The Multi-Level Engagement of Subnational Administrations in European Policy-Making Process: The Case of Turkish Municipalities and Regional Development Agencies

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Abstract

The European Union (EU) via its regional policy and structural funds has contributed to the territorial restructuring and decentralization in member (and candidate) states in varying degrees. Because of its official candidacy to the EU, such process has naturally affected the traditional Turkish polity. The scholars of Multi Level Governance indicate that the Europeanization process not only affects intergovernmental relations, but also promotes subnational mobilization and territorial representation in member (and applicant) states. Scholars have so far analyzed the former account for Turkey, but neglected the EU activities of Turkish subnational administrations (SNAs). In analyzing the situation for Turkish SNAs, this paper targets at filling this gap in the literature. Based on the original findings from semi-structured interviews and on a cross-sectional survey of 85 SNAs in Turkey, the research utilises the subnational mobilization literature. It also incorporates the analytical concepts of Europeanization and multi-level governance to explore the awareness and the attitude of Turkish SNAs towards the EU politics in general and the issue of subnational mobilization in particular. The finding suggests that although many SNAs have gone through the internal arrangements in order to benefit from the EU opportunities, only select subset of them have interacted with the formal EU institutions, joined the interregional organizations, and attempted to establish liaison offices in Brussels. These changes confirm the trend towards multi-level polity, yet the ongoing developments remain to be seen.

Keywords: Europeanization, multi level governance, subnational mobilization, territorial representation, Turkish subnational administrations

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Ulusaltı Yönetimlerin Avrupa'da Politika Yapım Süreçlerine Çok Boyutlu Angajmanı: Türkiye'deki Belediyeler ve Kalkınma Ajansları Örneği

Özet

Avrupa Birliği (AB), bölgesel ve yapısal fonları aracılığıyla üye ve aday ülkelerde değişen ölçülerde mekansal yeniden yapılanmaya ve yerelleşmeye katkıda bulunmuştur. AB'ye resmi adaylığı bağlamında, bahsi geçen süreçler doğal olarak Türkiye'nin geleneksel siyasasını da etki altına almıştır. Çok boyutlu yönetişim yazarları, Avrupalılaşma sürecinin, üye ve aday ülkelerde, sadece hükümetlerarası ilişkileri değil aynı zamanda ulusaltı hareketliliği ve mekansal temsili de teşvik ettiğini belirtmiştir. Ancak Türkiye örneğinden hareketle, akademisyenler şu ana kadar hükümetlerarası etkileri dikkate almış ulusaltı yönetimlerin AB faaliyetlerini görmezden gelmişlerdir. Türkiye'deki ulusaltı yönetimlerin analiz edildiği bu çalışma ile literatürdeki boşluğun doldurulması hedeflenmiştir.

Yari-yapılandırılmış mülakat yöntemi ve 85 ulusaltı yönetime uygulanan kesitsel anket verilerinden elde edilen bulgulara dayalı olan bu makalede ulusaltı hareketlilik literatüründen faydalanılmıştır. Ayrıca makalede, genel anlamda Türkiye'deki ulusaltı yönetimlerin AB politikalarına, özelde ise bu yönetimlerin ulusaltı hareketlilik konusuna olan farkındalıklarını ve değişen davranışlarını detaylı bir şekilde tahlil edilebilmesi için Avrupalılaşma ve çok boyutlu yönetişim analitik kavramlarına yer verilmiştir. Temel bulgular, bir çok ulusaltı yönetimin AB fırsatlarından istifade etmek için organizasyonel değişikliğe gitmiş olmalarına rağmen, sadece bazılarının AB'deki resmi organlarla iletişime geçtiğini, bölgelerarası örgütlere katılım sağladığını ve Brüksel'de kurulacak bir temsil ofisi açılmasına giriştiğini göstermiştir. Bu gelişmeler çok boyutlu siyasaya doğru bir trendin olduğunu gösterse de, devam eden gelişmeler belirsizliğini korumaktadır.

Anahtar Kelimeler: Avrupalılaşma, Çok Boyutlu Yönetişim, Ulusaltı Hareketlilik, Mekansal Temsiliyet, Türkiyedeki Ulusaltı Yönetimler

INTRODUCTION

The Helsinki Summit of 1999 has become an emblem for the students of EU-Turkish relations to explain the change(s) in the Turkish domestic arena¹. It is not only a milestone symbolizing Turkey's institutional ties with the EU, but also a time when sweeping political reforms have been adapted in Turkey in order for compliance with the EU demands. The re-

See for example, Meltem Müftüler-Baç, 'Turkey's Political Reforms and the Impact of the European Union', South European Society and Politics, Vol. 10, No. 1, 2005, pp. 17-31; Thomas Diez et al., 'File: Turkey, Europeanization and Civil Society', South European Society & Politics, Vol. 10, No. 1, 2005, pp., 1-15. Atilla Eralp, The Role of Temporality and Interaction in the Turkey-EU Relationship', New Perspectives on Turkey, Vol. 40, 2008, pp. 149-170. Ebru Ertugal, 'Institutional Change and Europeanization: Explaining Regional Policy Reform in Turkey', Policy and Politics, Vol. 39, No. 2, 2011, pp. 257-73.

form process in the area of regional policy and local administrations was no exception. In their comparative study, Paraskevopoulos and Leonardi argued, the influence of Europeanization on the regional and local policy making arenas is supposed to be twofold: a direct one and indirect one². The former is by providing increased resources through redistribution and a new set of rules and procedures for the formulation and implementation of development policies. The latter is by shaping intra-regional interactions and thus promoting local institutional capacity through the creation of intra-, inter-, and trans-regional networks. These are complementary features for the vertical dimension of multi-level governance.

Whilst studies on EU-Turkish relations have touched upon the direct effect in terms of changing intergovernmental relations in Turkey with a specific reference to its regionalization process³, the indirect effect account was largely neglected. For the latter account, a number of scholars have mostly chosen their empirical case selection from the EU-15 countries⁴, and later from CEECs⁵ to analyze the extent to which subnational administrations (SNAs) from these states have adapted themselves to exploit the EU opportunities or engaged with the EU politics. Again, there is no work done for the situation of SNAs from the current candidate, viz. Turkey. Addressing this lacuna in the literature, this article seeks to analyse the attitudes of Turkish SNAs vis-à-vis the mobilization across the EU arena.

² Christos. J. Paraskevopoulos, and Robert Leonardi, R. 'Introduction: Adaptational Pressure and Social Learning in European Regional Policy—Cohesion (Greece, Ireland and Portugal) vs. CEE (Hungary, Poland) Countries', *Regional and Federal Studies*, Vol. 14, No. 3, 2004, p. 316.

³ See for example, Murat A. Dulupçu, 'Regionalization for Turkey, an Illusion or a Cure?', European Urban and Regional Studies, Vol. 12, No. 2, 2005, pp. 99-115; Ebru Ertugal (2005), 'Europeanization of Regional Policy and Regional Governance: The Case of Turkey', European Political Economy Review, Vol. 3, No. 1, 2005, pp. 18-55; Trevor Young-Hyman, 'the Potential for Effective Regional Development Agencies in Turkey: A Comparative Analysis', Regional and Federal Studies, Vol. 18, No. 4, 2009, pp. 375-402; Arnoud Lagendijk, 'The Role of Regional Development Agencies in Turkey: From Implementing EU Directives to Supporting Regional Business Communities?, European Urban Regional Studies, Vol. 16, No. 4, 2010, pp. 383-396.

⁴ See for example, Michael Keating and Barry Jones (eds) The European Union and the Regions, (Oxford: Oxford University Press, 1995); Charlie Jeffrey 'Sub-National Mobilization and European Integration: Does it Make Any Difference?', *Journal of Common Market Studies*, Vol. 38, No. 1, 2000, pp. 1-23; Carolyn Moore, Regional Representation in the EU: Between Diplomacy and Interest Mediation (Houndmills, Basingstoke: Palgrave Macmillan, 2012).

⁵ See for example, Tarvo Kungla, and P. Kettunen 'Europeanization of Sub-National Governance in Unitary States: Estonia and Finland', *Regional and Federal Studies*, Vol. 15, No. 3, 2005, pp. 353-378; Carolyn Moore, 'Beyond Conditionality? Regions from the New EU Member States and their Activities in Brussels', *Comparative European Politics*, Vol. 6, 2008, pp. 212-234; Merit Tatar, 'the Impact of the European Union Regional Policy on Sub-National Mobilization in a Unitary State: The Case of Estonia', (RSA Annual Conference, Leuven, Belgium, 2009).

In order to do so, the following questions are answered: what has been going on at the subnational level in Turkey after the Helsinki Summit of 1999? And whether is there any evidence for the Europeanization of Turkish SNAs, suggesting the involvement of the EU multi-level polity? These questions are rather descriptive in nature but certainly crucial for the wider understanding of the impact of Europeanization on subnational level in one-would-be-member-state. Since the impact of the EU is not exclusively confined to the national level but extended to the subnational level.

The choice of Turkish SNAs, in the sense of city municipalities (CMs), metropolitan municipalities (MMs), and regional development agencies (RDAs), as empirical cases offers a fresh insight and findings on the impact of EU accession process on the subnational level. To reflect the response of Turkish SNAs to the accession process and to outline the range of their EU activities, a survey⁶ covering 85 SNAs was conducted (for the survey participants see Appendix 1). The survey is a descriptive, cross-sectional, and self-administered. It simply aims to explore the importance of the EU on Turkish SNAs' day-to-day activities; the channels through which they get the information regarding the EU-related issues; their preparatory works for EU accession; changes in organizational arrangements; and the forms of their international relations across the EU arena. In the selection of organizations for the survey, district municipalities are excluded as the focus is on the province (NUTS III)⁷ and regional (NUTS II) level administrations. Therefore, it was implemented on 26 NUTS II regions, which include 26 Regional Development Agencies (RDAs), 65 City Municipalities (CMs), and 16 Metropolitan Municipalities (MMs). 51 out of 65 CMs (%78); 14 out of 16 metropolitan municipalities (%88) and 20 out of 26 RDAs (%77) equal to 85 SNAs (%79) took part in the survey between April and July 2011. This generated a sufficient satisfactory response rate. The survey data has also been supplemented with insights obtained from interviews at three ad-

⁶ The survey was conducted as a part of PhD research at the University of Sheffield and aimed to analyse the mood of Turkish municipalities and RDAs on the issue of subnational mobilization across the European arena. After designing the survey, it was piloted with six people in order to test the survey and make any necessary amendments. It has subsequently been distributed to the most relevant person in selected organizations by checking the organizations' formal administrative structure and getting help from the human resources unit and/or operator. By finding the relevant persons in targeted institutions, the survey was explained to each participant on the phone. In so doing, it is aimed to get the highest response rate and to provide the reliability of the survey result.

⁷ The Nomenclature of Territorial Units for Statistics (NUTS) is a geo-code standard for referencing the subdivisions of countries for statistical purposes. The standard is developed and regulated by the European Union, and thus only covers the member states of the EU in detail. The NUTS is instrumental in European Union's Structural Fund delivery mechanisms.

ministrative levels, Brussels, Ankara, and the six selected cities (Samsun, Konya, Diyarbakir, Gaziantep, Adana, and Izmir) in Turkey by the author between February 2011 and June 2012⁸.

As explained in the following sections, the three case units have different characteristics in terms of legislation, organizational structure, economic and human sources. While CMs have been active since the establishment of the Republic of Turkey in 1923 and the MMs since 1984, the RDAs are relatively recent organizations at the regional level. The creation of RDAs has not yet been enshrined in Turkish constitution, though they are now described as semi-autonomous institutions. Whereas the municipalities are generally responsible for the division of functions in terms of service delivery, public transports, water supply and sewerage, solid waste management, and urban planning, RDAs generally deal with regional planning and development, and some human resources training. The term subnational administrations (SNAs), nonetheless, will be applied to these three units in order to be coherent in a subsequent part of this paper.

The paper proceeds as follows: The major claims of the debate about subnational mobilization are summarized in more detail (section 2). Section 3 puts the concept of SNAs in Turkish context. Section 4 analyses the scope of Turkish SNAs' EU activities and their mobilization in Brussels by giving an example from the internal arrangements, the participation of interregional networks and regional offices in Brussels and horizontal activities with their counterparts in the EU arena. The last section concludes.

⁸ The interview participants include senior officials and experts in a cross-section of local authorities in seven selected cities (Samsun, Konya, Diyarbakir, Gaziantep, Adana, Izmir, and Eskisehir) in Turkey. In these cities, interviews held with the representatives from the RDAs, Municipalities, Special Provincial Administrations, Governorships, and Chambers of Commerce and Industry. As for the central level (Ankara), the selection of interviewees was composed of officials in the Ministry of Development, the Ministry of Interior, Ministry for EU Affairs, the Union of Turkish Municipalities (UTM), the EU Delegation in Ankara, the Economic Policy and Research Foundation (TEPAV, Turkish Acronym), and Development Bank. Although the Ministry of Development, Ministry for the EU affairs, and the EU delegation in Ankara were targeted because they are the key institutions and responsible for Turkey's adaptation to the EU's regional policy, other interviewees as representative of several public and non-governmental bodies were chosen due to their interests in regional development, policies and governance. Finally, in Brussels, interviews held with the representatives from the EU institutions (DG Regio, DG Enlargement, the Committee of Regions, and the EU Parliament and from interregional organizations as well as Turkish public and private national delegations. Interviews were semi-structured and the same questions asked to every interviewee, yet they were completely free in the way they answered the questions.

REVISITING THE SUBNATIONAL MOBILIZATION LITERATURE

Through the integration process and ongoing regionalization in many parts of Europe, numbers of scholars have focused on developments on the subnational level. Scholarly attention on how to analyse the role SNAs play in European integration has increased dramatically in the literature through the 1990s⁹. A burgeoning literature has emerged around what has been termed "subnational mobilization"¹⁰, "territorial representations"¹¹ and "the growing engagement of sub-national governmental actors with the institutions and process of EU policy-making"¹². Among other developments in the EU integration process¹³, the Maastricht Treaty of 1992 could be perceived as the turning point for the involvement of SNAs to the EU politics as it was a solid recognition of the multi-layered structure of the EU governance¹⁴.

The integration process along with the enlargement have not only underpinned the power shift towards Brussels, making many SNAs reposition their activity towards the EU level, but also fortified channels (i.e. the Committee of Regions, the EU Parliament, and the EU Council) for SNAs to directly interact with EU institutions and represent their territorial interests to the broader audience in Brussels. As a result, the examination of subnational activities and their engagement with the EU politics has served as a fruitful source of and leverage for theoretical development in European integration studies¹⁵. The Multi-Level Governance (MLG) approach may be considered as one of the most sophisticated accounts for

⁹ Liesbet Hooghe, 'Subnational Mobilization in the European Union', West European Politics, Vol. 18, No. 3, 1995, pp. 175-98; Charlie Jeffrey, Subnational Mobilization and European Integration; Michael Keating, the New Regionalism in Western Europe: Territorial Restructuring and Political Change, (Aldershot: Edward Elgar, 1998); Partick Le Galès and Christian Lequesne, Regions in Europe (London: Routledge, 1998).

¹⁰ Liesbet Hooghe, Subnational Mobilization in the European Union.

¹¹ Carolyn Moore, Beyond Conditionality? Regions from the New EU Member States

¹² Charlie Jeffrey, Subnational Mobilization and European Integration

¹³ Other relevant developments include: the completion of the internal market; the revise treaties of Single European Act, the Maastricht treaty; the subsequent reforms of structural funds and Cohesion policies; the launch of the principles of partnership, additionality and subsidiarity; the creation of the Committee of Regions (the CoR); right to attend the Ministry of Council meetings for some privileged regions (Article 213).

¹⁴ Liesbet Hooghe and Gary Marks, Multi-level Governance and European Integration, (Lanham: Rowman and Littlefield Publishers, 2001).

¹⁵ See for instance, Gary Marks 'Structural Policy and Multi-Level Governance in the EC' in A. W. Cafruny and G.C. Rosenthal (eds.), The State of the European Community: The Maastricht Debate and Beyond, (New York: Longman, 1993), pp. 391-410; Hooghe, Subnational Mobilization in the European Union, Gary Marks et.al., 'EU Integration since 1980s; State Centric Versus Multi-Level Governance', (the American Political Science Association Meeting, Chicago, August 31-September 3, 1995).

explaining the foreign activities of SNAs in Brussels¹⁶. The remainder of this paper, therefore, suggests that the most promising way forward is to link the notion of MLG with the concept of subnational mobilization and '(functional) territorial interest representation'¹⁷ in the EU.

Multi-level Governance unlike the early integration theories, which were too narrow in failing to account for the mobilization and empowerment of SNAs, considers the emerging Euro-polity as "a system of continuous negotiation among nested governments at several territorial tiers-supranational, national, regional and local-as a result of the broad process of institutional creation and decisional reallocation that has pulled some previously centralized functions of the state up to the supranational level and some down to the local/regional level"18. Subnational mobilization, i.e. the engagement of SNAs in European policy-making, has become a central feature of the conceptions of multi-level policy making in the EU. While the MLG has offered an analytical outlook in order to conceptualize the so-called triadic relationship among national, subnational, and supranational levels, regional policy via structural funds has been largely taken, as an empirical ground to assess whether there has been necessary changes promoting any direct relations among different territorial tiers or the euro-engagement of SNAs in order to exploit the EU opportunities¹⁹.

The interaction between subnational and supranational actors does not target the sovereignty of states directly, but instead simply accepts that a multi-level structure is being created by various actors at various levels. Furthermore, MLG scholars assume that there is a change in the mode of EU governance without assuming that the power of member states is in terminal decline. As Hooghe and Marks propose, national governments are the most important player of the EU governance²⁰. Within this context, the MLG account holds a middle ground between supranationalist and state-centric tradition by not overstating or downgrading the role SNAs play within the broader policy game in the day-to-day European politics.

¹⁶ J. Blatter, et.al, 'Preconditions for Foreign Activities of European Regions: Tracing Causal Configurations of Economic, Cultural, and Political Strategies', *Publius: the Journal of Federalism*, Vol. 40, No. 1, 2009, 171-199.

¹⁷ Functional territorial interest representation here does not refer to any ethnic regionalist movement, rather it refers to participating inter-regional networks, interacting with the EU's formal and informal institutions and/or setting up an office in order for getting fund, liaising, networking, lobbying.

¹⁸ Gary Marks, Structural Policy and Multi-Level Governance in the EC, p. 392

¹⁹ Liesbet Hooghe and Gary Marks, Multi Level Governance; Ian Bache and Matthew Flinders, Multi-level Governance, (Oxford: Oxford University Press, 2004).

²⁰ Liesbet Hooghe and Gary Marks, Multi Level Governance, p. 3

In so doing, it addresses the lack of understanding of the 'Europe of regions' or 'the Europe of states' metaphors by offering the concept of 'a Europe with some regions'²¹.

Empirically speaking, the concept of 'a Europe with some regions' refers to the variation in the level of mobilization among SNAs within and beyond member (and candidate) states and a substantial divergence in their agendas for the EU politics. Nowadays, a large number of SNAs are operating in Brussels to influence the EU politics by lobbying, creating networks, gathering information, and securing the EU funds²². The evergrowing engagement of SNAs to the EU institutions and their presence in Brussels has continued with the enlargement process because the mobilization of SNAs is not limited to the EU members²³.

While academic endeavours have presented promising lines of enquiry, there is no study for the situation of applicant states. A number of SNAs from states seeking to join the EU over the medium to longer term have begun establishing bases in and around the EU institutions²⁴ and joining the inter-regional organizations such as Eurocites, AER, or CPMR. In the remainder of this paper, the creation of multi level governance in one of the applicant states, Turkey, will be discussed with regard to a particular emphasis on the issue of subnational mobilization. Before going any further, it is necessary to outline the Turkish administrative system and the role of SNAs in this system. The assumption here is the national context as an important explanatory factor because motivations behind 'change or continuity' should be accommodated in national histories, institutional and political cultures. Once the power balances and administrative cultures are institutionalized in a given national setting, it is difficult to change it because of the path dependent character of such an administrative system.

SUBNATIONAL ADMINISTRATIONS IN TURKISH ADMINISTRATIVE SYSTEM

The traditional Turkish administrative system represents an excellent case of unitary state that has been highly centralized, allowing little administrative decentralization. Such characteristics display close parallels with Na-

²¹ Gary Marks et.al, 'Competencies, Craks, and Conflicts: Regional Mobilization in the European Union', *Comparative Political Studies*, Vol. 29, No. 2, 1996, 164-192.

²² Ibid

²³ Carolyn Moore, Beyond the Conditionality,

²⁴ Carolyn Moore, Regional Representation in the EU, p.2

poleonic state tradition²⁵ and contains various cultural elements of southern Europe societies in terms of clientelism, patronage, and weak civil society²⁶, forming societal and institutional memory among subnational administrations. In that respect, most of the structural limits of Turkish SNAs in general and of their activities through different levels of government in particular are to be found in the history of the local and regional problems in Turkey.

From the institutional perspective, there is a clear continuity between the late Ottoman period and the early Republican time about the local administration understanding and the economic and political problems regarding the division of powers between central and local levels²⁷. This is shown in the establishment of an administrative tutelage over the local government. The tutelage in question was exercised over their decisions, transactions, composition, and personnel²⁸. A rational consideration deriving from the bureaucratic code of the late Ottoman Empire was that the centre had to be as strong as possible against the periphery²⁹. This rational consideration is not only a tradition that has been inherited from the Ottoman Empire, but it has also been developed and enhanced by the bureaucratic and military elites within the republican administrations during the consolidation of the nation state after 1923.

Traditionally, the territorial administrative system in Turkey consisted of two levels, central and local. The central administration is the core of the administrative organization, both in structural and functional aspects. A fundamental characteristic of the Turkish administrative system, before it met with the EU accession process during the 2000s, is that it had a lack of regional arrangements equalling the NUTS II levels of the EU territorial

²⁵ Ayşe Aslıhan Çelenk, Europeanization and Administrative Reform: The Case of Turkey', *Mediterranean Politics*, Vol.14, No. 1, 2009, pp. 41-60.

²⁶ For North and South Europe division see Edward J. Page and Michael J. Goldsmith (eds.) Changing Government Relations in Europe, (New York: Routledge, 2nd Edition, 2010).

²⁷ For the detailed historical evaluations, see inter alia, Halil İnalcık, 'Turkey', in R. E. Ward and D. A. Rustow (eds.) Political Modernization in Japan and Turkey, (New Jersey: Princeton University Press, 1963) pp. 42-63; Şerif Mardin, 'Centre-Periphery Relations: A Key to Turkish Politics?', *Daedalus*, Vol. 102, No.1, 1973, pp. 169-190; Metin Heper, State Tradition in Turkey, (Northgate: the Eothen Press, 1985); Bernard Lewis, The Emergence of Modern Turkey, (Oxford: Oxford University Press, 3rd Edition, 2002); Eric J. Zürcher, Turkey: A Modern History, (London, New York: I.B. Tauris, 3rd Edition, 2009); Korel Göymen, Türkiye'de Yerel Yönetişim ve Yerel Kalkınma (Local Governance and Local Development in Turkey), (Istanbul: Boyut Yayın Grubu, 2010).

²⁸ Metin Heper, (ed.) 'Introduction', in Local Government in Turkey: Governing Greater Istanbul, (London: Routledge, 1989) pp. 1-12.

²⁹ Şerif Mardin, 'Centre-Periphery Relations: A Key to Turkish Politics?', p. 183

system. This institutional hiatus represented an unusual case compared to other European states of a similar size. With a massive territorial scale, almost 73 million populations, and the deeply rooted interregional disparities³⁰, Turkey did not have any experience of decentralization and/or devolution to the regional level, as it had been a case in the most of EU-15 members.

The separation of regions in Turkey depends on their topography and climate conditions without any political reference because the concept of region is often treated as secessionist meaning. The view that enlargement of provinces may lead to a situation whereby a province is completely inhabited by ethnic groups, which would jeopardize the unity and security of the nation. This fear in mind, Turkey, with a 780.000 km² territorial area, consists of seven geographical divisions, equal to 81 provinces. With the exception of the authority for the development for the South Eastern Anatolian region (GAP, Turkish acronym) and branches of central units on some regions (i.e. General Directorate of Highways, and of State Hydraulic Works), there were no regional structures outside Ankara until the creation of two pilot Regional Development Agencies in 2006. There was no generally accepted territorial delineation of the Turkish regions, little or no sense of regional identity, no institutional focal point, and thus no defined policy networks (apart from highly developed cities particularly in the west part of the country) at the regional level. Because of such misfit between the EU standards and Turkey, the impact of the EU on Turkish administrative system was the greatest, and so did the adaptational pressure³¹.

Although Turkey does not have a/any regional government, it has no shortage of local administrations. Local administrative systems have three subnational units. Provincial Local Administrations ($II \ Ozel \ Idaresi$) under the appointed Governors represent the first level. Municipalities (*Belediye*, urban local governance units) constitute the second level. Village administrations ($K \ddot{o} y$, rural local governance) form the third level. In addition to these basic types, in 1983 a new type of government confined to the most populated urban centres, called Metropolitan Municipality ($B \ddot{u} y \ddot{u} k \ Sehir Belediyesi$), came into existence. By the creation of a new administrative arrangement, important powers were devolved to the metropolitan municipalities³².

³⁰ The regional disparities between the east and west part of Turkey is remarkable. GDP per capita ratio was 60 for eastern Turkey and 123 for western Turkey (2004 national average=100). There are significant economic and social differences between east and west regions in terms of socio-economic indicators (See Socio-Economic Development Index Prepared by the Ministry of Development in 2003).

³¹ Ebru Ertugal, 'Institutional Change and Europeanization'

³² Metin Heper, 'Introduction', p. 2

The recent move towards governance and institution building at subnational level in Turkey has been accelerated after the Helsinki Summit of 1999. Although the aim of this study is not to rehearse the debate on how much change the EU has caused in the Turkish regionalization and decentralization process, which has been done successfully elsewhere³³, it is hereby important to remember that the majority of interview participants suggested that the EU, albeit the most dominant actor, was not exclusively responsible for this process in Turkey. Interview findings suggest that several factors have facilitated this process and provided a perfect timing and scope for change(s) in the dynamics of intergovernmental relations in Turkey. Such factors include the impact of other international organizations (IMF, OECD, World Bank, and the Council of Europe) and internal developments (dissatisfaction with existing policy, the success of single party government, the result of economic crisis of 2001, and learning among state bureaucrats). It is, therefore, extremely difficult to address the counterfactual question of the degree to which territorial relations in Turkey would have changed in the absence of the EU impact. One could still argue that there is considerable impact of Europeanization on timing and tempo of the reform process by providing the necessary legitimization for the reformist Justice and Development Party (AKP, Turkish acronym) government. As already mentioned, this article does not deal with the wider effect of Europeanization on Turkish regionalization process. It, however, seeks to examine the extent which the process of Europeanization has changed the behaviour of SNAs in Turkey. The remainder of this article will elaborate on the developments at subnational level in terms of organizational changes, and SNAs' horizontal and vertical relations in the EU arena.

THE ADAPTATION OF TURKISH SUBNATIONAL ADMINISTRA-TIONS TO THE EU ACCESSION PROCESS

At the time of the survey, more than two-thirds of respondents (83%) agreed that Turkey's accession process to the EU has an impact on their day-to-day activities. In the absence of any details of what sorts of EU-related issues were being counted, the individual responses to this question were too ambiguous to be meaningful. Nevertheless, in the case of many

³³ Murat A. Dulupçu, 2005, 'Regionalization for Turkey', Ertugal, 'Europeanization of Regional Policy' and 'Institutional Change and Europeanization', S. Yaman Koçak, 'Europeanization of Turkish Regional Policy', (Unpublished PhD Thesis, University of Sheffield, 2007).

member states, the involvement of SNAs within the EU affairs appears as a direct result of the development of the Commission regional policy and structural funds³⁴. It clearly transpired in the follow up interviews at three levels that the financial incentives of the EU constitute the most tangible and visible influence on the daily activities of Turkish SNAs, which bring about change in their behaviour and encourage them to involve the EU integration process. The EU funds not only lead Turkish SNAs to conduct horizontal relations in their own region or their counterpart in other countries in the EU, but also necessitate vertical relations with national and/or supranational institutions (discussed below).

Turkey has participated in three different fund programmes since 1996 including the Euro-Mediterranean Partnership (MEDA). The actual instruments related to cohesion policy started to operate under the Pre-accession Financial Assistance to Turkey in 2001. By covering the period of 2002 to 2006, the core aims of the EU financial assistance to Turkey are to enhance the institutional capacity, and the quality of implementation of the legislation in order to prepare Turkish SNAs to the Community policies and to promote economic and social cohesion before the actual membership of the EU takes place. After the membership negotiations began in October 2005, there has been a substantial increase in Turkish-EU financial assistance budget. Through the 2007-2013 budget periods, the mechanisms of financial assistance of EU to candidate and potential candidate countries are consolidated into a single instrument, which is known as Instrument for Pre-Accession (IPA). By the launch of the IPA, the EU has shifted from its earlier focus on partnership principle and so that instead of supporting regionalization; it has promoted central institutions in candidate states to distribute financial programmes on a sectoral basis. The IPA has been implemented through calls for proposals and/or procurement contracts, whose geographical coverage is limited to 12 NUTS regions (encompassing 43 NUTS III provinces) with a GDP (per capita) income below 75%threshold.

EU supported regional development programmes have in fact constituted an opportunity to increase horizontal network and cooperation among SNAs. These SNAs involved in any EU-funded project experienced a process of practical learning on the topics of project preparation and management at EU standards. The common wisdom regarding the impact of the EU's financial incentives is an increase in project generation capac-

³⁴ R. Balme, and Patrick LeGalés, 'Stars and Black Holes: French Regions and Cities in the European Galaxy', in M.J.F. Goldsmith and K.K. Klausen (eds.) European Integration and Local Government, (Cheltenham: Edwards Elgar, 1998), p. 153.

ity of SNAs in Turkey. The majority of interview participants clarified that those SNAs eligible for the EU fund programmes have frequently interacted with the EU standards, directives, and procedures in their day-today activities (Interviews 1, 2 and 3). Forty-seven Turkish cities have been eligible for the utilization of EU-funded programmes since 2001, though this number has decreased to the level of 43 cities with the implementation of IPA for the period of 2007-2013. Statistically speaking, while 1919 EU-funded projects have been to date implemented in 47 eligible cities (covering 14 RDAs), this number has remained 518 in 34 non-eligible cities (covering 12 RDAs) between 2002 and 2010 (see Central Finance and Contract Units and Ministry of EU Affairs).

There are of course various institutional and organizational changes underlining the adjustment of Turkish SNAs to the Europeanization process. These changes are found within the incremental adjustments and developments of organizational and/or administrative routines such as recruiting staff, creating the EU offices inside the organization, subscribing journals related to the EU policies, and distribution of EU information inside the office. These changes drive many Turkish SNAs to learn from the other institutions' experiences. However, the changes, do not equally manifest in all SNAs. Whereas the adaptation process is high and swift in some SNAs, it can be low and incremental for others. Even in some cases, it is non-existent. Interviews with representatives from SNAs in different cities clearly underline some likely factors affecting the learning curve and readiness of SNAs to the adaption of Europeanization process. Yet, because of the limitation for the space, this article leaves aside the possible factors causing variations among Turkish SNAs and is restricted itself to demonstrate the change in institutional arrangements and the EU activities of Turkish SNAs.

Organizational Arrangements

The survey findings reveal that more than two-thirds of Turkish SNAs (80%) has at least members of staff with special knowledge and qualifications on EU matters. Besides, no organization has a negative view on having personnel educated or trained about the EU-related issues. As for the staff whose main duty is specifically responsible for EU affairs, the ratio is relatively lower, which is around half of Turkish SNAs (51%). It was highlighted during the interviews at subnational level that while some of the larger SNAs are considering the appointment of a full-time EU staff, many did not feel that the present level of EU activities warranted such a position, especially in the current Turkish-EU relations. Even so, the fact that half of the SNAs had personnel with some degree of responsibility for EU matters is a positive development. Another positive development is that if the organization does not have any special post for the EU, some of them (19%) can have access to consultation-companies. Only 15% of SNAs consider that they do not need any special post for the EU task. Overall, there is a positive attitude towards having educated and trained staff for the EU-related issues.

The most likely explanation for the higher ratio for the staff educated and trained about the EU is that the national authorities arrange seminars, workshops, or courses to educate staff working in any local and regional organizations (Interviews 1, 2 and 4). For instance, the EU delegation in Ankara established EU info centre under the Chambers of Commerce and Industry in some selected cities just after the Custom Union Agreement of 1995. Today, 21 EU info centres are working in different cities in Turkey. These centres have arranged awareness-raising events designed to assist public, private, and volunteer organizations at the subnational level to prepare for the advent of Turkish-EU relations. The events include Europe weeks, exhibitions, conferences, and concerts as well as spreading information leaflets. Recently, the activities have also included training seminars, PCM (Project Cycle Management) certificates, and consultancy for local firms³⁵.

In the early years of the EU-development programmes, the consultancy firms by holding excellent sources of information at their hands and recruiting competent professionals regarding the EU-funds have become crucial sources of information for many Turkish SNAs. The EU-related activities have been largely initiated by those consultations companies. They were actively pushing SNAs into starting EU related activities, from which consultants in turn may derive benefits (Interview 5). Later, several Turkish SNAs have continued with the creation of post or department for EU tasks in their organization. Survey findings evidently show that 31% of SNAs has a specific EU office. Apart from that, while 15 % has an office called as either international or foreign relations unit, 33 % is planning to have a specific EU office in future. It is worth noting that 18 % does not

³⁵ For instance, info-centre in Izmir (ESIAD) prepared a project called as 'the European Horizons on Anatolian Heaven' in 2002. With this project, it was aimed at training experts, professionals, and students as well as spreading the proper EU information in Anatolian cities (Interview 6). Similar project was also developed by other EU info centres in Turkey. One senior expert who is responsible for the EU info-centre in Gaziantep explained that 'our centre has become hub for the EU information and its role has been widened after the Helsinki Summit of 1999 (Interview 7).

have any office related to the EU matters and they do not plan to have one in future.

The creation of EU offices under different organizations in some instances has caused a sense of competition rather than coordination. The establishment and creation of 'EU Permanent Contact Point' under governorships was recently designed to coordinate EU activities in all 81 cities in Turkey. Such a permanent contact point was the most recent development regarding the awareness-raising campaign at subnational level. While in some cities the governorship took their own 'bottom up' initiatives to create such an office (i.e. Izmir, Antalya, Ankara, Istanbul), others have been created in a top down manner by the Ministry for EU Affairs and the Ministry of Interior. The very creation of such offices under the governorship not only shows the proactive behaviour of the centre towards the EU projects but also addresses the decreasing popularity of the EU at subnational level. One can also speculate that with these offices, the centre might have thought of coordinating all EU activities at the subnational level via the paid officials working in Governorship and therefore it has a chance to control the EU access points of SNAs.

The EU integration process is not only about learning the rules of EU financial management. Various different policies, directives, and rules have been affecting the day-to-day activities of many SNAs in the EU member and candidate states. To illustrate, EU directives and regulations have had significant impacts on service areas such as personnel, trading standards, and environmental health³⁶. Nowadays, around 60-80 %of legislation passed by regional legislatures originates from the EU³⁷. Even if the EU accession process has decelerated for Turkey and there is no anticipated date for the full membership, it may be necessary for those SNAs to be aware of the EU's policies, directives, and procedures because the Europeanization has reached beyond its border.

The best way for keeping up with the developments in the EU is to circulate those directives/legislations inside an office to elevate the awareness not only for the organization itself, but also for other institutions and individuals close to the organization. Given that many Chapters are frozen in the current negotiation process, nearly half of Turkish SNAs (44%) circulates special procedure and/or EU directives inside an office. In as

³⁶ Steve Martin, 'The Effects of EU Regional Policy on Local Institutional Structures and Policies,' in J. Bachtler, and I. Turok, (eds.), *The Coherence of EU Regional Policy*, (London: Jessica Kingsley, 1997), p.55.

³⁷ Carolyn Moore, 'Beyond Conditionality', p. 518

much as the accession proceeds in regional policy and related chapters, one can assume that the circulation of EU procedures and directives might be increased. Related to this, subscription to a specialist periodical about the EU is another important source of information for SNAs. However, a large majority of Turkish SNAs (86%) does not purchase any periodicals. This low-level interest on specialist paper or magazine about the EU may reduce the learning process for Turkish SNAs and be a hindrance for the appreciation of EU opportunities.

To deal with the EU issues and benefit from the numbers of EU opportunities, the certain levels of EU expertise are certainly required from the personnel working as EU expert³⁸. In fact, most of the staff working in SNAs is established and relatively long serving personnel often have come to EU issues from other areas of work, if not adding EU responsibilities to existing ones. Table 1 below evidently reveals that the staff with EU expertise has spent longer time in the organization than their present position.

	Average time spent in the organization	Average time spent in the current position
CMs	7, 9 Years	2,9 Years
MCMs	8,6 Years	3,2 Years
RDAs	1,2 Years	9,5 Months

Table 1: Duration both in the organization and in the current position

The follow up interviews with the representatives from SNAs clarified that for many SNAs, EU matters are still a minor issue, and they mainly engage with the EU project management. It is one of the reasons that the selection of those staff for the EU-related issues usually depends on their ability to speak foreign languages, especially English, rather than their technical expertise on the EU procedures or policies. This is particularly a case for the city municipalities that are eligible for the EU development programmes. What is generally required from these personnel are to search, conduct, and implement the EU funds. Given the complexity of the EU environment and the competition among different SNAs in Brussels, the level of EU expertise is not satisfying. Only recently, a small number of SNAs have sought to recruit staff with skills particularly relevant to EU matters such as having a second language; extensive experience in

³⁸ Catione Carter & Roman Pasquier, 'The Europeanization of Regions as 'Spaces for Politics': A Research Agenda', *Regional and Federal Studies*, Vol. 20, No. 3, 2010, pp. 295-314.

Brussels or Strasbourg; links to networks or other SNAs in other countries. These are appreciated as essential features for the EU campaigner's toolkit.

The best example for these skilled personnel could be seen in the Gaziantep Metropolitan Municipality. For instance, the vice-general secretary of the Municipality worked over 20 years in Strasbourg and Brussels area, and can speak English and French fluently. The EU team working in that Municipality has many talented experts who can speak different languages such as Italian, English, German, and French. Moreover, the volunteer representative of Gaziantep Municipality in Brussels has been living in Brussels for about 40 years and engaged with the EU-related issues in several occasions. Such capable and skilled experts and professionals are also found in more developed and richer cities such as Eskisehir, Bursa, Istanbul, Izmir, Yalova, Ankara, Kayseri, Samsun, and Antalya. These skilled personnel contribute significantly to the mobilization of their administrations through transnational networks. An expert from Izmir reported that especially those working as middle or senior staff in SNAs could be able to adapt themselves to the EU standards, once they have grasped the essential rules of the game (Interview 8). This is, indeed, particularly a case for those staff working in RDAs. The main reason for their easy adaptation to the EU standards is that the current system of project management in RDAs has followed the identical procedures of the EU. Additionally, their extensive networks with their opposite numbers in other EU countries or interregional organizations in Brussels allow them to learn more about the EU politics.

Some experts working in those SNAs also reported during the interviews that although the organization in which they are working for have enough capacity in terms of finance, human sources, and knowledge, there is no political will or leadership in that organization to initiate some steps towards the EU integration process such as applying the EU funds, sister city agreements, or some other transnational activities. Similarly, a freelancer lobbyist in Brussels underlined that the importance of the vision of the leader and their perception of the EU is seen as determining factors as lobbying in Brussels requires a managerial skills and takes a lot of time until obtaining benefits. Yet, many elected officials have a myopic consideration leading them to be inclined to activities that can be rapidly implemented and have an immediate effect so that they can be seen to be delivering their electoral mandate. Overall, the institutional capacity determines the success in mobilization across the EU arena. The institutional capacity here refers to financial strength, the quality of staff, and the visionary leaders. The next section puts more emphasis on the transnational activities of Turkish SNAs through the horizontal and vertical levels beyond Turkish territory.

Transnational Activities through Horizontal Networks

The attempts to engage with transnational networks have become more widespread after the Helsinki Summit of 1999. Although the EU funds have played a major role in this, it would not be possible, if the necessary conditions, i.e. expert, finance, and leaders, were ready in the given SNA context. The survey findings demonstrate that a half of Turkish SNAs has already applied EU funds with their equivalent partner in the EU. Around 40% of SNAs are planning to apply for the EU funds with partners abroad, if they ever have a chance to do so. Only a small amount of Turkish SNAs (5%) did not have any attempt to apply EU projects with their partners from the EU countries and they do not think to do so in the future. Next to this, there is a transnational cooperation and networking of Turkish SNAs with varying degrees ranging from personal contacts to sister city agreements with their opposite numbers in the EU (Table 2). The survey finds seven different types of transnational activities for Turkish SNAs.

Channels	CMs	MMs	RDAs	TOTAL
Reciprocal Visits	45	93	50	52
Sister City	55	93	15	52
Partnerships	49	64	45	51
Participation in Fairs	20	57	80	40
Personal Contacts	26	57	60	39
Participation in Conferences	16	36	40	25
Any of them	22	0	5	14
Via Consultation Companies	10	7	10	9
Others	6	14	5	9

Table 2: Transnational Activities of Turkish SNAs in the EU arena (%)

The most common activity among Turkish SNAs are 'reciprocal visits' with their counterparts in the EU countries (52%), the sister city agreements (52%), and partnerships (51%). More specifically, for the sister city and partnership agreements, one bureaucrat in the Ministry of Interior Affairs expressed, "the application from different municipalities to our ministry regarding sister city or partnership agreements have increased steadily over the last decade. These agreements used to be subject to the

decision of lines of ministers but after the rising demand, it is enough to acquire permission from our ministry only" (Interview 9). Given the EU support for sister city agreements in return for the financial aids, one might expect municipalities to be concerned to build up links with their counterparts in the EU countries. For instance, in 2005, the EU-supported programme, called Civil Society Dialogue, was launched, targeting the link Turkish municipalities with their counterpart in the EU (Interviews 10 and 11). Statistically speaking, there is indeed a sharp increase in the sister city agreements after the Helsinki Summit of 1999, especially towards the EU-27 countries. Table 3 below evidently shows that the sister city agreements with the EU-27 countries have been multiplied more than twelve times, whilst this ratio remained around six-fold with the rest of the world. The number of sister city agreements with EU-27 was 39 before the Helsinki Summit, but it has reached to the level of 413 after Helsinki.

Countries	1993-1998	1999-2012	Ratio
EU-15	24	226	9.4
EU-12 (New Members)	15	187	12.5
EU-27	39	413	10.6
Rest of the World	75	462	6.2

Table 3: Number of Sister City Agreements of Turkish Cities

Source: Republic of Turkey Ministry of Interior Affairs (2012)

Compared to reciprocal visits and sister city agreements, the overall numbers of participation in fairs (40%) and conferences (25%) are relatively lower. These are important channels for SNAs to engage with their opposite numbers in the EU. They are also important for learning and socialization process. By the participation in these activities, Turkish SNAs may become aware of the interregional networks, liaison offices in Brussels. Yet, like reciprocal visits, some of these activities have not advanced more than symbolic courtesy for the elected and paid officials of SNAs (Interview 12).

An interesting point derived from the survey finding is that SNAs hardly ever get assistance from the professional consultant companies (9%). Instead, they prefer to conduct their relations through personal links (39%). Another point is that there were no cross-regional programmes selected by the survey participants. As one can simply point out that Turkish participation in cross-border regions is confined to its regions that have borders to Greece and Bulgaria. Because of Turkey's geographic position,

Turkish SNAs cannot implement wide range of Euro-regions activities. The EU has indeed been supportive of such kind of cross-border relations as in the case of INTERREG Programmes. Overall, the visible proliferation in EU activities over the last decade simply means the volume of EU work at subnational level has increased. Additionally, it shows the rising trends toward the foreign activities, as there are only 14%SNAs in Turkey that have not involved in any horizontal activities across the EU arena.

Mobilizing in Brussels

Relations with the EU have been considered as a field of foreign policy and fallen under the reserved powers of Turkish Government, National Assembly, and several lines of ministers during the most of the time. The rest of the society apart from certain distinguished business or civil society organizations did not participate in any part of the EU integration process before the Helsinki Summit of 1999. Even if a number of SNAs have a great interest in the accession process, these endeavours are, in practice, not really involved in the course of planning and preparation of related reforms and legal adaptations. An interview with the director of foreign relations from the Union of Marmara Municipalities confirmed the sterilization of SNAs in the EU accession process. The said director argued that "the accession issue affects the local authorities much in a top-down way. Even in the case of consultation of various sectors (public bodies, civil society, business world) in relation with some EU-oriented policies, local authorities are generally overlooked" (Interview 13). In the current atmosphere, only the select subset of Turkish SNAs (17 out of 85) conducted direct relations with one of the formal EU institutions: seven of which with the EU Commission; seven of which with the CoR; and six of which with the EU Parliament. It is likely that there are SNAs that contacted more than one EU institution. In any case, these relations have mostly remained unofficial and unorganized. Most of the times, they were symbolic and courtesy visits.

The only way for establishing formal and direct relations with the EU Commission (i.e. DG Regio or DG Enlargement) is through the Sectoral Monitoring Committee (SMC) of the IPA fund management in Ankara. Turkish local and regional actors on a rotating basis have the possibility of joining the SMC meetings. There are, nonetheless, several concerns about the effectiveness of such meetings. These were pointed out by the interview participants both in Turkey and in Brussels. First, the SMC meetings are generally held in Ankara (except for the Human Sources Operational Programme organized by the DG Employment) and therefore it is often difficult for many Turkish SNAs to participate in those meetings. Besides, some local and regional representatives do not feel confident to gather with the representatives from the central institutions, and to raise their voice during the SMC meetings. The second concern is about the duration of the meeting, which generally lasts half a day. Given its massive and varied participants' feature, particularly for the SMC meeting of Regional and Competitiveness Operational Programme, it does not provide enough time and room for SNAs to express their problems or concerns. Finally, the rotation of local and regional actors for the SMC meetings does not allow sufficient time to solve issues consecutively and so that there is no chance for the emergence of collective memory. Although all these concerns currently reduce the interplay between the Commission and SNAs, the representatives from the DG Regio and DG Enlargement explained that they are working towards solving these problems (Interviews 14 and 15).

Aside from the SMC meetings, as noted above, seven SNAs interacted with the Commission in Brussels. The follow up interviews clarified that the relation with the Commission (particularly with the DG Regio) was mainly confined to the opposition municipalities. For instance, two mayors from the CHP party were able to meet with the DG Regio Commissioners, Pawel Samecki, and Johannes Hann, respectively (Interview 16). These meetings were conducted through personal and party links. Next to this, the most organized visit to the DG Regio was held by the mayors of the Union of Social Democrat Municipalities (SODEM) in 2011.

The relations of Turkish SNAs with the CoR require a special emphasis since it is a good example for showing the sensitivity of Ankara towards the relations between Turkish SNAs and the EU institutions. Although the CoR does not have a status of institution, it is considered as a consultative body. As a political platform in Brussels, all local and regional actors are actively engaging with the EU facilities. Their main priority is to influence the EU decision-making process. All members are elected with a local mandate and they are appointed by the government. SNAs from the candidate states also can take part in the CoR activities. For the Turkish case, on December 2006, the CoR Bureau gave its approval for the RELEX commission to set up a working group to monitor the enlargement process with Turkey, in accordance with Rule 35i of the Rules Procedure. The members are requested to decide on the working group's objectives, mandate, and working methods. This working group provided the direct involvement possibility for Turkish SNAs in the EU issue since 2007.

The Working Group of the CoR for Turkey gathers twice a year, once in Brussels, and once in Turkey. Although it is not an obligatory, the CoR can hold a meeting in any Turkish city upon the invitation of local or regional representatives (Interview 17). Up until now, four meetings have been taken place in Turkey (Istanbul, Gaziantep, Izmir, and Muğla). The issues discussed in these meetings are related to governance, decentralization, regionalization, shared competences, shared capacity, capacity building, administrative management, and fiscal decentralization. For instance, in the last meeting in Muğla in 2012, the discussion was centred on how Turkish SNAs are involved the process of writing the new civil constitution. Apart from the working group, the CoR called for the establishment of a Joint Consultative Committee (JCC) with Turkey. In fact, each candidate country signed the accession have the possibility to include in that agreement a chapter or paragraph allowing the establishment of JCC between the CoR and the candidate countries (Interview 18). JCC means that 50 percent of local and regional representatives from the EU sit at the same table with 50 percent of local and regional representatives from Turkey. JCC members together follow the implementation of the chapters and the implementation of acquis communautaire and the negotiations of the chapters with which they are concerned.

During the interviews in the CoR, it was reported by both the political and administrative staff of the CoR that in the association agreement, there is a paragraph allowing for the establishment of the JCC for Turkey. Upon reading this paragraph, in 2009, the President of the CoR informed the Turkish government with a letter requesting Ankara to take formal initiatives to allow the establishment of JCC. Setting up a JCC is dependent on an official request from the Turkish government; however, this has not happened so far (Interview 18). The JCC is a more formal platform of bilateral cooperation compared to a unilateral working group as in a JCC meeting Turkish local representatives would have co-presidency and voting rights. As a result, while the national parliament (through the EU-Turkey Joint Parliamentary Committee, established since 1965) and the civil society and business world (through Joint Consultative Committee with the EU Economic and Social Committee, established since 1995) interact officially with their European counterparts, Turkish SNAs do not enjoy such possibility.

There are two dominant views for explaining the resistance towards forming a JCC with Turkish SNAs. The first considers that the AKP government does not desire to see different voices, apart from its official dictum, in Brussels, and therefore it closes all-possible doors for Turkish SNAs' interaction with the EU institutions. Certainly, Ankara would not be happy to see, if there were mayors or representatives particularly from the BDP (the so-called Kurdish party) in the JCC meetings. Yet, on the other hand, the second view observes this situation as the EU is not serious about Turkey's membership and often makes excuses. For them, Turkey would like to see concrete steps, i.e. a full-membership. Joint consultative community, working groups, or networks at any governmental levels do not satisfy Ankara's expectation. The common question for this group is that if there is no EU membership perspective, why should SNAs go to Brussels? This is a strong rational consideration ignoring the non-material benefits of mobilizing in Brussels such as learning the best practices, improving local and regional democracy, or disseminating the good governance principles.

It is at this point relevant to emphasize that regardless of Ankara's futile effort for gatekeeping the access to the EU institutions, the opposition municipalities mainly from the CHP and BDP enjoy their relations with the EU institutions. For instance, while the local representatives from the BDP generally use the Green Party and Nordic group in the EU Parliament to interact with the EU institutions and raise their voice through these links, the CHP municipalities have their link with the social democratic group in the Parliament (Interview 19). More importantly, three MEPs (Turkish origin), one from Netherlands, one from Germany, and one from Bulgaria, are also there to contact with the Turkish SNAs and deal with their problems (Interview 20). During the interviews in selected regions, it was commonly reported that one of the main contact points in the EU parliament is to see these Turkish MEPs. Yet, SNAs' relations with formal EU institutions have heretofore remained limited and largely based on personal and party political consideration. In comparison to other enlargement countries, inter alia Poland, Czech, during their accession round, an official from the EU Parliament reported that, Turkish SNAs showed less interest from the beginning, though there has been a growing interest in recent years (Interview 21). The said official also remarked that it would be fantastic to see different cities and regions from Turkey in the EU Parliament because the function of rising awareness is important and MEPs or staff in the EU Parliament would be happy to see different parts of Turkey, not only Istanbul, Ankara, and Izmir. As an example of such events, the city of Bursa organized 'the Bursa Days in Brussels' with huge numbers of participants, though participants were predominantly Turkish (Interviews 19 and 20).

Alongside the interaction with the EU institutions, participating in the interregional organizations is another way of showing subnational mobilization. The past three decades have witnessed a growing number of interregional organizations bringing together many SNAs from the EU member (and candidate) states in order to promote and represent common interests at the EU level (Bullmann, 1997, p. 13). These organizations include, inter alia, the Assembly of European Regions (AER), the Council of European Municipalities and Regions (CEMR), the Conference of Peripheral Maritime Regions (CPMR), the European Association of Regional Development Agencies (EURADA), and the Eurocities. According to survey findings, while 33 % SNAs are engaged with at least one of these interregional organizations, on the other hand, the rest (67 %) has not yet involved any activities or shown interest in becoming a member.

The remarkable point is that with the 80%participation rate RDAs brought dynamism to the engagement of SNAs with the interregional organizations, mainly with the (EURADA). The EURADA has become a starting point for those RDAs in Turkey to be involved in wider European politics. For instance, by the end of 2011, the general secretaries of two RDAs, the Middle Black Sea, and Izmir Development Agencies, were elected to the executive board in EURADA (Interview 22). As for the municipalities, the level of participation from the city municipalities and metropolitan municipalities with the interregional organizations is relatively lower than that of RDAs. Eurocities as a network of the major European cities is seen as a popular destination for Turkish municipalities. It brings together the local governments of more than 140 large cities in over 30 European countries and seeks to influence and work with the EU institutions to respond to common issues that affect the day-to-day lives of Europeans. According to the survey results, two CMs, and three MMs are involved with the Eurocities' activities. Apart from the Sanliurfa municipality, located in the southeast part of Turkey where the cities are relatively less developed, other municipalities like Istanbul, Izmir, Bursa, and Yalova are situated in the well-off part of Turkey.

In addition to the survey findings, the primary and secondary research revealed that the participations of SNAs in certain interregional organizations, i.e. the Assembly of European Regions (AER) and the Conference of Peripheral Maritime Regions (CPMR), were in fact conducted by provincial level. As explained, local administrative systems in Turkey have three subnational units: Special Provincial Administrations, Municipalities, and Village. Today, seven cities through their respective special provincial administrations have become a member of the Assembly of European Regions (AER), which is the largest independent network of regions in wider Europe. Bringing together 270 regions from 34 countries and 16 interregional organizations, AER is the political voice of its members and a forum for interregional co-operation. At present, fifteen Turkish provinces through their respective special provincial administrations have joined the Assembly of European Regions (AER). After the membership of Kahramanmaraş to the AER in 2006, fourteen cities have followed suit. During the Michele Sabban's tenure as a president of AER, it was proposed to open a satellite office in Istanbul in April 2011. Given that the first connection with the AER started in 2006, one can argue that the participation of Turkish provinces has grown and the relations are becoming expansive. Moreover, one of the four vice-presidents for the AER, Hande Bozatlı, is from the Turkish delegation. She is also the President of Committee 3 (Culture, Education, Youth, and International Cooperation).

Regarding the CPMR, it also seeks the provincial participation. In its dealings with EU institutions and national governments the CPMR has been targeting its action towards ensuring that the needs and interests of its member regions are taken into account in all its policies with a high territorial impact. In particular, it is striving to ensure a strong EU regional policy targeted at all of Europe's regions and also working towards the delivery of an integrated maritime policy designed to contribute towards Europe's economic growth. Turkey is encircled by seas on three sides- the Aegean Sea to the West, the Black Sea to the North and the Mediterranean Sea to the South, and the Sea of Marmara in the northwest. Although 28 municipalities in Turkey have a coast, only seven cities (located on the coast of the Black Sea and part of the Aegean Sea: Çanakkale, Edirne, Kırklareli, Samsun, Sinop, Tekirdağ, and Trabzon) participated in this organization.

It is also worth noting at this point that the Union of Turkish Municipalities (UTM) became a member of the Council of European Municipalities and Regions (CEMR) in 2010 and they are planning to establish an office in Brussels, if the Ministry of Interior permits them to do so (Interview 4). The UTM has concluded with a number of bilateral agreements with partner associations in the EU. The CEMR membership is particularly important as a foreign affairs expert from the UTM stated, "this participation symbolises that Turkish local administrations have became part of the EU, even before the actual accession of Turkey as a country" (Interview 23).

As for establishing an office in Brussels, the Turkish case has hitherto showed a low level of mobilization compared to the previous accession states, particularly Poland and Romania before these counties' accession

to the EU³⁹. Two regional offices were established by the municipalities of Istanbul and Yalova in 2008, respectively. Yet, the municipality of Yalova closed its Brussels office because of legal and economic problems (Interview 24). With a population of 13 million, Istanbul is one of the biggest metropolises in Europe and bigger than the 17 EU member states in terms of population, but it has just opened up an office in 2008, though staffed by only one person. Compared to an average of 1.6 members of staff from new member states, having one person in Brussels is not sufficient for Istanbul, one of the biggest megacities in the world⁴⁰. The municipality of Istanbul delegated its office to the institute of Yunus Emre in 2011. Although other municipalities, such as, Tuzla (the district of Istanbul), Kayseri, Osmangazi (the district of Bursa), some Izmir municipalities under the name of the house of Izmir, tried to establish an office, they did not succeed. Survey results reveal that establishing a regional office in Brussels is on the agenda of two municipal cities, two metropolitan cities, and two RDAs. While nearly half of Turkish SNAs did not consider opening an office in Brussels, almost one-third of respondents had no idea about liaison offices in Brussels.

The immediate problem for establishing an office in Brussels derives from the legal obstacle (decree law of 189/3). Local administrations as well as RDAs are not allowed to have representation or liaison offices abroad, as their organic laws do not foresee such a possibility. This pushed the few local authorities determined to open an office in Brussels (e.g. Istanbul Metropolitan Municipality) to circumvent the law and to act via their affiliate companies or NGOs (Interview 13). The methods used by different municipalities vary: in the case of the municipality of Istanbul through its affiliate organization (Istanbul Culture ltd.); of Yalova through one nongovernmental organization; and of Tuzla through one non-government organization and private company partnership. Such an indirect approach decreases the transparency and accountability in the management, both administrative and financial, of these offices. In the final situation, there is only one volunteer representative of Gaziantep municipality working as listening post without any physical place in Brussels (Interview 20).

³⁹ Before their respective state has become a member of the EU, 11 Polish SNAs and 6 Romanian SNAs opened Reginal Offices in Brussels. the regional offices contact directory, http://ec.europa.eu/regional_policy/conferences/od2008/doc/pdf/catalogue_en.pdf (Accessed on 27th November, 2011).

⁴⁰ Germany has the largest representations, with an average of 9.3 members of staff. Spain also scores highly with 8.8 representations from Austria, Denmark, and Finland on the other hand have an average of 3 to 4 employees. For further detail see, Michel Huysseune and Theo Jans, 2008, Representations of Local and Regional Governments to the European Union, Final Report.

CONCLUSION

This article has discussed whether there is an engagement and interplay between supranational and subnational level institutions in Turkey after the Helsinki Summit of 1999. Such an engagement is considered within the context of the Multi Level Governance approach. The empirical reference for this has often been seen in the context of EU regional policy and structural funds. Since the EU regional policy not only affects the existing intergovernmental relations in the target country but also creates new opportunity structures and a new political space for political action and territorial interests of SNAs beyond the national level⁴¹. Yet, there is no thorough analysis to illustrate the activities of Turkish SNAs for the EU matters. This was the main motivation behind writing this article.

The key findings suggest that the increasing recognition and empowerment of subnational level during the EU accession process has been manifested in three main areas of subnational activity. First, there has been a growing awareness and recognition of the impact of the EU on day-today politics of SNAs in Turkey. Second, some Turkish SNAs have become increasingly pro-active in seeking to maximise the benefits in terms of the amount of EU financial incentives, accruing to their areas by recruiting staff, creating post, etc. Third, recent years have witnessed a burgeoning in the number and range of horizontal activities between Turkish SNAs and their counterparts in the wider EU area in terms of sister city agreements, reciprocal visits, twining projects. Moreover, there are some forerunner Turkish SNAs, which have already engaged with the EU institutions either by establishing (or considering to establish) offices in Brussels or joining the inter-regional networks. These changes confirm the trend towards multi-level polity, yet the ongoing developments remain to be seen.

Changes at subnational level are found within the incremental adjustments and developments of organizational and/or administrative routines such as recruiting staff, creating EU offices inside the organization, subscribing journals related to the EU policies, and distribution of EU information inside the office. These changes provide SNAs to with some opportunities to learn and imitate from the other institutions within and beyond the national settings. The changes, however, are not equally apparent in all SNAs. Whereas the adaptation process is high and swift in some SNAs, it can be low and incremental in others. Even in some cases, it is non-exis-

⁴¹ Hussain Kassim, 'The Europeanization of Member State Institutions' in Bulmer, S. and C. Lequesne (eds.) *The Member States of the European Union*, (Oxford: Oxford University Press, 2005), pp. 285-316.

tent. Interviews with representatives from SNAs in different cities clearly underline some likely factors affecting the learning curve and readiness of SNAs to the adoption of Europeanization process. Such factors include organizational capacity in terms of finance, expertise and leadership as well as regional capacity in terms of social capital and networking culture. Yet, to examine which factors at work, one needs to undertake further research.

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Interview Participants

- #1: Senior Planing Expert in General Directorate of Regional Development and Structural Adjustment, Ministry of Development, Ankara, (12.04.2011).
- #2: Head of Department in General Directorate of Regional Development and Structural Adjustment, Ministry of Development, Ankara, (19.04. 2011).
- #3: Sector Manager in Regional Development and Cross Border Cooperation, Delegation of the European Union to Turkey, Ankara, (13.04.2011).
- #4: Secretary General, The Union of Municipalities of Turkey, Ankara, (26.04.2012).
- #5: EU Coordinator, Municipality of Sarıyer, İstanbul, (15.12.2011).
- #6: Expert in EU Info Centre, Association of Aegean Industrialists and Businessmen, İzmir, (09.12.2011).
- #7: Gaziantep Chamber of Commerce, (Deputy Secretary General) and (Senior Expert in EU Info Centre), Gaziantep, (02.12. 2011).
- #8: EU Expert, İzmir Metropolitan Municipality, Izmir, (08.12.2011).
- #9: Head of Department, Ministry of Interior, General Directorate of Local Authorities, Ankara, (13.04.2011).

- #10: Head of Department, Ministry of European Union, Directorate for Social, Regional and Innovative Policies Director, Ankara, (14.04.2011).
- #11: Head of Department in the Implementation of Projects, Ministry of European Union, Ankara, (15.04.2011).
- #12: Economic Policy Research Foundation of Turkey (TEPAV), Interviews in Governance Studies, Coordinator and policy analysts, Ankara, (14.04.2011).
- #13: (Former) Director of International Cooperation, Union of Municipalities of Marmara, İstanbul, (15.12.2011).
- #14: Deputy Head of Unit, IPA/ISPA, Accession Negotiations Team, DG Regio, Brussels (21.06.2012).
- #15: Programme Assistant-EU Policies Turkey, DG Enlargement, Brussels, (19.06.2012).
- #16: Representative to the EU, Member of Socialist International, Republician People's Party (CHP, Turkish Acronym), Brussels, (19.06.2012).
- #17: Desk Officer, the CoR, Brussels, (18.06.2012).
- #18: Policy Advisor in PES Group Secretariat, the Committee of Regions, Brussels, (18.06.2012).
- #19: Free Lancer Lobbysist, Glocal, Brussels, (21.06.2012).
- #20: Honorary Representative EU-Belgium for the Metropolitan Municipality of Gaziantep, Brussels, (21.06.2012).
- #21: Head of Unit, Enlargement and European Economic Area, European Parliament, Brussels (21.06.2012).
- #22: Secretary General, the European Association of Development Agencies, Brussels, (Email Interview, 17.07.2012).
- #23: Expert, the Union of Municipalities of Turkey, the Department of International Relations Ankara, (11.04. 2011).
- #24: Expert for Local Administrations, the Municipality of Yalova, the director of Local Agenda 21, Yalova (phone interview on 02.04. 2010).

APPENDIX 1: SURVEY PARTICIPANTS (The Name of Organizations)

City Municipals (CMs)	Metropolitian Municipalities (MMs)	Regional Development Agencies (RDAs)
 Adiyaman CM Afyonkarahisar CM Afyonkarahisar CM Ağrı CM Aksaray CM Artvin CM Ardahan CM Artvin CM Aydın CM Balıkesir CM Balıkesir CM Bayburt CM Bayburt CM Biecik CM Bitlis CM Çankırı CM Çankırı CM Corum CM Çankırı CM Denizli CM Düzce CM Edirne CM Giresun CM Giresun CM Hatay CM Hatay CM Hatay CM Hatay CM Siğdır CM İşorata CM Karabuk CM Karabuk CM Kastamonu CM Kitis CM Kathramanmaraş CM Kütahya CM Maltya CM Simak CM Simrak CM Sirnak CM Sirnak CM Yalova CM Yalova CM Yalova CM 	1) Adana MM 2) Ankara MM 3) Antalya MM 4) Diyarbakır MM 5) Erzurum MM 6) Eskisehir MM 7) Gaziantep MM 8) İstanbul MM 9) Kayseri MM 10) Kocaeli MM 11) Konya MM 12) Mersin MM 13) Sakarya MM 14) Samsun MM	1) Ahiler 2) Çukurova 3) Doğu Anadolu 4) Dicle 5) Doğu Akdeniz 6) Doğu Marmara 7) Fırat 8) Güney Ege 9) Güney Marmara 10) İpek Yolu 11) İstanbul 12) İzmir 13) Batı Akdeniz 14) Karacadağ 15) Kuzey Doğu Anadolu 16) Kuzey Anadolu 17) Mevlana 18) Orta Karadeniz 19) Trakya 20) Zafer