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The Ubiquity of the Level: The Multi-Level Governance Approach to the Analysis of Transnational Municipal Networks

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Abstract

European cities have built cooperative relations through transnational municipal networks (TMNs). Most of the dedicated literature has relied on the multi-level governance (MLG) framework, claiming that the establishment of TMNs has been favoured by the multi-tier and multi-actor system of governance developed within the European Union. While MLG can help to illustrate the characteristics and functions of TMNs, it does not enable to explain the engagement of European cities in these organisations. This article therefore identifies and discusses the analytical and operational limitations of the MLG approach. It is claimed that the MLG framework does not provide a suitable analytical approach to shed light on the economic, political and institutional drivers of the participation of European cities in TMNs. By way of contrast, an urban approach hinging on the urban level may address the MLG's analytical and empirical shortcomings.

Keywords

Multi-level governance; Transnational municipal networks; European Union; Local government

In the fields of European and urban studies, the literature on subnational mobilisation has burgeoned relatively recently. Within this research domain, transnational municipal networks (TMNs), organisations made up of cities located in different countries, received particular interest (see Pierre 2017; Kern and Bulkeley 2009; Caponio 2018; Busch 2015; Bulkeley and Newell 2010; Bulkeley 2005; Bulkeley and Betsill 2005; Bulkeley, Davies, Evans, Gibbs et al. 2003; Betsill and Bulkeley 2006, 2004; Benz, Kemmerzell, Knodt and Tews 2015). Most of the research contributions on TMNs opts for a multilevel governance (MLG) approach, conceiving TMNs as a by-product of the system of MLG characterising the European polity (Mocca 2017a: 692). Accordingly, the multi-level governing arrangements in place in the European Union (EU) have fostered the diffusion of TMNs, thanks to the distribution of policy functions across various governmental tiers and the presence of access points to the decision-making process for non-state entities (Mocca 2017a).

While being a dominant approach in European studies along with intergovernmentalism and neofunctionalism, the MLG framework presents some analytical and operational flaws that question its validity to analyse the phenomenon of transnational municipalism in Europe. While comprehensively describing EU governing arrangements, characterised by the displacement of authority across multiple levels of government and by the involvement of various public and non-public, state and non-state actors in decision-making, MLG can provide neither the theoretical base nor the analytical tools to investigate the engagement of cities in TMNs.

By adopting the MLG approach, some questions about local governments' participation in TMNs are left unanswered: what factors determine the participation of cities in TMNs? What explains the different propensity of cities to engage at the EU level? By privileging a non-hierarchical treatment of the different tiers of government, although skewed towards a top-down perspective, the MLG approach does not allow the level and/or the group of actors that have a more prominent role in a

specific activity or policy to be targeted. In the case of TMNs, where the actors are local governments, the MLG framework does not provide the analytical instruments to closely examine the urban level, where political, economic and institutional factors may possibly contribute to explain the motivations for cities to join TMNs. The MLG framework does not question the fact that the closest connections among levels fostered by the process of European integration have facilitated the participation of local governments in EU decision-making and thus any reading of the various forms of subnational mobilisation in the EU has to be contextualised in the multi-level structure of the EU. However, the MLG approach does not seem to be capable of uncovering the reasons underlying the participation of local authorities in TMNs, inasmuch as the multi-tiered and multi-actor structure of the EU constitutes the backdrop to, rather than the cause for, the engagement of local authorities in TMNs.

Drawing on these premises, this article critically discusses the application of the MLG approach to the study of local governments' membership in TMNs by shedding light on its analytical and operational limitations. To emphasise, this article does not have the pretence of criticising in toto the concept of MLG or all its possible heuristic applications, although some of the critical arguments have a more general character, whose applicability may transcend the specific case of TMNs. In the attempt to complement the *pars destruens* of the critique, this article will devise a *pars construens*, proposing an alternative avenue to the MLG approach to the analysis of TMNs. This approach will focus on the urban level while taking into account the network level, hence enabling the drivers and motivations prompting cities to engage at EU level to be spelt out.

This article is organised as follows. After this introduction, a discussion of the various conceptualisations of MLG is outlined. The MLG approach is then critically assessed, before an alternative approach to MLG is presented. In the last section, concluding observations are provided.

THE APPLICATIONS OF MULTI-LEVEL GOVERNANCE

Before engaging with a critique of the MLG approach to the analysis of TMNs, it seems necessary to provide an overview of the various meanings and uses of the term MLG. The term, developed in the 1990s by Hooghe and Marks, has gained significant currency, not only in European studies, where it was originated, but also in other subfields of political science, such as local government studies. MLG was initially employed in the domain of cohesion policies and subsequently in other EU policy areas, including environmental policy (Piattoni 2009) and more recently refugee and migration policy (see Hepburn and Zapata-Barrero 2014; Caponio 2018).

In the literature, there is no consensus on the nature of MLG and a wealth of epitomes used to define it witnesses such lack of clarity. Firstly, MLG is described as a 'real-world phenomenon' (Peters and Pierre 2004: 75), whose existence can be investigated across different policy sectors and different countries (see Bache and Flinders 2004). In this sense, MLG refers to the particular governing arrangements that characterise the EU's architecture, entailing the displacement of power from the central state to the EU and subnational authorities as well as the involvement of non-public actors. This transfer of competencies and powers that characterises multi-tier systems of governance occurs in three directions: upwards to international actors and organisations, downwards to regional and local authorities, and outwards to civil society and non-state actors (Pierre and Peters 2000 in Jordan, Wurzel and Zito 2005: 480).

The distinct EU governing structure is captured in abstract terms by the concept, or notion, of MLG (see Zürn, Wälti and Enderlein 2010: 2; Zürn 2010: 87; Peters and Pierre 2004: 76-77; Kaiser and Prange 2002: 2; Bache and Flinders 2004a: 1). The concept of MLG indicates a 'system of continuous negotiation among nested governments at several territorial tiers – supra-national, national, regional and local' (Marks 1993: 392).

MLG has gained considerable success in European studies and acquired a prominent position over other similar concepts coined to define the displacement of power. The scholarly interest for the diffusion of authority has produced a wealth of concepts to define the dispersal of powers and influence: 'polycentric governance', 'multi-centred governance', 'governance by networks', 'consortio' and 'condominio' are just some of the terms that can be found in the literature (Hooghe and Marks 2003: 234-235)¹.

In an attempt to specify its nature, MLG has been defined as a 'normative concept', that is a 'normatively superior mode of allocating authority' (Bache and Flinders 2004c: 195). In particular, with reference to its adoption to the case of British politics, Bache and Flinders (2004c: 197) argue that the 'concept' of MLG 'has potential as an organizing perspective: a map of how things (inter)relate that leads to a set of research questions'. However, an 'organising perspective' does not equate with a theory, inasmuch as it 'is always partial, it is not falsifiable, and it never provides a comprehensive or even definite account of the topic of analysis' (Bache and Flinders 2004b: 94).

Drawing on its more sophisticated elaborations, MLG is also considered by some as a 'model' (see Peters and Pierre 2004: 75; Marks, Hooghe and Blank 1996: 346; Hooghe 1996: 3; Bache and Flinders 2004c: 195). The rationale underlying the MLG model is the recognition of various patterns of allocation of power among manifold actors at various tiers of governments. Consequently, MLG is not a monolithic model, but it can assume different configurations. The different 'visions' of MLG (Hooghe and Marks 2001: 3) are synthesised by the well-known two-pronged Type I and Type II typology developed by Hooghe and Marks (2003). The modalities in which each level operates and the way they are connected define two models of multi-tier systems: Type I, labelled as 'general-purpose jurisdictions', and Type II, defined as 'task-specific jurisdictions' (Hooghe and Marks, 2003: 236). While enriching the heuristic capacity of the concept of MLG, scholarly opinion diverges on the analytical value of the model: while some authors consider this typology as a heuristic tool to examine the different types of distribution of authority (Bache and Flinders 2004c: 200), for others, the two types of MLG represent ideal types, which cannot be studied empirically (Zürn, Wälti and Enderlein 2010: 4; Piattoni 2009: 170).

MLG is also conceived and applied as an 'approach' (see Zürn, Wälti and Enderlein 2010: 5; Peters and Pierre 2004: 86; Marks 1996: 418; Hooghe and Marks 2009: 2; Bache and Flinders 2004a: 2) or as an 'analytical framework' (Kaiser and Prange 2002: 2; Bache and Flinders 2004c: 196). Here, MLG is included, together with liberal intergovernmentalism, among the 'modern approaches of classical integration theory' (Jachtenfuchs 2001: 257). In effect, the 'theory-impregnated multi-level governance approach' (Börzel and Risse 2009: 218) enters in the debate on reducing and dismantling the central state through the distribution of powers and competencies to supra- and subnational authorities. In so doing, the state-centric perspective of previous approaches to European integration has been questioned by MLG. By postulating the 'transformation of the nation state', while rejecting its 'withering away' or its 'obstinate resilience', the MLG approach sought to provide a way out from the two theoretical strongholds of European studies: neo-functionalism and intergovernmentalism (Börzel 1997: 8). Despite the early enthusiasm for the MLG approach seeming to have faded away, it is still widely used to describe EU governing arrangements.

Finally, MLG is elevated by some authors to the status of theory. For Piattoni (2009: 172), MLG theory, pivoting around 'a multi-level concept', encompasses the analysis of politics, policy and polity domains and thus 'is at the same time a theory of political mobilization, of policy-making and of polity structuring'. More precisely, MLG theory assumes the 'embeddedness' of subnational governments in supra-local norms and relations, while asserting that the latter do not hinder the international actions of local actors (Peters and Pierre 2004: 79). Since in a multi-level system the relations among the agents involved in the decision-making and policymaking process are not structured in a vertical and compartmental way, 'hierarchy has been replaced by stratarchy'; in other words 'an organizational

model where each level of the organization operates to a large extent independently of other organizational levels' (Peters and Pierre 2004: 79). MLG theory has been applied to 'explain policymaking and its outcomes in a multi-level context', such as in research on fiscal federalism, joint decision traps and two-level games (Zürn, Wälti and Enderlein 2010: 5). However, some sceptical views have been aired on the capability of MLG to constitute a theory. In particular, it has been pointed out the descriptiveness (Ongaro 2015; Jordan 2001; Bache 2007) and, more specifically, the 'descriptive neutrality' (Schmitter 2004: 49) of the MLG framework. In this respect, it has been noted that MLG is unable to formulate articulate explanations of the mechanisms of European integration (Jordan 2001), or of the 'outcomes in the governance process' (Peters and Pierre 2004: 88). Therefore, it is claimed that MLG falls short of constituting a complete theoretical account (Ongaro 2015; Jordan 2001).

Thanks to its versatility, MLG has been widely employed as a lens through which to explore those cases where the intra- and inter-level relations in diverse polity arrangements constitute the object of enquiry, or whenever a phenomenon or process could be described as multi-actor, polycentric and multi-scale. For this, MLG has been readily applied to the study of TMNs and is considered suitable by some authors to explore such organisations for several reasons. Firstly, the MLG framework would enable abandoning state-centric interpretations of TMNs (Betsill and Bulkeley 2004). Secondly, the use of the MLG approach, by placing emphasis onto the 'polycentric arrangement of overlapping and interconnected spheres of authority', provides an alternative interpretation to vertical top-down accounts (such as regime theory and transnational networks), especially to examine global environmental governance (Betsill and Bulkeley 2006: 154). Thirdly, the MLG approach is deemed to be so apt to analyse TMNs that some authors have firmly stated that 'it is only by taking a multilevel perspective that we can fully capture the social, political, and economic processes that shape global governance' (Betsill and Bulkeley 2006: 141). Finally, the MLG perspective offers apt descriptions of EU institutional arrangements and the 'opportunities for strategic actions' of non-state actors (Benz, Kemmerzell, Knodt and Tews 2015: 322). From this perspective, the establishment of inter-urban networks is deemed to be favoured by the new mode of governing developed within the EU. In particular, the greater interconnection between levels of government and the transfer of competencies from central states to both the EU and local levels have provided cities with more opportunities to act independently from the nation states.

Additionally, few attempts to use MLG as a model have been made, as witnessed by some studies where Hooghe and Mark's two types of MLG have been employed to classify TMNs. Drawing on this typology, TMNs have been conceptualised in two ways. On the one hand, if considered as a form of Type I MLG, TMNs represent a channel of participation and involvement in EU affairs of local authorities, although within a hierarchical distribution of powers across scales (Bulkeley, Davies, Evans and Gibbs et al. 2003). If conceived as Type II MLG, TMNs enable local authorities to engage in a variety of policy sectors that cut across different scales, creating a 'new political space or sphere of authority' (Bulkeley, Davies, Evans and Gibbs et al. 2003: 240). An example of empirical application of the MLG typology is Betsill and Bulkeley's (2006) study on the Climate Change Protection programme, where it is argued this network, although interposing between actors across multiple scales (hence Type I MLG), can be viewed as Type II MLG, insofar as it engenders 'a new sphere of authority through which the governance of climate change is taking place and which is not bound to a particular scale' (Betsill and Bulkeley 2006: 151).

Due to its polysemous and polyvalent nature, the different meanings and applications of MLG are not mutually exclusive or contradictory and, therefore, the choice of one meaning over another eschews any epistemological justification. However, it is arguable that MLG can constitute an object of inquiry, a concept, a model, an approach and a theory, and succeed equally in performing all these functions. MLG may be a useful concept to describe the functioning and organisation of the EU institutional architecture, or a model of the EU system of governance. However, its capability to explain the wide

and diverse array of phenomena occurring within the EU raises some concern. Forcing a concept to function as an approach means to employ a tool with no explanatory power to interpret a real- world phenomenon, falling into what Sartori (1970) defined as the 'concept-stretching' fallacy (Ongaro 2015: 3). Similarly, a model cannot be used as an analytical approach, inasmuch it typifies a phenomenon, hence synthesising and ordering its complexity; but a model does not enable the uncovering of underlying causal mechanisms, unless it is elaborated into a theory. Hence, such inadequate use results in a poor explanation of the phenomenon under study. Following this line of reasoning, MLG does not seem to be suited to provide a causal explanation of local authorities' membership in TMNs. The reasons for the rejection of the MLG approach to analyse the engagement of European local governments in TMNs rest with a series of limitations of this framework, discussed in the next section.

A CRITIQUE OF THE MLG APPROACH TO TMNS

The concept of MLG has made its way in the field of TMNs and subnational mobilisation more broadly. The main merit of MLG is the emphasis placed on the importance of non-state and non-public actors in decision-making as well as its comprehensive perspective on the diffusion of power and the integration and mutual influence between levels. Despite its wide success, the MLG approach presents a series of limitations that affect research on TMNs. Such shortcomings are engendered by issues related to the insufficient explanatory strength and the problematic empirical applicability of the MLG approach to examine the participation of local authorities in TMNs. In more detail, it is possible to distinguish two main types of limitations affecting the MLG approach to transnational municipalism: analytical and operational (see Table 1). While the first type of flaws refers to the validity of MLG as an approach to uncover the causal mechanisms explaining cities' membership in TMNs, the latter indicates the challenges posed by this framework to empirically investigate the phenomenon under discussion. In the following sub-sections, these limitations are examined.

Table 1: Limitations of the MLG approach to the analysis of TMNs

Analytical limitations	Synchronic and unhistorical reading
	Descriptive comprehensiveness
	Absence of a specific analytical focus
	Lack of internal causal coherence
Operational limitations	Limited empirical applicability to comparative studies
	Lack of tools to analyse economic, political and institutional dynamics at play at
	each level
	No prescriptive stance
	Issues with case selection
	Inability to assess inter-level influence

ANALYTICAL LIMITATIONS

A first analytical flaw of the MLG approach to TMNs is its implicit synchronic and unhistorical reading of the international engagement of subnational agents. The contributions mentioned in the introductory section stress how the multi-layered structure of the EU has prompted cities to coalesce around urban issues. As such, the multi-tiered structure of the EU has provided local authorities with access points to the supranational level, through which they can obtain considerable political and economic advantages. Such a reading has an inherent contemporary flavour, suggesting that this is a fairly recent phenomenon dating back to around two decades. It is certainly true that, with the progress of European integration, cities have been able to carve out of the European polity a growing niche of autonomy. Nonetheless, cities have been threading cooperative linkages for centuries, although not with the same intensity as today. Indeed, cities have always sought to establish

international links with the purpose of gaining economic advantages and political influence. In this respect, Braudel (1984) documents how the gradual establishment of the economic relationships among European cities, such as the Hansa or the Italian Maritime Republics, laid the foundation of the international economic system. From an historical viewpoint, the growing autonomy that cities have acquired in the last decades is not exceptional. By way of contrast, it can be argued that the process of nation state building during the eighteenth and nineteenth centuries represents a rupture with a long-lasting locally-based political order. In effect, the stability of the nation state began to shake since the 1970s, when economic, political and institutional factors caused a shift of responsibilities from the central states to local governments. Among the main drivers of such a transformation are: the welfare state retrenchment undertaken in a neoliberal shift throughout Western society; the reform of public administration of the late 1980s to 1990s, which outsourced once public functions to private enterprises and devolved many competencies to subnational authorities; and the principle of subsidiarity promoted by the then European Economic Community as a way to foster democratisation. The very same literature on TMNs acknowledges the historical roots of the modern transnational municipalism in the medieval inter-urban leagues (see Kern and Bulkeley 2009) and the town twinning practice developed in the second decade of 1900s (see Kern 2009). More recently, several examples of 'city meddling' in international issues have been documented, such as anti-war and anti-nuclear protests, whereby local political elites took a stand on matters of international relevance (Alger 1990: 511).

Therefore, lacking an historical perspective, the MLG approach underestimates the past existence of local governments and nation states and their autonomous historical trajectory in the European integration process. In other words, the greater involvement of cities in the EU went hand in hand with the EU integration process. By way of contrast, cities and states developed at different times and, in many cases, urban settlements formed well before nation states, especially in those countries unified in a relatively recent period (for example Italy, Germany and Belgium). Therefore, besides overlooking the historical evolution of the international interactions between subnational actors that have threaded European relations, a further limitation of the MLG approach to the analysis of TMNs is its descriptive comprehensiveness, as mentioned previously. While providing a clear description of the EU governing structure, MLG does not appear to offer an adequate framework to explain either the political processes that have led to the engagement of local authorities in the EU decision-making system, or what the relationships between actors at different levels are. In this sense, it can be claimed the MLG approach offers a narrative of the existing displacement of power across tiers and agents; but it is not explanatory, as it does not provide an account of the drivers that have led to such peculiar configuration of authority.

Although from a conceptual viewpoint the all-embracing nature of this approach can be seen as a strong point, it can be at the same time an analytical weakness. The non-hierarchical and multi-agent features that characterise MLG may constitute an analytical flaw, as it does not allow giving preference to one level over another. The absence of a specific analytical focus may thus result in a lack of critical explanations of the potential tensions among actors at different levels. In the case of TMNs, the local and EU levels play different roles: while the first is the level where actions are initiated, the second represents the target of local governments' actions. In this sense, local governments are the actors of TMNs, while the EU is the recipient and, to some extent, the enabler of their actions. Therefore, the use of a MLG framework does not shed light onto the causal drivers underlying the participation of local governments in TMNs. While the existence of TMNs is contextualised in a multi-level system of governance in the EU, the latter cannot explain the reasons underlying cities' participation in such organisations. Rather, to develop an explanatory account of the engagement of European local authorities in TMNs more attention should be paid on the local rather than on the supranational level (see Saunier and Ewen 2008).

As a corollary of its descriptive nature, the MLG-oriented literature on TMNs appears to be uncritical, eschewing an assessment of the effectiveness of a multi-tiered structure to address specific policy problems. For this reason, the MLG approach to TMNs carries an implicit normative assumption about the capability of multi-tier systems to deliver effective policy solutions and ensure adequate political participation. More generally, it has been observed that the MLG literature is characterised by 'premature normativism', as it assumes implicitly the effective functioning of multi-level governance arrangements rather than shedding light on the mechanisms underpinning MLG (Stubbs 2005: 69). In the same fashion, Ward (2010: 478) observes that MLG has been popularised in most of urban comparative research 'treating each of the levels – nation, region and city – as ontological and epistemological givens'. In light of this general criticism, it is arguable whether the MLG approach can help to understand how TMNs can address specific problems. Nor is it clear how the MLG framework can guide an analysis of the effectiveness of TMNs' action (in terms of decision-making, lobbying and problem-solving capacity) in a given policy sector.

A fourth limitation is the lack of internal causal coherence of this approach to study TMNs. If used as an explanatory framework to examine TMNs, the MLG approach is tautological. On the one hand, according to its definition, the governing system of the EU is multi-level precisely because of the presence of a multitude of actors at different levels. On the other hand, as the research contributions mentioned in the previous section note, subnational mobilisation appears to be incentivised by the multi-level structure of the EU. In the first case, the involvement of local authorities at EU level is a pre-condition of MLG; while in the second case, MLG is a driver of subnational mobilisation. Therefore, it is not clear whether the interaction of subnational actors at EU level contributes to shape the institutional and policymaking structure of the EU or the multi-tier nature of the EU architecture explains the supranational engagement of local authorities.

Due to its unhistorical, descriptive and normative nature, the MLG approach appears to lack of the essential elements that qualify an analytical framework, thus not lending support to examine TMNs. The minimal consideration of a diachronic perspective of the supranational inter-urban connections does not enable the analysis of the causes of subnational mobilisation by separating the implications of the historical evolution of the international engagement of cities from the outcomes of the establishment of the European Community. Additionally, the presumption of the MLG approach about the goodness of fit of the multi-layered model of governance limits a critical analysis of the participation and contribution of European local authorities to the EU decision-making process.

OPERATIONAL LIMITATIONS

In addition to the analytical criticisms identified above, the MLG approach to TMNs faces several operational issues. Primarily, the validity and applicability of MLG to specific cases are questionable. The MLG approach is affected by a problem of abstract modelling: MLG is mainly a theoretical model with limited empirical applicability to the comparison of different units (Stubbs 2005: 70). More precisely, it has been observed that MLG typologies (such as Type I and Type II MLG) are tailored to the Western European institutional context and therefore they cannot be adapted to other realities (Stubbs 2005). By way of contrast, some authors have claimed that Hooghe and Marks' two-pronged typology of MLG, despite its European origins, can be easily adapted to other governance arrangements with a federal structure (as the US and Australia), or where transnational organisations exist (Betsill and Bulkeley 2006). Indeed, Betsill and Bulkeley (2006) have adopted the two types of MLG in their study on the CCP programme, which groups cities outside the European area. Nonetheless, the transfer of this approach from one context to another requires a certain degree of adaptation. Such a process would require the inclusion of the different political and institutional elements of the new reality and, possibly, the elimination of those components characterising the original context. From this perspective, it is arguable that the MLG approach is so flexible and

adaptable to analyse all the institutional multi-tiered structures. Therefore, it can be claimed that, thanks to its looseness, MLG as a concept can be exported, while this is not possible for the models (Stubbs 2005).

Moreover, while providing an insight into the opportunities that new modes of governance have opened up to local authorities, the MLG approach to TMNs does not provide the instruments to undertake the analysis of the economic, political and institutional dynamics that play out at each level, which are pivotal to gain an understanding of why cities are getting increasingly important in the political landscape. While enabled by supranational processes, subnational mobilisation is a phenomenon initiated by local governments, which are the main actors of TMNs (see Saunier and Ewen 2008; Payre 2010; Acuto 2016; Acuto and Rayner 2016). By emphasising the entanglement of the several levels, the MLG approach does not allow us to cast light on a single level as an object of inquiry. Even further, the levels appear to be symbiotic and mutually influencing, although a preference for a top-down reading is more prominent. As such, the MLG approach seems to discourage any research endeavour to unravel the web of relations among levels and actors.

Another critical aspect of the MLG approach is its fuzziness about the role and competencies of which level should be entitled to deliver effective policy responses, and how the different actors should cooperate. To understand what each level of government should do to deliver adequate policies, it is necessary to understand the role that each level plays in a given policy domain. However, disentangling the actions and the contribution of public and non-public, supranational, national and subnational actors poses methodological and empirical challenges. Firstly, it is difficult to analyse the different types and modes of interaction among the levels as well as to appraise the results of this interaction. A second challenge is how to isolate and evaluate the contribution of each agent to address a specific policy issues and how this differs from the input provided by other actors. A case in point are TMNs operating in the realm of environmental policy. One may ask how local authorities tackle climate change. Then, the issue is how to isolate the impact of local authorities' action from the concurring action of the national and European levels, which are entitled of binding legislative powers. In this respect, Bulkeley and Betsill (2005), in their analysis of sustainable cities, argue that focusing on the local dimension of sustainable cities will not enable to depict a more articulate landscape. By way of contrast, the MLG framework can provide a multi-faceted perspective.

A multi-level approach would also limit the choice of the research methods. For example, there would be issues with the application of a comparative research design, since the selection of the cases would constitute a significant challenge. Indeed, it is neither straightforward to select the most appropriate cases at each level, nor to establish criteria to operate such a choice. For what concerns the research on TMNs, the adoption of the MLG framework would imply that European transnational municipalism involves more than one level of government, namely the local and the European levels. From a methodological standpoint, then, the units of analysis should be located on each level, leading to draw a sample of member cities and a sample of networks. However, when it comes to data collection, both samples would comprise cities, inasmuch as member cities constitute the networks and, in many cases, also hold representative positions (such as chairs). Hence, the sample would be cross-national rather than multi-level (the level would still be local) (see Pierre 2017; Castán Broto and Bulkeley 2013; Bulkeley and Betsill 2003; Betsill and Bulkeley 2004) and in some cases, even only national, with studies focusing on a small pool of cities in the same country (Caponio 2018; Benz, Kemmerzell, Knodt and Tews 2015). Alternatively, the units of analysis are networks (Hakelberg 2014), or cities and networks in the same country (Busch 2015). The MLG approach to transnational municipalism is thus flawed by a mismatch between the conceptual premises of the MLG, which emphasise the multi-tier aspect, and the empirical application relying on the use of cities as units of observation. When used as an analytical approach, the empirical results do not seem to support the theoretical premises. However, even assuming that a pool of cases including participants at each level of government could be drawn, it is debatable whether a diverse sample would enable to explore the causal mechanisms of transnational municipalism. It can be contended that this method would privilege breadth over depth of the explanations, providing a more descriptive rather than explanatory account.

Finally, a particularly challenging aspect is to distinguish and assess the existence, strength and direction of the influence exerted by one level over another. Similar concern is expressed by Bache and Flinders (2004c: 196), who cast some doubt on the capability of the MLG framework to 'measure the impact or outcomes of multi-level governance processes'. Although it is widely argued that the supranational level has influenced the local level, this argument has more a theoretical than an empirical validity. The magnitude (i.e. how much) and the direction (i.e. which level has impacted on another level) of such influence cannot be measured, unless the EU–local relationship is explored over a very long time-span. While through TMNs European cities can lobby the EU institutions, the degree of such influence, for instance over EU funding programmes and legislation, is difficult to quantify. Similarly, while it is clear that the EU has influenced local authorities, it is difficult to quantify the scope of such influence.

The gist of these criticisms refers to the implicit incoherence between the key arguments and their empirical application. While most of the literature on TMNs emphasises the importance of couching such phenomenon in a multi-level and non-hierarchal theoretical framework, it fails in developing it fully. Thus, a multi-level approach to examine TMNs may result in the production of an exhaustive anthology of descriptions of this phenomenon, primarily through the use of case studies where individual cities are the units of observation. This incongruence between the conceptual base of multi-level accounts of TMNs and the practice can be, at least partially, explained by the analytical challenges of the multi-level analysis outlined above.

The discussion of the analytical and operational issues with the MLG approach suggests that this framework does not enable the explanation of inter-urban networking in the EU in sufficient depth. MLG can be considered as a characterisation of the status quo in the European administrative context and, with this meaning, it constitutes the backdrop against which the decision as to participate in TMNs is taken. In other words, the MLG approach to TMNs provides an exhaustive description of the nature, functions and role of these organisations, but it does not offer a suitable tool to examine the reasons and drivers for European local governments to participate in TMNs.

To substantiate the *pars destruens* articulated in the preceding section, the *pars contruens* of this critique will be set out in the ensuing section, by devising an analytical alternative to the MLG approach to TMNs.

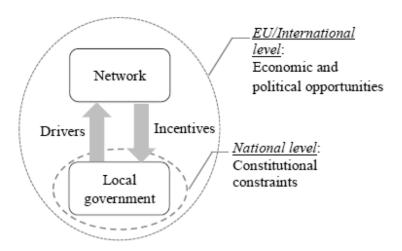
AN ALTERNATIVE PATH: THE URBAN-CENTRIC APPROACH

To rectify the shortcomings of the MLG approach to TMNs outlined in the previous section, an alternative analytical avenue focused on the urban level could lend a useful interpretive framework². Rather than adopting a multi-scale perspective to examine TMNs, where all the levels are treated in a non-hierarchical way, this approach, named elsewhere 'urban approach' (Mocca 2017a), draws on a different analytical perspective, enabling an exhaustive analysis of one single level (i.e. the urban) to be undertaken. At the core of this approach lies the normative assumption of the pre-eminence of the urban dimension, conceived as an environment where economic, political and institutional structures shape municipal decision-making and thus cities' decision as to whether participate in TMNs (Mocca 2017a). While international phenomena, such as Europeanisation and globalisation, have favoured the establishment of supranational city networks, offering greater opportunities to create relationships and providing a space to exchange knowledge and practices, they cannot alone explain the reasons for cities to join. Hence, Europeanisation and globalisation processes can be considered as 'enabling

factors' to the actions of local governments (Pierre 2017; Mocca 2017b; Benz, Kemmerzell, Knodt and Tews 2015). Although local governments are influenced by European and international events, local authorities maintain a sphere of autonomy within their boundaries (Mocca 2017a).

As shown in Figure 1, the urban approach is structured around four dimensions grouped in two categories: the supranational and national levels, which represent the broad context, and the meso and urban levels, which offer causal explanations. Intuitively, the supranational level is characterised by those phenomena occurring beyond the national boundaries, such as European integration and global interconnections, which have enabled the internationalisation of local governments. Therefore, this dimension comprises the enabling factors of TMN membership. By way of contrast, the national level, by constitutionally establishing the relationship between central and local governments, limits the policymaking, financial and political autonomy of cities. Thus, it is in this dimension that the constraining factors should be found.

Figure 1: The urban approach to Transnational Municipalism



The meso level, or horizontal level, i.e. the network dimension, is where the local interconnects with the European level. If we want to understand why cities engage in TMNs, then we have to factor in the incentives derived by the involvement in networks. These benefits are not only and not primarily financial: more importantly, network membership hones in the skills and knowledge of local officials, strengthens the international image of cities as well as their political weight at EU level (see Phelps, Mcneill and Parsons 2002; Payre and Saunier 2008; Payre 2010; Mocca 2017b; Kübler and Piliutyte 2007; Keiner and Kim 2007; Ewen 2008; Betsill and Bulkeley 2004; Andonova, Betsill and Bulkeley 2009).

Finally, in the urban dimension, a wide range of context-specific factors may concur to influence cities' involvement in TMNs. As found by previous research on the topic, these drivers may be grouped in three comprehensive analytical domains: economic, political and institutional (Mocca 2017a, 2017b). The economic domain refers to the economic context where local administrations operate as well as to the specific economic decisions taken by the latter to improve the local economic performance. As such, it has been found that cities' engagement at the EU level may be a strategy to access an extra source of funding (additional to national transfers) to redevelop their locality (Mocca 2017a; Ewen 2008). Further, it has been argued that cities with advanced economies are more likely to participate in cooperative urban networks (Mocca 2017a). The political domain comprises urban-level political drivers, namely the political composition of the council, the political weight of individual councillors in determining TMN membership and the political tradition and discourses characterising a given city's context (Mocca 2017b). These factors may thus affect whether and to what extent cities participate in

TMNs (Payre and Saunier 2008; Leitner and Sheppard 2002). Finally, the institutional structure has to be examined, since the level of decentralisation that determines the distribution of policy and financial competencies may foster a greater presence of cities at EU level, thus accounting for an explanation of socio-ecological urban networks membership (Mocca 2017a).

The model here proposed to analyse TMNs postulates that the participation of local authorities in TMNs is driven by the place-specific economic, political and institutional urban structures and by the instrumental expectations of local political elites that exploit networks to obtain collective and selective benefits, which in turn help them tackle urban issues. More broadly, focusing the analysis on one level means to extrapolate it from the multi-level web and permits to elaborate a causal explanation of a specific political phenomenon through the identification of a set of actors at one specific level that are primarily responsible for the phenomenon in question. Overall, then, the urban approach argues for a more orderly structured picture of EU governance, contradicting the MLG perspective.

CONCLUDING REMARKS

In this article, the adoption of the MLG as an analytical approach to explain the engagement of European local governments in TMNs has been discussed. It has been argued that, as a concept, MLG provides an exhaustive description of the nature, functions and role of TMNs. However, when applied as an approach to shed light onto the drivers of cities' membership in TMNs, MLG presents both analytical and operational shortcomings, which make it an inadequate framework to analyse the topic under study. Therefore, the criticisms moved here do not refer to the concept of MLG, which aptly describes the governing arrangement of the EU, but to the forceful adaption of a descriptive tool to serve as an explanatory framework. As such, the use of the MLG framework to examine TMNs results in a theoretically weak causal account of the phenomenon of transnational municipalism in the EU. In particular, the inadequacy of the MLG approach lies in its inability to unravel the motivations and drivers prompting local governments' involvement in TMNs. Further, the multi-level perspective, by privileging the inter-level rather than the intra-level dynamics of transnational municipalism, plays down local governments' political agency.

To address its shortcomings, an urban-centred approach has been proposed. This focuses on the urban level and conceptualises the European integration process and the multi-layered and multi-actor structure of the EU as enabling factors of local governments' actions. This framework, focusing on the urban structures while taking into account both the individual (i.e. single cities) the collegial dimension of TMNs, may provide a tool to sift through the range of urban-level factors and dynamics that influence the engagement of cities in TMNs.

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ENDNOTES

¹ For an exhaustive list of the terms coined to define diffusion of authority across different levels, see Hooghe and Marks (2003).

² For an empirical application of this approach, see Mocca (2017a, 2017b).

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