European Union cultural policy and the Open Method of Coordination: examining the main roles of the Commission, Council, and Member States

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ABSTRACT:

This paper discusses intergovernmental policy coordination in the case of a limited but politically charged competence in the European Union: culture. This is done within the context of the Open Method of Coordination (OMC), a non-legally binding method of governance guided by the principles of voluntarism, subsidiarity, and inclusion. Having only started in 2008 in the cultural field, the relative ‘youth’ of the OMC makes it an opportune time to look at it in more depth, particularly in light of the “institutionalisation of novel forms of consultation, participation, and representation” (Barnett 2001) that are have emerged in the governance of cultural policy since the involvement of the EU in this field.

Based on interviews with key policy actors and drawing on theoretical insights from sociological institutionalism, the paper examines the roles played by the European Commission, the Council of Ministers, and the experts appointed to the groups by Member States. It shows how these roles differ in practice from their formal description, and concludes by suggesting some of the implications of this gap. On a wider scale the paper contributes to dialogues on non-legislative and non-hierarchical governance in the EU as well as the relationship between sovereignty and subsidiarity in the EU cultural governance.

Paper for the annual Political Studies Association conference
Sheffield, 30 March-1 April 2015

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Introduction

Culture has been an area of European Union competence – albeit a limited one – since the early 1990s. However, more than twenty years since its formal introduction in the Treaty of Maastricht, there is still little known about the processes of policy-making, coordination, and in particularly on the specific roles of institutions (the European Commission, Parliament, and Council of Ministers), as well as individuals and practices within these organizations. This paper delves more into this environment and looks at the role of three major actors in policy coordination via the Open Method of Coordination.

Studying cultural policy at the European Union level presents unique challenges: it is a comparatively relatively new policy area for the EU, and it is a restricted, politically sensitive, and at times highly symbolic competence. It is also an area of policy heavily associated with the nation-state level. Rather than using these as reasons to dismiss this arguably comparatively inconsequential policy area, the position adopted in this research is that it is precisely these characteristics that make EU cultural policy worth studying. In particular, the principle of subsidiarity creates a restricted environment in which action takes place.

This paper is part of a larger study on the Open Method of Coordination in the field of culture. But why study this topic? There are two main reasons. The first is a dissatisfaction with existing literature on EU cultural policy; as culture has become a more developed policy area in the EU, the study of it has developed too. But, with a few exceptions, this literature tends to be general, focusing on the cultural policies of “Europe” or “Brussels.” The roles of EU institutions or individual actors – everyday policy processes – are not a focus. As Clive Barnett argues, “an assessment of EU cultural policies needs to move beyond an exclusive focus on symbols, meaning, and identity” (Barnett 2001, p.422). We must look more into detail at who makes policy and how it is done, particularly as culture is increasingly being used in an instrumentalized way in EU-wide programs such as Europe 2020.¹

The second reason is a desire to delve more into the micro-level details of the Open Method of Coordination in a cultural policy context. While the OMC has been the object of many studies, in the cultural field there is little known about the way this system works and what impacts (if any) it has had on national-level policy learning and change. Having only started in 2008 in the cultural field, and, with the introduction of the 2015-2018 Work Plan, now in its third round, it is an opportune time to look more in detail into what this process is and what it sets out to do. The OMC, as a ‘new’ method of governance, is particularly interesting when examined through the lens of the “institutionalisation of novel forms of consultation, participation, and representation” that Barnett (2001, p.406) discusses in his paper on subsidiarity and EU cultural policy.

The goal of this paper therefore is to examine in more detail how the OMC operates in practice in the field of culture. In particular it looks at the roles of the Commission, Council, and Member States and focuses on how these roles differ in practice than what they are formally defined as. The paper begins with a brief historical outline of cultural policy and the EU with a particular focus on its legal treaty base. This is followed by a similar discussion of the Open Method of Coordination, situating this so-called new mode of governance in its

¹ For work on instrumentality in cultural policy, see Belfiore (2002), Belfiore and Bennett (2008), and Gray (2007).
historical context. The second more substantive part of the paper discusses the roles of European Commission, Council of the European Union, and finally the Member States themselves. Finally, the discussion and concluding sections offer some thoughts on the roles and the ramifications it has for thinking about the culture OMC as a whole.

**Background: cultural policy and the European Union**

Culture was first legally introduced as an EU competence in the 1992 Treaty of Maastricht.² In comparison with most other EU policy areas, culture is comparatively small and modest: the principle of subsidiarity³ means it is a limited competence, and most of the authority within this policy field still lies with Member States. The EU’s legal powers in the area of culture are threefold:

- encouraging and facilitating cooperation between Member States;
- promoting the incorporation of culture into other areas of EU jurisdiction;
- cooperating with Member States on cultural action.

Since the early 1990s, the EU has been responsible for a range of small- and large-scale events, programs, and initiatives. Current cultural action encompasses a wide variety of areas, including the European Capital of Culture programme; EU culture prizes; European heritage including annual heritage days and the heritage label; and programmes to support artist mobility. The Commission also administers EU-wide funding programmes, the current being Creative Europe (2014-2020).

EU policy thus *supplements*, not overrides, that of Member States, and, due to strict adherence to the principle of subsidiarity, agenda setting and policy framing must be done in a way that it can be justified to be handled at the EU level. In the Commission’s own words, ‘[the] work done by the EU complements [Member States’] and adds a different dimension. Information gathered from the EU as a whole can be used to support national policy decisions or provide examples of best practice that others can share. Programmes run across the EU can have a greater overall impact than those just run on national grounds, and policies put in place throughout the EU can help further national goals’ (European Commission 2013, p.3).

As a restricted competence, the way that policy is made at the EU level differs from many other areas of jurisdiction. While decisions about some programs are made via the ordinary method of legislation (previously known as co-decision), the use of ‘softer’ methods of governance, such as the Open Method of Coordination, has developed over the past seven years. The primary advantage of a method such as the OMC is that it “put[s] the EU Member States on a path towards achieving common objectives, while respecting different underlying values and arrangements” (de la Porte 2002, p.39).

**What is the Open Method of Coordination?**

The Open Method of Coordination (OMC) is “a governance mechanism for transnational coordination in European Union (EU) policy-making” (Borrás and Radaelli 2015, p.129). It was formally introduced at the March 2000 Lisbon Summit and was a primary method of

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² There was informal Community involvement in the field prior to its legal introduction, with, for example, the European Capital of Cultural program, initiated in the mid-1980s by the Council of Ministers.

³ The legal principle of subsidiarity dictates that the EU will not become involved in a policy area unless it is deemed the best ‘level’ of government to do so.
governance for achieving the objectives of the 2000-2010 Lisbon Agenda. It is an alternative means of policy-making “owing to the lack of political willingness to transfer further legislative powers to the EU” (Borrás and Radaelli 2015, p.132), and is a non-legally-binding mode of governance based on the principles of voluntarism, subsidiarity, and inclusion (Héritier 2001). The OMC in most fields works on the principles of benchmarking and sharing best practices. According to the Commission, the OMC, is a light but structured way EU Member States use to cooperate at European level in the field of culture. The OMC creates a common understanding of problems and helps to build consensus on solutions and their practical implementation, without regulatory instruments. Added value is created by addressing common responses to problems that are supra-national (European Commission 2015).

The OMC was first used in employment policy, and its use has expanded over the years to include areas that are politically-sensitive or that the EU does not have full jurisdiction in (Regent 2003), including social protection, research and development, asylum and immigration, youth, sport, and education.

What has emerged in the literature is that there is not just one Open Method of Coordination – we cannot speak of an OMC as it is not a coherent object of study. Over the years the OMC as a method “has been deployed with different purposes, logics of action, procedures and instruments” (Borrás and Radaelli 2015, p.131). In addition, EU governance is “deeply sectorized;” each area of competence has its own treaty base, institutional structure, and policy goals (Jordan and Schout 2006, p.12). This necessitates careful attention to the specifics of the policy sector in the analysis of the OMC, in light of its position as “a shifting object in terms of governance structure and political objectives” (de la Porte and Pochet 2012, p.338).

The OMC is main working method of the Council of the European Union’s Work Plans for Culture, which, since 2008, have been used to develop overarching policy priorities involving cooperation between the Commission, Council, and Member States. The OMC began in this field in 2008, and 2015 marks the start of the third Work Plan and round of working groups. Each Work Plan contains policy priorities, which are further sub-divided into topics. The 2011-2014 Plan, which this research is based on, contained six policy priorities ranging from Cultural diversity, intercultural dialogue and accessible and inclusive culture (Priority A) to Culture statistics (Priority F).

In comparison to other policy fields therefore, the culture OMC is relatively young. Crucially, it also differs in its institutional structure and characteristics. The most important factor is that the culture OMC does not feature benchmarking, target-setting, or monitoring. According to the Commission, the Culture OMC features a more flexible approach and a voluntary reporting system. It is conceived as a non-binding framework for structuring cooperation around the strategic objectives of the Agenda for Culture and fostering exchanges of best practice (European Commission 2013).

In the words of one policy officer in the Directorate-General for Education and Culture, “we are the softest of the soft” (personal communication, April 2014). The only other policy area featuring such a ‘soft’ system of coordination is youth policy. What this means is that mutual

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4 The first Work Plan was 2008-2010; the second 2011-2014; and the third, released in late November 2014, is 2015-2018.

5 Please note that all interviews, carried out between April-December 2014, are anonymous. Where names are used, pseudonyms have been given. In addition, where job titles could identify individuals, these have been made slightly more generic.
learning and exchange are the key features of the culture OMC, rather than target-setting. This soft system, therefore, reinforces the principle of subsidiarity.

This distinction raises the important question of why states coordinate policy in the first place. Turning to the literature we can see that there are a range of reasons why states may do so, ranging from a damage control model of minimizing spillover effects in the case of, for example, common economic policy, to ‘looser’ coordination as capacity-building and facilitating learning (Begg 2008, referenced in Armstrong 2010). The culture OMCs do not fit into the first category, since there is no unilateral action taken in the cultural field at the EU level. However, as Armstrong identifies, the multitude of reasons indicate different logics of coordination. Armstrong (2010, referring to Biagi’s [1998] work) has discussed the difference between coordination as cooperation and coordination as convergence. The former “works with the autonomy of states to define their policies but promotes elective and selective learning across states” (Armstrong 2010, p.41). This is indeed what we see in the case of the culture OMC, whereas other OMCs promote convergent coordination. This is a hugely important distinction as it influences the goals of the group, the way that success is evaluated, and indeed how policy learning (and change) is conceptualized.

Methodological and theoretical positions

Information for this study comes from primary sources, including policy documents as well as 30 interviews conducted with key policy actors carried out between April and December 2014. Interviews were carried out with three main groups: European Union staff (Commission and Council); experts that participated in the OMC groups as the representative of a Member States; and invited guest experts who represented civil society platforms or independent arts and cultural organizations. All of these individuals were involved with one or more working groups within Priority A in the 2011-2014 Work Plan. The interviews were semi-structured and questions focused on individuals’ interpretations of their own experiences as actors within the OMC process.

One of the weaknesses of the OMC literature is that it can be rather abstract on empirical, micro-level details of the process (Armstrong 2010, Zeitlin 2011). Many studies also evaluate the OMC without giving much attention to specific characteristics of the system. The different logics of coordination referenced above necessitate approaches that do not gloss over the mechanics of the process. Borrás and Radaelli (2010) argue that the OMC has developed in a very ad hoc, trial-and-error manner, and that justifications for using coordination procedures have not been clear since the beginning. This study therefore tries to situate the culture OMC groups studied in time and context; ignoring this and looking at “abstract archetypes” (Ibid., p.52) is misleading and dangerous, particularly given the complexity of EU governance in general and the methodological challenges of a multi-level system.

In order to do so, a sociological institutionalist perspective is adopted. This theoretical position emphasizes structure over agency and examines the role that institutions play in the determination of political outcomes (Hall and Taylor 1996). Rules and norms (formal and informal) – defined as institutions – are highly important in this perspective, as institutions “give order to social relations, reduce flexibility and variability in behaviour, and restrict the possibilities of a one-sided pursuit of self interest or drives” (March and Olsen 2005, p.8). Procedures and norms within organizations are viewed as “culturally-specific practices” that
are “a result of the kind of processes associated with the transmission of cultural practices more generally” (Hall and Taylor 1996, p.14), not based on managerial efficiencies and individuals’ self-serving interests.

In this perspective, individuals are not presupposed to have self-serving desires and goals but rather act according to social and cultural norms, seeking self-definition and expression within a specific context. Acts are thus interpreted as socially-meaningful and adhering to conventions. This is known as the logic of appropriateness, which says that there is an unspoken, implicit understanding of appropriate behaviour within institutional settings: “[t]o act appropriately is to proceed according to the institutionalized practices of a collectivity, based on mutual, and often tacit understandings of what is true, reasonable, natural, right, and good” (March and Olsen 2009, p.4). Agency is therefore highly tied to institutional norms rather than actors’ individual preferences. Institutions are viewed as both constraining, reducing the possibilities of action in a given context, as well as enabling, since it is through agency that agents create the very conditions they operate in and are engaged in sustaining them as well.

**Actors, roles, and goals**

The paper now turns to examining the roles of three of the main ‘actors’ in the culture OMC process: the European Commission; the Council of Ministers, comprised of the Cultural Affairs Committee as well as a small team of permanent staff; and finally the Member States themselves. The OMC is a system that “empowers the European institutions with very specific tasks central to the whole process” (Regent 2003, p.191). But what exactly are these roles? What happens in practice?

**European Commission: “coordinating coordination”**

The Commission’s formal role description is to provide logistical and secretarial support to the work of the groups. As far as possible, it will support the groups by other suitable means (including studies relevant to their field of work) (Council of the European Union 2010, p.9).

The 2001 White Paper on EU Governance specifies that the body “should be closely involved and play a coordinating role” (European Commission 2001, p.18) in the OMC. The DG is also responsible for monitoring progress in the culture OMC as a whole – it has an overview of the whole process and how it develops throughout the course of the three-year Work Plan.

However, the description of the Commission’s role does not tell us much about who specifically carries these activities out and how exactly the system works in practice. It is therefore interesting to probe more into the mechanics of facilitating the OMC, but also more generally about how policy officers see their role, and to what degree of ‘control’ and power the Commission has in the overall OMC process.

It is important to look at the Commission because it occupies a central position in the process: it “enjoys a superior political presence and visibility” and also “is in a better position than others to manage the content and the directions of the information flows within the group” (Borrás 2007, n.p.). One can extend this argument in a sociological institutionalism manner, and argue that the Commission “socializes the players to internalize its conception of issues and objectives” (de la Porte 2002, p.44, referring to Goetschy 1999’s work). It “structures the

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6 I have used the ‘Commission’ for simplicity’s sake, but please note it is one policy unit within the Directorate-General for Education and Culture (DG-EAC) that is responsible for the culture OMC.
framework in which different players are to interact, and contributes to the structuring of the discourse through the documents it prepares” (Ibid.). The Commission’s central place in this process is therefore one that enables it to set certain terms of reference.

The word that is most used to describe the Commission’s role in the culture OMC is “secretariat.” Typically, one policy officer is assigned per OMC group, and follows that group from beginning to end. That individual is responsible for coordinating with Member States on the appointment of experts, coordinating with chairs, organizing the meetings, and distributing information to the group. Fatima, a policy officer, described her role as such:

I hold the secretariat – all the basic administrative support, but also support in terms of contact. So my role is not only to disseminate information - the agenda, the minutes, all that - but give the group specific information on certain topics, of which we have some information, reports, studies, and so on, I provide this to them. But the work is done by them (personal communication, May 2014).

It would seem then that the Commission’s role is limited – almost de-politicized, because of its emphasis on managerial, administrative, and technocratic tasks and because (political) policy priorities are set by Member States in the Council. However, in practice it is more complicated than this. Findings point to a more developed role than the Commission’s (limited) role description in the Work Plan indicates. This was explicitly stated by one member of the Commission: “The word used is secretariat. I would suggest it’s slightly more” (personal communication, May 2014). It was also noted by Viktoria, a participating expert, who said that:

… the Commission – they’re doing much more than it’s written in the documents, where it says simply “secretariat”, sending the emails, etc. They do a lot more (personal communication, October 2014).

In one case, this also included the writing of the final report (normally, this is done by the elected chair of the group). But why is this? The first reason is that the Commission has a unique overview of the entire OMC process that neither the Council nor the Member States have. Because of this, a sense of ownership as ‘overseer’ emerged. This is compounded by the institution of rotating Council presidencies: Jette, a Commission official, admitted that the presidencies “come and go,” but the Commission is constant (personal communication, May 2014). This more developed role was also seen in the creation of the Work Plan. Talking of the 2011-2014 plan, Darya, an EU official, commented that “… it’s a Council work plan, but in reality a lot of the preparation was done with intensive cooperation of the Commission [civil] servants” (personal communication, April 2014).

Secondly, not only does the Commission play a role in the creation and overall monitoring of the Work Plan, they are also responsible for day to day management of it – scheduling meetings, supplying additional information when necessary, and communicating the results of the OMC groups to the relevant parties in the Council. This further increases a feeling of ownership, since no other actor in the process has as much knowledge about the OMC at any one time than the Commission. These two reasons suggest that the Commission’s agenda-setting power is more extensive that appears on paper, as the body is largely responsible for the drafting of the policy priorities.

Council of the European Union (Council of Ministers)

The Council of Ministers’ role is to approve the Work Plan for Culture. The Council setting acts as a platform to set out a strategy – common aims and objectives, loosely defined – in
cultural policy matters (personal communication, April 2014). Because the Work Plan is approved by the Council, and the Council represents the interests of Member States, this “shows a consensus on certain things, certain priorities” (personal communication, May 2014). The Council’s main activity is during the creation of the Work Plans as well as evaluating progress afterwards, in preparation for the next one; they do not have much to do with the *carrying out* of coordination, which is the shared responsibility of the Commission and Member States.

The Council’s workings are unique in that the work is done by rotating six-month presidencies. There is a small permanent staff that supports the Council’s work in the General Secretariat; in the cultural field, this consists of a team of only six people – one head of unit, three policy officers, and two assistants. The Council is split into ten policy-specific groups, and culture falls into the Education, Youth, Culture, & Sport Council (EYCS). According to the official Council website,

> The policy areas covered by the EYCS Council are the responsibility of member states. The EU’s role in areas of education, youth, culture and sport is therefore to provide a framework for cooperation between member states, for exchange of information and experience on areas of common interest” (Council of the European Union 2015; emphasis my own).

Because the EYCS only meets three or four times a year, much of the work is done in working parties and committees, and it is in these committees that over 90 percent of decisions are “settled” (Versluis, van Keulen, and Stephenson 2011, p.138). The relevant committee for culture is the Cultural Affairs Committee (CAC). This body is composed of national representatives. The results of the OMC groups are presented to the Council via the CAC (personal communication, April 2014). Typically, this is a short presentation on the output of the group, usually a best practice or policy manual. So, while the CAC is informed of the outputs of the groups, they are not informed about the process (*Ibid*).

What this means is that the results of the OMC work rarely research the ‘high politics’-level politicians (in this case, the ministers of culture for EU-28). The degree of politicization of the OMC and its influence in the Council are issues that are frequently discussed in OMC literature. The extent to which OMCs have been politicized varies across policy fields. Radaelli (2003, p.8) has argued that the preconditions are there for both a low and high level of politicization, as “on the one hand, [the OMC] works on innovation and improvement on a case-by-case basis,” which “should keep politicisation at low levels.” However, “the aim in the OMC is to promote convergence and coordination at the highest political levels, notably at the European Council. This makes politicisation unavoidable” (*Ibid.*)

One could argue that culture, as a limited competence, is a necessary enough condition for high politicization: Member States do not want to transfer more powers to the EU and do not desire more European integration in this field. That makes it political. On the other hand, the OMCs have been criticized for their political irrelevance at the national level (Borrás and Radaelli 2010). In the cultural case, it would seem that there is a paradox: the strict adherence to the principal of subsidiarity means that Member States keep a close eye on cultural action, yet, results suggest that there is little interest in the culture OMC among the EU’s cultural ministers. Most obviously, this is because the results of this coordination are never presented directly to them in the Council. This has ramifications regarding how the OMC process functions as a whole, particularly in national ministries.
Member States

Considering that the Council Work Plan for Culture 2008-2010, in particular through its use of the open method of coordination (OMC), constituted a new and important stage in the development of Member State cooperation on culture, improving the coherence and visibility of European action in this field, while underlining the horizontal role of culture (Council of the European Union 2010, p.1).

This phrase appears in 2011-2014 Work Plan for Culture, outlining a part of the justification for coordination policy at the EU level. Ideally, the benefits of cooperation should be clear to Member States, but this is not always what we see in practice. In addition, the role of Member States is not easy to ‘pin down,’ due to the multi-faceted and multi-level nature of their activities. Via the Council, the Member States are responsible for creating the Work Plan. They are also responsible for establishing and participating in the OMC groups (Council of the European Union 2010), where they are represented by an individual expert that is nominated by their national government and sent as national representative. The role of the ‘Member States’ then can be conceptualized as both participation in the Council, represented by the minister for culture of national governments (discussed in the preceding section); national-level ministries of culture; and the appointed expert participating in the working group. When broken down like this, and given that this system exists in 28 different Member States, the role of the national level in this process is very complex.

The first thing to note is that participation in OMC groups is voluntary – individual states decide themselves whether they want to join. The Commission does not have the authority to command or force states to participate. If a state decides that it wants to partake in a particular OMC group, an expert is appointed by the national ministry of culture (or equivalent), in cooperation with the Commission (Council of the European Union 2010). This individual attends the meetings of that particular working group (typically there are 4-6 meetings per OMC group, mostly held in Brussels) and participates in discussions, eventually, as a group in consensus, producing a final report.

However, in its ideal-form, the role of national governments does not end there. The hope is that, having sent an expert, there are benefits accrued from participating in such an exchange. After all, the OMC is a process for Member States. But what we see is a hugely varying system of dissemination and post-OMC action among Member States. Methods of dissemination were incredibly diverse and ranged from nothing (i.e. not sharing the report with anyone) to full-on conferences organized around the publication of the report in the Member State. A couple of participating states also had extensive dissemination plans for the period in between meetings, before the working group came to an end (typically each OMC working group lasts for a period of approximately 18 months). In general, actors’ thoughts on dissemination were very reflexive, with many people, including Commission officials, saying there was more that could be done:

…in terms of the output, certainly the dissemination at the national level has to be improved. Sometimes you’ve got the impression that the reports end up on the shelves and aren’t used anymore (personal communication, May 2014).

Note that the participation rate has been relatively high, with regularly 20-25 Member States participating (McDonald et al. 2013). In future work, it would be interesting to explore more into why and how Member States decide to participate (or not).

The output of the OMC groups in culture is a policy or best practice report. There is much to say about this choice of report-types as well, but that extends beyond the scope of this particular paper.
This begins to illuminate the question of relevance at the national level, and begs the question of the role of national ministries of culture in the lead- and follow-up to participating the working groups. Corinne, a policy officer in the Commission, explained that, … the interest is clear for [Member States]. They have to exchange good practice, experiences, and so on. They should come back home with more knowledge about what is done in certain fields, what can be done and what should be done and maybe impact it on national level (personal communication, April 2014).

She went on to say however, that, I think this is one element that is ‘less’ achieved is that we would hope that the results of the OMC discussions are really impacted at national level and they may not always be (Ibid.). An important factor in the relative ‘action’ taken at the national level depends on rules and norms within that particular national ministry. There were some states who had a long and institutionalized history of policy coordination and cooperation at the EU level – of incorporating broader policy goals into national frameworks – and it is not surprising that in these states the value of the OMC was perceived to be higher. There was also a sense more generally that more should be done to promote and publicize the work of the OMC groups among EU institutions. Julita, an expert participating in one of the working groups, suggested a more institutionalized system of dissemination at the EU level: I think maybe it’s better to develop some strategies in Europe – in the Council, Parliament, wherever – to disseminate even more the results of the work of these groups. If we only trust the members [of the group], you can’t achieve as much as if [there was a coordinated effort] from Brussels (personal communication, October 2014).

It is worth looking more into the individual experts appointed by Member States, as they are after all the people who participate directly. As a non-hierarchical mode of governance, “cooperative and participative interactions” (Kröger 2004) are a central part of the OMC process, and the experts themselves are the participants in these interactions. But who actually are these experts? The Commission has stated that it prefers experts who are members of national governments – typically, policy officers or advisors. However, they only provides minimum guidance on who should be selected; it is specified that the individual should have (a) practical experience and (b) effective communication capabilities with decision-making national authorities (Council of the European Union 2010). Expanding on this, Fatima, a policy officer in the Commission said that, [the Commission] has recommended … that the participants belong to public administrations, or at least they have a ‘channel’ to administrations and decision makers because it’s important that the output of their work…is being reported and disseminated to the right people – the decision-makers and policy-makers, and the appropriate stakeholders (personal communication, May 2014).

Similarly, Quentin, a ministry representative and participating expert, explained the thinking in sending experts from public authorities, and links it directly to enacting change: … we chose to send people from the national authorities so that we have the ability to implement certain recommendations in the law. If we sent experts from other institutions, it’s more difficult to do this (personal communication, July 2014).

In practice, then, the experts in the OMC groups surveyed were much more diverse than what can be assumed from the Work Plan. Some came directly from ministries of culture, some from public cultural/arts institutions or arms-length agencies, and others from more varied places such as embassies, other state ministries, or were independent experts known to ministries. They also varied in terms of their experience, expertise on the subject(s), and their connections, particularly to national decision-makers. There three areas were found to be significant with regards to the way they participated and what they got out of the process.
Experts varied considerably in terms of their experience and knowledge, both practical and otherwise. For example, some participants had never worked in an arts or cultural organization. Others were not familiar with how policy is made in their state or current policy priorities. At times, experts reported that groups were speaking at cross-purposes and discussions lacked direction because of the heterogeneous nature of experts. Nils, who works for a regional cultural development agency, considered himself very experienced, but found that he could not participate effectively with regards to policy matters. The quote highlights the difficulties he faced because he did not have the knowledge required to fully participate in discussions:

“I couldn’t use my experience in the work for OMC. [...] maybe it would be better if someone from the Ministry of Culture participates in the group. [...] I wasn’t prepared for being aware of everything that was going on in the Ministry of Culture, and what are their main problems” (personal communication, June 2014).

One of the reasons why the Commission is keen for representatives from state administrations to participate is that these people in theory have a clear channel to decision-making. If they are not responsible for making decisions themselves, they know who to contact. One can easily trace the Commission’s thinking here, but in practice it is more complicated than this, because, in opening up policy coordination and discourse to “new sources of influence,” the process is also (re-)bounded by these same sources (Armstrong 2010). Some individuals who are outside official channels may well have a direct link to them, and those that are a representative of a ministry of culture may go home and not share the work that has been done. What seems to be more relevant is how committed the delegate is to ‘spreading the word,’ dissemination, and enacting change, rather than their professional role:

“[I]t depends on the degree of decision making [power] they have. Sometimes coming from a ministry and sitting in the working groups does not mean they have the possibility to really spread the word within the Ministry, or to their superiors, so it depends really on the people sitting in the group (personal communication, June 2014).

One can extend this argument and say that the institutional norms of national ministries are a key factor in determining what is expected out of the OMC process and what, if anything, will be done on conclusion of the group. According to Ulla, who is herself a member of a national cultural ministry, “[i]t’s up to the ministry to take advantage, be clear on what is expected, and use the expertise gained” (personal communication, October 2014). In order for the OMC to operate effectively, national ministries must be clear on why they choose to send delegates and what they hope to get out of the process, making a closer link between coordination at the EU level and policies and programs at the national or regional level.

**Discussion**

The roles described above indicate differences between formal role descriptions and what happens in practice in the culture OMC. From this, some preliminary conclusions can be drawn about the three groups of actors and how these practices might impact the outcomes of the OMC. Before doing so it is worthwhile turning back briefly to the methodological and theoretical considerations. There are many ways to evaluate the ‘success’ of any particular OMC (Zeitlin 2011). This has been the subject of a significant number of studies, mostly regarding policy change (or lack of) at the national level. While commenting on the success or failure of the culture OMC is not the objective of this paper, it is important to acknowledge the contested nature of success and what this means for any discussion surrounding it. Indeed,
‘measuring’ success has proved a complex methodological issue (see Zeitlin 2011) and it is imperative to acknowledge the challenges of doing so. The objective here, then, is to discuss some of the implications of these informal practices and what this might mean for our understanding of the culture OMC.

Ultimately, the European Commission was shown to play a more developed role than its formal description would suggest, and, in addition, the role of the Member States was shown to be not as central as would indicate on paper. The Commission plays a vital role as the body responsible for not only the day-to-day operation of the OMC groups but also an overview of the Work Plan. However, there is a ‘check’ on the Commission’s power because the Work Plan must be approved in the Council. As formal guardians of the treaty, the Commission’s first responsibility is consideration for the principle of subsidiarity. In the cultural field, this is taken very seriously. However, as the central body responsible for drafting policy priorities, facilitating the OMC, and monitoring progress of the Work Plan it has a stronger position to dictate the terms and conditions of coordination.

With respect to the Council and Member States, there appears to be a disconnect between the importance of the policy priorities outlined in the Work Plan, their relative importance at the national level, and how the OMC works in linking them. The link between the OMC and national level policy is weak and not well understood (Borrás and Radaelli 2010, Zeitlin 2011). As the body representing the direct interests of Member States, one could argue that there is more that could be done in the Council to support the OMC work and communicate it more widely at the Member State level – dissemination that goes beyond simply that which is done by the expert. Why this is not done was attributed to both time as well as a lack of political will, but would benefit from more a detailed examination, as, as Zeitlin (2011) argues, “Member States may often have political reasons for playing up or down OMC influences on domestic policy” (Zeitlin 2011, p.7). What we see with the culture OMC is a lack of politicization at that highest level, suggesting that involvement of the Council may be higher when coordination is convergent, rather than cooperative, the former pushing more towards policy mainstreaming and the latter allowing for considerable development according to national situations. It seems then there is a role for increased involvement from the Council in connecting the work of the OMC more clearly to Member States, and, leading on from that, in national cultural ministries where it could be made clearer to designated expert what is expected of them and how their work feeds into national policy processes.

Two of the more common criticisms of the OMC discussed in the literature are its weak integration into national policy-making and a closed, bureaucratic structure of operation (Zeitlin 2011). The discussion above has highlighted how these concerns are present in the culture OMC as well. A clearer link between OMC work and national level politics, with a greater role for the Member States (paradoxically, since the OMC is a ‘Member State process.’) would help to ensure their relevance. This has implications for the outcomes of the OMC, particularly to do with policy learning and fostering mutual exchange, two of the main advantages and goals in this type of cooperative coordination. The risk is that the OMC becomes another box-ticking, technocratic process with relatively little relevance for policy-makers or cultural institutions.

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9 One possible reason for the aforementioned loosely-defined goals and aims of the culture OMC is that in order to achieve maximum support, the policy priorities must be as generic as possible.
Conclusion

The discussion herein has provided some more insight into the everyday practices and roles of European Union policy coordination in the field of culture. It has sought to ‘deconstruct’ the roles based on various institutional characteristics of the culture OMC, situating the study in time and place, and ‘reconstruct’ or interpret what this means for the process in general (Armstrong 2010). Ultimately, it has demonstrated the complex and multi-level nature of activity and how formal roles differ from what happens in practice, most notably that the Commission’s central role gives it power to set the terms and conditions of coordination and that there is a disconnect between the work of the OMC groups and national cultural policy. The effects are in general complicated, and more work needs to be done to determine their impact on the OMC’s goals, particularly, in the case of culture, to see how these practices influence mutual learning.

The OMC as an object of study is a slightly strange beast. It seems to exist (and be studied) in isolation, but is a part of a much larger system of coordination and ‘hard’ law, at both the EU and national levels. There thus a lot of scope to connect the work done in the OMC groups to wider policy-making at both the European Union and national levels:

…it shouldn’t just be about the Work Plan, it should be more about why at this moment do we have these groups, and what connections does the work of this group have to the broader EU agenda? (Personal communication, June 2014).

This quote comes from a participating expert, head of an arm’s length cultural agency in his home country. His point ties into the need to probe more into the nature of EU cultural governance; a need as well to move beyond questions of symbolism and identity and connect the Work Plan and its associated OMC groups to wider outcomes. Ultimately, the day-to-day mechanics of governing a policy field that still ‘exists’ mostly at the Member State level, but that has an official, albeit limited, EU remit, remain largely unknown. Yet, they have important implications for how we view cultural governance, and illuminate rich and interesting questions about the complicated relationship between subsidiarity and sovereignty in this field.
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