CHAPTER THREE

PUBLIC RELATIONS BETWEEN PROPAGANDA AND THE PUBLIC SPHERE: THE INFORMATION POLICY OF THE EUROPEAN COMMISSION

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Introduction

The European Union (EU) has a problem with its citizens. For about fifty years the political elites have pursued the agenda of political and economic integration, while the broader public remained uninformed and by and large uninterested in what was happening in Brussels. This mode of governance has clearly shown its limits: when the citizens were asked whether they support the plan to introduce a constitutional treaty in June 2005, fifty-five percent of the French voters said "Non" and sixty-five percent of the Dutch "Nee". In June 2008, fifty-three percent of the Irish voters rejected the Lisbon Treaty, the follow-up to the constitutional treaty, and in 2009 the European Parliament (EP) suffered a record weak election turnout. This came as no surprise, considering that barely every second EU-citizen knew that he or she can vote for the EP (in fall 2007, 48 percent of the respondents knew that they can vote) (CEC, 2008a: 10).

From the perspective of the EU elites, this situation results from a communication *deficit*. According to policy papers from Brussels, the key to tackling this deficit is the strengthening of a European public sphere, a transnational communication arena where Europeans can participate in public debates about issues of common concern for all Europeans. Closely related to the idea of building a transnational public sphere is the aim of promoting dialogue between the EU institutions and the citizens. To further this purpose, the Commission has intensified its communication activities since the mid-1990s. Since 2004 there has been a commissioner

responsible for the field of communication: Margot Wallström. She has initiated a comprehensive reform of the communication activities of the Commission (CEC, 2005c, 2006a). Communication is 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 (CEC, 2005c: 2).

The new policy aims at enhancing the transparency of the EU. Furthermore, it is designed to promote a dialogue with the citizens and thus provide the basis for a European public sphere (CEC, 2006a: 4–5).

Does the information policy of the Commission actually contribute to the strengthening of a European public sphere? 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 public relations activities.[1]

Information policy: connecting public relations and the public sphere

In everyday talk, the term "information policy" is used as a synonym for public relations activities. Journalists might write about the information policy of an energy company after an incident at an atomic power plant. For this chapter, information policy is a concept for the analysis of information and communication activities as a policy. Policy is understood as a set of governmental decisions (Dye, 1972: 2; Jenkins, 1978: 5). Public relations activities of official institutions can thus be

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[1] This chapter presents a concept of information policy that is more fully developed in Brüggemann (2008). This chapter is an elaborated but at the same time radically shortened version of the book, which should be consulted for further details on the theory of information policy, the design of the empirical study and the detailed results of the analysis of the information policy of the European Commission. I would like to thank Andreas Hepp, Jennifer Gronau and the editors of this volume for valuable feedback and helpful reviewing of this chapter.

viewed as being part of the implementation of an information policy. Information policy is *a set of political decisions which determine the goals, rules and activities of an organisation's communication with the citizens*. Information policy determines how organisations communicate with the citizens. However, information policy leads not only to certain strategies and means of active communication (public relations), but also to the regulation of access to information (transparency regime). Viewing public relations and transparency rules as belonging to the same policy enables us to explore the relationship between the two.

Having defined information policy, I will now briefly introduce the concept of the public sphere and the status quo of the research on the European public sphere. Finally, the relationship between the European information policy and the public sphere will be conceptualised.

The term public sphere has numerous meanings. First of all, the adjective "public" describes objects which are neither secret nor private (Kleinsteuber, 2004c: 601; Peters, 1994: 43): public means accessible for everyone and relevant to the political community as a whole. In this article, the public sphere is understood as a public *space of communication*. It is a sphere of social interaction that is structured as a network of spaces of political communication (Habermas, 1990 [1962], 1998 [1992]). The various arenas of public communication are connected by communication flows. Central junctions of this network are the mass media, which make the debates of small arenas of 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 being 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 (and many others exist that cannot be discussed here) may be transferred from the national to the European level: A *transnational public sphere* is a space of communication which is comprised of a set of interconnected national public spheres. Communication flows go beyond national borders, allowing for transnational debates. 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 EU. An obvious weakness of the European public sphere lies in the absence of strong transnational media as

institutions of integration of national public spheres (Schlesinger, 1999; Brüggemann & Schulz-Forberg, 2009). The European public sphere evolves from the activities of 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 to the extent that national public spheres open up for transnational flows of communication of a European scope. The Europeanisation of national public spheres can be analysed as a multi-dimensional process.

1) First of all, EU politics and its institutions increasingly step into the centre of public debates. This may be called "vertical Europeanisation" (Koopmans & Erbe, 2004) or "monitoring governance" (Wessler et al., 2008). 2) Secondly, the horizontal connections between national public spheres intensify. Issues of other EU Member States are being discussed. Speakers from these countries increasingly get their say. This has been called "horizontal Europeanisation" (Koopmans & Erbe, 2004) or "discursive integration" (Wessler et al., 2008). 3) A common discourse can only evolve if people talk about the same thing. Therefore, a certain minimal degree of similarity of national debates is a precondition for a transnational public sphere. Transnationalisation, therefore, entails some elements of convergence of the agenda of national debates. 4) Finally, a "participant perspective" (Eder & Kantner, 2000: 313) develops: the perspective of being part of a common European debate about issues which concern the Europeans altogether.

The empirical research on the European public sphere has brought to light ambivalent findings (Wessler et al., 2008): on the one hand, at least in the national quality press, there is an Europeanisation of national debates in terms of intensified attention to EU institutions and Brussels. On the other hand, the horizontal exchange with other European countries does not increase and the perspective of a common debate is only weakly pronounced. National quality newspapers show patterns of Europeanisation that remain stable over time and do not converge (Brüggemann & Kleinen-v. Königslöw, 2009). All in all, the European public sphere remains nationally segmented and rather fragile. Having said that, it is an equally important finding that there is a trend of Europeanisation at least in the vertical dimension, and that there are (at least in some media outlets) high levels of horizontal connections across national borders. Therefore, the European public sphere as a network of national networks of communication is already beyond being just the wishful thinking of European policy makers.

So far, we have defined information policy as a set of decisions governing public relations and the transparency regime of a political

institution. We have defined the European public sphere as a network of national networks of public political communication and we have shown that studies do find signs of an Europeanisation of public spheres. Now, in what way could information policy influence the public sphere?

Ethics and efficiency of a European information policy

If one follows the intuitions of the public sphere theory of Jürgen Habermas, public debates should be autonomous from state control in order to enable critical reasoning (Habermas, 2006). According to the original and more radical formulations of normative public sphere theory, public relations activities of the state and of big companies would transform the citizen's sphere of public debates into an arena of cultivating a positive image and affirmation of power (Habermas, 1990 [1962]: 291). EU information policy would thus only contribute to the "re-feudalisation" of the European public sphere, bringing back the times of feudalism when the public sphere mainly served the acclamation of political rule. This is the exact opposite of what the European Commission promises in terms of introducing a dialogue with the citizens.

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: public relations and transparency rules. Only the *empirical* scrutiny of the transparency regulation and their implementation will reveal whether they 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, public relations activities may also serve or distort free public discussion. Public relations influences public debates through strategic diffusion of themes and opinions, through the promotion of certain speakers in the public discourse, and sometimes also through the establishment of separate communication arenas in the networks of public communication. How this intervention is to be evaluated essentially depends on whether it improves the possibilities of citizens to come to an "enlightened understanding" (Dahl, 1989: 111) of politics and allows them to participate in democracy in a meaningful way. Thus, the contribution of public relations to a functioning public sphere is not to be determined a priori: public relations might or might not promote democratic communication.

The extreme forms of public relations may be labelled *propaganda* and *dialogue*. Propaganda as a strategy 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 the basic norms of truthfulness and a minimum of respect towards diverging opinions. *Dialogue* as a strategy of information policy generates a communicative exchange with some kind of connection to political decisions. The government is expected to react in a responsive way to the results of the communicative exchange with the citizens.

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.

It is not enough, however, to test whether criteria for democratic information policy are fulfilled. If information policy actually wants to influence a transnational 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 specific 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 the public relations activities of authorities lead to a re-feudalisation of the public sphere, they implicitly presuppose that the public relations actually reach the citizens and affect them. These presuppositions, especially when applied to the public relations of the European Commission, should not be taken for granted.

The empirical analysis of the European information policy

The empirical study focuses on the information policy of the European Commission since the turn of the millennium. The public relations and transparency regulations of the European Commission 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 are in fact designed and implemented in a way that fosters the transparency of EU policy-making. The analysis of the public relations will focus on the question of whether a political dialogue with the citizens was effectively promoted.

Research design

As for public relations, in the light of the variety of the public relations-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 was fifty-nine expert interviews with officials of the Commission, the European Parliament, the European Council and the national governments, as well as with public relations agencies involved, which were conducted successively between 2003 and 2006. The EU-wide overview was provided by two standardised surveys of all national representations of the European Commission and of the receivers of grants for information projects of the EU. In addition, altogether almost 300 "documents" were analysed. Besides the policy documents (reports and policy papers of the Commission) also selected public relations products (brochures and 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 were initially analysed separately with qualitative content analysis and then interpreted, taking the insights gained from the different parts of the analysis together. Here, only some of the main results can be represented.

The old paradigm

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. Paradigmatic for the further development was the encounter between Jean Monnet, the architect of the European integration, and Emanuele Gazzo, the founder of *Agence Europe*, the news agency specialising in the EU. Instead of being pleased about the newly found interest in the European integration process, Monnet is said to have requested the founder of the agency to immediately stop his undertaking (Gramberger, 1997: 100). When the entire Commission had to withdraw in 1999 after allegations of corruption, a study found that the attempt to exercise pressure on journalists and to cover up the affair had actually driven the spiral of scandal (Meyer, 2002). An information policy orientated towards secrecy hit a dead end. 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 public relations activities.

Towards transparency?

This section will take a closer look at the formulation and the implementation of the EU's transparency regime. It 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 very right of access to documents but also comprises 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 (public relations) 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 of the implementation of these rules.

Opening up Council meetings

Traditionally, only the 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 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). 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.[2] There is a change towards more openness, but there are still a number of meetings (those without legislative decisions and which do not fall under the co-decision rules) which are not public.

A comprehensive right of access to documents

Likewise, after the turn of the millennium there was a turn towards more transparency regarding the right of access to documents. Until 2001 there was no right for the public 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.

Limited set of exceptions

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.

The exceptions concern documents withheld for reasons of public safety, for keeping professional secrets and privacy and whole areas of politics (security, finance, 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

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[2] Retrieved 14 August 2008, from http://ceuweb.belbone.be

"seriously undermine" (Article 4.3) the internal decision-making process of the EU institutions (Bunyan, 2002). With this exception the institutions gain room for manoeuvre, which has been widely used for refusing documents. More than a third of all refusals for releasing documents by the Commission, the Council or the EP in 2006 made reference to the exception granted in Article 4.3 (see Table 3.1).

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 3.1 compares the information gathered from the reports of the EP, the Council and the Commission.

Table 3.1. Transparency in Practice: 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	0	5
	1	0	7
Rate of documents disclosed after inquiry (2006)	98 %	85 %	77 %
Protecting decision making as reason of refusal	40 %	43 %	33 %

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 some weaknesses in implementing the regulation. The main weakness is the absence of a functioning register of documents held by the Commission.[3] 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. 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 the 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 experience with the implementation of the transparency regulations by 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, other officials proclaimed that all the "public" documents of the Commission are already published online, and that all other documents are "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. 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. Two lessons can be drawn from the experience of the research process. Firstly, 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. The second lesson is that, above all, the transparency regime serves those who have

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[3] The register of documents can be found at http://ec.europa.eu/transparency/reg doc/recherche.cfm?CL=en (Retrieved 25 April 2009).

both the knowledge and the time to use the procedures of the transparency rules. Thus, it comes as no surprise that lobbyists, NGO representatives, lawyers, scientists and representatives of other public institutions are the main users of the transparency regulations (Council of the European Union, 2005; CEC, 2005b). An important group is represented with just under 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.

In 2008 the Commission put forward some proposals for revising the transparency rules (CEC, 2008b). Proposing a narrower definition of "document", these revisions would further limit transparency. The European Ombudsman fears that thereby the civil right of access to documents is *de facto* in danger (European Ombudsman, 2008). Altogether, the analysis has shown that the formulation of the regulation giving access to documents in 2001 was nevertheless a great step towards an information policy guided by the aim of transparency. It also became apparent that the Commission in particular faces some implementation problems, and that the danger of setbacks towards bureaucratic arcane policy is still present.

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. Access to information and documents may be complemented by public relations measures of actively disseminating information. 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.

Dialogue desired?

Whether the information policy of the Commission incites such a political dialogue will be explored through a case study of the public relations campaign on the EU's big fifth enlargement round.

With a budget of 150 million Euros, the activities on EU enlargement constituted an important focus of the Commission's communication work between the years 2000 and 2006. Public relations were 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 clarify the concept of "political dialogue" first.

The concept of a political dialogue with "the" citizens goes 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 a communicative exchange—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", public relations 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 whether dialogue constituted one of the proclaimed goals of the Commission's communication activities. According to the Commission's documents, the information activities on enlargement ultimately aimed at broadening both the understanding and the support for enlargement. Dialogue was seen as a means of achieving this goal (CEC, 2000a). The possibility that a dialogue could also lead to an enlightened rejection of the enlargement project is ignored by the Commission in its strategic considerations. On the working level, however, this view of a persuasive mission of the Commission has not caught on. The following interview-statement of a civil servant is typical of how officials responded in the interviews:

> The Commission is not in the business of convincing people, or winning their hearts and minds. It is not our job to sell Europe. […] We are not elected politicians, we are civil servants. So we have to provide objective information.

Giving out neutral information is not enough for conducting dialogue, however, if the Commission neglects to justify its initiatives. A dialogue is not only an exchange of facts but of opinions as well; therefore, so far our analysis faces two contradictions. There is a contradiction between the

primarily persuasive aim described in the policy papers and the open dialogue likewise promised in these papers, and a second contradiction between the intentions of the officials on the working level to disseminate factual information and the idea of a dialogue as an exchange of opinions and justifications.

Having looked at the contradicting aims of the Commission with regards to dialogue, we will now tackle 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 the 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 public relations activities for the general public. It was not before 2003 that concrete public relations 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 (May 1, 2004).

Overall, communication was clearly lacking behind political decision-making. *De facto*, the public relations 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, progress in integration should precede public discussions about it and become a "fait accompli" once the citizens take notice of it. Integration should therefore start with technical issues before spilling over to more contentious policy fields (Haas, 1968). The analysis of policy documents and the expert interviews conducted with officials from the Commission point in other directions. There is the traditional 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 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 public relations would have been dialogic. 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 public relations activities were documented in a very thorough and consistent way, e.g. giving details on the groups targeted by the public relations 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 structurally different communication activities have a varying potential to inspire a dialogue or to contribute to the transparency of politics through factual information. In a forum of discussion where people in various positions sit on the podium and where the listeners can ask questions and express opinions, the structural conditions for a dialogue are better than in the case of a politician's speech, which at most permits the top-down justification of a political position. This room for presenting arguments and enabling the audience to develop an enlightened understanding of the issues at hand is much less likely to be available in case of marketing activities such as organising social 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 3.2 shows the results of this analysis: nearly every second public relations 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. Marketing plays only a negligible role.

Table 3.2. Profile of Public Relations Activities in Germany (2002 – 2004)

Public Relations 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 mentioned activities; n = 159.	100

Dialogical forms were at the heart of the public relations 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 a temporal or institutional 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. Therefore the information policy aims at agenda-setting rather than dialogue.

So far, we have argued that the dialogic public relations of the Commission were 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; or c) important media follow the debate and serve as amplifiers.

Table 3.3. The Reach of Public Relations 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

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. 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—inferring from the case

of Germany—the Commission was not able to reach out to hundreds of millions of EU citizens drawing on the small-scale public relations 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 public relations 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 seen by looking at the resources available for projects with the media. Table 3.4 classifies the various posts from the budget administered in Brussels by primary target group as "media relations" or "direct public relations": barely 30 percent of the expenditures went to media-centred activities (Table 3.4).

Table 3.4. The Central Budget for Public Relations Activities (2001 – 2004)

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

Calculations based on the Commission's documents (CEC, 2004; CEC, 2005d). 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. 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 are centred on public relations activities that aim to reach out directly to citizens. They do reach some citizens but mostly those already interested in the EU who were willing to attend informational seminars or public roundtable discussions. The public relations of the Commission fail to reach the public at large. Media work is structurally weak and therefore cannot compensate for the failure of direct public relations activities.

Perspectives for the EU information policy

Overall, the information policy since the turn of the century has turned into the 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 website EUROPA,[4] 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. Due to its total uncoupling from the decision-making process, these measures cannot be viewed as being part of a *political* dialogue with the peoples of Europe. It could still have been a relevant contribution towards explaining EU enlargement to the people if the public relations efforts were 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 public relations 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 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

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[4] See Brüggemann (2008) for a discussion of different communication tools, such as the EUROPA website.

public relations 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 public relations of the Commission must be scaled down. A direct dialogue with the citizens seems to be delusionary. The promise of dialogue is propagandistic if the debates with citizens do not reach a wider public and are in no way linked to political decision-making.

Even if 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. 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 this practical conclusion 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. Public relations 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 citizens, we come to a more sceptical conclusion. For the Commission, the strategy of a political dialogue proves 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. Also, 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 public relations 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 feasible and useful in 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 public relations measures, which are, indeed, two sides of the same coin.

Furthermore, the study has shown that it is paramount to combine research addressing normative 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 Niklas 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.

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