Defining the Role of Cultural Policy in Cultural Impact Assessment

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Abstract

The role of cultural policy in cultural impact assessment (CIA) is unclear. CIA practises include two separate approaches: the first is interested in the impacts of cultural policies on the rest of society. The second regards culture as one, usually marginal factor in the other disciplines of impact study. The indicators and criteria employed in cultural impacts are many and varied, and often lack context sensitivity. The indicators are commonly subordinated to system-specific or other normative goals. In this presentation I try to construct a model in which cultural policy would operate as a co-ordinator for cultural issues in the process of assessing various forces which impact on society. Moreover, the paper claims that cultural policy should try to neutralise its own normative orientations. This might be achieved by strengthening the role of group-based analyses in its analysis models.

Introduction

The object of this study was to investigate how the political goals, and the actual contents of *the cultural dimension of development* affect the more or less established system of *cultural impact assessment* (CIA). The focus was on how cultural indicators are created, and on the relation between those indicators and the ways in which cultural impacts are assessed in the strategies of cultural policy and in a selection of international studies with cultural impact as their main subject.

For more than ten years now, a number of cultural congresses and projects have emphasised the significance of the cultural dimension of development (OCD 1995; IFM 1995; Unesco 1996; Harrison & Huntington 2000; Valdés 2002; Mercer 2002). According to several experts, emphasis on the cultural dimension requires that the overall development should be approached and analysed with reference to cultural indicators, and not exclusively in terms of economic or political indicators.

The political missions of this cultural orientation vary. Some say that cultural diversity, like biodiversity, should be protected from global threats. Others, on the other hand, claim that culture explains differences between successful and deprived communities, and consequently should be regarded as a goal for cultural strategies. These ideas have certainly reinforced orientations towards impact assessments in the fields of cultural

policy. With these concepts – cultural dimension and cultural diversity – the primary question is no longer whether cultural impacts should be assessed, but which phenomena the assessments should be based on and how.

It is self-evident that culture, the most essential concept of cultural policy as well as of CIA, is simultaneously one of the most complicated concepts of empirical research. Many contemporary scholars claim that culture is little more than an artificial, anthropological or mentalist construct created in order to provide a demarcation line between groups of people, *a difference-maker* (see e.g. Wicker 2000: 36 – 37). As such it is a contextual and constantly-changing reflection of social being, doing and behaving. This basic assumption is present in many analyses of cultural policy – even if culture takes on a more practical form in other (empirical) parts of these studies.

Therefore, I analysed the above-mentioned strategies and studies; asking myself how the indicators of cultural impacts have been constructed in respect of the relative and contextual nature of culture. Moreover, I asked what can be the role of traditional cultural policy in this respect, and what kind of pressures a larger role would impose on its methods.

The Difference between Cultural Policy and Other Culturally Oriented Assessment Procedures

A basic difficulty with CIA has always been that there is no consensus as to what it really means. For traditional cultural policy-makers, an impact assessment means the evaluation of their field of interest, cultural administration. Such evaluation is made in terms of indicators and criteria that suit their political goals and values. For the larger system of assessment – including economic, environmental, social, health and technology impact assessments – cultural impacts have so far been regarded as sub-indicators, something that has to do with human values, habits and states of mind (see e.g. Barrow 2001).

Cultural policy traditionally applies a narrow and quite normative model of culture. This model includes the arts, heritages and, depending on the national context, various other activities. From the political point of view, there is nothing wrong with that. All policy sectors have normative priorities based on their specific expertise (criteria for, for instance, mortality or emissions). Rather, the problem is that cultural policy-makers seem unwilling to admit these hierarchies.

Other impact assessments, on the other hand, are so dependent on the practices and priorities of their own fields that their cultural analyses are regarded as "culturally shallow" (e.g. Hunt 1999; Castro & Alarcón 2002). In these cases culture is a strictly limited factor of, for example, environmental or economic impacts.

However unintentional these limitations may be, they have, in both these areas, resulted in some fundamental problems as far as the cultural dimension of development is concerned. Both approaches suffer from *cultural blindness;* meaning that many cultural groups, positions and, therefore, cultural characteristics are ignored, or interpreted narrowly in terms of the strategic goals of cultural policy, land use or national economics. The concepts of culture are operationalised as essential and inwardly static categories. This lack of cultural sensitivity has resulted in cynicism, hostility and lack of trust between the analysts and marginalised groups (O'Faircheallaigh 1999: 64; see also Barrow 2001: 51). It appears difficult to understand, for example, the special significances indigenous minorities may attach to land that is planned for industrial use,

or the changes which may be brought about in the culture of a community as a result of immigration.

Thus, in both cultural policy and in the larger system of impact assessment the operational concept of culture is derived from sources that themselves should be objects of analyses. To ensure the credibility, validity and efficiency of any assessment practise it is crucial to recognise the limitations that traditional methods impose on cultural analyses.

The Determinants of Contemporary CIA

Contemporary assessment practises have faced plenty of criticism directed towards their methodological and theoretical lightness. The criticism has been basically fair, in view of the narrow theoretical background of assessment practises, but it has not offered alternatives. In order to avoid the total lack of a cultural factor in different political analyses, the problems should be addressed by analysing the determinants of the processes themselves. In my analyses I identified four general types of factor that determine the identifications and definitions of cultural impacts.

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1. Lack of unambiguous indicators
2. The formal nature of cultural indices
3. Lack of contextualisation
4. Aim at the desired impacts

In order to analyse impacts one needs unambiguous indicators. As an operational concept an indicator means a point at which a reaction concerning a variable has fully ended. Thus, the indicator of cultural impact would be a point, where a cultural impact has taken place; *cultural cause/effect -relation* has been realized.

However, if the argument that culture is little more than a difference-maker, and as such a relative concept, is accepted, how may the points at which a cultural impact has been realized be identified. The fundamental problem for both cultural policy and the larger system of impact assessment seem to derive from a concept of 'culture' that varies not only in its theoretical definitions, but also according to its linguistic and administrative uses. The remaining problems are more or less results of this fundamental one.

The formality and system-specific orientation of cultural indices means that the practises of particular systems direct the definitions of culture. What effects does this have on cultural policy? The ideal task of cultural policy is to recognise culture (cultural groups, artefacts, phenomena or attitudes), and to allocate resources and legitimacy to – or sometimes even to deny and remove them from – the recognised cultural entities. In this sense, cultural policy would be responsible for public cultural needs in general, whereas other policy sectors pay attention to culture only when it is a functional factor in their specific fields.

In reality, cultural policy-makers are not anxious to assume this responsibility. Rather, cultural policy has avoided extension beyond its traditional field of supporting and promoting selective arts and heritages. The official descriptions of culture seem to be unable or unwilling to recognise the overlapping, interpretative and contradictory dimensions of culture (see e.g. Häyrynen 2002). This is partly due to the limitations of the prevailing systems, legal instruments and other institutional conventions. It may also

be suspected that the cultural policy community considers a potential extension of its administrative responsibilities risky for the convenience of the prevailing system, even though it has become evident that the cultural dimension is an important factor in the development of arts and heritage policy as well.

This organisational inflexibility has many consequences for the definitions of culture. First, the content of culture depends on the practical agenda and conventions of an organisation and, consequently, on the relative strength the organisation has in the deep systemic and normative structure of a given society. Thus, the content of culture will finally be designed by the division of responsibilities and influence between the sectors of political society.

Second, a system-specific orientation constantly avoids the definition problem by using formal measures of culture. A quotation from a report prepared for the Finnish Ministry of Education reveals a typical short-cut: 'this cultural life index would reflect the organised and formalised aspects of cultural life that can be measured, and not the individualised and less formalised aspects of culture' (Picard etc. 2003: 5). Analysts tend to use statistical analyses which require established and universal categories of cultural consumers, finance, and creators, and established and universal categories of cultural labour or culturally valuable landscapes.

Statistical and formal approaches are certainly relevant and sometimes even indispensible for cultural analysts trying to make their field more understandable and to evaluate its position in the structures of political society. Moreover, statistics can give analysts some basic knowledge concerning distinctive cultural factors. For example, comparison of the numbers of domestic films produced before the 1970s in two quite similar countries, Finland and New Zealand, makes it easy to study the impacts of linguistic and historical conditions of the film production.

However, considered within these formal categories culture becomes a dependent variable, something to be explained by organizational, economic and other such "hard" independent variables (see also Patterson 2000, 203). Formal categories are not sufficient for analysing ongoing cultural development, which is by definition dynamic and changing. Otherwise, it would not be development. The tendency to naturalise culture is particularly intractable with regard to the question of quality control within cultural administration. Regardless of political ideology – liberal, liberal-democratic or even totalitarian – the purpose of cultural investment is not usually to generate a certain amount of art but to produce art of a certain quality.

The requirements of universal and formal measurement lead us on to the next problem of CIA, i.e. the lack of contextualisation. The use of universal cultural measures certainly does provide a baseline for operational analyses and statistics; but at the same time, such measures wrongly homogenise cultural impacts occuring in different circumstances. Seemingly similar cultural phenomena or institutions can have a totally different meaning for different groups of people (see also Keating etc. 2003). To take one example: The enforcement of legislation protecting children was not the same in Britain (1989) and in Ghana (1998). The reason was not variation in the letter of the law in these countries, but the different values concerning, for example, gender equality (Laird 2002) or the roles of age groups (Etounga-Manguille 2000).

The attempt to construct universal cultural indicators has meant huge gaps between the definitions of cultures and the actual implementations of their definitions. A usual means to overcome these gaps has been to define culture as a limiting attribute by using – not seeing – it as a difference-maker. Many cultural policy analyses offer somewhat universal categories of, for instance, cultural service, cultural industry, cultural capital

and cultural resources, categories that group the cultural field into appropriate slices which are thought to have some effects for the rest of the society.

In these interconnections culture is often presented – usually after long-winded discussions on the difficulties of defining culture – as a neutral concept that suddenly needs no specific definition. 'Culture is a significant industry sector in its own right' (Mercer 2002). Instead, the concept will be determined from two directions: first, from the actual content of an affix (selected industries) and second, from the general normative orientation of society at a given time (what should the government do with the industries).

The wide definition of culture seems to be no more than a politically-correct cover for strictly institutionalised purposes. In other words, despite their anthropological definitions, assessments do not apply or see the concept of culture as a dynamic factor, or as an impact, but rather as an essential and static category determining assessment processes from the first idea to the final monitoring. This has reinforced a one way cause/effect -relationship in the analysis of cultural impacts. As a predetermined category, culture should radiate physical, economic or political effects of some kind to the outside world; but is not an area where reaction is changing.

The harmonisation of the contents and significances of culture may mean a cleansing of small and grass-root phenomena from the agenda of cultural policy in order to match to the rest of public policy. Therefore, the harmonisation process may be capable of taking local specialities into consideration only if they are applications of strictly-defined global formats, such as local flavours in McDonalds. Regardless of how good are the intentions (human rights, democracy) these formats also limit the space available for implementing them.

It is stated here that system orientation and, consequently, a lack of contextualisation have been major reasons for cultural blindness in assessment practises: the imposition of ideas of civilization which are based on majority norms or other hegemonic values have in many cases meant that people also abandon many important traditional practices, vital for themselves and maybe for us all (traditional ways of surviving from diseases, social deprivation, or storms).

Therefore, political norms are carried into relativist cultural policy through the back door; a process known as the self-replicating impact circle. The idea has been so dominant in CIA that it gives the impression of a dedication to prearrange the culture concept into a form that satisfies certain strategic requirements and produces <u>desirable impacts</u>. Increasing assessment markets have created competition for the *best results* or the positive externalities of culture on public economy (Myerscough 1988), life expectancy (Konlaan etc. 2000) and social capital (Matarasso 1997). Of course, these desirable impacts may have strengthened the political exchange value of cultural policy and other cultural strategies. However, the possible promotion value has accrued mainly to administrative actors, and recognition of the significance of cultural impacts has not necessarily been promoted.

This cannot be what the cultural dimension of development is all about. Undoubtedly, the inventors understood the notion of 'culture' in a much more profound analytic sense. In reality, cultural patterns interact with structural ones, sometimes unpredictably, to produce both desirable and undesirable outcomes (Patterson 2000, 215). For example, new technological innovations have different social and moral impacts on different groups of people (Valdés 2002, 7). The compulsory desirability of impacts would require too much prearrangement from cultural analyses to be valid anymore. An operational

regulation such as this would weaken the social significance of seemingly unnecessary, but nonetheless real, cultural characteristics.

The tendency towards operational selectivity is highlighted in parts of *Culture Matters* (Harrison & Huntington 2000), a book in which several researchers explain the deprivation of certain nations and groups as the effects of culture. For example, Huntington explains the difference between Ghana's and South Korea's GDP per capita in terms of different values: South Koreans value thrift, investment, hard work, education, organization and discipline. Ghanaians have *different values*. These 'different values' apparently fill the notions of irrational or even immoral behaviour in the western vocabularies.

Figure 1. An example of value selection in contemporary cultural analyses

	Desirable impacts	Unwanted impacts	Irrelevant impacts
Indicator/criteria	-Economic prosperity -Political success of Western democracy	-Restrictions to free competition -Other political systems	-Non-recognised (unless moving into the area of bad or good impacts).
Impact maker	-Western values	-Irrational behaviour	-Negative impacts of Western values -Positive impacts of 'different values'

Approaches such as this have gained popularity among those cultural strategists who are tired of 'radical relativism'. By far the largest proportion of CIA has been much more interested in searching for *necessary conditions* to fulfil the economic and political expectations of some hegemonic core interests than in presenting concerns about the effects these economic and political calculations have on cultures. Some studies on the social impacts of large industrial projects on indigenous peoples form an exception (e.g. O'Faircheallaigh 1999: 63 – 64; Graham 2002), but even then members of minorities have experienced that they only decorate larger interests.

The methodological problem is a tremendous selectivity among the cultural factors or impact makers. Comparisons between dramatic examples of, for instance, gender inequality and so-called *western values* feel unfair, and are also fatal for the validity of the analyses, because not only 'different values' but also 'western values' are exemplified by chosen representations. The unwillingness of the industrialised countries to lower the amount of emissions is also a western value and has significant impact in and between almost every culture on the earth. On the other hand, the unequal number of immigrants and indigenous peoples in lower-paid jobs do not necessarily reflect a value-based choice made by them, but is more likely to be something forced on them by the social environment.

In making these selections a danger exists that culture becomes something that explains causality if nothing else can. However, naturalised cultural indicators are usually colonised by the social facts of a responsible institution. Different cultures have various, more or less divine, explanations for good and bad (see e.g. Sewpaul 1999). The positive imago is, therefore, highly dependent upon the moral orientation of a given

society or the economic standards of a given situation. Joseph Goebbel's' cultural policy might have attained good results by the standards of the Third Reich.

My contention is that the criteria for successful cultural policy should extend beyond immediate or socially arranged impacts. I am not saying that all cultural representations need to be protected. There are plenty of studies on behaviours and values that can be described as ethically untenable (e.g. Sukthankar 1999, 174). Cultural policy is justified, for political reasons, to regard some phenomena as positive and some others as negative or meaningless. Yet, in the analysis of cultural impacts, and in the assessment of their own actions, cultural policy-makers cannot ignore any impact without weakening the special meaning and self-identity of cultural policy both as public policy and as an academic field. It is not enough to announce that culture is applied in its largest possible meanings if the methods, indicators and other standards used do not allow any room for this to happen.

How Can Cultural Impacts Be Assessed?

The first and most important requirement for the analysis and assessment of cultural impacts is simple: some impact becomes weaker or stronger because of a factor that can be defined as culture. The rationale of this impact is based on the deviations culture causes to other sectors or factors (geographical location, degree of democracy etc.).

It is not at all difficult to find impacts which can be taken as cultural. Though cultural fault lines do not necessarily replace political or economic lines (comp. Huntington 1998), the political significance of ethnic and religious differences has risen throughout the world. Moreover, not only artefacts (Murphy 1995) but languages (Milloy 1999), traditional habits (Kumar & Curtin 2002) and entire communities (Daes 1997) have become endangered as the more or less intentional side-effects of economic, political and cultural globalisation. New type of cultural sensitivity is also needed in the conventions of everyday life such as education (Sukthankar 1999), labour policy (Hammer 1997) and health care (e.g. Castro & Alarcón 2002). These examples produce strong arguments on behalf of a larger and organisationally more credible system of CIA.

One question that is constantly thrown up by cultural policy evaluations, as well as by the other analyses with a cultural orientation is how culture can be separated from non-cultural features. Even the most detailed conceptualisations seem to be unable to take individual or collective cultural deviations into consideration in a way that would meet the requirements of methodological validity.

Public policies usually treat different groups of people consistently with the normal behaviour of the majority, or social leaders, applying *a priori* evaluative assumptions about the sources of rational and irrational behaviours (Hunt 1999). Further, the criteria of CIA have been readily accepted as being good for a community as a whole. For instance, to limit the concept of *cultural capital* only to cultural services and goods (e.g. McKinsey 2002) implies that culture is not a socially relative concept but a similar resource and capital for all people.

However, the determinants of complex cultural processes are invariably plural and interrelated. Cultural groups are different, and impacts between them therefore varying (O'Faircheallaigh 1999: 64 – 65). Some minority groups are deprived according to almost every indicator of social welfare. Whatever an impact is in these subgroups, it will be culturally dependent. That is why CIA should apply a particulate theory of culture, a theory about the 'pieces' of culture, their composition and relation to other things (e.g.

Patterson 2000: 208), and that is why CIA should be sensitive to the variation between group-based cultural reactions.

For group-based approaches the value of assessment does not depend on whether a cultural impact is desired or not. As have been already said, intentions are usually interpretative, and their future articulation is almost impossible to predict. According to Söland's (1998) study on the 1989 *Gay and Lesbian Partnership Legislation* in Denmark, the largely-approved law simultaneously committed gay men and lesbians to a profound form of gender conformity and drew a clear boundary between "conservative" and "radical" homosexuals (Ibid: 66). Even the most obviously well-meant intentions can generate new "others".

Identities seem to be intractable norms but they may be useful tools for analysis. In a group-based analysis the identification and recognition of cultural problems has to be carried out based on a less formalised interpretation of culture. Moreover, though system-specific attention is occasionally needed, culture cannot be divided only into environmental, economic, or health questions. People carry on their culture everywhere, and the same culture may have different functions in different fields.

Figure 2. The matrix of group-based analysis

Type of actor	Nature of actor	External attitude
Defining a cultural group (*on linguistic, ethnic, religious, age, gender, socio-economic, artistic etc. lines*)	Describing the characteristics of a cultural group regarding its social context (*e.g. physical attributes, sources of symbolic hierarchy and capitals, attitudes towards outsiders*)	Analysing the attitudes to this group or these characteristics from the outside (e.g. *acceptance/negativity in media, politics and other public forums*)

Figure 2 attempts to exemplify the requirements of group-based analysis. An analyst can define a cultural group in terms of common sociological and anthropological divisions, but can never take symbolic lines for granted. They are analytical tools but nothing more, and should be carefully reviewed according to how their definitions limit the interpretations, or which groups are ignored and which get too much weight.

Finland, for example, is a relatively young independent state without a massive physical patrimony, a member of a smallish language group and ethnically one of the most homogeneous countries in the western world; providing a striking but varying contrast to countries such as Italy, Australia and Brazil. That is why the culturally-drawn demarcation lines too are exceptional, and the same phenomenon can have various symbolic meanings depending on from where and by whom it is viewed.

The special characteristics of, and relations within a group itself should also be subjected to careful analysis. Fashionable attempts to explain the characteristics of this or that ethnic group in terms of genetic or inwardly-developed processes have turned out problematic. Cultural groups are not static categories. Russians (over 150 millions of them!), who are often stereotyped as lazy and unthrifty, have recently proved themselves more productive than locals in Finnish strawberry fields and Norwegian fisheries. Individual deviations within a recognised group are huge (see also Castro & Alarcón 2002: 784) and variations between individuals from different cultures often smaller.

Therefore, a cultural impact may be desirable for one member of a group but undesirable for someone else.

It is worth noting that some sectors admitting only partially of cultural explanations (e.g. environmental or immigration policies), have taken the explanatory power of subjective cultural experiences more seriously than cultural policy has. This may indicate that cultural policy-makers are more likely than, for example, environmental policy-makers to prefer absolute, cut-and-dried norms. This raises the question of whether this openness to sometimes irritating and contrasting views may explain the superior ability of environmental policy, which has posed rather similar global challenges, to work its way to the core of public agenda during the past decades.

At this point, it may be as well to emphasize that subjective experiences and objective measures are not regarded here as mutually exclusive methodological orientations (see also Merli 2002: 109). Free individual choice may sound an attractive idea on account of its apparently democratic nature (Goodale & Godbey 1988: 240). However, it ignores the question of whether any choice can ever be entirely subjective and individual. Cross-cultural psychology, among other disciplines, has demonstrated important links between cultural context and individual behavioural development (e.g. Berry 1997). Though it is difficult and perhaps politically incorrect to publicly nail down objective criteria for defining cultural characteristics, the fact is that some cultural characteristics acquire the status of natural characteristics in various daily processes.

From Bourdieu's (e.g. 1989) theory on the actor/structure -relation it can be deduced that, for example, good taste is a composite made up of individual assumptions concerning the ideal, and sometimes wrongly objectified, norms of good culture. Individual assumptions are interrelated with the hierarchies of society and produce prevailing norms of normal behaviour and desirable advancement just as in the case of the above-mentioned cultural explanations of underdevelopment. This means that the universal cultural hierarchy is based on the countless individual interpretations and expectations of that universal hierarchy.

These reflections can take forms of aesthetic values or racial attitudes but they can be seen by looking at almost any one of the innumerable cultural differences which exist between different populations. For example, Finnish men, especially from the eastern part of the country, and more precisely, from the remote, forest-industry based villages commit more suicides per capita than any other nationalities. This social fact refers to differences in mostly subconscious and unwritten collective self-controls and cultural risks between not only the nationalities but genders, geographical location and even the ways of making living.

The most significant lack in the contemporary analyses of group-based cultural impacts, closely related to the above, has been the small degree of interest they show in evaluating pressures that come from outside groups. It is easily forgotten that shared group attributes can also include nationally or even internationally-derived images of shared group attributes. One clear reason for this lack is the ongoing attempt to portray culture as a neutral and unchangeable factor.

However, if culture is a difference-maker, cultural policy should be, as Volkerling (1996) puts it, a difference-engine. It promotes certain cultural phenomena or characteristics instead of certain others. Through these promotions, cultural policy creates social, economic and regional differences within culture in respect of what can be called the natural cultural evolution. Therefore, an assessment should always explain what cultural values direct the intentions of cultural policy, and in what direction cultural policy intends

to change the course of natural evolution. To explain this requires a clear methodological distinction between the indicators of CIA and the normative standards of cultural policy.

Government officials usually carry out evaluations in terms of their own, more or less conscious standards of both horizontal and vertical cultural differences. In practise, the standards and criteria adopted often turn out to support strong and vocal interest groups and to neglect weaker groups. The historical institutionalisation of a minority group usually clinches its position regarding minority legislation (see also Extra & Yagmur 2002). Regardless of the size of their populations, so-called older minorities seem to be institutionally more approvable than new ones, including the recently immigrated. This mechanism is a kind of "national tail" still following the inevitable process of globalisation, and seems to work regardless of the ideology of a state (comp. Abu-Laban 2002).

This is how external events also interfere with the way in which the internal divisions of a group are formed (see also Okin 1999). Some group members are invited to the national negotiation tables (official minority leaders), some are passive conformist. Some representatives of a minority group can actively resist external influence (e.g. human rights activists) and some are defined as outsiders even if they are physically integrated in the group.

In CIA, therefore, it is not necessarily reasonable to concentrate on goal-oriented intentions at the expense of the definitions of culture. The most crucial interpretations of the result of an impact assessment have already been made in the definitions of culture or of the cultural nature of a group or a place. Though CIA as a whole cannot be value-free, the invention of cultural conditions has to be as neutral as possible. The effects of poor invention are easily multiplied during assessment procedures. The stage of description is also the phase where opportunities to manipulate assessments are biggest. This is another reason why assessments should be made on a small a scale, and in as small areas as is possible.

Concluding Remarks

The aim of this presentation was to analyse some of the most common problems in the analyses and assessments of cultural impacts, and to elaborate alternative solutions for them. The most common problems can be described as follows: 1. the lack of functional indicators, 2. the dependence of impact areas and operational concepts on their respective systems, 3. the absence of contextual control mechanisms, and 4. the aims at tailoring methods and concepts to fit a given ideology.

These problems strongly imply that the focus of CIA should be oriented, at least partially, towards more individual and informal cultural connections, towards more specific use of anthropological methods and local knowledge (comp. Valdés 2002) in the recognition of cultural groups and relations. It requires, however, that while the other impact assessments are responsible for their respective sector, cultural policy should in addition be a co-ordinator of different public cultural needs, approaches and contexts. In other words, it should be a *cultural conscience* of the impact assessment procedure as a whole.

The allocation of resources and legitimacy certainly but also the recognition of cultural groups are matters for political decision. Both cultural policy and CIA are therefore necessarily normative approaches, and their criteria are determined by political arguments. That is why their combination may result in a somewhat needless double-

policy, a system that double-checks and double-approves quite definitive political orientations.

However, CIA can also become a fruitful counter-power for cultural policy. While cultural policy, inevitably, is and obviously always will be based on formal, structural and statistical approaches to the cultural needs of society, CIA could be a more informal, group-based and contextually sensitive evaluation of these approaches. It may just be the case that experts have in neither way, any real opportunities to participate in the socially determined definition processes of culture. However, more profound analysis could at least facilitate recognition of the points at which the determinants penetrate to the assessment processes.

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