

**The Evolution of EU Cultural Policy in the Post-Maastricht Period –
Towards Commission Dominance and the Commodification of
Culture?**

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List of Abbreviations

AER	Assembly of the Regions
CAE	Culture Action Europe
CCIs	Cultural and Creative Industries
CEC	Commission of the European Communities
COE	Council of Europe
COM	Commission Document
COR	Committee of the Regions
DG	Directorate General
DG EAC	Directorate General for Education and Culture
EBLIDA	European Bureau of Library, Information and Documentation Associations
ECOC	European Capital of Culture
EFAH	European Forum for Arts and Heritage
EHL	European Heritage Label
ENCATC	European Network of Cultural Administration Training Centres
EP	European Parliament
EU	European Union
OJ	Official Journal of the European Communities
TEC	Treaty establishing the European Community
TEU	Treaty on the European Union
TIN	Netherlands Theatre Institute
TFEU	Treaty on the Functioning of the European Union
UNESCO	United Nations Educational, Scientific and Cultural Organization

Abstract

Culture has been widely treated as having a dual rationale at EU Level, both symbolic and economic, however scholars observing the post-Maastricht period of EU cultural action have noted a steady 'instrumentalisation' of culture and recent research suggests that a radical shift has taken place with the symbolic dimension displaced and the economic dimension dominant. The responsibility for this has been placed with the Commission, the actor which has, from the beginning, been most consistent in promoting economic objectives for culture. Having gained official competence to act on cultural issues with the Treaty of Maastricht, the cultural programmes and actions which followed in the mid 1990s have offered a tangible way of assessing the development of the EU's cultural policy, casting light both on how the thematic conceptions of culture have evolved and what influences various actors have had on the justifications for cultural action. Research has shown that whilst Commission dominance and the 'commodification' of culture is a valid observation in the EU's latest cultural programme, it has been a sudden rather than gradually developing change and is less applicable to the cultural actions, thus cannot be taken as reflective of the EU's cultural policy as a whole.

Signed in 1992, the Treaty of Maastricht gave the EU legitimacy to act in the cultural domain for the first time. Yet the EU's involvement in cultural issues predates Article 128 (TEU) (later Article 151 TEC, now Article 167 TFEU) by several decades, widely held to have begun in the early 1970s (Barnett 2001, p.409). Since then, the EU's stance has metamorphosed from treating culture as an indistinct area and as a good and service subject to the rules of the free market (Staiger 2013, Sassatelli 2007, Forrest 1994, Craufurd Smith 2011), to distinguishing it as an area worthy of specific attention. With the conclusions of the Tindemans (1975) and Adonino (1985) reports which recognised the potential of culture to contribute to the building of a European identity, the EU implemented a host of 'symbolic' cultural initiatives from the late 1980s, including the adoption of a European Flag, European Anthem and the establishment of a European Youth Orchestra (Shore 2006). Thus, by the late 1980s, most scholars agree that culture had developed a dual rationale at EU level, on the one hand economic, on the other symbolic. (See Littoz-Monnet 2007, Sassatelli 2009, Tsaliki 2007, Psychogiopoulou 2008, p.11, Shore 2000, 2001). This dual rationale is still widely invoked, both within academic discussions and at the EU Level, as characterising the foundation of EU cultural policy (Sassatelli 2009, Bruell 2013, Tsaliki 2007, Screendaily 22/03/13), but while for some, the 'symbolic dimension', focusing on identity building, remains the 'theoretic rationale' and 'ultimate target' of EU Cultural Policy (Tsaliki 2007, Sassatelli 2009 p.59,69), for others, the post-Maastricht period has marked a departure from this reasoning (Barnett 2001).

By the late 1990s and 2000s many scholars perceived an increasing 'governmentalisation' of culture (Staiger 2013, p.20, Barnett 2001, p.405), defined as the increased instrumental use of culture to help fulfil wider EU objectives, and noted numerous new goals applied to culture, including links to cohesion (Delgado Moreira 2000), EU citizenship (Staiger 2009) and economic development (Barnett 2001, p.417). With the development of the 'multiple instrumentalities' (Ibid., p.405) of culture during the 1990s, Barnett (2001) perceived a corresponding comprehensive move away from the symbolic conception. Whilst this view has widely held, the 'recent twist' observed by Annabelle Littoz-Monnet (2012,2013) and Cornelia Bruell (2013), has been to see economic objectives becoming the 'core justification of the EU's cultural policy' (Littoz-Monnet 2012, p.506 and 2013, p.227). Looking at the EU's recent discourses on culture, both identify the intensification of economic rhetoric. Bruell (2013), focusing specifically on the latest cultural support programme, *Creative Europe*, contends that it transfers the original dual function of culture firmly over to the 'profit -orientated side' (Bruell 2013, p.31, 44). Notably, both place responsibility for this shift with the Commission.

Indeed the Commission is widely seen as the actor responsible for the overall europeanization of cultural policy (Sassatelli 2009, Theiler 2005, Shore 2000, 2001, Tsaliki 2007, Littoz Monnet 2003, 2007, Delgado Moreira 2000, Barnett 2001), with its liberalization of cultural markets prompting Member States like France to invoke culture at EU level as a form of defence against the Commission's free market agenda (Littoz-Monnet 2003). Whilst some have interpreted the Commission's actions cynically, seeing them as a strategic manoeuvre aimed at increasing its policy remit (Shore 2000, 2001, Theiler 2005, Littoz-Monnet 2003, 2007), others have suggested that the growing economic importance of cultural goods and services left the Commission little choice but to intervene in culture (Craufurd Smith 2011, p.26). What is however undisputed, is that the Commission has consistently privileged the economic dimension of culture. By contrast, the European Parliament (EP) is traditionally seen as the defender of culture's intrinsic value (Barnett 2001), which Barnett argues is also true of the Committee of the Regions (COR) (Ibid., p.417).

Together with cultural operators, he sees the EP and COR as a coalition protecting culture's inherent worth (Barnett 2001, p.415).

Though the Commission is often seen as the key actor in policy formulation (Dewey 2008, p.104), the substantial institutional changes following Maastricht, namely the establishment of COR, an empowered role of the EP through the adoption of the co-decision procedure, an increased role for cultural networks (European Commission 1992, European Commission 2007), combined with the continued importance of Member States in the Council of Ministers, would seem to mitigate the possibility of Commission dominance. Indeed, some have suggested the EP as a key actor whose influence has grown since Maastricht (Sarikakis 2007, p.16). On the other hand COR is predominantly seen as weak and peripheral (Psychogiopoulou 2008, Gordon 2010), though not by all (Barnett 2001, p.415). For cultural organisations, views are ambivalent, with some sceptical of their influence (EFAH 1998b, EP 2007) and others showing they can be significant (Patel 2013).

In the absence of scholarly consensus on who is ultimately steering the direction of cultural policy, this thesis will seek to fill this gap by attempting to provide a comprehensive analysis. Taking the research of Littoz-Monnet (2012) and Bruell (2013) as a foundation, the purpose will be twofold. Firstly, to ascertain whether there has indeed been a shift within the EU towards conceiving of culture primarily in economic terms, what I term the 'commodification of culture' and secondly, to what extent the Commission can be seen to be driving the rationale of EU cultural policy and whether there is a correlation between the two. For the purpose of this analysis, EU cultural policy will be defined as the cultural activities under the remit of DGEAC, discounting audiovisual matters. It will look at five key actors, the Commission, the European Parliament, the Council of Ministers (hereafter the Council), the Committee of the Regions (COR) and the cultural sector. Opinions of EU institutions will be taken from official documents, whilst views of the cultural sector will be taken from results of official consultations and where available, drawn from position papers of cultural networks, such as the European Forum for Arts and Heritage (EFAH), now Culture Action Europe (CAE), the largest pan-European cultural network which, through its representation of over 100 organisations, offers a reflective view of the cultural sector (CAE no date, CAE 01/10/10).

The dissertation will be divided into three parts, firstly looking at the three first generation cultural programmes, then at the subsequent three implemented after the year 2000 and lastly, looking at the *European Capital of Culture* and the *European Heritage Label* to ascertain whether the cultural actions correspond with the trend observed in the cultural programmes. The methodology adopted will be to trace the legislative process, focusing on the policy formulation stage, since this is the stage at which all actors are most active and when discussions over the content and thematic basis of proposals makes them most liable to change. Since I am primarily concerned with measuring the extent to which there has been a shift towards a commercial rationale for culture and looking at the position of actors in relation to this, the thesis will adopt a primarily discourse-analytical approach and will focus on thematic justifications of the programmes and actions under study, looking at the main objectives and aims and treating as secondary, negotiations over technical and budgetary issues, where it is widely seen that the Council and Commission are the dominant actors.

Putting Treaty basis into action – The first generation of cultural support programmes – *Kaleidoscope, Ariane and Raphael*

Between 1996-1999, the EU's newly acquired Treaty basis led to the establishment of the first generation of EU wide cultural support programmes, *Kaleidoscope, Ariane and Raphael*. From the

start, the formulation of the programmes has involved the input of numerous actors, yet Littoz-Monnet (2007, p.13) argues that the cultural support programmes are largely 'marginal' and discounts them from her analysis, arguing that they are not considered significant by the actors involved and therefore do not provide a good basis for an analysis of actors' influences on EU cultural policy. Yet, as Obuljen (2005, p.71) rightly states, cultural support programmes are the most visible articulation of the EU's stance on culture and as Bruell (2013) shows, the current cultural support programme *Creative Europe*, has sparked strong opinions from numerous actors, suggesting that actors are not indifferent to the design of the support programmes and are far from considering them peripheral, making an analysis of the support programmes relevant for comparing how EU rhetorics on culture have changed and how various actors have shaped these changes. In 1989, during initial discussions on the future of the EU's cultural policy, the Commission was advised by a specially appointed Committee of Cultural Consultants that the EU should avoid an instrumental approach to culture informed by 'economic determinism,' in which culture is, amongst others, treated as an 'investment good' (CEC 1989, p.8). 25 years later, this advice seems to have been breached, with *Creative Europe* at the centre of charges about the commercialization of culture (Bruell 2013). A useful starting point for analysing whether there has indeed been a 'commodification' of culture and a tangible way of judging the influence of various actors, will be to examine the rhetoric of initial Commission proposals and to compare this with the text of final decisions.

Filtering by terms such as 'economic', 'economy', 'employment' and 'jobs', analysis of initial proposals for *Kaleidoscope 2000*, *Ariane* and *Raphael*, shows that while economic concerns are present, they are not paramount. Whilst the Commission proposal for *Kaleidoscope 2000* states that the programme 'can also create added value at a socio-economic level' (European Commission 1994a, p.15), this is only the fifth point of seven on the first page and there is no explicit focus solely on 'economic' value. Furthermore, socio-economic impact is always positioned as the final point in the list of selection criteria, being superseded by concerns to create a 'European dimension', which also features in the title of the programme. Economic rhetoric is similarly not prominent in the proposal for the *Ariane* programme for support in books and reading. The only instance is the reference to translation being part of both 'cultural and economic exchanges' (European Commission 1994b, p.53), but this is in the explanatory memorandum and not in the proposal itself. In both programmes, the repeated use of 'symbolic' and 'emblematic' emphasises the primarily symbolic nature of the programmes. However in the *Raphael* programme, supporting cultural heritage, there is a slightly more explicit recognition of culture's economic value as the explanatory memorandum states that 'in addition to its intrinsic value, the preservation of cultural heritage generates various types of activity with important social and economic repercussions' (European Commission 1995a, p.2). There is also a reference within the proposal itself to the 'socio-economic dimension' of cultural heritage which 'can contribute significantly to job creation' (Ibid., p.9). While statements about cultural heritage as a 'source of jobs' (Ibid., p.2) and references to 'employment' show the Commission's acknowledgement of the economic impacts of culture and an intention to utilise this as an objective, overall, it cannot be seen as the Commission's primary objective in the first generation of programmes.

The final decision for *Kaleidoscope 2000* reveals a stronger economic rhetoric as compared with the initial proposal, suggesting other actors had an interest in promoting the economic impacts of culture. The main evidence is the addition of a new paragraph under point 8, explicitly pertaining to culture's economic value, which states that support for culture and the arts 'can boost economic

activity and employment' (Decision No 719/96/EC, p.1), the statement that projects under Action 2 must have a 'major cultural and socio-economic impact' (Ibid., Action 2, p.6) and making 'socio-economic' impact one of the criteria for assessment of the programme's achievements (Ibid., Article 8, p.4). While the latter point can be traced to an amendment proposed by the EP (EP 1995a, Amendment 24), overall, the EP cannot be seen as vocalising a preference for the economic dimension, for example, elsewhere, the Parliament suggested that socio-economic impact should be omitted from the selection criteria for Action 1 projects (Ibid., Amendment 27).

Overall, the EP had a moderate influence on the design of the *Kaleidoscope 2000* programme, as only 16 of the EP's 37 first reading amendments and only 2 of 11 from its second reading, found resonance in the final decision (EP 1995a, EP 1995b, Decision No 719/96/EC). Looking subsequently at the opinions and amendments presented by COR and the European Foundation for Arts and Heritage (EFAH), at the time representing 39 cultural organisations (EFAH 1995a), it can be noted that neither actor called for the inclusion of greater economic objectives and that both have overall been less successful than the EP in exerting influence on the final decision. The main theme of COR's suggestions was unsurprisingly in seeking greater recognition for regions and local authorities as well as calling on the Commission to recognise 'social backgrounds' in the definition of cultural diversity (COR 1995a). With this, COR did have some success, with a small increase in references to these issues, particularly the inclusion of a reference to regional actors under Article 2 (Decision No 719/96/EC, p.1). Yet the vast majority of COR's proposals, for example calls to clarify the definition of 'European dimension', 'emblematic events', 'symbolic actions' and 'culture' in general, and to reduce the emphasis on 'innovative' cultural projects at the expense of existing ones, were not incorporated. Similarly to COR, EFAH criticised the Commission for failing to define the 'European dimension' and in line with the EP, called for the removal of references to large scale and emblematic projects. It also called for greater support for the structural development of networks as well as innovation, and exchanges to be emphasised (EFAH 1995a). While innovation and exchanges continued to be emphasised and the reference to emblematic programmes was removed entirely, none of EFAH's other suggestions left an imprint on the final decision.

Examining the Common Position of the Council reveals that it was the actor responsible for the strengthened economic rhetoric under point 8 of the final decision. Notably, it was the Council that rejected the EP's amendment 27 pertaining to the removal of socio-economic impact in the criteria of Action 1 projects, stating that it considered it 'advisable to point out that culture could indeed play a part in creating employment' (Council 1995). This closely echoes the phrasing of the new economic paragraph under point 8 and while the exact wording of this paragraph does not feature within the Council's Common Position, in the absence of an amendment made by any of the other actors, it seems logical to assume that it was the Council that was responsible for this inclusion. The Council also had a substantial influence through various structural changes.

Moving to look at the *Ariane* and *Raphael* programmes, analysis shows that once again, the Commission was not the only actor promoting the economic dimension of culture, with both the EP and COR advocating for culture's economic potential. Within the final decision on *Ariane*, two new references relating to culture's economic dimension were incorporated, that books must be recognised as both 'economic and cultural objects' (Decision No 2085/97/EC, p.1) and that the impacts of the programme will amongst others be measured on its 'socio-economic consequences' (Ibid., p.4). The former of these can be traced to an amendment of the EP in which it advocated that books should be referred to as 'both an economic and cultural good' (EP 1995a, Amendment 8). Yet, again, the EP was not just concerned with emphasising the economic dimension, as it also made a

host of other amendments advocating the inherent cultural value of books. For instance it called for the Commission to adjust economic regulations to take account of the 'specific cultural characteristics of books' (Ibid., Amendment 9), something that was rejected. The EP's overall influence was once again moderate, with only 14 of its 43 first reading amendments (EP 1995a, Decision No 2085/97/EC) and only 4 of 8 from its second reading (EP 1996) finding their way into the text of the final decision.

COR was, once again, less successful than the EP, with very few of its ideas being incorporated, only those relating to greater recognition for minority languages and the opening up of the programme to Central and Eastern European states, however these were also supported by the EP. Significantly, COR mentioned in its opinion that it 'is aware of the economic significance of culture' and its 'considerable potential for job creation' (COR 1995b), suggesting COR's support for the expansion of economic objectives within the cultural programmes. In terms of economic rhetoric, nothing further was added by the Council, with its main influence being in structural changes as well as in the areas of funding and monitoring (Council 1996a). In terms of the influence of the cultural sector, the *Ariane* programme proved the hardest of all the cultural programmes to analyse due to the lack of published public consultation results from the Commission and the lack of position papers drawn up by the three largest cultural networks, EFAH, Europa Nostra and ENCATC. Further avenues of research such as the European Writer's Congress, active at the time, drew a blank due to the dissolution of the organisation and the successor organisation, the European Writer's Council, being unaware of any past position papers published on *Ariane*. The only paper publicly available online was published by the European Bureau of Library, Information and Documentation Associations (EBLIDA). Though not detailed, EBLIDA did make some significant comments and proposals, most significantly, it noted with disappointment that the programme was too heavily orientated on the translation and production of literature as opposed to 'the dissemination of books and promotion of reading' and called for a greater recognition of libraries as 'the promoters of cultural and literary heritage' (EBLIDA 1994). There is some evidence that the former suggestion may have had some influence, as in one of its amendments, the EP echoed EBLIDA's recommendation, calling for *Ariane* to not only focus on translation, but also encourage 'other measures to promote books and reading' (EP 1995a, Amendment 7). Furthermore, whereas under Article 1 in the initial proposal it was stated that the dissemination of literature would occur, 'notably by means of translation' (European Commission 1994b), in the final decision, translation is not the only means of support, but 'support for cooperation projects on books and reading' is also added (Decision No 2085/97/EC), as well as the addition of a new clause specifically on the importance of support in reading (Ibid., point 3).

The *Raphael* programme shows a continuation of the EP and COR's support for the subtle strengthening of culture's economic impacts. Of the three first generation programmes *Raphael* saw the strongest recognition of economic considerations by the Commission in the initial proposal and as a result there were no major additions of economic rhetoric in the final decision, however the EP did propose amendments to this effect, suggesting that cultural heritage should be incorporated more closely into 'social and economic life' (EP 1995c, Amendment 24) and that the Commission's mid-term evaluation should focus on assessing the programme's ability to create 'added value of a socio-economic nature' (Ibid., Amendment 40). On this occasion, neither the Council nor Commission accepted these amendments. However, again, the EP also made amendments relating to culture's immaterial value. Amongst others, it called for the greater focus on the restoration of damaged monuments, the role of cultural heritage in promoting mutual understanding, tolerance

and respect and its role in building a European identity (EP 1995c), suggesting no radical shift by the EP towards privileging the economic dimension. COR's opinion revealed a similar stance, on the one hand it noted 'with pleasure, the socio-economic dimension of the programme' (COR 1995c) and recognised that cultural heritage had an important role to play in creating 'new employment opportunities (Ibid.), while on the other it showed a desire for the greater recognition of the symbolic worth of cultural heritage and criticised the Commission for conceiving of culture solely in its 'material form' (Ibid.). As with the previous two programmes, few of COR's suggestions found their way into the final decision and those that did were often also amendments supported by the EP, such as those calling for greater accessibility to cultural heritage for the young and handicapped and greater synergies with the COE and UNESCO. The Council's Common Position and EFAH's position paper show that neither made any further suggestions or comments in relation to the economic dimension of the programme, but the Council, can be seen to have had an important influence on the final decision in other aspects including setting the general aim and clarifying the specific aims of the programme (Council 1996b). Meanwhile, in spite of EFAH's praise of the Commission's wide consultation of the cultural sector (EFAH 1995b), only one of EFAH's suggestions, related to setting a maximum budget for projects, was incorporated, suggesting the limited influence of the cultural sector.

Analysis of actor opinions on the first generation of programmes reveals that though economic concerns were present; they were, overall, a decidedly negligible concern in the first generation of programmes, which retained their primarily symbolic quality. Furthermore, the Commission was not the dominant actor in calling for the emphasis on the economic dimension, with most amendments to this effect coming from the EP. Whilst other actors did have an input in the thematic content of the programmes, this was overall not very substantial, even from the EP, and the Commission was overall the most influential actor in the design of the first generation of programmes.

Changing Directions – The Cultural Programmes after 2000: *Culture 2000*, *Culture (2007-2013)* and *Creative Europe*

The year 2000 marked a turning point in the EU's organisation of cultural support through the establishment of a single framework programme *Culture 2000*, bringing with it a radical change in the Commission's rhetoric on culture. Overall, the text of the initial proposal supports a trend towards the 'multiplication of culture's utility' as identified by Barnett (2001, p.412), with the assertion that culture has 'an important role to play in meeting the new challenges facing the Community' (European Commission 1998, p.13) and with this, the proliferation of objectives connected to EU wide issues, including 'social cohesion', 'European citizenship', and 'external relations' (Ibid.). There is also a marked increase in the economic dimension of culture, with the Commission's proposal and communication jointly including thirty three instances of the terms 'economic', 'economy', 'jobs' and 'employment', a large increase on the *Kaleidoscope*, *Ariane* and *Raphael* programmes where the same terms featured seven, three and eight times respectively. Furthermore, economic impacts of culture are elevated in importance as the mention of culture's 'socio-economic' value now figures as the second point of the proposal as compared with the fifth point in *Kaleidoscope 2000* and economic impacts are also singled out as an area of focus under point four (European Commission 1998). Yet economic impact is not the primary aim, as under the objectives of the programme, culture's contribution to 'socio-economic development' is only

positioned as the fourth of six objectives (Ibid., Article 1, p.16) and within the selection criteria for projects, 'economic impact' is the last criterion (Ibid., p.40). Furthermore, rhetoric alluding to culture's 'symbolic' and 'identity' building value has not been entirely displaced, with eight instances of these terms reflecting the continued importance of this rationale.

With the tangible increase in economic rhetoric used by the Commission with *Culture 2000*, the Commission's initial proposal for *Culture (2007-2013)*, surprisingly contains no reference whatsoever to culture's economic impacts, with dominant references instead being to 'participation', 'intercultural dialogue' and promotion of 'networks' (European Commission 2004a). As in all previous programmes, the symbolic and identity related aspects of culture are also retained, with the continued recognition of culture as a 'key element' of identity and a commitment to supporting 'symbolic cultural events' (Ibid., p.10-11).

By contrast, with *Creative Europe*, economic impact unexpectedly and suddenly becomes the primary focus. This is immediately apparent within the explanatory memorandum which emphasises culture's contribution to 'jobs and growth' and describes the sector's value as a share of Europe's GDP (European Commission 2011a, p.2). Within the proposal itself, the emphasis on culture's contribution to growth and jobs is also emphasised and culture is explicitly linked to the Europe 2020 strategy (Europe 2020). The previous objectives of *Culture*, which included support for the transnational mobility of cultural professionals, circulation of works of art, promotion of intercultural dialogue and cultural networks, are continued, but are now subsumed by the overriding objective of economic growth. The shift towards privileging the economic value of culture is also tangible in the specific objectives, which no longer make reference to 'symbolic' or 'identity' related aims.

Returning to *Culture 2000* and turning to look at the text of the final decision, the economic dimension becomes even clearer with the rewording of point two to state that culture is 'both an economic factor and a factor in social integration' (Decision No 508/2000/EC), the inclusion of an additional economic objective (Ibid., Article 1, (g)) and the addition of 'socio-economic consequences' as an evaluation criterion (Ibid., Article 8). All three changes are traceable to amendments proposed by the EP (EP 1998a, Amendment 4, 14 and 20 respectively). In what would seem to further reflect a shift in the EP's stance towards seeing culture as an economic good, the EP also called for one of the programme's aims to be the creation of 'conditions for a single market in culture' (EP 1998a, Amendment 3), though this was rejected by the Council (Council 1999). COR was also a strong advocate of the economic dimension, noting the 'growing awareness of the role that culture and its industries can play in contributing to economic and social cohesion', calling for more attention to be paid to the economic impacts of tourism and the audiovisual industries and requesting the Commission to implement 'further measures to stimulate employment opportunities' in the cultural sector and foster connections between the sector and other economic activities (COR 1999).

In terms of the influence of the cultural sector, the Commission cited 'in depth' consultations with cultural stakeholders, stating that they were the 'probably the widest consultations which have ever been conducted on cultural issues' (European Commission 1998, p.9), seemingly implying a key role for the sector in the design of *Culture 2000*; however views from those who participated, were less optimistic. Director of the Netherlands Theatre Institute (TIN), Dragan Klaić, noted that the Commission only wrote to selected organisations (EFAH 1998b) and that 'it is not known how many organizations received an invitation to send in their proposals nor on what criteria these organizations were hand-picked by DG X' (Prior name of Directorate General responsible for culture)

(Ibid.). He was similarly damning about the European Union Culture Forum, convened in 1998, in which he stated that only '10-15% of over 200 participants' were from the cultural sector, the rest being Commission officials, MEPs and other politicians from Member States (Ibid.), adding that the discussions showed 'little understanding' of the cultural sector's needs and how it works. Klaić's comments suggest a rather different view to the one presented by the Commission and cast doubt on the receptiveness of the Commission to the views of the cultural sector and thus its overall influence.

The lack of open consultation and transparency from the Commission in consultation with the cultural sector, suggests the Commission's dominant role, yet according to EFAH's position paper on *Culture 2000*, the cultural sector did have an influence on the content of the programme (EFAH 1998a). Indeed in 1997, prior to the Commission's initial proposal, EFAH's Marseilles working group set out detailed recommendations for the design of the new cultural programme from 2000, with which it does seem to have exerted some influence. For example its suggestions that activities chosen for support should be assessed on their capacity to create 'mobility', 'exchanges', 'collaboration' and 'access', were substantially referenced in the Commission's initial proposal and final decision (EFAH 1998c, European Commission 1998, Decision No 508/2000/EC). It would also seem that the sector was generally supportive of economic recognition for culture in the new programme, with EFAH acknowledging that 'culture is a locomotive for economic growth' (EFAH 1998a). However this differs to the original suggestions contained in the report of EFAH's working group, which displayed a strong leaning towards the intrinsic value of culture above all else, with the statement that actions under the new culture programme should only be chosen on the basis of their cultural contribution and not their 'social and economic benefits' (EFAH 1998c). It had also been stated that activities that do have socio-economic benefits should be 'catered for by other programmes' and 'only the cultural segment of the activity should be funded principally through the cultural programmes' (Ibid.). However, these recommendations were not taken up by the Commission.

Altogether, none of the actors under study advocated a strong shift towards the economic value of culture in *Culture 2000*. Within its initial proposal, the Commission expressly stated the need to find 'a better balance' between the 'economic and cultural aspects of the Community' (European Commission 1998, point 4), while in the amendments put forward by COR and the EP, both actors can also be seen defending culture's intrinsic worth. For instance, amongst the EP's 27 initial amendments, is the recommendation that the Community's cultural activities must acknowledge the 'specific nature' and 'specific needs of each cultural area' (EP 1998a, Amendment 9) and display greater protection for small cultures and minority languages (Ibid., Amendment 5), both of which were included in the final decision (Decision No 508/2000/EC). Similarly, COR reinforced that 'culture has an intrinsic value' as well as playing an 'economic role' (COR 1999), an idea articulated in very similar terms by EFAH (1998a), who emphasised culture's 'intrinsic value' as a priority of the programme. This consensus seems to have had an influence as the final decision did see the addition of a reference to culture's 'intrinsic value' (Decision No 508/2000/EC). Of the three actors, the EP's influence was greatest in terms of amendments incorporated into the final decision, and the significance of these. However a number of the EP's significant changes relating to implementation, functioning of the Committee, monitoring and evaluation, and budgetary aspects were not incorporated (EP 1998a), many having been blocked by the Council, which, in its Common Position, accepted only 9 of 27 EP amendments (Council 1999), clearly reflecting the Council's key role.

The *Culture (2007-2013)* programme showed perhaps the greatest change in economic rhetoric between the initial proposal and final decision, going from none at all, to several new references. Once again the root cause lies with the EP, COR and the Council, the EP in particular seeking to redress the absence of the economic dimension in the initial proposal with four amendments, all of which were included in the final proposal. These included recognition that the cultural sector is an 'important employer', that cultural industries are making an 'increasingly large contribution' to the European economy, recognition of a 'clear link between investment in culture and economic development', culture's key role in the Lisbon Strategy and reference to the 'specific economic and social features of non-audiovisual cultural industries' (EP 2005, Decision No 1855/2006/EC). Both COR and the Council also supported this approach, with COR asking the Commission to highlight 'the socio-economic benefits that culture can bring' and to make mention of culture's contribution to the aims of the Lisbon Agenda (COR 2005a, 1.16), while the Council showed its support through approval for all of the EP's economically related changes (Council 2006). Altogether, the EP was highly significant, with the majority of its textual amendments incorporated into the final decision. It also put forward a number of changes related to the symbolic dimension, including emphasis on common European cultural heritage and promotion of cultural diversity. Furthermore, it changed the title of the programme, gained better access for smaller operators and projects and changed the duration of support for projects. Better access for smaller operators, greater mention of cultural diversity and the increased duration of projects had also been supported by COR, however aside from this, COR's influence was largely marginal. On the other hand, the Council was, as always, a strong influence and was this time strongly in agreement with the EP on many issues, such as promoting the importance of cultural heritage and supporting measures to help smaller operators as well as extending the duration of projects to last between 3-5 years. In budgetary issues, the Council's influence was also ultimately strongest (Council 2006).

The design of the *Culture (2007-2013)* programme was also influenced by the cultural sector which showed support for reducing the objectives of the new programme (Working Group 2003, p.2-3, European Commission 2004b, p.8,) and supported the three new objectives proposed by the Commission (European Commission 2003, European Commission 2004b, p.12). As well as an online consultation, the Commission established an expert working group whose report called for an emphasis on artists and cultural producers and special protection for cultural products 'created outside the commercial marketplace' (Working Group 2003, p.7). The report also made suggestions for culture to be put at the 'heart of European integration', primarily due to its inherent value and not only its economic dimension, and mentioned the need to promote cultural diversity and use the programme to connect Europe with its citizens (Ibid., p.6-8), the latter two points being particularly influential on the initial proposal. While the report also showed the need to recognise the socio-economic importance of culture, there was a tangible desire to balance the two dimensions of culture, with comments including that criteria for projects should privilege cultural objectives rather than economic ones, that culture's intrinsic value should be clearly stated within the programme and be referred to as distinct from its economic value and that the 'special nature' of the cultural sector and its difference from the economic sector should always be considered, (Ibid., p.11,7,20,8), a suggestion included by the Commission in the initial proposal and final decision.

Actors were similarly keen to balance the two dimensions of culture in *Creative Europe*, which, of all the EU's cultural programmes, caused the most consternation about the perceived 'economic shift' in the EU's thinking on culture Bruell (2013). Compared with the initial proposal, which sees culture first and foremost in terms of economic utility, the final decision reflects a markedly better

balance between culture's economic and inherent value. New clauses under points 20 and 21 specifically mention the need to recognise the 'dual nature' and 'intrinsic value' of culture, whilst point 5 on the first page cites the dual nature of culture as defined by the UNESCO Convention. There is also a statement that cultural activities must not be treated as 'solely having commercial value' (Regulation No 1295/2013). The changes reflect the views of the EP, COR and Council (Regulation No 1295/2013, EP 2013a, COR 2012a), Council 2012). The Council also added support for 'not for profit organisations and projects' (Regulation No 1295/2013, Council 2012) and together with the EP, COR and the cultural network ENCATC, opposed the Commission's desire to evaluate programmes solely on quantitative indicators (EP 2013a, COR 2012a, ENCATC 2012). Reflecting the view of all four actors, COR stated that '*Creative Europe* must not be framed on the basis of economic criteria alone' and that the Commission's indicators feature an 'excessive focus on economic growth, profit and competition' (COR 2012a). In light of this pressure, qualitative indicators were successfully included in the final decision (EP 2013a, Regulation No 1295/2013, Council 2012).

However the change that perhaps best reflects a turn towards 'commodification' is exemplified by the Commission's idea for a new financial 'Guarantee Facility' which changes the basis of financial allocation to cultural projects, giving the responsibility to private financial operators (Regulation No 1295/2013), meaning that projects will unavoidably need to be assessed on their economic potential to produce a financial return and thus will be treated as commercial products rather than being judged on their cultural value. The development has led to concerns from a number of actors, with some delegations in the Council and the cultural network Europa Nostra expressing concerns that it would cause culture to become too market orientated (Council 2012, Europa Nostra 2012).

The strong consensus between the EP, COR, the Council and cultural networks against the Commission's initial proposal, clearly shows a very real perception of the Commission's overzealous application of economic objectives for culture, a cause for concern among all four actors. In order to mitigate this, all four have supported greater mention of the specific value of culture and have called for greater reference to aspects and values such as 'cultural diversity', 'cultural heritage' (EP 2013a, COR 2012a, CAE 2012a, Europa Nostra 2012) and the contribution of culture to creating a 'European identity' (COR 2012a). As with all previous programmes however, it is clear that the EP, Council, COR and the cultural sector, recognise an important link between culture and economic development and are not against the endorsement of culture's economic benefits per se. This is evidenced by continued calls for the recognition of its economic impacts. For example the EP, COR and three large cultural networks, all supported the mention of the contribution of CCIs to the creation of 'jobs and growth' and the imperative of connecting culture to the Europe 2020 strategy (EP 2013a, COR 2012a, Europa Nostra 2012, CAE 2010a, CAE 2010b, CAE 2012a, ENCATC 2012). On the surface, it also does not seem that any of the three cultural networks, Europa Nostra, CAE and ENCATC, were overly alarmed by the Commission's more economic approach to culture as their position papers did not contain strong criticisms of this aspect (Europa Nostra 2012, CAE 2010b, CAE 2012a, ENCATC 2012). Furthermore, of the 1000 cultural operators who responded to the Commission's public consultation (Public Consultation on the Culture programme) and those who participated in the public consultation meeting, the results did not report any widespread concern of an undue emphasis on the economic aspect of culture, with the majority of stakeholders seemingly supportive

of the connection of culture to the Europe 2020 strategy and the general recognition of its contribution to economic growth (ECORYS 2011b, p.i, 2011c, p.2, European Commission 2011b, p.7).

However, this is not to say that cultural operators do not recognise the need to protect the inherent value of the cultural sector from commercialization, as in its 2010 position paper, CAE differentiated between the cultural sector and the more commercial CCI and advocated for their separation, stating that the CCIs should be supported by 'a separate tool from the culture programme' (CAE 2010b). Furthermore, though the published opinions of CAE and other networks do not seem to express strong concerns about the 'commodification' of culture, this is not to say that the private opinions of networks and cultural operators always correspond with their published opinions. Raj Isar, former President of CAE, expressed this clearly when he questioned whether it is valid for 'all types of cultural production to be justified in terms of economic gain?' (Isar no date). Speaking on behalf of the cultural sector as a whole, he implied that far from the cultural sector being an advocate of the economic dimension and using economic arguments willingly, it has adopted this stance out of strategic necessity,

We may find it tactically useful to use these arguments in our own rhetoric because it is the language policy-makers want to hear. The problem though is that this paradigm obliges us to adopt an essentially neo-liberal worldview. Is this what we believe in? (Ibid.).

This connotes a clear sense of the economic dimension being driven from above. Further evidence that official position papers do not always reveal the complete viewpoint of cultural operators can be found from internal organisation communications. In an internal communication from the Secretariat of Culture Action Europe to its members from June 2011, CAE notes the 'industry colour' of the *Creative Europe* proposal and states that the new programme 'confirms our worst fears of having to fight hard in the coming months for the many dimensions of culture, and *not only the economic one, to be recognized*' (CAE 2011, *emphasis added*). This implies CAE's concern with the strengthened economic dimension of Creative Europe, made even clearer by two official statements in which it expressed support for the amendments made by the EU Council of Culture Ministers and the EP towards creating 'a better balance between the economic-driven and social-driven objectives' of the Commission's initial proposal (CAE no date, CAE 2012b), which suggest CAE's belief that the economic dimension of the initial dimension was too strong. Yet CAE does also recognise the need to make economic arguments in order to elevate the importance of culture at EU level, invoking the argument that culture is 'an investment' in 'Europe's future economic and social development' (CAE 2012b), as a means of justifying the imperative of raising the *Creative Europe* budget.

The 1000 responses to the online consultation seem to imply a good representative sample of opinions from the cultural sector (European Commission 2011a), but CAE's position paper from 2010 suggests the Commission has not been very receptive to the views of the sector as neither CAE's suggestions for specific objectives nor action strands were incorporated into the Commission's initial proposal. However, some of its suggestions, such as support for 'capacity building', 'cooperation' and 'partnerships', do find resonance (CAE 2010b, European Commission 2011a). Overall the extent to which the views of the cultural sector have significantly influenced the *Creative Europe* programme, or in fact, any of the previous programmes, is debatable. An example of the Commission's attitude towards consultation with the sector can be drawn from an independent

briefing paper carried out for the EP on the *European Agenda for Culture*, in which the authors reached very unfavourable conclusions about the Commission's public consultation process (EP 2007). Against the Commission's claims of an 'extensive' consultation (European Commission 2007), the report found that the majority of responses came from the older Member States from northern Europe (EP 2007, p.9), an observation confirmed by CAE (CAE 2013). The report also found that many of the questions in the consultation questionnaire was skewed towards the Commission's agenda, with finite options available and with a strong focus on the Lisbon Agenda reflective of the Commission's tactical approach, seemingly using the consultation to gain legitimacy for its own agenda of elevating the economic dimension of culture (EP 2007, p.9-13).

Indeed, it seems that the drive towards the economic dimension of culture is being led by the Commission, with the shift being strongly expressed in three Commission led documents, which cumulatively informed the *Creative Europe* proposal. The 'Economy of Culture Report' can be seen as the origin of the 'economic turn', making a strong case for culture's contribution to the Lisbon Agenda and making a pledge to reveal culture's hitherto 'largely ignored' socio-economic benefits (KEA 2006, p.1). Drawn up on the basis of this report, the *European Agenda for Culture* shows an increased focus on the 'instrumental' applications of culture and assumes 'the economy as the key driver' of cultural support (EP 2007, p.16), which, does not concur with the prior views expressed by the cultural sector (Ibid.). The economic dimension is further cemented by the Commission's 'Unlocking the Potential of the cultural and creative industries' report which refers to the 'untapped potential' of the CCIs to create growth and jobs (European Commission 2010d). Whereas the Commission makes reference to a Council Conclusion (Council 2007) and an EP resolution (EP 2008) which also express support for developing the economic potential of culture through the CCIs, it is clear that the original initiative for the shift in rationale still lay with the Commission.

However, it is important to remember, that the Commission is not a unitary actor with a unified stance on culture (Littoz-Monnet 2012). As Littoz-Monnet convincingly shows, the DGEAC has traditionally argued for the intrinsic value of culture, while other Commission DGs have always held a much more commercial view. Their greater influence as compared with the peripheral standing of DGEAC, has meant that the economic argument has always prevailed and DG EAC has been subordinated to the Commission's overall agenda. With the establishment of the new Commission in 2014, there is strong evidence to support this view. Although President Juncker implied a commitment to protecting the specificity of culture, stating that he would not 'sacrifice cultural diversity on the altar of free trade' (Juncker 2014), Juncker's mission letter to new culture Commissioner Tibor Navracsics, shows that 5 out of 7 priority areas designated for the DGEAC have an economic focus and culture is conceived of almost primarily as a commodity, with no mention of its intrinsic value (European Commission 2014b). Furthermore, Tibor Navracsics underlined that the DG EAC is bound by the Commission's overall agenda and has little room for manoeuvre, when, in response to an EP question asking what guarantees he would give that the cultural policies would not be subordinate to economic and commercial interests, he cited Juncker's mission letter, referring to its obligation that he works closely with the Vice-Presidents for Jobs, Growth, Investment and Competitiveness (European Commission 2014b, 2014c).

Overall, whilst *Culture 2000* initiated a more instrumental approach to culture and a greater emphasis on economic objectives, it is only with *Creative Europe* that a sudden and radical shift towards the economic dimension has occurred. Furthermore, whilst in *Culture 2000* and *Culture*

(2007-2013), the rationale for the programmes was broadly consistent with the input of various actors, with *Creative Europe*, the drive towards the economic rationale seems to be predominantly attributable to the Commission.

The Cultural Actions - The case of the *European Capital of Culture* and the *European Heritage Label*

While the cultural programmes can be seen to represent the EU's overall vision for culture, the cultural actions are perhaps the most visible examples of the EU's involvement in culture. One of the first and most recognisable, the *European Capital of Culture* (ECOC) is often predominantly seen as a symbolic action (Littoz-Monnet 2007, p.2, Sassatelli 2009, p.83). Similarly, the EU's newest cultural initiative, the *European Heritage Label* (EHL), appears to also be presented as predominantly emblematic (European Heritage Label webpage). Both actions share the objective of helping to bring the EU and its citizens 'closer together' (Ibid., Council 1985) and would seem to show that the EU retains a symbolic cultural dimension. However both Greg Richards (Richards 2000 in Sassatelli 2009, p.95) and Monica Sassatelli note that the 1990s saw a greater instrumentalisation of the ECOC, with the symbolic, cultural orientation giving way to a greater preoccupation with its economic impacts (Sassatelli 2009, p.95-97). Sassatelli observes this developing since 2005, but does not see this as being led from the top down, but rather originating out of the objectives set by many of the cities themselves (Ibid., Sassatelli 2013, p.64). The trend towards the economic utility of the ECOC has also been noted by those in the cultural sector such as Spyros Mercouris, director and coordinator of the first capital of culture in Athens in 1985 (Mercouris 2007), who believes the main objective of the action should primarily be symbolic, promoting citizen participation and the 'shaping of a European consciousness' (Mercouris 2006). But while for Sassatelli (2009, p.57, p.97) the symbolic value of ECOC still prevails, Mercouris provides an alternative view, stating that in recent years 'the concentration on economic impact has had negative repercussions on the visions and concepts of the programme (Mercouris 2013), and there is now a danger of the 'commercialization' of culture (Mercouris 2007).

Starting as an intergovernmental initiative in 1985, the ECOC did not become an official EU level action until 2005. However, following Maastricht, the Commission acknowledged the ECOC as a cultural event with EU patronage, subsuming it under the cultural programmes (Sassatelli 2009, p.83). Initially, the Commission referred to it primarily in symbolic terms, classifying it under 'large-scale emblematic cultural projects with a European dimension' (European Commission 1994a, p.26). Within *Culture 2000*, *Culture (2007-2013)* and *Creative Europe*, the Commission continued to link ECOC with symbolic, identity building aims, defining it as a project which 'should strike a significant chord with the people of Europe, help to 'increase their sense of belonging to the same community' (European Commission 1998, Decision No 508/2000/EC) and foster 'belonging to a common cultural area' (European Commission 2004a, Decision No 1855/2006/EC, European Commission 2011a, Regulation No 1295/2013). With *Culture (2007-2013)* the objectives of 'trans-European cultural cooperation' and 'intercultural dialogue' were also added (European Commission 2004a, p.7, 12, Decision No 1855/2006/EC, European Commission 2011a, Regulation No 1295/2013), but these were still in keeping with the overall symbolic basis of the action.

It was not until 1999 when the decision was made to establish the ECOC as an EU level action, a suggestion initially made by the EP (European Commission 1997, p.3). In the first phase of

the action, between 2005-2019, the economic dimension was slight, though tangible. In its explanatory memorandum the Commission made reference to the measurable 'socio-economic impact' of the event and within the proposal itself, included 'the development of economic activity, particularly in terms of employment and tourism' in the criteria for participation, stating that candidate cities must outline how this economic dimension will be developed (European Commission 1997, p.8).

Following a report commissioned by the European Commission, which revealed a number of areas of areas for improvement, (Palmer Rae 2004), the Commission put forward a new proposal to update the action for the period 2007-2019, however it made no major changes to the overall basis of the action, with the symbolic objectives remaining predominant. In fact the Commission's proposal contained no references at all to the economic dimension of the ECOC.

By contrast, the initial proposal for the 2020-2033 phase, saw the Commission placing a much greater emphasis on economic impacts. Already under point 7, it states that while the ECOC 'remains first and foremost a cultural initiative', it can also have 'significant social and economic benefits' (European Commission 2012, p.7) and economic impacts are added within two assessment criteria for applications (Ibid., p.12). However the greatest example of a shift towards the economic dimension can be seen in the Commission's decision to link the action to the objectives of the *European Agenda for Culture* and *Creative Europe*, both of which place a strong emphasis on culture's contribution to creating 'growth', 'jobs' and raising the 'competitiveness of the cultural and creative sectors' (Ibid., p.7-8). The shift is underlined by the prominent positioning of these references, at point 2 and 6 respectively (Ibid.), reflecting the importance of the economic dimension as a basis for the ECOC action from 2020.

Turning to the text of final decisions, 'the development of economic activity, particularly in terms of employment and tourism' remained the only economic reference in the final decision for the 2005-2019 action (Decision 1419/1999/EC) and neither the EP, Council, nor COR, made any further calls for greater emphasis, with the main objective outlined by the Commission being 'to highlight the richness and diversity of European cultures, and the features they share, and promote greater mutual acquaintance between Union citizens'(European Commission 1997, Decision 1419/1999/EC), this clearly still being concurrent with a symbolic vision for the action. COR was largely supportive of the Commission's initial proposal and put forward few amendments, therefore its influence was slight. However it did gain greater mention of the regional and local dimension and the promotion of citizen participation written into the selection criteria (COR 1998, Decision 1419/1999/EC). Both of these were also amendments endorsed by the EP. Like COR, the EP put forward a small number of amendments, however it had a stronger influence, gaining the need for chosen cities to take greater consideration of the long term dimension of projects, that the selection panel should meet annually and also a number of changes under the selection criteria (EP 1998b, Decision 1419/1999/EC). However, by far the most substantial impact was that of the Council, which made the biggest changes to the Commission's initial proposal, succeeding in changing the title of the action from 'city' to 'capital' of culture, in implementing a rotating selection system to only allow applications from designated Member States each year and reduced the Commission's proposed role by making the Council the chief actor in the selection process (Council 1998, Decision 1419/1999/EC). In terms of cultural stakeholders, the 2005-2019 phase does not seem to have

included any consultation with the cultural sector, with no mention of this in the Commission's proposal.

Like the ECOC 2007-2019 initial proposal, the final decision did not see any references to the economic dimension (European Commission 2005, Decision No 1622/2006/EC) and no calls for a greater acknowledgement of the economic dimension were expressed by the EP or the Council, COR being the only actor to mention that the ECOC also had a positive impact in providing 'economic and employment opportunities' (COR 2005b), though it too, did not expressly call for the inclusion of references to this effect, suggesting little concern with this aspect. Thus, the ECOC 2007-2019 phase retained the symbolic rationale, as the five criteria specified by the Commission were all symbolic, including 'highlighting the richness of cultural diversity in Europe' and 'bringing the common aspects of European cultures to the fore' (European Commission 2005, Decision No 1622/2006/EC). Though there was, once again, no public consultation on the new phase, opinions of the cultural sector did this time have a tangible influence as cultural stakeholders were consulted as part of the 2004 Palmer Report on the Capitals of Culture from 1995-2004, which was cited by the Commission as an important influence (European Commission 2005, p.2). The key suggestions made for improvement by stakeholders included the need to enhance the European dimension and long term legacy of projects, increase cultural-cooperation and clarify the 'unclear vision' of the programme's objectives (Palmer Rae 2004, p.186, p.187, p.179). Further recommendations also included clarification of selection criteria (Ibid., p.190). Significantly, over 95% of respondents also supported a strengthened role for the Commission, advocating its greater role in evaluation, providing information and monitoring; however at the same time they recommended that the priorities of the action should be left for cities themselves to decide (Ibid., p.184-5, p.187). These views seem to have been highly influential as all were addressed in the Commission's initial proposal (European Commission 2005). In light of this, it cannot be seen that the Commission was the dominant actor in the design of the 2007-2019 decision as it responded significantly to the main suggestions made by the cultural sector and though few new ideas were incorporated from the EP and COR, the EP's influence was substantial on the final text, with the majority of the EP's structural amendments to the text being accepted (EP 2006, Decision No 1622/2006/EC). COR's influence was much less notable, its main success being in gaining a representative on the monitoring panel (COR 2005b).

With the already strong economic rhetoric in the initial proposal for the 2020-2033 phase, there were no major additions within the final decision, only two minor references under points 13 and 16 (Decision No 445/2014/EU), however several opinions and studies were important in influencing the design of the 2020-2033 phase, the most important of which included The Palmer Report on the Capitals of Culture from 1995-2004, the findings of ex-post evaluations of previous ECOCs, the results of the online consultation of the cultural sector on the future of the ECOC after 2019 and the 2012 Committee of the Regions' own initiative report on the future of the European Capital of Culture.

The Palmer Report had already had a substantial influence on the previous phase of the ECOC, through communicating the views of stakeholders, but due to the report's strong emphasis on the ECOC's economic impact, it was also a key source initiating the Commission's strengthened interest in the ECOC's economic dimension. Already in 2004, the report noted that assessing the economic impacts of the ECOC was difficult, as few of the chosen cities had set 'well defined economic objectives' or collected meaningful data on this aspect (Palmer Rae 2004, p.102-6) and

suggested that the EU should offer 'incentives' for developing a consistent framework for economic assessment as this was 'long overdue' (Ibid., p.106). The ex-post evaluations of the ECOC cities in 2007 and 2008 also stressed this, revealing that all four cities had been effective in using the title to foster economic development and suggested that the Commission should explore further the extent to which the ECOC could be used to generate economic impacts (European Commission 2009, p.5-7, p.9), something the Commission committed itself to do, when it announced, in 2009, that it would weigh up two possibilities for the future of the action, a greater focus on economic utility versus returning to an approach in which culture is valued as 'an end in itself' (European Commission 2010a, p.9).

Overall, it was felt that since a number of ECOC cities have included 'economic impacts' within their own objectives for projects, that there was a case for including this as an explicit objective of the ECOC programme in order to be able to gain consistent comparative view across all ECOCs (Palmer Rae 2004). The Commission's 2011 online consultation revealed some support for this, but it was by no means a consensus view and as a result, it was recommended that the general objectives of the programme remain the same and ECOCs be allowed to retain flexibility in setting their own objectives (ECORYS 2011a, p.8). Furthermore, cultural stakeholders previously consulted for the 2004 report, underlined that cultural aims should be the basis of the ECOC action and that it should not be informed by political and economic aims (Palmer Rae 2004, p.186). However other actors were in favour of a greater emphasis on the economic aspect. For example, in its own initiative report, COR recognised the strong economic potential of the programme and advocated placing projects within a long term strategy which included economic impacts (COR 2012b). However, it also warned the Commission against 'placing one-sided emphasis on the purely economic importance of culture' (Ibid.), though it doesn't seem that COR felt this to have been breached with the Commission's 2020-2033 initial proposal, as it made no criticisms of the strengthened economic rhetoric (COR 2012c).

With the greater economic focus of the 2020-2033 phase, the Commission seems to have departed somewhat from the preferences of stakeholders, however the cultural sector did have a key influence on the design of the programme and supported many of the other changes made by the Commission. For example, the cultural network Eurocities, advocated the strengthening of the European dimension, the clarification of criteria for participation, greater emphasis on the participation of citizens, reinforcing the importance of the long-term dimension and supported the necessity of monitoring procedures (Eurocities 2011), all of which were incorporated by the Commission into the final text (Decision No 445/2014/EU). These had also all been areas singled out for improvement by the cultural stakeholders consulted in 2004 (Palmer Rae 2004) and were also largely supported by the 212 cultural sector representatives consulted during the 2011 online consultation (ECORYS 2011a), which would seem to confirm Monica Sassatelli's view that reforms of the ECOC have largely been in keeping with evaluation reports commissioned by the EU and with the opinions of consulted stakeholders (Sassatelli 2013, p.59).

Overall, the Commission's initial proposal doesn't seem to be far removed from the preferences of other actors either. The EP, COR and Council all agreed with the Commission on the need to emphasise the 'European Dimension' (EP 2013b, COR 2012c, Council 2014, European Commission 2012), and the EP and COR also agreed on the need to promote long term impacts (EP 2013b, COR 2012c, European Commission 2012). However of the EP and COR, the EP had the greater

influence. Whilst COR succeeded in getting a greater emphasis on local and regional aspects and secured the option for Member States to choose an expert to the independent panel (COR 2012c, Decision No 445/2014/EU), the EP contributed in more areas; helping to maintain the non-economic dimension of the action through amendments calling for the inclusion of symbolic objectives such as 'belonging to a common cultural area, stimulating 'intercultural dialogue' and 'mutual understanding' (EP 2013b, Decision No 445/2014/EU), as well as securing greater emphasis on cultural heritage and references on the protection of cultural diversity. It also contributed amendments to the criteria of the action and the definition of the independent panel (Ibid.). However the Council again, had the most substantive influence overall, keeping the Commission's attempts at dominance in check by opposing two significant changes, namely that the monitoring and evaluation panel be composed solely of European and not national experts and that the Commission should take over the designation of cities from the Council, as had hitherto been the case (Council 2014). The Council instead gave designation powers to Member States entitled to hold the title in the given year (Ibid.). Thus the Council had a significant impact in blocking the Commission's attempt at gaining greater power over the action. However at the same time, the substance of the Commission's initial proposal remained intact, as the Council did not propose any thematic changes and the Commission also gained greater control through new powers to designate cities from candidate countries (Decision No 445/2014/EU) and the stricter criteria and evaluation obligations placed on Member States still show the Commission's overall greater control over the action, though as previously seen, this was in keeping with the preferences of cultural stakeholders.

Like the European Capital of Culture, the European Heritage Label started out as an intergovernmental action, only becoming an EU level action in 2011 following a call made by the Council (Council 2008). Being a new action in its first phase, comparison cannot be made between successive phases of the EHL, however analysis of the initial phase can nonetheless help to confirm an overall trend. As an intergovernmental action, the main aim of the EHL was 'to strengthen European citizens' sense of belonging to Europe and to promote a sense of European identity' (European Commission 2010b, p.2), an objective that would seem to cement its description as a 'symbolic action'. The same objective was reiterated by the Commission within point 2 of its initial proposal and was set as the main general objective, suggesting a commitment to continuing the symbolic basis of the action (Ibid., 9, 11). Further supporting this, the Commission's initial proposal emphasises symbolic aims such as the promotion of cultural heritage of 'European significance' (Ibid., p.11), makes reference to the 'symbolic European value' of sites (Ibid., p.12), and makes numerous references to 'intercultural dialogue' (Ibid., p.9-13) as another objective of the action. Whilst this seemingly reflects the predominant basis of the action being an appreciation of culture's inherent value, the Commission has not entirely omitted the economic dimension, making reference to 'expected' economic benefits within the explanatory memorandum, and within the proposal itself, states the role of cultural heritage in contributing to the economic development of regions and connects the EHL with the aims of the *European Agenda for Culture*, specifically the aim of 'culture as a catalyst for creativity' (Ibid., p.4,10). The annex to the proposal also connects the EHL to the EU's overall strategic objective of prosperity and states an intention to utilise economic indicators as one way of measuring the effectiveness of the action (Ibid., p.24) and whilst the Commission's overall inclusion of economic objectives in the initial proposal does not seem to reveal a strong economic agenda, the Impact Assessment accompanying the proposal hints at the Commission's

intentions to maximise the economic dimension by considering 'building in more ambitious economic objectives' in future phases (European Commission 2010c).

The final decision shows a further addition to the economic dimension with the inclusion of a specific objective referring to the role the EHL can play in boosting 'the attractiveness and the economic and sustainable development of regions, in particular through cultural tourism' (Decision No 1194/2011/EU). This can be traced to an amendment proposed by the EP calling on the Commission to foster an interaction between heritage and economic activities (EP 2010). However, as previously under the cultural programmes, the EP's amendments show overall support for a balance between the dual functions of culture rather than a preference for emphasising the economic dimension. This is evidenced by calls for 'a sense of European identity' to be included under the specific objectives, that the intermediate objectives should 'stress the symbolic value' of sites and an amendment on the widening of the definition of heritage sites, the latter two of these changes being included in the final decision (EP 2010, Decision No 1194/2011/EU). Other successful EP amendments included changes to the composition of the European panel and the criterion that experts should be drawn from a 'balanced geographical spectrum' (Ibid.). However though the EP did have a substantial influence on reworking the structure of the document and rephrasing of existing ideas, it did not succeed in bringing many new ideas into the final decision.

COR's influence was equal, if perhaps not slightly greater than the EP's on this occasion, as several of COR's key amendments were adopted. For example within the statement that sites will play a 'key role in the history and building of the European Union', COR initiated the change from 'European Union' to 'Europe' (COR 2010, Decision No 1194/2011/EU). Highly significantly, it also managed to change the composition of the European panel of independent experts to include an extra seat for a representative of COR and also ensured that COR would be informed by the Commission about the list of pre-selected sites and receive an evaluation report from the Commission on the overall action (COR 2010, Decision No 1194/2011/EU). Additionally, COR secured greater emphasis on promoting the shared heritage of Member States as an objective and the recommendation that Member States should 'involve local and regional authorities' (COR 2010, Decision No 1194/2011/EU). It can also be seen that like the EP, COR welcomed the economic dimension of the action (COR 2010). With regards to the role of the Council, it was, as always, highly significant, amongst others in approving many of the amendments of the EP, putting forward the idea for joint applications between thematically linked sites and in opposing the opening up of the initiative to third countries (Council 2011).

The cultural sector also played a key role, as the Commission's initial proposal was based on several consultations including an online consultation and consultation meeting carried out in 2009, with participants including the large cultural heritage network Europa Nostra (European Commission 2010c, p.12). The results of the consultations confirmed the sector's support for the establishment of the EHL and show that opinions and comments of respondents were largely in line with the contents of the Commission's initial proposal and final decision (European Commission 2010c, 2010b, Decision No 1194/2011/EU), seemingly reflecting the Commission's receptiveness to the views of the cultural sector. For example the consultations showed that the cultural sector strongly agreed on the EHL's contribution to fostering a sense of EU belonging (Ibid., p.10). In fact most of the potential impacts mentioned by participants were later acknowledged in the Commission's initial proposal, including also the promotion of European values, a higher profile for cultural heritage, the

strong educational value of the action and economic development through tourism (Ibid.). Consensus was also reached among participants on the award being given on a permanent basis and strong support was articulated on pre-selection being carried out at national level and only afterwards at EU level, both of which were acknowledged by the Commission's initial proposal (Ibid., p.12-13). Since the economic dimension had not been an objective of the intergovernmental initiative (Ibid. p.7), the cultural sector had a very significant role in safeguarding the symbolic basis of the action. Whilst some stakeholders, such as the Assembly of the Regions (AER) network, advocated economic arguments as a partial basis for the action (AER 2009, p.2, p.5-6), AER and the majority of cultural stakeholders agreed that the label should be awarded primarily on the symbolic value of sites and that this objective should not be eroded over time (European Commission 2010c, p.12-13, AER 2009, p.3), warning that economic aspects should remain secondary as too great an emphasis on these could distort the main objectives of the action (European Commission 2010c, p.21), which currently seems to have been respected.

Whilst the *European Heritage Label* remains a primarily symbolic action and does not confirm a 'commodification' of culture, the *European Capital of Culture* has shown a markedly greater focus on the economic dimension with the latest decision. However whilst Mercouris's (2007) prognosis seemed to suggest that the ECOC was undergoing the same 'commodification' as the main cultural programmes, the shift in the ECOC is not as dramatic as with *Creative Europe*, and symbolic rationale still remains, so it is not possible to describe a 'commodification' of culture under either action and it is also not possible to speak of Commission dominance as both actions seem to strongly reflect the views of all actors.

Conclusion

Examination of the policy formulation stages of the EU's cultural programmes and actions has revealed some interesting results and proved a fruitful basis for analysing both how the EU's cultural policy has developed thematically in the post-Maastricht period and how various actors have influenced this. Overall, whilst economic aspects were decidedly peripheral in the first generation of programmes, *Culture 2000*, initiated a shift by introducing a more instrumental approach for culture, amongst others, economic. However whilst economic terminology was comparatively more visible in *Culture 2000* than the first three programmes, *Culture 2000* did not yet mark a 'commodification' of culture. It is only with the most recent programme, *Creative Europe*, with its unprecedented, near sole focus on the economic impact of culture that we can speak of a sudden shift towards 'commodification', confirming the argument made by Bruell (2013). Whilst the previous programmes had retained a symbolic dimension alongside the economic one, with *Creative Europe*, the symbolic dimension has disappeared entirely.

The Commission has undoubtedly been the dominant actor in bringing about the overall shift in the conception of culture with *Creative Europe*, with all other actors expressing clear concerns about the overtly economic focus. Though other actors, most notably the EP and Council, had a tangible influence, with a large proportion of their amendments included in the final decision, notably amongst these, changes calling for a greater recognition of culture's intrinsic value, they nevertheless did not manage to substantially alter the economic justification of the action which remains as the Commission proposed. This is also true of the previous programmes; though actors' opinions have often been acknowledged and incorporated, the overall aims and justifications of the

cultural programmes have remained faithful to the Commission's design. Yet, surprisingly, analysis of the cultural programmes has revealed that it is only with *Creative Europe* that there is a correlation between Commission dominance and the 'commodification' of culture, as analysis of the previous programmes revealed that the EP and COR were the actors at the forefront in calling for a greater inclusion of economic rhetoric, findings which challenge the generalisations of Barnett (2001) and others that the EP and COR have consistently been the sole champions of culture's intrinsic value against the Commission's economic agenda.

By contrast with the cultural programmes, evidence from the cultural actions has shown that they still remain largely symbolic, the EHL barely focusing on the economic dimension at all, and though there has been a marked increase in economic focus with the latest ECOC action, this has not yet displaced its symbolic rationale. Furthermore, the EHL and second and third phases of the ECOC show the Commission's substantial responsiveness to the opinions and suggestions of various actors, as compared with the cultural programmes, thereby discounting Commission dominance. Thus, whilst the cultural programmes have, to some degree, moved towards Commission dominance and a 'commodification' of culture, analysis of the cultural actions shows that this is only partially true of the EU's overall cultural policy.

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