

Journal of Contemporary European Research

Volume 10, Issue 1 (2014)

From Informing to Interacting? Exploring the European Commission's Communication Strategy "to be all ears"

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Citation

Van Brussel, A. (2014). 'From Informing to Interacting? Exploring the European Commission's Communication Strategy "to be all ears"', *Journal of Contemporary European Research*. 10 (1), pp. 90-104.

First published at: www.jcer.net

Abstract

Since 2001 the European Commission has paid increasing attention to two-way communication in its institutional communication strategy. Besides informing the public, the Commission's strategy has become orientated towards listening to and engaging in a dialogue with citizens. This article explores the rhetoric of the Commission regarding its institutional communication strategy from 2001 to the present time and studies in depth the dialogic dimension of this strategy. This contribution extends the study of the Commission's communication strategy by offering new insights into the development of the dialogic approach and the Commission's current understanding of communication. Furthermore, defining institutional two-way communication as a means to facilitate a link between decision making and public opinion, I contribute to the debate on the European public sphere. The data used for the analysis originate from document analysis and semi-structured elite interviews with Commission officials. The analysis indicates the gradual nature of the shift between 2001 and 2009 from a one-way informing approach to a two-way communicating approach. The dialogic dimension in the Commission's communication strategy is found to be more restricted in terms of subjects for discussion and facilitation. There are indications that engaging in a dialogue and interaction have been played down and are being managed through other means outside the formal communication strategy.

Keywords

EU; public sphere; communication policy; European Commission

The European Commission had never given its communication policy and strategy as much overt attention as it did during the first decade of this century. In view of a number of (interdependent) institutional developments,¹ the Commission has seemingly become determined to put communication high on its agenda. Moreover, the importance of communication has been explicitly linked to key questions of legitimacy, democratic governance and the responsiveness of the European Union and its institutions.² This contribution examines the development of the Commission's rhetoric regarding its institutional communication strategy from 2001 until 2013 and looks at the dialogical dimension which has recently been introduced in this strategy. By doing so, I

¹ Such as the appointment of the first-ever European Commissioner explicitly in charge of Communication Strategy, the establishment of a Directorate-General Communication, the growing number of policy documents on communication, an inter-institutional partnership with other EU institutions to communicate the EU jointly.

² C. Bee, 'The "Institutionally Constructed" European Identity. Citizenship and Public Sphere Narrated by the Commission', *Perspectives on European Politics and Society*, 9, 4 (2008), 431-450; C. Bee, 'Understanding the EU's Institutional Communication. Principles and Structure of a Contested Policy', in C. Bee and E. Bozzini, eds., *Mapping the European Public Sphere. Institutions, Media and Civil Society* (Farnham: Ashgate, 2010), 65-82; M. Brüggemann, 'How the EU Constructs the European Public Sphere. Seven Strategies of Information Policy', *The Public*, 12, 2 (2005), 57-73; C. H. de Vreese, 'The EU as a Public Sphere', *Living Reviews in European Governance*, 2, 3 (2007), available at <http://europeangovernance.livingreviews.org/Articles/lreg-2007-3/> [last visited 13 January 2014]; J. Harrison, 'European Social Purpose and Public Service Communication', in Bee and Bozzini, *Mapping the European Public Sphere*, 99-116; A. Michailidou, 'Vertical Europeanisation of Online Public Dialogue: EU Public Communication Policy and Online Implementation' in Bee and Bozzini, *Mapping the European Public Sphere*, 65-82; C. Meyer, 'Political Legitimacy and the Invisibility of Politics: Exploring the European Union's Communication Deficit', *Journal of Common Market Studies*, 37, 4 (1999), 617-639.

address the question of the extent to which the European Commission has become orientated towards interaction with the European public sphere through its institutional communication policy. I expand upon the existing research in the field and deliver a first insight into the approach of the second Barroso Commission (2010-2014), which no longer had a Commissioner explicitly in charge of Communication Strategy and did not draft new policy documents on communication.

The circumstances urging the Commission's upgrading of the importance of institutional communication and its interest in tackling the gap between Brussels and its citizens are quite evident. Events often cited in this connection are, for instance, the problematic ratification of the Maastricht Treaty (1992), the Santer Commission's resignation (1999) indicating dormant deficiencies in the Commission's communication approach,³ the French *Non* and the Dutch *Nee* against a Constitution for Europe (2005) and the Irish referenda on the Lisbon Treaty (2008-2009). Furthermore, the continual decline in voter turnout for the European parliamentary elections indicates that the general public has gradually been losing interest in the European integration process and it has been established that the permissive consensus has been crumbling.⁴ Notwithstanding earlier (isolated) efforts to design a communication strategy,⁵ in 2005 the Commission declared it had 'made communication one of the strategic objectives (...), recognizing it fully as a policy in its own right'.⁶

Thereafter, the various communication tools, new approaches and initiatives introduced by the Commission have been studied more and more often. A number of scholars have pointed to an uncertain change of paradigm in the Commission's communication strategy.⁷ Whereas the strategy up to 2002-2004 is generally described as one-way informing (including justification, persuasive communication and marketing), characterised by gradual transparency and openness, research has shown that from 2004 onwards the Commission has shown interest in developing two-way (online) communication and a structured dialogue with its citizens and civil society. The idea of increasing civic participation and involving individual (active) citizens in the EU's decision-making processes,⁸ a suggestion put forward in the 2001 White Paper on European Governance, was finally being taken into account.

None of the studies that reported this trend towards dialogue and civic participation in the formal communication policy, however, refrained from casting doubts on this change and its

³ C. Meyer, op. cit. n2; D. Georgakakis, 'Was It Really Just Poor Communication? A Socio-Political Reading of the Santer Commission's Resignation', in A. Smith, ed., *Politics and the European Commission. Actors, Interdependence, Legitimacy* (London: Routledge, 2004), 119-133.

⁴ L. Hooghe and G. Marks, 'A Postfunctionalist Theory of European Integration. From Permissive Consensus to Constraining Dissensus', *British Journal of Political Science*, 39, 1 (2009), 1-23.

⁵ These previous efforts include, for instance, the ad hoc committee 'On a People's Europe' and the associated Adonnino report (1985), the controversial De Clercq report (1993), the Priority Information Programs for the Citizens of Europe (PRINCE) in the nineties.

⁶ Commission of the European Communities, *Action Plan to Improve Communicating Europe by the Commission*, SEC(2005) 985 final, 2.

⁷ J. Mak, 'Publicizing the Euro. A Case of Interest Maximization and Internal Fragmentation of the Commission', in A. Smith, op.cit n3, 170-185; M. Brüggemann, op. cit. n2; A. Michailidou, *The Impact of 'Constitutionalisation' on the EU Public Communication Strategy. EU Official Rhetoric and Civil Society*, European Political Communication, Working Paper Series 14/07, 2007, available at http://www.eurpolcom.eu/exhibits/paper_14.pdf [last visited 2 January 2013]; A. Michailidou, 'Democracy and New Media in the European Union. Communication or Participation deficit?', *Journal of Contemporary European Research*, 4, 4 (2008), 346-368; A. Michailidou, 'Vertical Europeanisation of Online Public Dialogue: EU Public Communication Policy and Online Implementation', op. cit. n2; C. Bee, 'The "Institutionally Constructed" European Identity. op. cit. n2; C. Bee, 'Understanding the EU's Institutional Communication, op. cit. n1.

⁸ B. Kohler-Koch and B. Finke, 'The Institutional Shaping of EU-Society Relations. A Contribution to Democracy Via Participation?', *Journal of Civil Society*, 3, 3 (2007), 205-221, 209-212; P. Maignette, 'European Governance and Civic Participation. Beyond Elitist Citizenship?', *Political Studies*, 51, 1 (2003), 144-160.

implementation. Scholars called it a mere ‘dialogue on a dialogue’,⁹ still overly structured from the top-down and focused on building consensus and burnishing the perception of legitimacy.¹⁰ Taking this into account, this article explores the communication policy of the Commission and offers insights into the rise and current development of the dialogic approach. As a consequence, this research takes on the conception of the Commission’s communication policy designed to develop to a certain extent a dialogue with the public and goes one step further by exploring profoundly the actual design of that dialogic approach. The study reported in this article specifically brings into focus the objectives, actors, target audiences, subject matters and tools that have been put forward in the Commission’s rhetoric with regard to its two-way communication strategy from 2001 to date.

This article offers an assessment firstly of how the dialogic dimension in the communication policy of the Commission was initially launched. Secondly, it considers the extent to which the second Barroso Commission (2010-2014) consistently put communication and, in particular, the dialogic and participatory dimension high on its agenda. Thirdly, researching recent rhetoric of the Commission, the more recent design (if any) of the dialogic dimension is also explored. As a result, this study questions whether the Commission is taking the communication dossier one step further by consolidating and implementing it as a dialogic process or whether communication is (again) narrowed to a one-way process of informing and justifying EU policy output and results.

The article is structured as follows. In the first section, the theoretical concepts on which this study draws are explained and it is here that the concept of the European public sphere (EPS) is introduced. Although it is held that, by definition, such a public sphere must in essence be distinguished by an unprompted, non-organised flow of communication and interaction between private people, free from far-reaching interference by authorities and institutionalisation,¹¹ the focus is on the potential role the Commission plays in respect of the EPS. The core research problem of this study is based on the idea of the EPS forming part of a continuous process delivering input for EU policymaking and on the role EU policymakers can consequently play in connecting to and interacting with the EPS. The subsequent section reports on the results of the research based on document analysis and elite interviews, in order to address the three areas presented above. Finally, this article concludes by reflecting on these findings, with reference to the theoretical conceptualisation presented earlier, and suggests guidelines for further research.

CONCEPTUAL FRAMEWORK

The rationale behind this study originates from the definition of institutional communication formulated and applied by scholars such as Michailidou and Bee. Bee conceptualises institutional communication as

the set of activities organised by public institutions to address questions of public concern. It necessitates: 1) an awareness (on the part of the institutions) of what needs to be communicated 2) the possibility (for the citizens) to interact with policy makers 3) continuous feedback on the activities of public bodies 4) the possibility to influence and

⁹ J. Mak, op. cit. n7.

¹⁰ Michailidou, ‘Democracy and New Media’, op cit. n7; Bee, ‘Understanding the EU’s Institutional Communication’, op cit. n7, 96-98.

¹¹ J. Habermas, ‘Further Reflections on the Public Sphere’, in C. Calhoun, ed., *Habermas and the Public Sphere* (Cambridge, MA: MIT Press, 1992), 451-452; J. Cohen and C. Sabel, ‘Directly-Deliberative Polyarchy’, *European Law Journal*, 3, 4 (1997), 313-342, 339.

change institutional activities through feedback.¹²

Accordingly, institutional communication, defined as facilitation of an ongoing open process of dialogue between policy makers/institutions and the general public, links up with the concept of the European public sphere (EPS). The link between the EPS and EU policymaking is now discussed in order to clarify the importance of institutional communication.

The European Public Sphere and the Next Step

The public sphere is generally defined as an open and independent communicative space(s) or arena(s) for unconstrained and rational debate, interaction and social integration, a forum where public concerns can be raised, publicly discussed and accounted for politically.¹³ Habermas's ideal type described the public sphere as 'a forum in which the private people, come together to form a public, readied themselves to compel public authority to legitimate itself before public opinion'.¹⁴ At first sight, this suggests that this communicative process of public opinion formation develops spontaneously and independently from decision making or administrative power. However, the linkage with institutional settings and decision making bodies cannot be disregarded since the public sphere is there, on the one hand, to legitimise decisions and proposals (a posteriori), and on the other hand, is supposed to set issues on the political agenda (a priori). The public sphere is said to 'besiege the parliamentary system without conquering it'.¹⁵ But how can the public sphere as an unstructured, anything but clear-cut entity have an impact on institutions and their procedures and structures? As Cohen and Sabel have noted,

Habermas' view seems to be that the democratic public can not [sic] be just and effective because to be just it must be informal in the sense of constituted freedom of institutions, while to be effective, it must be institutionalised in forms that constrain discussion and hinder pursuit of justice.¹⁶

Fraser's (1992) distinction between strong and weak public spheres offers to a certain extent an escape hatch for this discord. Strong public spheres stand for institutionalised instances where deliberation can result in will formation and decision making (e.g. parliaments), whereas weak or general public spheres are characterised by discourse outside the political system and restricted to mere opinion formation.¹⁷ However, these two types of spheres, again, do not operate in strict isolation; in order to reach legitimate binding decisions (which are formally decided with the involvement of the strong public sphere), these 'must be steered by communication flows that start at the periphery and pass through the sluices of democratic and constitutional procedures'.¹⁸

¹² Bee, 'Understanding the EU's Institutional Communication', op. cit. n2, 85.

¹³ E.g. C. H. de Vreese, op. cit. n2; E. O. Eriksen, 'Deliberative Supranationalism in the EU', in E. O. Eriksen and J. E. Fossum, eds., *Democracy in the European Union* (London: Routledge, 2000), 42-64, 52; J. E. Fossum and P. Schlesinger, 'The European Union and the Public Sphere. A Communicative Space in the Making?', in J. E. Fossum and P. Schlesinger, eds., *The European Union and the Public Sphere. A Communicative Space in the Making?* (London: Routledge, 2007), 1-20, 1; J. Gerhards and M. S. Schäfer, 'Is the Internet a Better Public Sphere? Comparing Old and New Media in the USA and Germany', *New Media & Society*, 12, 1 (2010), 143-160, 144.

¹⁴ J. Habermas, *The Structural Transformation of the Public Sphere. An Inquiry into a Category of Bourgeois Society* (Cambridge, MA: MIT Press, 1991), 25-26.

¹⁵ E. O. Eriksen, 'Conceptualising European Public Spheres. General, Segmented and Strong Publics', in Fossum and Schlesinger, *The European Union and the Public Sphere*, 23-43, 27-31.

¹⁶ Cohen and Sabel, op. cit. n11, 339-340.

¹⁷ E. O. Eriksen, op. cit. n13, 54; E. O. Eriksen, op. cit. n15, 28.

¹⁸ J. Habermas, *Between Facts and Norms* (Cambridge: Polity Press, 1996), 356.

Consequently, this article focuses on the mechanisms which the European Commission has developed and is offering through its institutional communication policy in order to facilitate connection and interaction between the spheres of decision making and public opinion. From a political scientific perspective, this (technical) part of the EPS is one of the substantive aspects of the EPS. Eriksen argued that

it is not the public sphere alone that bears the burden of legitimation. Rather, it is the interplay between free and open debate in non-institutionalised (weak) publics and institutionalised debates – strong publics – in the political system that together secure the presumption of rational opinion and will formation.¹⁹

The European Commission as the Only Stepping Stone?

Research has relied to an important extent on media content analysis in order to examine the communication flow in the EPS. That should not be surprising since media are commonly seen as one of the main gateways between opinion formation and decision making in the traditional model of Habermas's circulation of political power.²⁰ Koopmans and Erbe assessed the dependence of the communication flow between Europe and the public on mass media as being even greater than at the national level.²¹ As Gerhards and Schäfer pointed out, compared to other fora within the public sphere (i.e. everyday encounters and public events), mass media do indeed have a high impact because of their extensive reach and their traditional role and image as a tool and representative of public opinion.²²

Nonetheless, considering the role and performance of media as EPS gatekeepers and mediators, a number of observations must be made. First of all, scholars draw attention to possible external (e.g. perceptions of readerships, information supply and sources) and internal (e.g. experience and knowledge, resources, editorial procedures) elements influencing EU news coverage in national media.²³ Secondly, regarding important media related trends such as agenda setting, news selection and framing, media are said to 'privilege powerful and institutionalised actors'²⁴ and to be 'particularly open to active participation by the strong public, which already has access to power'.²⁵ Fuchs puts it somewhat bluntly:

And something like a discussion occurs here [i.e. in the mass media]. But it is not a discussion among citizens but advocacy discussion among journalists and representatives that is conducted in public and, perhaps, for the public. Through this type of political

¹⁹ E. O. Eriksen, op. cit. n13, 55.

²⁰ J. Habermas, op. cit. n18, 341-359.

²¹ R. Koopmans and J. Erbe, 'Vertical and Horizontal Dimensions of Europeanized Political Communication', *Innovation*, 17, 2 (2004), 97-118, 98.

²² J. Gerhards and M. S. Schäfer, op cit. n13, 144-146.

²³ Ibid.; R. Koopmans and B. Pfetsch, *Towards a Europeanised Public Sphere? Comparing Political Actors and the Media in Germany* (Oslo: Centre for European Studies, University of Oslo, 2003); K. Raeymaeckers, L. Cosijn and A. Deprez, 'Reporting the European Union. An Analysis of the Brussels Press Corps and the Mechanisms Influencing the News Flow', *Journalism Practice*, 1, 1 (2007), 102-119; P. Statham, 'Media Performance and Europe's "Communication Deficit". A Study of Journalists' Perceptions', in Bee and Bozzini, *Mapping the European Public Sphere*, 117-140.

²⁴ Gerhards and Schäfer, op. cit. n13, 145.

²⁵ M. van de Steeg, 'Theoretical Reflections on the Public Sphere in the European Union. A Network of Communication or a Political Community?', in Bee and Bozzini, *Mapping the European Public Sphere*, 31-46, 35. Even Euronews, the 24-hour television news channel funded by the EU and launched in 1993 to shape an inclusive European identity and promote a European perspective, does not live up to the requirement to give a voice to citizens as they are marginalised in its news coverage; I. Garcia-Blanco and S. Cushion, 'A Partial Europe without Citizens or EU-level Political Institutions', *Journalism Studies*, 11, 3 (2010), 393-411.

opinion-building, anything resembling a deliberatively constituted will of the demos can scarcely come into being.²⁶

Moreover, the internet as a new and promising medium in terms of open participation in communication has not (yet) proved itself a solace in this regard, as Wright, Gerhards and Schäfer, as well as Koopmans and Zimmerman have shown.²⁷

Besides media, another (evident) category of actors presents itself as a possible gateway between opinion formation and decision making. In liberal democracies, political parties and representatives act by definition as legitimate channels and spokespeople of the public sphere in decision making. Whereas liberal, representative conceptions of democracy settle for indirect and occasional civic participation through elections and representation, other normative views on democracy go beyond that thin definition of the public sphere.²⁸ The latter assign more value to supplementary citizens' involvement, going beyond traditional mechanisms and actors of representation. Consequently, being attentive and responsive to the public sphere against that background becomes a concern for representatives as well as executives. As far as the EPS is concerned, it has been established that the European Commission has a formally developed interest in direct citizens' participation.²⁹ Furthermore, the provision on democratic principles in the Treaty of the European Union states that the EU is founded on representative democracy, and consolidates the citizens' right to participate.³⁰

To summarise, nowadays, the EPS is generally described as an open, multiform forum for citizens to interact with each other and debate various issues and events,³¹ across European borders. The linkage that the EPS has with institutional settings and EU decision making bodies, aimed at legitimisation of political choices and agenda setting, can be facilitated by different actors and by different means (e.g. media, representatives, polity reforms). Through its communication strategy, the European Commission can serve as a stepping stone to connect the EPS and EU decision making.

ANALYSING THE EUROPEAN COMMISSION'S COMMUNICATION STRATEGY

To explore the European Commission's rhetoric regarding the dialogic and participatory dimension of its public communication strategy from 2001 onwards, a twofold qualitative method is used. Firstly, relevant policy documents of the Commission concerning its communication strategy have been coded and analysed in order to explore the dialogic dimension in the Commission's communication policy from 2001 until 2009. The documents were divided into two time frames. The first group of documents refers to the 2001-2004 period, when Romano Prodi was Commission president, and the second group includes policy documents that were drawn up during the first Barroso term (2004-2009). This subdivision is made because of the aforementioned caesura indicated in previous research and literature and because of the appointment in 2004 of the first-ever European Commissioner explicitly in charge of Communication Strategy, and the establishment of the Directorate-General Communication. The overall design of the dialogic dimension of the

²⁶ D. Fuchs, 'Participatory, Liberal and Electronic Democracy', in T. Zittel and D. Fuchs, eds, *Participatory Democracy and Political Participation. Can Participatory Engineering Bring Citizens Back In?* (London: Routledge, 2007), 29-52, 35.

²⁷ J. Gerhards and M. S. Schäfer, op cit. n13; R. Koopmans and A. Zimmerman, *Internet. A New Potential for European Political Communication?* (Berlin: Wissenschaftszentrum Berlin für Sozialforschung, 2003); S. Wright, 'A Virtual European Public Sphere? The Futurum Discussion Forum', *Journal of European Public Policy*, 14, 8 (2007), 1167-1185.

²⁸ V. Kaina and I. P. Karolewski, 'EU Governance and European Identity', *Living Reviews in European Governance*, 4, 2 (2009), available at <http://europeangovernance.livingreviews.org/Articles/lreg-2009-2/> [last visited 10 February 2014], 11.

²⁹ C. Bee, 'The "Institutionally Constructed" European Identity', op. cit. n2; B. Kohler-Koch and B. Finke, op. cit. n8.

³⁰ See in particular Article 11(4) TEU.

³¹ See, e.g., S. Lingenberg, 'The Citizen Audience and European Transcultural Public Spheres. Exploring Civic Engagement in European Political Communication', *Communications*, 34, 1 (2009), 45-72; E. O. Eriksen, op. cit. n15.

Commission's communication policy is mapped out, based on five questions/data clusters:

- Objectives: Why did the European Commission seek to establish a dialogue with citizens?
- Actors: Who did the European Commission consider to be eligible to conduct a dialogue with citizens?
- Target audiences: With whom did the European Commission want to enter into a dialogue?
- Subject matter: On what kind of topics did the European Commission want to conduct a dialogue?
- Tools: How did the European Commission set up a dialogue?

Secondly, in order to gather data on the more recent development of the communication policy of the Commission (since 2009), semi-structured interviews with Commission officials were conducted, in the absence of new policy documents on the communication and information strategy. In the Barroso II Commission, no Commissioner was explicitly in charge of the Communication Strategy. Instead, the Vice-President and Commissioner responsible for Justice, Fundamental Rights and Citizenship, Viviane Reding, was in charge of the Directorate-General (DG) Communication. Hence, questions arise as to whether the communication strategy and the related dialogic and participatory dimension are high on the Commission agenda, as well as about the principles on the basis of which institutional communication is designed. Besides analysing the interview data with reference to the five questions with regard to two-way communication listed above, the general importance attributed to institutional communication is also considered. The research involved coding and analysing the interviews in order to study the main principles of the Commission's institutional communication strategy.

The interviewees for this study were Commission officials working in the DG Communication and in the communication units of four other DGs.³² By exploring the rhetoric on institutional communication of other DGs, the article offers new insights and broadens the scope of research in this field. Working on the basis that communication is an activity that works by definition in a horizontal, decentralised way (i.e. its implementation is not restricted to the DG Communication), the need to study the position of DGs other than the DG Communication regarding two way communication is evident. Moreover, possible discrepancies between the different DGs over the importance attributed to public opinion have been highlighted.³³ However, this study does not apply a comparative case study approach; the four DGs were added to the research in order to complete and illustrate the DG Communication's rhetoric about the Commission's dialogic communication approach. The six semi-structured elite interviews (with one Director General and five heads of the communication units in four DGs of the Commission) took place from December 2011-January 2012 on Commission premises in Brussels. In the following section, on the basis of an analysis of policy documents and interview transcripts, I explore how the Commission has gone about setting up a dialogue with citizens in the EPS. For all three periods (2001-2004, 2004-2009, 2009-2013), the five aforementioned questions are addressed.

Before 2004: from Informing ...

Although the dialogic and participatory dimension made its proper entry into the Commission's communication policy in 2004, a number of references to this can already be found in the

³² I.e. DG Internal Market and Services, DG Justice, DG Information Society & Media, DG Research and Innovation.

³³ Mak, op. cit. n7, 183.

communication policy documents issued by the Commission between 2001 and 2004. By including the 2001 White Paper on European Governance,³⁴ the analysis presented in this article may have been skewed to some extent since one of the five principles presented as underpinning European governance is precisely labelled 'participation' and an important part of the paper refers to involvement and openness towards citizens. However, the three other genuine communication policy documents from this time span certainly delivered relevant data as well.

By examining the objectives that the Commission had been striving to reach before 2004 by facilitating dialogue between the EU and the European public, it can be seen that this dialogue was mainly useful for preparing and evaluating information campaigns. For instance, findings of public opinion surveys are supposed to be 'used to prepare and evaluate information actions with a view to calibrating campaigns and as general information for the public'.³⁵ The Commission's main interests lay in stimulating debate and gaining insight into public debates and opinion, primarily in order to gear its one-way information strategy. The document analysis showed that debate was considered valuable in order to improve perceptions of the EU and boost general awareness and generate feedback for information campaigns. Only in the White Paper on European Governance and the report published subsequently in 2002, were dialogue and citizens' input framed as substantive sources for the policymaking process.³⁶

Concerning the actors considered responsible, the analysis demonstrated that the European Commission regarded itself and the European Parliament as the main European institutions in charge of putting up two-way communication with citizens.³⁷ However, more than the European level, the Commission stressed the importance of the member states and regional and local governments. In one of its communication policy documents the Commission stated:

[I]t goes without saying that, even acting collectively, the Union institutions do not have the capacity to engage directly with the man in the street. So the success of this strategy will depend directly on the degree of support afforded it by the Member States.³⁸

Civil society organisations were also taken into account as third parties with a responsibility to engage in a dialogue with citizens in the EU.

Looking at the target audiences before 2004, the Commission saw the general public as potential partners in dialogue. The Commission wanted discussion to take place beyond 'the narrow circle of specialists'³⁹ and aimed at involving 'as broad a section of the general public as possible in the European debate'.⁴⁰ In line with the principle of subsidiarity, regional and local governmental actors were cited as target audiences for dialogue as well.

Regarding the tools for two-way communication indicated by the Commission, the internet was predominantly considered to be the channel for interaction and genuine dialogue. The Your Voice in

³⁴ The 2001 White Paper on European Governance (Commission of the European Communities, *European Governance. A White Paper*, COM(2001) 428 final) (together with the corresponding report from the Commission on European Governance issued in 2002 (Commission of the European Communities, *Report from the Commission on European Governance*, COM(2002) 750 final)) is included because of the explicit references made to this paper in other communication policy documents.

³⁵ Commission of the European Communities, A New Framework for Co-operation on Activities Concerning the Information and Communication Policy of the European Union, COM(2001) 354 final, 21, 32

³⁶ Commission of the European Communities, *European Governance. A White Paper*, COM(2001) 428 final, 13-16.

³⁷ See for instance Commission, op. cit. n36.

³⁸ Commission of the European Communities, An Information and Communication Strategy for the European Union, COM(2002) 350 final/2, 17, 17.

³⁹ Commission, op. cit. n35, 21.

⁴⁰ Commission, op. cit. n38, 8.

Europe, Futurum, Convention and EUROPA websites were referred to as tools offering the ‘opportunity to play an active part in the process of shaping Commission policy’.⁴¹ How input arising from this kind of online two-way communication will thereupon be processed and channelled into policymaking is not explained in the documents. (Interview data discussed below indicate that concerning social media, for instance, this question is still unanswered.) Two other tools – public hearings and public opinion surveys – were framed as tools used for gaining additional insights into previously selected issues and for testing receptiveness (e.g. in the policy documents, these tools are framed as instruments to ‘offer additional insight into public perception of and reaction to information from the institutions’⁴²).

After 2004: ... to Interacting?

2004-2009

Judging by the increase in the absolute number of references to them found in the documents analysed for this period, the second dimension of dialogue and citizens’ involvement in the communication policy of the Commission was evidently given more consideration. In the first policy document published during this time span, it was clearly stated that ‘[c]ommunication is more than information: it establishes a relationship and initiates a dialogue with European citizens, it listens carefully and it connects to people’.⁴³ Moreover, the appointment of the first-ever Commissioner for Communication Strategy, Margot Wallström, suggested an additional push for this communication approach.

The main emphasis shifted towards generating substantive inputs for the EU policymaking process, notwithstanding some references to dialogue as an instrument for the design of communication plans and information campaigns. Debates were predominantly considered to be fora where citizens could express their opinions and consequently influence EU decision making.⁴⁴ In the opinion of the Commission, ‘Europe’s citizens want to make their voices in Europe heard and their democratic participation should have a direct bearing on EU policy formulation and output’.⁴⁵ Furthermore, the Commission did not shy away from linking this process with abstract and ambitious targets such as improving democracy and active European citizenship. In the 2004-2009 communication policy documents, explicit references to the EPS concept were found, specified as a space ‘where citizens are given the information and the tools to actively participate in the decision making process and gain ownership of the European project’.⁴⁶ However, my document analysis confirmed the finding of Michailidou⁴⁷ that one of the important aims still embedded in the Commission’s rhetoric on two-way communication is improving ‘the *perceived* lack of legitimacy’.⁴⁸ Moreover, it is also said to offer the opportunity to showcase the EU’s relevance and added value by improving the ‘perception of the European Union and its Institutions and their legitimacy’⁴⁹.

⁴¹ Commission of the European Communities, Report from the Commission on European Governance, COM(2002) 750 final, 8.

⁴² Commission, op cit. n35, 33.

⁴³ Commission, op. cit. n6, 2.

⁴⁴ Commission of the European Communities, *Communicating Europe in Partnership*, COM(2007) 568 final, 6.

⁴⁵ Commission, op. cit. n6, 4.

⁴⁶ Commission of the European Communities, *The Commission’s Contribution to the Period of Reflection and Beyond: Plan-D for Democracy, Dialogue and Debate*, COM(2005) 494 final, 3.

⁴⁷ A. Michailidou, op. cit. n7.

⁴⁸ Commission, op. cit. n46, 9 (emphasis added by the author).

⁴⁹ Commission of the European Communities, Communication from the Commission to the Council, the European Parliament, the European Economic and Social Committee and the Committee of the Regions on implementing the

The key actors assigned with the task of developing dialogue continued to be the European Commission and the European Parliament, and their respective individual members. The Commission, however, took a back seat since it envisaged more of a supporting role, while the responsibility of the member states and national, regional and local political actors was raised. It was proclaimed that maintaining public discussion on Europe

is first and foremost the responsibility of the public authorities in the Member States. It is the responsibility of government, at national, regional and local level, to consult and inform citizens about public policy – including European policies and their impact on people's daily lives – and to put in place the forums to give this debate life'.⁵⁰

Moreover, since many European policies and programmes are implemented at regional and local levels, 'local and regional authorities are well placed to engage in a dialogue with citizens and to actively involve local communities in EU issues'.⁵¹ Civil society organisations were again referred to, as well.

In contrast with the previous period, the documents analysed for this term did hint at the possible content of the dialogue with citizens. Specific policy issues and areas were suggested, e.g. employment, the environment, the fight against terrorism, Europe's borders and the EU's role in the world. To a lesser degree, the debates were said to deal with broad issues such as the future of Europe. This finding accords with the shift observed by Quittkat concerning the Commission's online consultations; since their introduction, these consultations have become more standardised and less open, leaving less opportunity for unrestrained and spontaneous input.⁵²

The general public continued to constitute one of the main official target audiences, though media were now included in the category of target audiences as well. Occasionally, young people, minority groups and women were explicitly specified as particular target groups for dialogue.

When it comes to tools for two-way communication in this period, a more differentiated set-up becomes obvious on the basis of the document analysis. Public consultations, public opinion surveys (e.g. Eurobarometer) and media monitoring made up the main pillars of this multi-method approach for gaining insight into public opinion and for identifying citizens' expectations and concerns. Besides the internet, new tools and methods were briefly presented, e.g. citizens' conferences, focus groups and panels and programmes such as 'Europe for the Citizens' and 'Youth in Action'. The Representations of the European Commission in the member states made an especially notable entry as intermediaries that could report to Brussels on citizens' concerns on European issues.

Post-2009

As explained above, the scope of the analysis for this time span was wider to allow examination of the general importance attributed to communication and the dialogic and participatory dimension within.

Data from the semi-structured elite interviews at DG Communication and communication with the four other DGs showed that, in general, institutional communication is still very much advocated.

information and communication strategy of the European Union, COM (2004)196, p. 3

⁵⁰ Commission of the European Communities, *White Paper on a European Communication Policy (presented by the Commission)*, COM (2006) 35, 5.

⁵¹ *Ibid.*, 11.

⁵² C. Quittkat, 'The European Commission's Online Consultations. A Success Story?', *Journal of Common Market Studies*, 49, 3 (2011), 653-674, 661-662.

The fact that, at present, the Communication Strategy is not a fully-fledged policy area in a Commissioner's portfolio and that no new policy documents are being issued, is brushed aside. One of the interviewees (DG Internal Market and Services) explained that:

There is less emphasis on the strategy building, but that does not mean that communication is less important. There is just more emphasis on operational delivery of good communication rather than on discussing with member states and Parliament how we communicate with each other better.

References were also made to the newly introduced Communication Steering Board⁵³ and to a Commissioners' seminar on communication in August 2011 to argue that communication is probably placed even higher up the agenda. However, the attention paid to communication is not self-evident and consistent within the Commission as a whole, given the different attitudes and varying top-down support of senior management, Directors-General and Commissioners regarding communication. The interviewees from the DGs indeed collectively stressed the importance of their communication-minded working environment.

Other elements related to the main principles of the current communication policy are the need for one global EU narrative (e.g. the long-term Europe 2020 strategy) and streamlined content, and the wish to make communication part and parcel of the policymaking process. Looking at the general communication content and subjects, the emphasis is clearly put on explaining the EU's added value to people's daily lives (e.g. their rights as EU citizens) and 'showcasing what is going on with their money', as one interviewee (DG Research and Innovation) aptly put it. Nevertheless, the plea for this kind of persuasive communication, entailing elements of justification and propaganda,⁵⁴ was accompanied by warnings not to deceive citizens by implanting false hopes concerning the EU's (limited) powers. Hence, most of the interviewees argued for a communication strategy that would also focus on explaining on a basic level the (different) roles of the EU institutions.

In respect of the recent rhetoric regarding the dialogic dimension of institutional communication, the Commission seems to blow hot and cold on this. On the one hand, analysis of the interviews shows a general support for increasingly listening to, communicating with and systematically involving citizens and local policy stakeholders. However, limited resources restrict what can be done in practice. Interaction and participation are no longer facilitated through communication channels, but through affiliated programmes such as 'Europe for Citizens'.⁵⁵

On the other hand, this opening up vis-à-vis the public is at the same time restricted in two other important ways. Firstly, the dialogue occurs on the Commission's terms with regard to the topics of discussion. Broad discussions with the purpose of gaining insights into topics of general concern or browsing through suggestions is traded in for more structured consultations based on concrete policymaking processes. This is not a fundamental deviation from the approach applied in the previous periods. However, the initiative for this dialogue is put to a great extent in the hands of the citizens. As argued in the previous sections of this article, the very idea of having discussions and debates in the EPS presupposes that they have to take place freely, but top-down facilitation is an essential part of the next step towards consolidation of the EPS output. Nonetheless, our

⁵³ The Commission's Secretary General, Commission President Barroso's Cabinet, Vice-President Reding's Cabinet, DG Communication, the Spokesperson's Service and the Bureau of European Policy Advisers are represented in the Communication Steering Board.

⁵⁴ M. Brüggemann (2005), op. cit. n2.

⁵⁵ The programme was set up in order to facilitate transnational cooperation and exchanges between citizens and organisations in Europe. It is managed by the Education, Audiovisual and Culture Executive Agency (under the supervision of DG Communication, DG Education and Culture and DG Humanitarian Aid & Civil Protection). Since 2004 it has been supporting projects such as town-twinning, citizens' meetings and various kinds of remembrances projects.

interviewees in the DG Communication as well in the other DGs clearly indicated that this facilitation is not systematically implemented: 'We don't facilitate the dialogue as such', and: 'I don't think it is up to us to tell people to get involved. I think people get involved if they think it is in their interest'. This exercise of institutional restraint was, once again, explained by the risk of causing frustration:

I think that the listening process is potentially dangerous because if you give the impression that you are really listening, then you have to act on what is said. (...) You listen, but in the end you do what you want to do as a public authority; it might generate frustration. (Interviewee in DG Communication.)

Although the differences between the approach of Commissioner Wallström (2004-2009) and that of Commissioner Reding (2009-2014) are at first glance minimised as being a mere matter of different tools serving the same goals, the analysis of the interviews points to an important shift; in the Barroso II Commission, legitimacy is mostly defined on the basis of output and results, whereas former Commissioner Wallström emphasised the need for stimulating input and active involvement. The following analysis indeed shows the shift towards more emphasis on delivery, impact and return on investment through one-way communication.

Whereas the main objectives of the dialogic dimension characteristic for this period remain more or less the same compared to the previous period (i.e., generating input for better policymaking and convincing the public of the EU's relevance), the responsible actors differ. Although the need for an inter-institutional partnership was mentioned, it is the role of the Commission's DGs that is mainly highlighted. Since dialogues and consultations are meant to focus on concrete pieces of legislation, they are considered to be the actors responsible first and foremost for maintaining the dialogic dimension of communication (particularly targeted towards policy stakeholders). However, the communication units themselves drew attention to decentralisation and 'the natural trend of the DGs is to act on their own and for their own benefit', as one of the interviewees (DG Justice) explained. The responsibility of the DG Communication covers primarily contacts with media and the general public, and offering other DGs communication tools (e.g. audiovisual services), all interviewees confirmed. Nevertheless, the prime responsibility of member states and national politicians to engage in a dialogue with the public is still underlined.⁵⁶

The main target audiences in this period are the general public and stakeholders. As I have already mentioned, in this context there is a rather clear division of labour between DG Communication (responsible for the former) and the other DGs (responsible for the latter). Media are targeted by both, but especially by DG Communication in an effort to reach the citizens. It has to be noted that since the initiative for dialogue is increasingly put in the hands of the citizens themselves, their role is no longer that of a public waiting to be addressed. As a result, one can state that in the Commission's understanding of communication, the link between EU policy making and the EPS does not (anymore) have to be facilitated in a top-down way. Instead, it is the turn of the citizens in the EPS to reach out and search for connection.

The new tools for the two-way communication dimension introduced during the previous period appear to remain relevant. Public consultations are still mentioned as one of the key tools, as long as they are complemented with publicity and the support of the Representations of the European Commission in the member states and conferences. The importance of more involvement of the Representations is also stressed with reference to the drawing up of communication plans adapted to national settings. In addition to their role as target audience, media are put in the tools category as well, since the dialogue with the public is currently becoming less direct. By using media, the Commission aims to 'directly reach the citizens, covering this gap [between the EU institutions and

⁵⁶ A. Michailidou, op. cit. n7.

the general public] which we couldn't do with just a few meetings'. As this quote from one of the interviewees (DG Communication) illustrates and as I have argued above, communication actions are increasingly weighed against their impact and visible effectiveness. Using mass media guarantees a quantitatively better impact, the Commission's argument goes. A striking finding is the Commission's reluctance to use social media. It is true that online communication and social media are still welcomed as tools of facilitating involvement and input but the question of how the outcome of this direct online dialogue will be dealt with raises uncertainty. As one of the interviewees (DG Justice) put it: 'We are still thinking about how we are going to do this when we get all these people talking back to us on social media'.

CONCLUDING REMARKS

Taking a departure from the uncertain paradigm shift in the Commission's communication policy previously reported by scholars, this contribution has brought into focus the development of the dialogic and participatory dimension in this policy area from 2001 to 2013. Referring to the three areas I set out to assess, I can state that (1) it is only since 2004 that the concept of two-way communication has gained proper recognition from the Commission. Whereas before 2004 two-way communication was predominantly aimed at preparing and evaluating information campaigns, the listening process explicitly put forward in the 2004-2009 documents was linked to generating input for EU policymaking. Referring to the conceptual framework of this paper, by 'being all ears', the European Commission facilitated (through its communication policy) the role of the EPS as a communicative process of public opinion formation to legitimise (a posteriori) and instigate (a priori) EU policymaking. However, findings from earlier research were validated in the sense that analysis also confirmed that the Commission's rhetoric still reflects the aim of improving citizens' perception and appreciation of the EU. Moreover, the responsibility to enter into a dialogue with the general public that basically makes up the EPS, which was indicated as the main target audience in this context, was passed on to an important extent to member states and national, regional and local political actors. The analysis indicates that from 2004 to 2009 the dialogic dimension in the institutional communication strategy of the Commission was increasingly concretised, but as an evaluation for the Commission of Plan D and Debate Europe consultation projects⁵⁷ made clear, a lot of room for improvement was left, for example, for connecting the results of the consultations to the EU decision making process. That said, from 2001 to 2009 a shift, however gradual, was observed from informing to facilitating interaction and dialogue.

Regarding the Commission's more recent interpretation of communication, (2) the research found that a formal step was taken forward in what concerns the informing dimension (e.g. the constitution of the Communication Steering Board). Concerning the role of the EPS, the focus is now placed on its (a posteriori) legitimising capacity. The need for more evidence-driven communication (based, for example, on media monitoring) dominates the rhetoric. The dialogic dimension is rationalised as well. In this respect, it was demonstrated that the dialogic dimension (3) is played down in the sense that the subjects of the dialogue with citizens are defined in a top-down manner, whereas the initiative for dialogue is expected to arise from the bottom. Metaphorically speaking, whereas up to 2009 the Commission had been gradually developing a general interest in 'becoming all ears', citizens in the EPS nowadays have 'to catch the Commission's eye' to make their voices heard. Professional and specialised stakeholders, by contrast, are still target audiences and interlocutors invited to contribute actively.

⁵⁷ Euréval, Rambøll-Management, and Matrix, *Evaluation of the Plan D / Debate Europe citizen consultation projects*, 2009, available at http://ec.europa.eu/dgs/communication/about/evaluation/documents/2009-debate-europe_en.pdf [last visited 12 February 2014].

Based on this analysis of the institutional communication strategy of the Commission, one could conclude that the Commission has become less involved in facilitating the link between the unstructured, general EPS and policymaking. However, less can be more. Although the Commission's reticence to step up to the European public and to 'be all ears' vis-à-vis citizens can be considered detrimental, more goal-orientated initiatives can in the end deliver improved results for the benefit of the EPS. To put it bluntly, trading in broad listening operations without (direct) connection to EU policymaking for limited consultation procedures with more direct policy relevance, could at least partly solve the problem of frustration on the part of the participants. With regard to the increased effort expected from the public, as Aars pointed out,⁵⁸ public participation predominantly steered by political elites runs the risk of reducing involvement and participation to a means for gathering support instead of input. Further research is needed to explore the thesis that less institutionalised and broader facilitation of the next step between EPS output and EU policymaking input is accompanied by an increase in the substantial incorporation of EPS output.

Consequently, it is suggested that further research could look beyond the policy area of institutional communication and study the next step or link between the EPS output and EU policymaking input facilitated through, for instance, the European Citizens' Initiative instrument, which was introduced by the Lisbon Treaty (2008-2009). Although the efforts required by citizens to organise such a transnational initiative are rather disproportional compared to the possible outcome (i.e. agenda setting), citizens can put on the table their own proposals and subject matters. Moreover, if a citizens' initiative is successful, policymakers are obliged by regulation to listen to the organisers during a public hearing and to give formal consideration to this bottom-up initiative for policymaking. As a consequence, future research will also be able to explore further the Commission's receptiveness towards a more formalised way of engaging in a dialogue with the EPS, which bypasses its institutional public communication strategy.

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⁵⁸ J. Aars, 'Democratic Renewal in Local Government? Top-Down Strategies for Bottom-Up Involvement', in Zittel and Fuchs, *Participatory Democracy and Political Participation*, 202-222.