as being part of a political dialogue with the citizens of Europe. It could still have been a relevant contribution towards explaining EU enlargement to the people if the PR had been able to reach out to millions of citizens. Looking at the effectiveness of both, the steps towards transparency as well as the attempts towards dialogue, the analysis arrives at the finding that the potential to actually enhance the transparency and public debate about European governance is severely compromised by a lack of effective implementation of information policy: This was shown by looking at the implementation of the transparency rules as well as by looking at PR measures. All in all, the image emerges of an information policy which operates "with the handbrake on." Information policy turned out to be normatively acceptable (even if the aim of dialogue proved to be illusionary) but not effective.

However, the information policy is not failing because it refrains from means of marketing and propaganda. Promoting a culture of transparency within the European Commission and installing a more comprehensive register of documents would help to make transparency real. The only way to enhance the effectiveness of the PR of the EU seems to be to focus on media relations. Only the media can take micro-dialogues with a few dozens of citizens to the wider public; this means the promises of the PR of the Commission must be scaled down. A direct dialogue with the citizens seems to be illusionary. The promise of dialogue itself becomes propagandistic if the debates with citizens do not reach a wider public and are in no way linked to political decision-making.

Even if direct dialogue might be bound to fail, the Commission can still go beyond promoting open access to EU information. It could strive to put EU topics on the agenda of public communication by strengthening media relations. National media are perfectly adapted to the needs of the national audiences. There are already signs of Europeanisation at least in the quality press (see e.g. Wessler et al. 2008). Information policy could try to broaden this trend. By provoking public transnational debates in the media, the Commission could contribute to a lively European public sphere. Beyond these practical conclusions drawn from this study, we will now go back to the more abstract question concerning the relationship between information policy and the public sphere and open up some links for future research.

Information Policy and the Public Sphere: Potential and Limits

The ambivalent finding of this study, that the Commission pursues democratically acceptable aims but fails in communicating effectively, also opens up a new perspective on normative theorising of state intervention in the public sphere. The general assumption of a re-feudalisation of the public sphere through information policy cannot be confirmed by the case study on the European Commission. PR measures are neither propagandistic by nature nor do they always have strong effects. If the case of the EU can be generalised to the information policy of other public bodies, then we should be very cautious in jumping to conclusions about good or bad effects of government intervention in the public sphere. Information policy may contribute to transparency or it may indeed be an attempt towards misguiding citizens. Providing access to information and documents promotes the thriving of a public sphere as it provides an important resource for public discussions: information that is needed to make useful political arguments and come to enlightened conclusions.

For the question of promoting direct political dialogue with citizen, there is a more sceptical conclusion. For the Commission, the strategy of a political dialogue proved to be deceptive. Researchers should be very careful when looking at political institutions which promise a dialogue with the citizens: they should ask whether these public bodies can actually initiate and implement a political dialogue with the citizens and whether these public bodies can be plausibly expected to take dialogue seriously. First of all, executive bodies such as the European Commission lack a strong incentive for dialogue if they are not elected by the citizens and do not have to fear sanctions if they ignore the needs of the citizens. In these cases, responsiveness is primarily a voluntary act of the administration. Furthermore, the Commission, as well as many national administrative organs, lack the means for a direct dialogue with the broader public. They cannot directly communicate with millions of citizens.

Government bodies might nevertheless contribute to the thriving of a public sphere in a more effective and normatively acceptable way if they focus on media relations. Then, on the one hand the media can work as an amplifier of political communication to a wider public. On the other hand, professional journalism can counter propaganda efforts by press officers. Therefore, the media are not only an amplifier but also a necessary corrective of government communication. Direct PR might be fashionable among some practitioners because there is no critical corrective for their messages. Sometimes, however, they overlook that there is also no amplifier for reaching out to millions of people. Media relations are thus the missing link between information policy and the public sphere. And the political message which results from these considerations is that a democratic and effective European information policy is feasible.

Using the concept of information policy for empirical studies has proven to be useful for the case of the EU and it is very likely to be helpful to analyse national forms of government communication since it combines the analysis of transparency rules and PR measures, which are, indeed, two sides of the same coin. Furthermore, the study has shown that it is paramount to combine research addressing norma-

tive questions (guided by the public sphere concept or other approaches) with questions of effectiveness of communication. Beneficial or malevolent, attempts to communicate may fail. Following Luhmann, one should indeed assume that communication is unlikely to occur (Luhmann 2005, 30). And this is certainly true for direct communication between government bodies and citizens, especially when the question is taken to the level of transnational structures of governance and communication.

Notes:

1. This article presents a concept of information policy that has been originally introduced in a more conceptual article in *Javnost – The Public* (Brüggemann 2005) and has been more fully developed and applied to the case of the EU in a book published in German (Brüggemann 2008). This article presents key findings and the main conceptual conclusions arising from of this study. I would like to thank the reviewers from *Javnost – The Public* for the very helpful feedback on earlier versions of this article!

2. For an overview of some of the flourishing academic literature on the European public sphere which goes beyond the scope of this article, please see the review article by Brüggemann et al. (2009) as well as the special issues of *Javnost – The Public* (2/2005), *European Journal of Communication* (4/2007), *Journalism* (4/2008), *Journalism Studies* (1/2009) and the project reports by the AIM project (see: http://www.aim-project.net/), the EUROPUB project (see: http://europub.wzb.eu/), the Reuters Institute (see: http://reutersinstitute.politics.ox.ac.uk/research/featured-projects) and the ongoing research in Amsterdam (see: http://www.claesdevreese.com/research.html), Oslo (see: http://www.arena.uio.no/about/staff/trenz.xml), Zurich (see: http://www.nccr-democracy.uzh.ch/research) and Bremen (see: http://www.jacobs-university.de/publicsphere).

3. See: http://ceuweb.belbone.be.

4. Find the register of documents at: http://ec.europa.eu/transparency/regdoc/recherche.cfm?CL=en.

5. According to the web site by the NGO Statewatch that has set up an observatory on Freedom of Information in the EU, see: http://www.statewatch.org/foi/foi.htm.

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