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A Critical Perspective on Data Transparency in the Common Foreign and Security Policy of the European Union

Methodological Challenges in Foreign Policy Research

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Content

This working paper is part of a broader research project and provides an extended data analysis in connection with the SWP Comment 2020/C58.

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List of Abbreviations

CFSP	Common Foreign and Security Policy
CSDP	Common Security and Defence policy
EAD	European External Action Service
EC	European Commission
EDA	European Defence Agency
EEA	European Economic Area
EFTA	European Free Trade Area
EU	European Union
EU ISS	EU Institute for Security Studies
EUCO	European Council
FAC	Foreign Affairs Council
HR	EU High Representative for Foreign Affairs and Security Policy
SAA	Stabilisation and Association Agreement
SatCen	EU Satellite Centre
TEU	Treaty on European Union
TFEU	Treaty on the Functioning of the EU
UN	United Nations

1. Introduction

The aim of this data collection is to examine the output of the European Union (EU) in the area of Common Foreign and Security Policy (CFSP) since the entry into force of the Lisbon Treaty in 2009. To date, European academic research has been lacking a comprehensive quantitative record of CFSP output. Individual data sets, such as on the sanctions imposed by the EU, are an exception and already well documented and analysed in detail.[1] However, a documentation of the CFSP, such as published by the German Federal Foreign Office in the 1990s, has been discontinued.[2] The unique feature of this analysis is therefore the ambition to systematically collect all public data on various areas of the CFSP.

The intergovernmental nature of the CFSP is distinct from other communitarised EU policies. Member states are bound by the principle of unanimity unless there are clearly defined exceptions. Decision-making in the Council of the EU takes place largely behind closed doors and in the non-legislative area. The issues discussed in the European Council or the Foreign Affairs Council (FAC) are confidential and often classified. The CFSP falls within the sphere of national security and executive ownership, where secrecy is tolerated as a necessity for government executive action.[3] This "functional" secrecy may well open up new negotiating spaces for diplomatic successes.[4] Trust forms the basis for negotiations at the EU level and is created through personal exchanges between representatives of the member states. The EU's multi-level system reinforces the requirements of confidentiality in the CFSP, as it is not only the sum of national foreign and security policies, but also creates its own dynamics of confidentiality at the EU level. [5]

Secrecy stands in a complicated relation to transparency, which the EU has committed itself to in the Lisbon Treaty. Documents are published in almost unmanageable numbers - the Council claims to make some 25 000 documents available to the public every year. However, the amount of data is insufficiently processed and it is left to the users to systematise it. This makes a quantitative analysis of the CFSP as a separate policy area considerably more difficult. Moreover, despite the transparency requirement, a number of CFSP-relevant documents are still kept under lock and key due to the confidentiality of the policy area. Functional secrecy in diplomacy may be necessary to a certain extent for the functioning of foreign policy, but it ought to be accompanied by functional transparency of policy results. In order to locate political responsibility, more than the mere publication of

[1] See for example *The Global Sanctions Database* by Felbermayr et al., 2020; Clara Portela/Erica Moret, *The EU's chemical weapons canctions regime. Upholding a taboo under attack*, Paris: EUISS, 31.7.2020; Portela, Clara Portela/Paulina Pospieszna/Joanna Skrzypczyńska/Dawid Walentek, "Consensus against all odds: explaining the persistence of EU sanctions on Russia", in*: Journal of European Integration*, August 2020, DOI: 10.1080/07036337.2020.1803854; Sascha Lohmann, "Pflugscharen zu Schwertern. Sanktionen sind ein Klassiker der Geoökonomie. Zur politischen Steuerung taugen sie allerdings nur bedingt", in: *Internationale Politik*; January/February 2020, pp. 41-43.

[2] *Federal* Foreign Office, *Common Foreign and Security Policy of the European Union (CFSP)*. Documentation, status mid-1998. Berlin: Federal Foreign Office.

[3] See Guri Rosén, "Contestation and co-optation: why secrecy in EU external relations varies", in: *West European Politics*, 41 (2018) 4, S. 938; Mai'a K. Davis Cross, "Secrecy and the making of CFSP", in: *West European Politics*, 41 (2018) 4, p. 916.

[4] See Cross, *Secrecy and the making of CFSP* [see footnote 3], p. 918.

[5] Ibid., p. 919.

unprocessed data is needed. Low-threshold access for users to the information contained in documents is essential for functional transparency; for example, through machine-readable formatting and user-friendly filter functions.

Given the current data availability, research is dependent on close cooperation with the EU Council Secretariat in order to obtain systematic access to data for a quantitative analysis of the CFSP. A further complicating factor is that EU documents that are relevant for research do not automatically have to be published and released by the responsible authorities. The final decision on publication remains with the EU decision-makers, who have a gatekeeper function. The information that the EU provides, for example through its website, is therefore inevitably incomplete and only represents a selection. The contents of the press releases of the European External Action Service (EEAS), which in principle are easily accessible sources of information, are also carefully selected. The present data collection and output analysis of the CFSP based on it are therefore limited by default.

In a first step, the methodological approach to data collection chosen here is presented. SPARQL queries were used as well as an automated collection of raw data by means of web scraping of the Council websites. In a subsequent step, a descriptive analysis of the data on CFSP output follows. Council decisions, sanctions and minutes of Council meetings as well as press releases are examined. The pilot study on CFSP output carried out here makes it possible to formulate recommendations for improved functional transparency, which is a necessary step for further research.

2. Methodological Approach

The publicly available output of the CFSP, as analysed here, consists of the following types
of documents:
- Non-legislative Council decisions in the field of CFSP
- Sanctions
- Minutes of the meetings of the FAC
- Press releases of the EEAS

These and additional instruments are presented in Table 1.

Table 1: Instruments of the CFSP

Actor	Type of document	Level of commitment
European Council (EUCO)	Strategic guidelines	Art. 26 TEU
Foreign Affairs Council (FAC)	Council decision (action, position)	Art. 25 TEU, politically binding
Council based on a proposal by the High Representative (HR) and the Commission	Sanctions: Council decision against third countries or individuals (EU autonomous or implementation of UN resolutions)	Implementation according to Art. 215 TFEU on the basis of a Council Decision under Title V Chapter 2 TEU, legally binding
EUCO, FAC	Council conclusions	De facto acquis, not legally binding
HR, EU	Statements by the HR on behalf of the EU	Political signal of the EU
HR	Declaration of the HR in own responsibility	Not representative for the EU
HR, Spokesperson	Statement by the Spokesperson of the AGM	Public communication
EU delegation, HR	Local EU statement	Position of an EU delegation in a third country
HR	Demarches	Terms of reference, bilateral working basis
Heads of State or Government, Foreign Ministers, Senior Officials or experts	Political dialogue	Regulated by agreements, joint declarations or exchanges of letters
Council based on a proposal by the HR	Appointment of EU Special Representatives	Art. 33 TEU

Source: Own compilation based on the EU Treaties and official EU websites

The available data was read and processed using automatised methods from the official
websites of the EU institutions. The quality of the collected data was checked on a random

basis. As a first step, *Council Decisions in the field of CFSP* published in EurLex were collected. These were then divided into five categories based on the assigned eurovoc descriptors and keywords identified by two coders: *sanctions*, *missions and operations*, *EU special representatives*, *arms control decisions* and *others*.

Public votes and the respective legislative acts are, in turn, documented in a public voting register of the Council.[6] Other documents, which are not legal acts, are published in a public document register. These form a platform of the Council's public data. Since 2015, as part of its "Open Data Initiative", the Council has also been publishing raw data on voting behaviour and on already published documents as RDF data, which can be accessed using the SPARQL language. However, the data collection was complicated by the fact that the Council's public document register is partially incomplete. The data published in the register, i.e. the document names and the associated metadata, are therefore not always reliable. Moreover, the documents and voting results are published as PDF files in a hardly machine-readable format. The raw data and associated interfaces for voting behaviour available under the Open Data Initiative are insufficiently documented by the Council, unlike data on public documents, in order to serve as independent data sources for the public.

As of now, there is no codebook in the narrower sense for the data set on voting behaviour. Interestingly, however, these codebooks do exist for the other data sets of the Open Data Initiative. In contact with the Council's Department for Transparency, the data was made available through a SPARQL query. This problem, however, made it difficult to verify the data collected, both in terms of the quality of coding in, for example, policy fields, and the pure number of public votes collected.

The EEAS *press releases* were collected via the official website using web scraping and partly manual coding, as the classification into *statements* and *press releases* was enriched with information on the content. The coding of the general press releases into 16 new categories was done by one coder and a random sample of 160 press releases was coded by a second coder without knowledge of the first codes. The intercoder reliability was 0.673 according to Cohen's Kappa, which is substantial.[7]

The *minutes of the FAC's meetings* were taken from the public document register, which means that also in this case, the data collected may be incomplete. However, the number of documents suggests that they are probably complete – for each Council meeting there should be one document. Minutes withheld so far were requested for publication in their entirety from the General Secretariat of the Council on 13 July 2020, but have not yet been made available at the time of publication.

The current *EU sanctions regimes* were collected from sanctionsmap.eu, a website operated by the EU. In doing so, we relied on the website actually listing all consolidated legal acts related to adopted restrictive measures. The implementation of United Nations (UN) sanctions requires several EU legal acts, so the number of legal acts does not reflect the total number of sanctions regimes. For the total number of individual legal acts, the amendments to the consolidated acts, listed in EurLex, were counted. In some cases, the most recent amendments have not been integrated into the consolidated acts and have therefore not been counted.

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[6] In the CFSP, the EU Treaty explicitly excludes the Council's legislative activity (see Articles 24 and 31 TEU). Nevertheless, legislative acts are also adopted in the FAC. The reason is that each of the ten Council configurations can adopt a legislative or regulatory act on behalf of the Council as a whole, even if it falls within the competence of another configuration, since each Council configuration represents the Council as a whole. The legislative acts adopted in the FAC are therefore included in this context in order to clearly distinguish legislative acts without CFSP reference from CFSP-related decisions.

[7] Jacob Cohen, "A coefficient of agreement for nominal scales", in: *Educational and Psychological Measurement,* 20 (1960) 1, pp. 37-46.

Table 2: Overview of the data collection

Data type	Number (*n*)	Source	Survey method	Last update
Council votes in the configuration "Foreign Affairs" (no CFSP output)	36 (since 2009)	https://www.consilium.europa.eu/en/general-secretariat/corporate-policies/transparency/open-data/	SPARQL request Web scraping	10.08.2020
Council votes in the policy area of external relations (no CFSP output)	92 (since 2009)	See above	Web scraping	10.08.2020
EEAS press releases	2053 (since 2014)	https://eeas.europa.eu	web scraping, qualitative coding	03.08.2020
Sanctions as consolidated legal acts	47 (since 2009)	www.sanctionsmap.eu	Web scraping	03.08.2020
Active sanctions regimes	30	Giumelli et al. 2020		31.12.2019
Sanctions as individual legal acts	1264 (since 2009)	www.sanctionsmap.eu https://eur-lex.europa.eu/	Web scraping	03.08.2020
Minutes of the meetings of the FAC	288 (since 2009)	https://www.consilium.europa.eu/en/documents-publications	Web scraping	13.07.2020
Council decisions in the FAC	1054	https://eur-lex.eu-europa.eu	Web scraping	08.10.2020

Council conclusions, which are central elements of the coordinating function of the CFSP, are not covered by this data collection. Systematic collection is not possible without considerable effort, which could not be made in the context of this collection. A first look at the Council website reveals three sources for Council conclusions:

1. https://www.consilium.europa.eu/en/council-eu/conclusions-resolutions/
2. https://www.consilium.europa.eu/register/en/content/int?lang=EN&typ=ADV
3 .https://www.consilium.europa.eu/en/general-secretariat/corporate-policies/transparency/open-data

With regard to all three data sources, it is clear that the Council produces a large amount of data. While the first source seems to be limited to Council conclusions, these do not appear to be listed here in full. In the second source it is possible to filter for conclusions, but the filter function is not reliable. Finally, the last source cannot be used without the help of the Council's IT department for a reliable SPARQL query to the Council servers. A first at-

tempt has shown that some metadata are stored unequally in the different sources. Therefore, for the time being, the output of the Council in terms of conclusions is not represented in this data collection.

3. Challenges in the Output Analysis

3.1 Council Decisions in the Field of CFSP

The FAC adopts legal acts known as Council Decisions, which establish actions to be implemented by the EU, common positions, or implementing decisions (see Article 25 TEU). Decisions are generally adopted unanimously (Article 31(1) TEU). Council regulations are another form of legal act adopted by the FAC. While Council decisions are only politically binding on the governments of the member states, regulations have direct legal effects in each member state. They serve to implement Council decisions.

The Council adopts a decision establishing an action when a specific situation requires operational action from the EU, in particular when it entails financial costs. The Council decision defines the objectives of the action, its scope, the means available to the Union, the conditions, and, if necessary, the implementation period. The main application is the establishment of the legal basis for launching or extending a civilian or military mission in the context of international crisis management (EU Common Security and Defence Policy, CSDP). However, such Council decisions can also establish or amend the mandate of EU special representatives or support for certain disarmament measures. Council decisions also establish CFSP agencies such as the EU Institute for Security Studies (EU ISS), the EU Satellite Centre (SatCen) and the European Defence Agency (EDA). Decisions are politically binding on all member states (except when they abstain or make a separate statement).
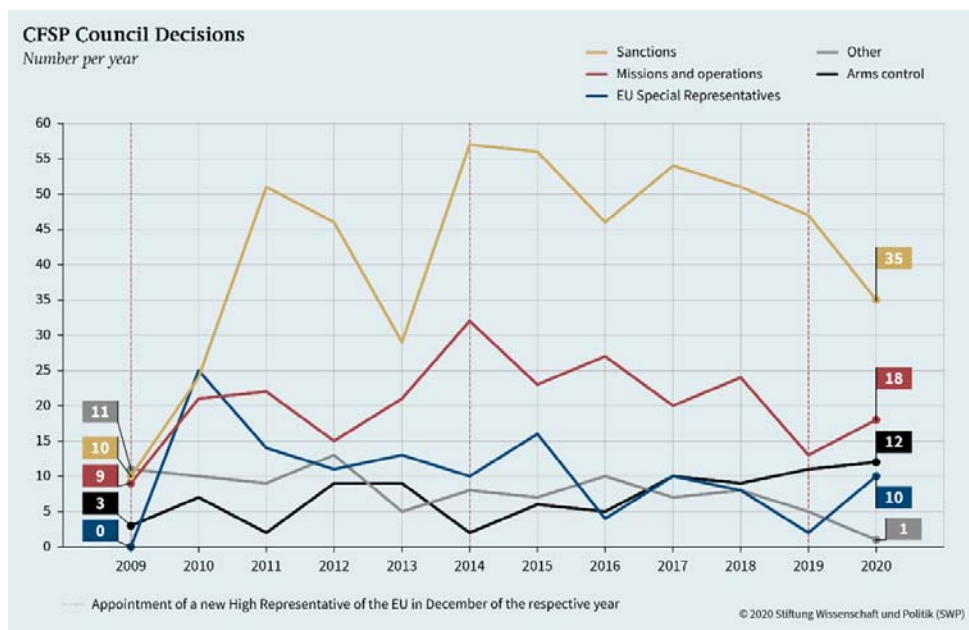

Chart 1: CFSP Council decisions, number per year

The analysis of CFSP decisions published in EurLex since 2009, as illustrated in chart 1, shows that decisions have been taken in four main domains: Sanctions (506), CSDP missions and operations (245), appointments of Special Representatives (123) and arms control (85, in a broader sense including both small arms and weapons of mass destruction). The remainder (94 decisions) related to various types of agreements with third countries and the establishment of EU agencies.
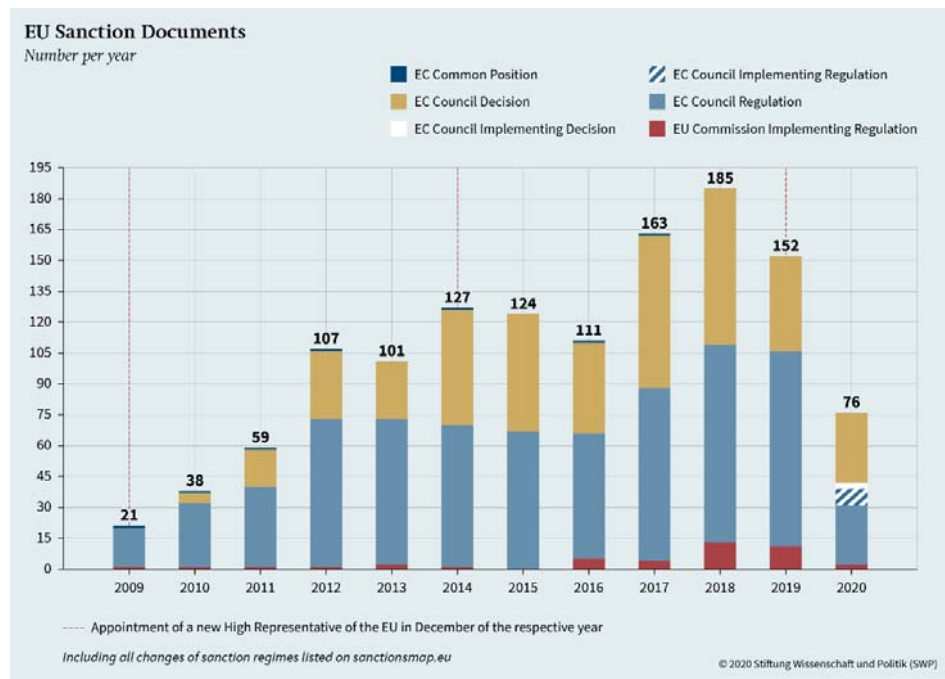
In addition, the data on public votes in the FAC provided by the Council of the EU through the Public Vote Register and the Open Data Initiative were also collected for the purpose of conceptual clarity. These show that a total of 36 legislative decisions have been taken since 2009. However, as the selection below shows, these decisions have no relevance for the CFSP.

Table 3: Examples of legislative acts adopted in 2014 in the FAC

Legal act:	Policy field:
DIRECTIVE OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL amending Council Directive 2001/110/EC relating to honey	Agriculture
REGULATION OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL laying down provisions for the management of expenditure relating to the food chain, animal health and animal welfare, and relating to plant health and plant reproductive material, amending Council Directives 98/56/EC, 2000/29/EC and 2008/90/EC, Regulations (EC) No 178/2002, (EC) No 882/2004 and (EC) No 396/2005 of the European Parliament and of the Council, Directive 2009/128/EC of the European Parliament and of the Council and Regulation (EC) No 1107/2009 of the European Parliament and of the Council and repealing Council Decisions 66/399/EEC, 76/894/EEC and 2009/470/EC	Agriculture
DECISION OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL on enhanced co-operation between Public Employment Services (PES)	Employment
REGULATION OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL on fees payable to the European Medicines Agency for the conduct of pharmacovigilance activities in respect of medicinal products for human use	Health

Source: Open Data Initiative, Council of the EU https://www.consilium.europa.eu/en/general-secretariat/corporate-policies/transparency/open-data/

3.2 Sanctions and Council Minutes

Chart 2: EU Sanction documents, number per year

Chart 2 shows the number of sanctions, or 'restrictive measures', adopted by the EU since 2009. These may be directed against various international actors or third countries and are implemented by different regulations depending on the legal competence within the EU (see Articles 28 and 29 TEU). Sanctions as a foreign policy instrument of the EU have recorded a steady increase since 2009. In the period under review, from 2009 to 2019, the number of regulations and decisions increased sevenfold, from 21 to 152. This includes decisions to extend or to expand existing sanctions, as well as the implementation of UN sanctions. It peaks in 2014, when the EU adopted new sanctions against Russia, the terrorist organisation "Islamic State" (ISIS) and the Syrian government. Currently, the EU maintains sanctions against 30 regimes or organisations, of which only 23 are autonomous EU sanctions (chart 3). However, whenever there are multiple sanction regimes targeting the same country, these have been added into the charts below.
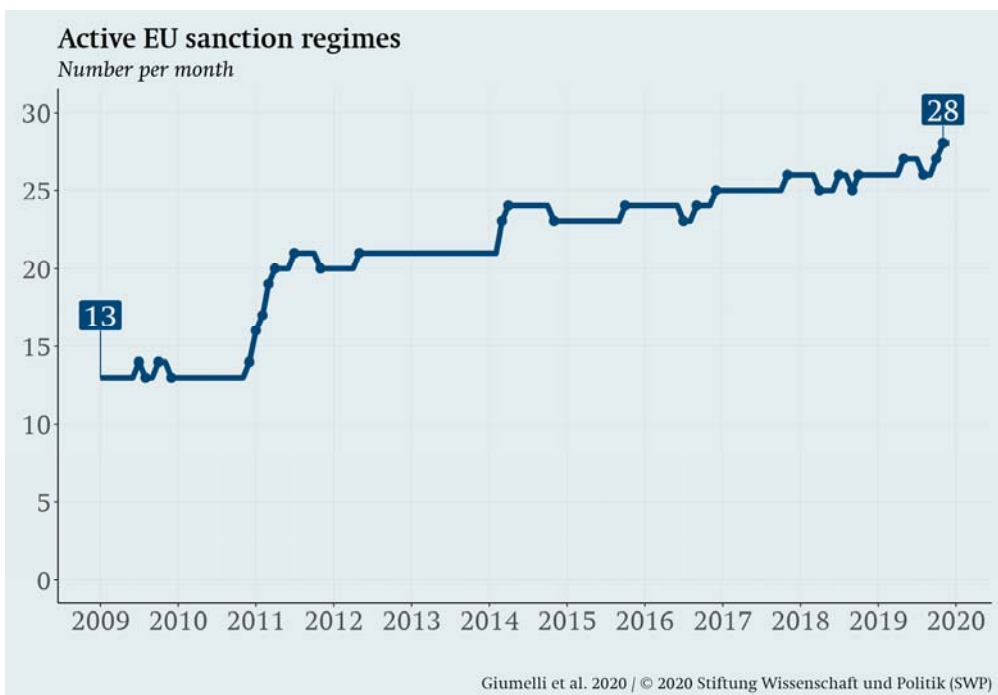

Chart 3: Active EU sanction regimes, number per month

Council conclusions are another legally non-binding but politically relevant CFSP instrument. Conclusions are adopted at each meeting of the FAC on diverse foreign policy issues. They are an important element of EU external action, aimed at formally setting out the EU's position on certain issues of high political significance, crisis situations or conflicts and, above all, at sending a political message or calls for action in a compact form. Council conclusions can serve as reference documents for an EU position for years.

Since the Council conclusions cannot be systematically recorded without substantial difficulty due to the current data situation (see chapter "Methodological approach"), we have used the Council minutes, which also contain information on conclusions, instead. Since 2009 there have been 172 publicly accessible original minutes[8] of the FAC meetings. In addition, a further 113 minutes documents are not public or only accessible upon request, of which only four are original minutes and the rest amendments to existing

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[8] Without addition, revision and correction documents.

minutes. A closer look at the minutes reveals that many agenda items of the Council meetings are discussed in exchanges of views but are not published as conclusions. Since 2018, a decrease in the amount of information in the minutes can be observed: Results of exchanges or even positions of individual member states are no longer documented, instead only the topics of discussions are mentioned with a reference to whether they remained at the level of an exchange of views or were formalised as conclusions.
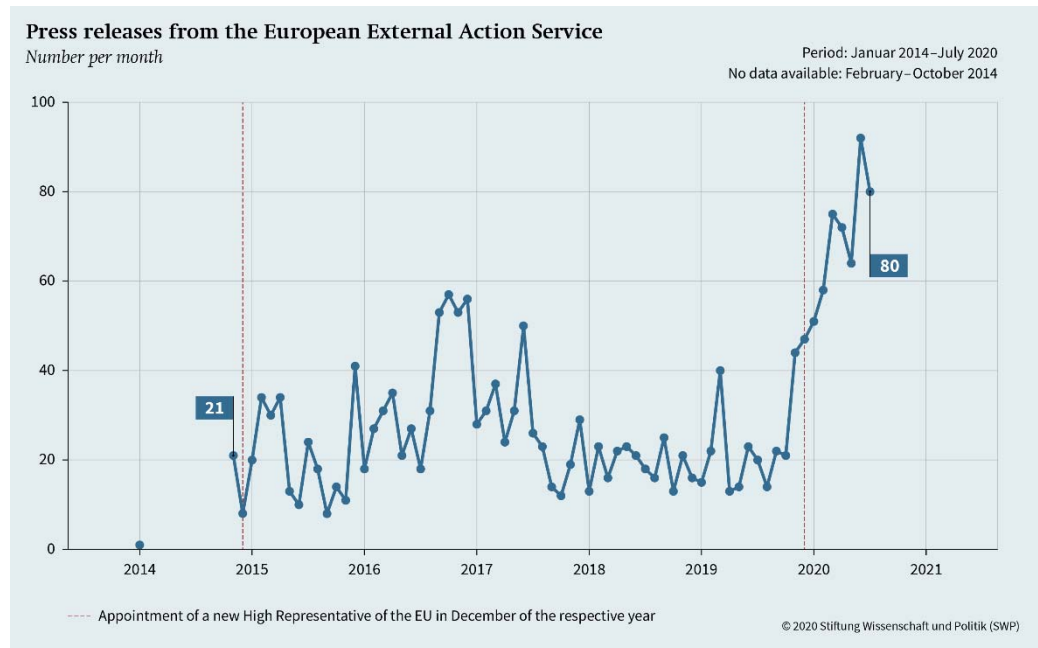
3.3. Press Releases

Press releases from the European External Action Service
Number per month

Period: Januar 2014–July 2020
No data available: February–October 2014

---- Appointment of a new High Representative of the EU in December of the respective year

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Chart 4: EEAS press releases per month

The EEAS and the EU High Representative for Foreign Affairs and Security Policy issue press releases on a wide range of international policy issues. They often report on the activities of EU diplomacy or announce the position of the EU or the High Representative on current events. Since the inauguration of the new High Representative Josep Borrell Fontelles in December 2019, there has been a substantial increase in the number of press releases issued by the EEAS (chart 4). The general press releases largely reflect the density of events in the meeting calendar of the High Representative. These include reports on bilateral or multilateral meetings, conferences or state visits. Press releases of the *Statement* type, on the other hand, are actual EU positions on foreign policy issues.

Press releases are divided into four categories: *Statements, Diplomacy, Policies* and *Others* (see graph 5). The *Statements* category includes 1206 press releases on statements and declarations by the High Representative, the spokesman or on behalf of the EU, Council conclusions, as well as joint press releases with international actors on specific issues. *Diplomacy* consists of 401 press releases relating to visits, meetings of the High Representative, Council meetings, mediation processes, political dialogues and human rights dialogues. The *Policy* category covers 300 press releases on financial assistance, Enlargement and Neighbourhood Policy or CSDP missions and operations, sanctions, strategic partnerships, and more recently, Brexit. The *Other* category includes press releases on,

among other things, awards, appointments, reports, and since 2020, Covid-19. *Declarations* are consistently the most frequent category in the 2014-2020 period, accounting for more than half of all press releases.
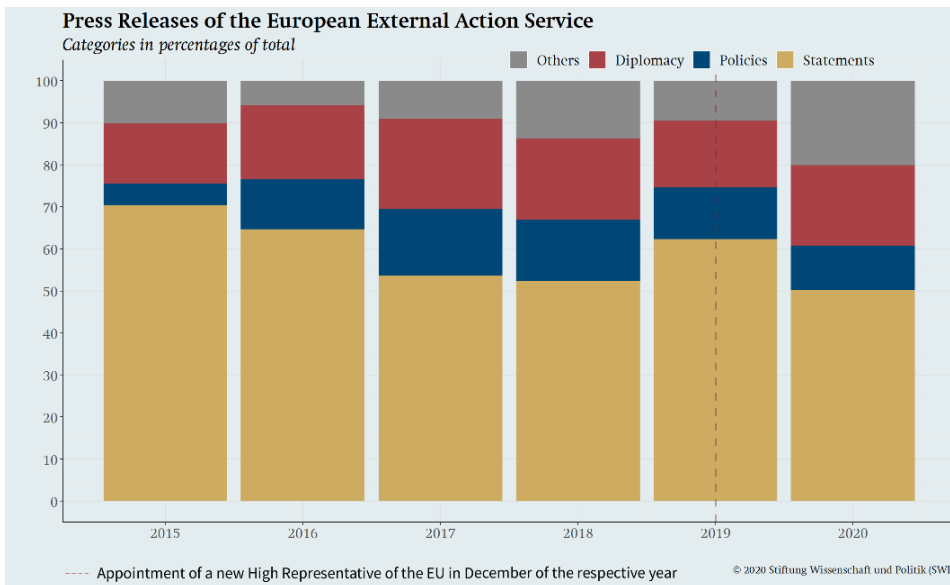

Chart 5: EEAS press releases per year and type

The increase in recent months is due both to increased press activity by the new High Representative, but also to an increase in less substantial categories such as communications on visits and meetings, and the dynamic developments in the wake of the Covid-19 pandemic. Covid-19 has to be considered as an intervening variable, as telephone calls between the High Representative and international partners have been subsumed under visits and meetings", replacing face-to-face meetings. The need for virtual communication, which allows for more contacts with partners in a shorter time, may distort the volume of the press releases in this category upwards.
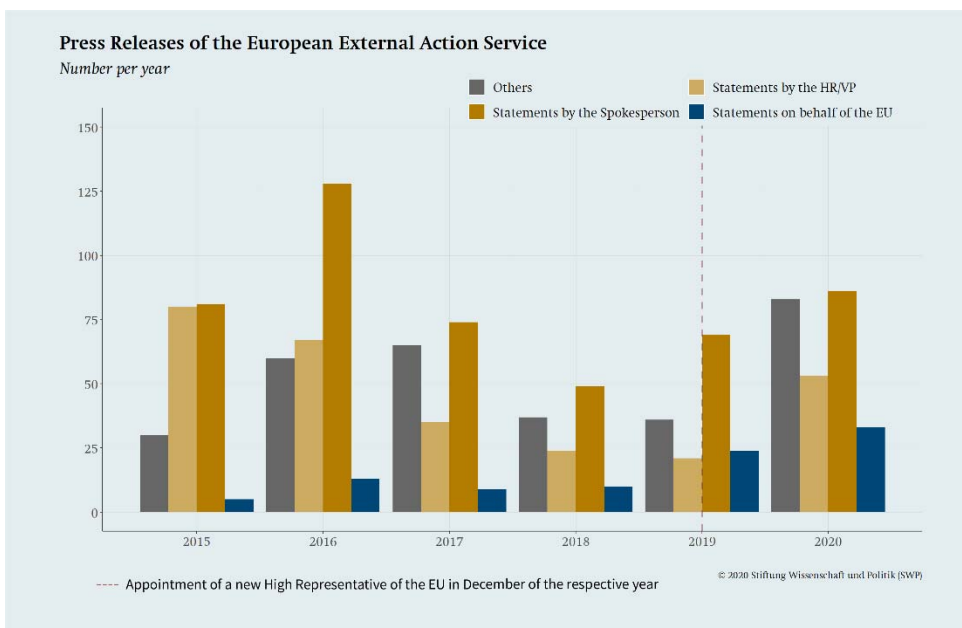

Chart 6: EEAS press releases per year and type

Chart 6 shows the press releases of the category *Statements* with subcategories corresponding to the different types of statement:

1. *Statement by the High Representative on behalf of the EU*: such a statement must be agreed on by all EU Member States before publication. A statement by the High Representative on behalf of the EU is usually issued in cases where an immediate reaction is not necessary and an EU position has to be developed in the light of a new situation or where existing EU positions need to be adjusted. The initiative for such statements may come from the High Representative or from a member state. Third countries, usually EU candidates, EFTA, SAA, or EEA countries, regularly join a "CFSP Declaration".

2. *Statement by the High Representative*: the High Representative makes a statement in his own responsibility when a rapid reaction to an event or a specific situation makes it necessary and when an immediate vote within the EU-27 is not possible. Sometimes the High Representative does not have to call a vote if the statement is a standard one. The statement must reflect agreed EU positions.

3. *Statement by the Spokesperson*: when an event is less politically charged, this may justify a personal statement by the High Representative, which is published as a statement by the Spokesperson.

A relative comparison (chart 6) shows that the number of statements by the High Representative has decreased, while statements on behalf of the EU, although still not a substantial part of press releases, have been used more frequently and continuously since 2019. An interesting finding is that the number of statements by the High Representative and of statements on behalf of the EU increased, especially in 2016, when the EU published its new Global Strategy. It is also noticeable that there was a significant decrease in press activity in the following years. This trend only reversed with the appointment of the new High Representative in December 2019. It is possible that the new High Representative Borrell follows a more assertive media strategy than his predecessor Federica Mogherini.

4. Conclusions

The data collection results presented here show that the quantitative recording of CFSP output represents a methodological challenge for foreign policy research. Data on the CFSP output is unsystematically documented by the Council and not uniformly categorised. Furthermore, the publication of CFSP decisions is partly subject to confidentiality. Due to these shortcomings, it is difficult to draw final analytical conclusions regarding the CFSP output. The methodological challenges could be overcome by cooperation between academia and the Council Secretariat. The results on the CFSP output compiled here present only a pilot project, however they are nevertheless valuable as they highlight deficits in the publication of data on the CFSP and allow for constructive proposals to improve co-operation between politics and science:

- Firstly, the output of different EU policies is not systematically distinctly categorised in the public databases. It is therefore difficult to systematically record and analyse the CFSP as an independent policy area under the EU Treaty – if the purpose is to go beyond anecdotal evidence and to identify trends and developments in comparison with other EU policies.
- Secondly, the secrecy in the foreign and security policy of the EU is a challenge for scientific research. To a certain extent, diplomatic procedures justify functional secrecy, but functional transparency of policy results ought to be guaranteed.
- Thirdly, the cognitive complexity[9] of the EU's external policies and its many instruments requires data processing that goes beyond the publication of raw data. Although the public register of documents allows access to all documents in principle, elementary filter functions, for example according to common categories such as the EU's foreign policy instruments, are not applied.
- Last but not least, a basic knowledge of information technology is a prerequisite for obtaining relevant information on the content and output of the CFSP. A systematic collection of CFSP-relevant documents among the approximately 25,000 Council documents published each year is a nearly impossible task. The EEAS press releases are the most accessible, albeit incomplete, source of information on CFSP.

Lack of transparency in EU decision-making is a well-known problem that underlines the EU's reputation as an elite project far removed from the citizens. The transparency of decision-making procedures and lobbying controls have gradually increased – for example, voting on EU legislation is now public and lobbyists have to register. However, since the CFSP is excluded from legislation in the EU Treaty, the regulation does not improve the transparency of the policy area. More precise information on the CFSP could be obtained from the conclusions and minutes of Council meetings. However, due to technical difficulties and insufficient research capacity it was not possible to systematically scan the minutes and conclusions within the framework of this pilot study.

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[9] See Maarten Hillebrandt, "Twenty-five years of access to documents in the Council of the EU", in: *Politique Européenne*, 61 (2018), p. 149.

Functional transparency requires not only to provide information and open data but to make it accessible as well. Not the question of "how much transparency" is decisive, but "what kind of transparency".[10] The EU has already issued regulations regarding the matter.[11] A key point that is missing in the EU data bases is a relevant categorisation of documents. The insufficient data quality is an obstacle to academic research and scientific policy advice. Structuring and processing the data sets related to the EU's foreign and security policy, in close cooperation with the independent scientific community, are necessary steps to achieve a justifiable balance between transparency and secrecy.

[10] Hillebrandt, *Twenty-five years of access* [see footnote 7], p. 148-9.

[11] "In order to make it easier for citizens to exercise their rights, each institution should provide access to a register of documents" and "For each document the register shall contain a reference number (including, where applicable, the interinstitutional reference), the subject matter and/or a short description of the content of the document" Regulation (EC) No 1049/2001 of the European Parliament and of the Council of 30 May 2001 regarding public access to European Parliament, Council and Commission documents. Official Journal L 145 , 31/05/2001 P. 0043 - 0048.

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