



MAPPING COUNTERTERRORISM

A categorization of policies and the promise of empirically-based, systematic comparisons

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Netherlands Organisation for Applied Scientific Research TNO

Fundacion para las Relaciones Internacionales y al Dialogo Exterior (ES)

Danish Centre for International Studies and Human Rights

Institute of International Relations Prague

Clingendael Netherlands Institute of International Relations

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INTRODUCTION

Awareness of the full range of options is a vital element in the development of any sound policy. Ideally, an inventory of policy options would of course come with an estimation of the effects, advantages and disadvantages of each policy and of the circumstances under which they might work. The field of counterterrorism studies seems, unfortunately, to fall short of even the first step, an overview of the options. Even though the numbers of academic publications on counterterrorism have skyrocketed since 9/11, we know as of yet very little about what kinds of policies are now being applied and have been applied in the past and about how all these policies converge and differ from each other. This report describes our first attempt at a framework that will help us identify different categories of counterterrorism policies of states. Not only will this tool be helpful in meeting a necessary condition for research into the effectiveness of counterterrorism policies, it will also be helpful later on in identifying how a given policy should be adapted in order to establish policies that can be considered 'best practices'.

Below, we will discuss the state of the art of the application of frameworks and inventories to compare counterterrorism policies, explain the logic behind our own framework, briefly describe the application to eleven EU member states, analyze the results and formulate an empirically-based categorization of counterterrorism policies. As this is not merely an academic exercise, we applied our framework to the counterterrorism policies of eleven EU member states to see whether there are any policy gaps the EU could step into. After all, filling these gaps is a requirement if the EU wants all its member states to have a comprehensive counterterrorism policy. If our framework is well-constructed, it will show us what counterterrorism policy fields have been neglected by both the member states and the EU.

1. BENCHMARKING COUNTERTERRORISM

Comparative analyses of counterterrorism policies often take the form of descriptive case studies, which are by definition a relatively poor basis for general conclusions. Case studies about counterterrorism policies give at best rough indications of the differences and similarities between policies and are not systematic in the sense that, in these studies, countries are never all compared on the same variables (See for example Van Leeuwen (ed.), 2003, Reinales

(ed.), 2000, Von Hippel (ed.), 2005, Art and Richardson (ed.), 2007, Alexander (ed.) 2002 and Alexander, 2006). Comparisons of this kind are hamstrung by the lack of empirical data that capture a counterterrorism policy *in its entirety*. This only further underlines abovementioned need for a measurement tool that takes all aspects of counterterrorism into account and will show both what a country does and does not do to fight terrorism.

There have been academic attempts at a general classification of counterterrorism policies, but they are few and in between. The most elaborate classification to date is the one by Ronald Crelinsten and Alex P. Schmid. They categorize counterterrorism policies along several dimensions. They make distinctions between long-term versus short-term policies, coercive versus accommodating policies and domestic versus international policies (Crelinsten and Schmid, 1993: 310-312). The most widely applied classification, thought up by Crelinsten, is based on the distinction between the 'war' and the 'criminal justice' approach to counterterrorism. The distinction is made on the basis of which players have the leading role. The criminal justice category comprises the policies in which law enforcement agencies are the dominant players and civil rights are being respected, whereas in the war category the army is more important, terrorism is treated as a form of armed conflict and rules of war are applied to terrorists (Crelinsten, 1989 and Crelinsten, 1987). Ami Pedahzur and Magnus Ranstorp have made a case for a middle ground category of policies that have a little of both. They argue that, since neither the war model, nor the criminal justice model fully grasps the essence of the way Israel has fought Jewish terrorism since the late 1940s, a third category should be introduced (Pedahzur and Ranstorp, 2001). Arunabha Bhoomik, in his comparative study of the counterterrorism policies of the United States, Israel and India, adds the 'intelligence model'. This category encompasses policies that rely on expanded powers for intelligence services and often include extrajudicial measures such as special tribunals and liquidations of terrorist suspects (Bhoomik, 2004). The third adaption is suggested by Eric Posner, who sees the tendency of governments to fight terrorism by changing rules and regulations as deserving a separate category (Posner, 2002). None of these categories are induced from systematic, empirical comparisons. The authors pay next to no attention to the empirical data on the basis of which one should decide whether a given counterterrorism policy is an example of the war model or of the criminal justice model. In other

words, the categories remain ideas and are not turned into observable phenomena.

On the policy level, there are some inventories of counterterrorism measures. Shortly after 9/11, the EU initiated an inventory of counterterrorism measures per country (Council of the European Union, 2004a and 2004b). Similarly, the UN asks its member states to keep the Secretary General informed about what they are doing to fight terrorism.¹ The Council of Europe (CoE) publishes so-called *Profiles on Counter-Terrorist Capacity*, brief reports submitted by the member states in which they explain their counterterrorism policies.² The Department of Homeland Security (DHS) and the UN Office of Drugs and Crime (UNODC) have made frameworks consisting of areas and sub-areas of counterterrorism policies that could be used to categorise counterterrorism measures (Department of Homeland Security, 2005).³ For example, the UNODC identified the area 'Judicial and legal' with the sub-areas 'International efforts', 'Domestic legislation', 'Witnesses' and 'Courts'. The difference between the approaches of the EU, the UN and the CoE on the one hand and of the UNODC and the DHS on the other is clear: the former have measures but no framework, whereas the latter have a framework but no measures.

2. THE FRAMEWORK

In a first attempt to fill this lacuna and use both a framework and measures, we have developed a framework to categorize counterterrorism policies and applied it to the UK, Spain, Denmark, Sweden, the Netherlands, France, Germany, Italy, Poland, the Czech Republic and Portugal.⁴ We combined the frameworks with extensive input from sources referring to counterterrorism measures, taking a

¹ See <http://www.un.org/terrorism/sg-reports.shtml> (accessed 1 April 2008) for links to the reports of the UN Secretary General which include sections about the member states and the measures taken by them. States are also asked to periodically submit reports to the UN Counter-Terrorism Committee. For links to those reports, see <http://www.un.org/sc/ctc/countryreports/reportA.shtml> (accessed, 8 April 2008).

² See http://www.coe.int/T/E/Legal_Affairs/Legal_co-operation/Fight_against_terrorism/4_Theme_Files/Country_Profiles/ (accessed 1 April 2008) for links to the CoE country profiles.

³ For the UNODC's *A classification of counter-terrorism measures*, see http://www.unodc.org/unodc/terrorism_measures.html?print=yes&print=yes (accessed 26 March 2007).

⁴ We have selected these countries because they vary on many relevant variables that might determine the nature of a country's counterterrorism policy, such as culture, duration of EU-membership, population size, experience with terrorism and GDP. This variation implies that we will be able to find a rich variety of counterterrorism policies.

two-pronged approach. We filled out the frameworks with concrete measures we found in the sources and adjusted the frameworks when we felt that they were inadequate in handling certain measures. This process of going back and forth between framework and measures resulted in, simply put, a matrix with a list of categorized measures on the left and the country names on top. For all of our eleven countries, we checked which of the measures on the left they have taken as a part of their counterterrorism policy.⁵ The idea behind our framework is that we first lay an empirical basis of data that show us what the countries in our set actually do to fight terrorism and then spot differences and similarities. We will group countries that lay roughly the same emphases on the same strands. These groups will be our categories.

The idea behind measures on the left of the matrix is that they together make the matrix an *accurate representation* - as opposed to an *exhaustive taxonomy* - of the realm of instruments that can conceivably be part of a counterterrorism policy. This raises the question of how we are to decide which measures can be part of a counterterrorism policy and which cannot, and thus the question of what a policy is. In the academic literature, the definitions of 'policy' abound, but none of them adequately solves our demarcation problem. Perhaps due to the dissension about what a policy is, there is no widely accepted methodology to demarcate a certain kind of policy, for example counterterrorism policy, and arrive at a set of activities that together should be considered as making up that particular policy (Wildavsky, 1979, Parsons, 1995, Hofferbert, 1990). Some have even argued that policy is a mental construct and not an observable and measurable empirical entity (Greenberg, 1977). Defying this claim, we think that any definition of policy will include the elements 'aim' and 'resources'. A policy is always the result of at least one analysis, however scant, of the problem and a conscious choice regarding the resources to solve it. This is why we choose to think of policy as made up of measures that have consciously been applied to solve the problem, terrorism in this case. This is the first element of our definition of counterterrorism policy. This element lies with the governments we are examining: to us, their counterterrorism policy is what they say it is. However, there is a limit to what we are willing to accept as counterterrorism. This brings us to the second element of our definition: our

⁵ For the matrix with the research results for all countries, see the [TTSRL-website](#).

framework, which is an operationalization of counterterrorism in the form of an extensive list of measures and therefore comes down to a decision on our part about which policy instruments can be considered part of a counterterrorism policy.

States make their choices for particular policy measures on the basis of assumptions about the characteristics and the causes of the problem. These assumptions differ widely, and since we intend this framework to be generally applicable, i.e. we want to be able to use this analytical tool to grasp the counterterrorism policy of *any country*, we had to select measures to cover as many different approaches to fighting terrorism as possible. Taking the four strands of work of the EU's counterterrorism strategy (Prevent, Protect, Pursue and Respond) as our starting point, we looked for as many ways as possible to prevent vulnerable groups from resorting to terrorism, protect citizens, sites and infrastructure from terrorist attacks, pursue terrorists and disrupt their networks and respond adequately to the immediate consequences of a terrorist attack.⁶ The advantages of using the four strands are twofold. First, it allows us to clearly identify policy gaps and overlap of countries' counterterrorism policies vis-à-vis the EU, which is one of the goals of this exercise. Second, the strands are analytically helpful. They are well-delineated, clear-cut categories and do point to different essential aspects of counterterrorism.

We chose to stick with a categorization of measures based on *what the measures aim to affect*. The basic question when placing a measure under a certain strand or subcategory was: what does the measure change directly? For example, we put '100% screening of cargo on aircraft' under the 'Transport (Aviation)' subcategory because it affects aviation. Similarly, we put 'Participation in the Alliance of Civilization program' under 'Battle of ideas' because participation in this program changes the way a government presents itself and its values to certain target audiences.

Thorough exploratory research using academic literature and policy documents led us to the subcategorization and the measures that you will find in the matrix. To incorporate as many policy options as possible in our framework, we simply scanned a wide variety of relevant sources for counterterrorism measures. The subcategories, loosely based on the UNODC's classification of

⁶ For the definitions of the four strands as formulated by the EU, which is also how we understand them here, see European Council, (2005).

counterterrorism measures, helped us form an idea of the directions in which to look.

2.1 Criteria for inclusion of measures in the framework

Combined, measures that are in the matrix should be able to give information concerning the emphasis that a state places on the different policy areas and allow for a comparison between countries. With this in mind, we went over the academic literature and policy documents looking for counterterrorism measures using five criteria to decide whether we could use a measure for the matrix. We only used measures that are:

- *Indivisible*: we tried to avoid measures that contain other substantial measures that could *in themselves* tell us something about the emphasis of a member state on specific policy areas. For example, a law such as the USA PATRIOT Act is by all means a counterterrorism measure, but it exists of many other measures that are in their own rights parameters to compare policy areas. Had the US been in our set, we would have gone a level down and put the individual regulations from the USA PATRIOT Act as separate measures in the matrix.
- *Unequivocal*: whether a country applies a measure from the matrix should be a strict 'yes' or 'no' question. For vaguely formulated measures, often phrased in terms like "improve capabilities to ..." and "enhance coordination between ...", appliance is a matter of degree. The question whether the measure has been applied, is then left to the eye of the beholder and comes too close to the measurement of effectiveness. For "enhance coordination between intelligence and security services" we put the concrete and unmistakably observable measures that should bring this about (e.g. 'Centre for integration and analysis of intelligence on terrorism') in the matrix.
- *Comparable*: the measures in the matrix are formulated in a way that allows for comparability between countries. For example, measures should not imply a particular organizational structure. These measures are often unique for each country and hinder cross-comparability. For example,

“expansion of the intelligence and security service” is a measure that can only apply to the Netherlands since it is one of the few countries that does not have a separate security and intelligence service, but has merged the two roles into one organization.

- *Focused on terrorism*: only measures that have a clear link with terrorism have been included. This is difficult in especially the Prevent and Respond-strands, but we have been careful not to list measures with only a far-fetched connection to the fight against terrorism. All measures in the matrix can reasonably be expected to be part of a state’s counterterrorism policy. This might sound like a judgment call, but, again, when putting together the matrix, we went to great lengths to take into account as many policy options that states can take to fight terrorism as possible. This exploratory research was broad and extensive enough to enable us to make a fair estimate of the realm of measures that are taken to fight terrorism.
- *On a feasible level of detail*: some measures, for example ‘increasing the amount of adhesive bandages in hospitals by 10 percent’, are so specifically formulated that it is unreasonable to expect another country to take that exact same measure. Other measures, for example ‘enhancing the capability to respond to the consequences of terrorist attacks’, are so generally formulated that we run the risk of finding that all countries take them, which will lead us nowhere. We have tried to find the middle-ground between these two extremes: concrete, but not detailed.

2.2 Sources

After the framework had been formulated, we checked all measures for all countries in our set. When we found that a country takes a measure from the matrix, we put an ‘x’ in the box for that measure and that country. Sticking to our perception of counterterrorism policy outlined above, we only accepted ‘x’-es with references to sources that show that a measure really is part of a country’s counterterrorism policy. This means that the source should be either a policy document that is about terrorism, a policy document that explicitly discusses the measure as part of that state’s fight against terrorism or a scholarly source that

proves that the country under consideration considers a certain measure as part of its counterterrorism policy.

2.3 Scope and limitations of the framework

Having worked the way we have, several disclaimers should be made to avoid misunderstandings about the status of the outcomes. The first limitation follows from our choice to only use readily available government documents. We are aware of the information biases that might come with the use of government materials to map a counterterrorism policy. First, some measures may be kept secret, which is not a problem that can easily be solved by using other sources. Second, governments may want to convince the public that they are taking the fight against terrorism seriously, which may lead them to interpret counterterrorism policy very broadly. They might include measures not originally taken to fight terrorism when informing the public. Third, it is theoretically possible that countries have taken some measures from our framework, but do not consider them part of their counterterrorism policy. This problem is not our biggest worry. Most of the measures we have included in our framework are explicitly formulated as counterterrorism measures, so it is highly unlikely that countries will not mention them in the sources we chose to use. We consider the second problem, inflation of a country's counterterrorism policy, which is actually the opposite of the third problem, bigger than the third.

Having outlined these reservations, we are still confident that the research results in the matrix give us an adequate basis for the analysis in the next paragraphs. There are no comparable frameworks of this kind and consequently no research results to test our own, but there are some common-sense notions that can serve as tests of sorts. For example, one can clearly see the influence of the EU in the results. Many authors name the subfields terrorist finance, legal prosecution capabilities and exchange of customs and visa information as the aspects of counterterrorism on which the EU has achieved the most in its post-9/11 counterterrorism efforts (See for example Dittrich, 2005: 13, Wilkinson, 2005: 31, Armitage, 2007: 229, Bures, 2006: 66 and 70, Brouwer, 2002: 414-415). Almost all countries score high on these subcategories. Another intuitive validation, also - but perhaps less emphatically - related to the role of the EU, might be to check for the lessons learned from 9/11 about the need for intelligence exchange, both on the domestic and on the international level. Much

has been made of the failure of the CIA and the FBI in the months preceding 9/11 to integrate the pieces of information that, had they been combined, would have made clear what was afoot. Ever since 9/11, practitioners and scholars alike have warned that without intelligence clearing houses or similar institutions, we will never be able to 'connect the dots' about terrorist attacks in the works (see for example Omand, 2005: 115, Posen, 2001: 46-47, Dearstyne, 2005: 174, Schindler, 2005: 696-698 and Sloan, 2002: 338-341). It is widely accepted that 9/11 was followed an unprecedented overhaul of intelligence and security services, and not only in the US (See for example Pillar, 2004: 123-124, Schindler, 2005: 695 and Neve et al., 2006: 84-85). Our research results show that almost all countries, partially under the influence of the EU, have indeed taken to heart the lesson about intelligence sharing. The scores in the Intelligence subcategory, made up for the most part of measures to guarantee that all intelligence gets to where it should be, are generally very high.

Having sketched the ideas, methodology and caveats of our framework, we now turn to the reason why we developed it in the first place: the analysis of EU member states' counterterrorism policies.

3. THE CATEGORIZATION

On the basis of the matrix containing the results of all countries, we can distinguish four types of counterterrorism policy, five if we consider the absence of a counterterrorism policy as a policy type. In making this categorization, we have primarily been looking at the first level of the categorization of the measures. The differences and similarities in emphasis on the Prevent, Protect, Pursue and Respond strands are the defining elements of the categories we derived from our research results.

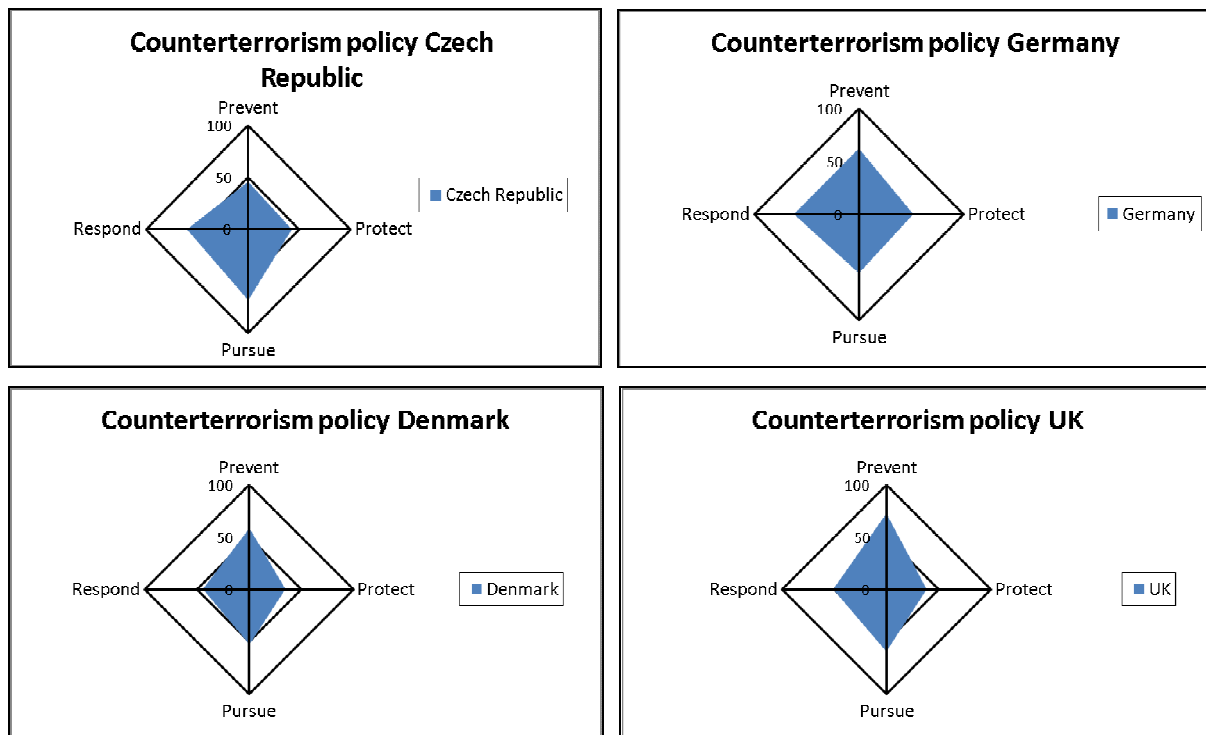
In order to be able to grasp the essence of the countries' policies, we put the results for each country in a radarchart, with each leg indicating the score for a strand. The calculation of the scores in the radarcharts needs a brief explanation. A measure cannot be treated in the exact same way as a euro or a yard. Policy measures are so different from each other in terms of scale, costs and personnel involved, that we have to be careful not to treat them all as equal units. For example, it is difficult to accept participation in ISAF on a par with a law that allows the arrest of minors on charges of terrorism by saying that they both represent the same percentage of a country's counterterrorism policy. In an

attempt to alleviate this problem and allow for at least some calculations, we weighed the measures on the basis of the resources that they require. We gave one point to measures that are mainly an amendment of a rule, law or regulation and do not by themselves require more resources to be executed. Examples are changes in criminal procedures and penal law. The change itself is the measure, and it is not *per se* followed by an allocation of resources to execute it. Concrete, more 'tangible' activities or initiatives, i.e. where the measure is not only the adoption or amendment of a law, but also an activity, are worth two points. Most measures from our framework are in this category. Finally, really large undertakings, such as the implementation of national strategies, are worth three points. We also gave three points to participation in ISAF.⁷ Thus, every strand has a maximum score. We expressed the countries' numbers of points for all strands as a percentage of the maximum score. A leg in one of the radar charts shows the percentage of points that a country scored for a strand. For example, the Czech Republic (see par. 6.1) scores slightly less than 50% of the points of the Prevent strand. Note that the percentages are merely indicators. It is not important whether a country scores 55% or 56% on a strand, but it is important that it is safe to say that a country with a score of 55% relies more strongly on that strand than a country that scores 25%. The categorization below is based on unmistakable differences between the countries' scores on the four strands. Of course, a weighing on the basis of more tangible data, such as budgets, would be better, but that would have been outside of the scope and resources of this explorative research project.

3.1 The maximalist approach

There are four countries in our sample set that have all aspects of counterterrorism covered. The Czech Republic, Denmark, the UK and Germany score relatively high on all four strands. This suggests that these countries perceive terrorism as a multi-faceted phenomenon.

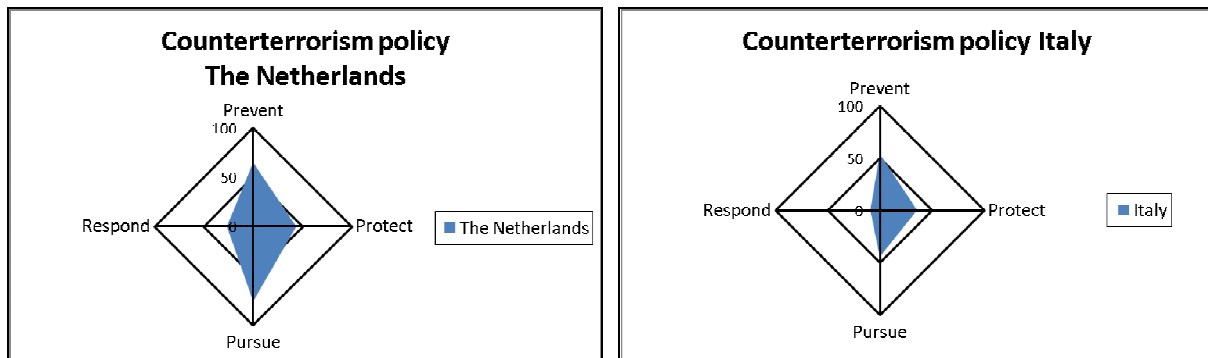
⁷ The weights of the measures can be found in the left column of the Excel-sheet containing the dataset.



Admittedly, both the UK and Denmark are closer to the countries that take the 'human agent' approach (see next paragraph) than the Czech Republic and Germany, but, on the other hand, the scores of the former are more evenly distributed over the categories than the scores of the Netherlands and Italy, which justifies their classification as countries taking the maximalist approach. Of all countries, Germany - in a sense together with Sweden - seems to be the country with the most balanced policy. It pays equal attention to all four strands.

3.2 The human agent approach

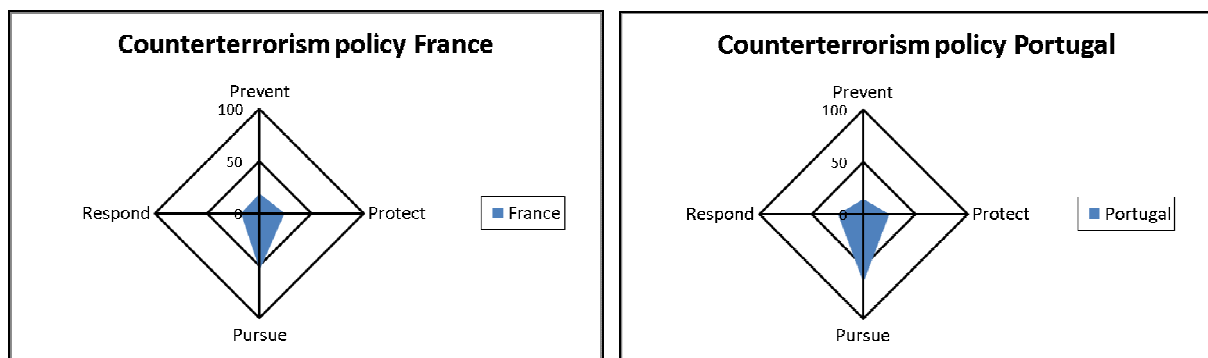
Countries in this category - the Netherlands and Italy - focus their policies more, or in any case more so than the countries from the first category, on one aspect of terrorism. We have labeled this category the 'human agent approach' since both policies score relatively high on the strands that take terrorism as an activity undertaken by human beings rather than as a possible cause of damage and emergency situations. The emphasis of the Dutch and Italian policies lies on measures that entail direct contact with people, be they terrorists or possible terrorist recruits. Perhaps surprisingly, there is no country that takes the opposite approach, treating terrorism solely as a threat to physical security and therefore banking on protective measures and crisis response mechanisms.



It is true that the Netherlands' policy is more comprehensive than Italy's. The scores of the Netherlands are higher for all strands, but the pattern is similar. Relatively speaking, the Prevent and Pursue-strands are the most important in both policies. Given the low scores on the Respond strand, it appears that the Netherlands and Italy are counting on counterterrorism measures that keep them from ever getting to the response phase, or that they are confident that the consequences of terrorist attacks can be managed by instruments used in other emergency situations. This former logic, even though it may never have been explicitly formulated, sits well with the label the human agent approach: only by changing the courses of action of human beings can terrorist attacks and consequent emergency situations be avoided.

3.3 The confrontational approach

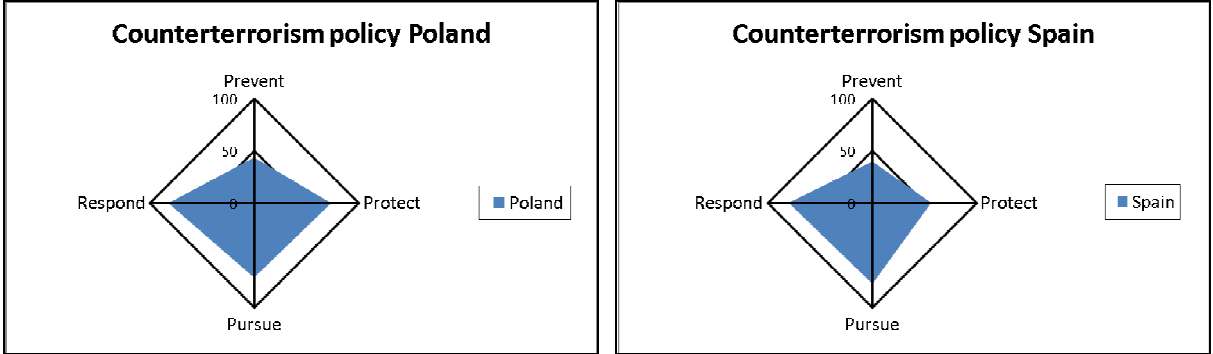
France and Portugal also seem to take terrorism primarily as human activity, but take a more narrow approach than Italy and the Netherlands. Their policies are based on measures in the Pursue strand. What these measures have in common is that they directly affect the terrorists themselves or their assets or improve the instruments to do so. They take the fight against terrorism to the terrorists and are in this sense direct action. This strand is therefore the most aggressive one, which is why this policy has been labeled the 'confrontational approach'.



The charts show that the reliance on measures in the Pursue-strand goes together with an almost complete disregard of other aspects of counterterrorism in both cases. The approaches of France and Portugal are clearly very one-dimensional. These policy patterns are indications of a perception of terrorism as an enemy that simply has to be beaten, almost the way one beats an enemy army in war.

3.4 The antagonistic approach

Poland and Spain together make up the fourth category. They have been put together because they both have high scores on all strands except on Prevent. This approach can be labeled the antagonistic approach, because it emphasizes all aspects of counterterrorism that treat terrorism in the stages where it already is a danger and a risk.⁸ They put relatively little stress on the softest strand, Prevent, where states try to maintain their citizen’s loyalty either by persuading them of the value of democracy and of the government’s best intentions or by improving social and material living conditions.



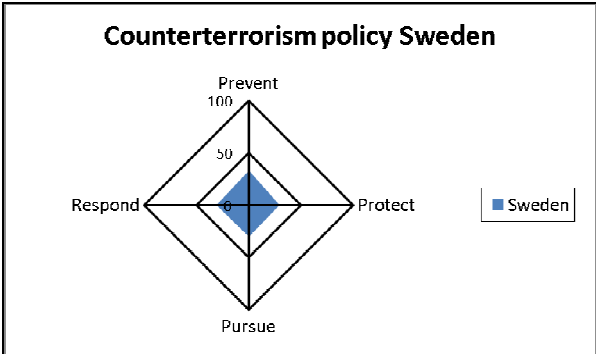
What is striking about the above charts is that, while they do little to prevent terrorism, both countries have higher scores for the Protect, Pursue and Respond strands than almost all other countries. The relative disregard of the Prevent strand is compensated by a very strong reliance on the other strands, which seems to suggest the same logic: terrorism is first and foremost a threat and needs to be treated as such. Another possibility is that Poland and Spain are simply unwilling to invest in preventive measures because of the uncertainty about the origins of the terrorist threat. The disregard for the Prevent strand is only relative, as Poland and Spain have covered the Prevent strand better than

⁸ The previous category could also have been labeled ‘antagonistic’, but we felt that the more specific ‘confrontational’ better reflects the gist of the policies in that category and saved ‘antagonistic’ for this category.

Portugal, France and Sweden, but this does not dispel the logic behind the former two countries' policy priorities.

3.5 Sweden

We have not categorized Sweden because it hardly has a counterterrorism policy at all. It has implemented some measures in the EU-driven fields identified in the previous paragraph, but it is hard to escape the impression that for Sweden the fight against terrorism is just not a priority.



4. THE FOUR STRANDS: COVERED GROUND OR POLICY GAPS?

The differences between the patterns in the radarcharts are striking. There is little convergence between the countries and the efforts to harmonize counterterrorism policies seem to have had only a limited scope, which means that there is still room for an examination of where the EU should focus its counterterrorism efforts. Having developed an idea of the policy options that are being chosen by EU member states, we can now see the gaps that the EU could try to fill and on which countries it could draw for ideas about what measures could be used to these gaps.

The countries' scores on the Prevent strand differ widely, with France, Portugal and Sweden trailing behind and the UK and the Netherlands as leading countries. The latter countries score high on 'Battle of ideas' as well as on 'Tackling root causes'. Even though Spain and Germany do not score particularly high on the Prevent strand, it should be noted that they do have a strong focus on one of the subcategories within the Prevent strand. Spain is very eager to prevent the emergence of terrorism by convincing target audiences of its own position, whereas Germany puts a lot of effort in improving material and social living conditions that might give rise to radicalization or terrorism.

The Protect strand is most comprehensively covered by Germany and especially Poland. Spain's high score is based for the most part on measures in the 'Transport (maritime)' subcategory. The Czech Republic scores high on security measures regarding aviation. Countries trailing behind are France, Portugal, Sweden and to a lesser extent Denmark. No country seems as yet to put much effort into securing public transport against terrorist attacks.

The Pursue strand is the one strand where one can see a pattern for all countries. With the exception of Sweden, all countries have high scores for this strand and cover all subcategories. Overall, Spain is a little ahead of the other countries in this strand. More specifically, it has many post-trial criminal procedures and special powers over its civilians.

In the Respond strand, the Czech Republic, Germany and especially Poland and Spain are very active, with scores based on an even distribution of measures over the subcategories we identified. Clearly lagging behind are France, Portugal, Italy and Sweden.

From this brief examination, it is clear that the policy gaps in EU member states' counterterrorism policies should be formulated in terms of countries rather than in terms of sub-fields. There is no strand or counterterrorism sub-policy field that EU member states collectively ignore, but there is a group of countries - Sweden and the countries taking the confrontational approach - that are neglecting many of the available policy options. This may be a deliberate and legitimate choice and we are certainly not suggesting that these policies are any less effective than the other ones, but does not take anything away from the observation that these countries' approaches are minimalist in comparison to the other countries. Similarly, there is a group of countries - the ones taking the maximalist or antagonistic approach - that have a strong tendency to take counterterrorism broadly. If the EU wants all its member states to take comprehensive approaches to counterterrorism, these countries serve as examples of what kinds of measures are possible.

CONCLUSION

The exercise that led to this report offers lessons on several levels. First, regarding the subject matter at hand, the differences between the counterterrorism approaches of the EU member states are substantial and salient. There are four very different types of counterterrorism policy in a set of

eleven countries, which seems to suggest that the EU is still a long way from harmonization of the counterterrorism policies of its member states. The 'punitive terrorist behavior' and 'special state powers over civilians' subcategories and abovementioned EU-driven fields seem to be the minimum counterterrorism program for EU member states, as these are the only fields where almost all countries are active. It is noteworthy that, on average, the countries score almost 60% of the points for the Pursue strand, compared to about 40% for the three other strands. Also, we now have a clue about where the policy gaps are, i.e. which countries are lagging behind. Portugal, France and Sweden appear to see little reason to take a broad approach to counterterrorism.

Second, on a more methodological level, even this first attempt at an empirically-based analysis of counterterrorism policies delivers findings that none of the more traditional analyses has delivered before. Our findings are encouraging in that respect, and make clear that a sounder empirical basis for the operationalisation of counterterrorism can help us get a firmer, more solid grasp of the phenomenon. To stress again what we said about this in the introduction, this is crucial for policy making, as only when we know what a given country does to fight terrorism, can we fully understand the lessons that should be learned from that case. Suppose that a country is very successful in the fight against terrorism, a framework of the kind used in this report will allow us to see how another country's policy differs from that country, and thus what it should do to bring its own policy in line with what can be considered a good practice. The measurement of effectiveness is the single most important question for anyone interested in counterterrorism policies, but cannot be examined without means to show distinctions between different counterterrorism policies. In this report, we presented a concrete tool that can help us doing exactly this.

Of course, for reasons discussed in the preceding pages, our framework is not perfect and needs to be developed further, but if a relatively straightforward and feasible procedure as the one we followed during this research project can provide valuable insights, one can imagine that a similar project with more time and resources could seriously raise the level of our understanding of counterterrorism. Access to official budgets indicating the costs of counterterrorism measures, interviews with policy makers and government officials and mere extension of the set of countries would be logical and helpful first steps. Having made an attempt at an empirically-based framework for

counterterrorism policies and given the not unassailable, but certainly promising research results, this report should also be read as a plea for more empirical evidence in research into counterterrorism. The development of counterterrorism studies in this direction would enhance both its scientific validity and its policy relevance.

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