

### EUROPEAN DISINTEGRATION AS A MULTILEVEL PROCESS

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#### INTRODUCTION

The June 2016 British referendum on membership in the European Union (EU) is widely regarded as a unique event. Never in the history of European integration has a country held an in-or-out referendum on membership after the fact; countries have voted on whether to apply for membership and they have also voted on whether to accept the terms of accession at the end of the application process. Becoming part of the European Union is a major political and institutional commitment. Ensuring that the people support such a momentous decision only makes sense.

Asking whether to stay in the EU is an altogether different question because so much is unknown about the answer. Leaving the EU does not restore the status quo ante: the world has been changed by European integration and European countries have changed by dint of their participation in that process. Any country that leaves the EU brings a very partial array of governance institutions into a much more complex and imbalanced European environment – within which the European Union is the overweening regional power. So far, the British are the only people to undertake that experiment. Now they are realizing just how complicated it is to implement that decision.

British authorities might have had a better sense of the dilemmas they would face if they had focused less attention on the uniqueness of their situation within (and now leaving) the European Union, and if they had focused more attention on the challenges subnational or regional authorities face when seceding from federal or national political arrangements. The European Union is not equivalent to a modern nation state. Nevertheless, EU member states share many characteristics with sub-national regions

Like sub-national regions, EU member states do not control their borders completely, they play host to a large number of temporary residents from other parts of the union and they have significant numbers of their own citizens living elsewhere, they lack the full complement of regulatory authorities, they cannot negotiate their own external trading relationships or control cross-border capital flows, they have to share tax revenue in exchange for common procurement processes and (often implicit) cross-border transfers, and they are interpenetrated by large multinational firms that are more concerned with market access than national or regional loyalty. When sub-national regions secede from larger federal or national arrangements, they must learn to function as stand-alone political entities with all the risks and challenges that entails. Now the British government is (re-)discovering that necessity as well

Students of secessionist movements can also learn from Britain's experiment with the decision to leave the European Union. The lessons emerge from the politicization of European Union membership, the political dynamics that gave rise to a sense of British exceptionalism at home and isolation elsewhere in Europe, the strength of emotion that emerged when the referendum took place, and the strange determination to move forward with the decision

once the complexity and the complications became self-evident. Many observers were surprised that the British would vote against elite consensus and against their own economic self-interest. The political leaders of secessionist movements have very similar – and similarly risky and costly – objectives. Hence the question is whether they will be able to engineer a similar consensus that the advantages are worth the consequences.

Finally, it is worth looking at how the interaction between Britain's decision to leave the EU and secessionist tendencies both inside Britain and elsewhere in Europe. The questions are not just about whether Britain's departure from the EU makes another bid for Scottish independence more likely, but also about how Britain's exit from the European Union threatens the delicate peace in Northern Ireland, and how it alters the balance of power in favor of "self-determination" or against secessionist movements in other countries. Europe was dominated by nation-states before it became focused on the European Union; now political order in Europe seems to be changing again.

The conclusion to draw from this comparative analysis is that Britain's departure from the European Union is less unique than it appears at first glance. It is also more meaningful than an already important story about relations between Britain and the rest of Europe. What Britain's exit from the EU reveals is that European disintegration is a multilevel process with implications that all parts of Europe will have to manage. Those implications will also be important for the United States.

#### LESSONS FOR BRITAIN FROM ELSEWHERE

The growth of British scepticism toward European integration that culminated in the referendum on European Union membership is comparable in many ways to the emergence of national secessionist movements in parts of Belgium, Spain, Italy, and even the United Kingdom. If British authorities had looked at what determines the success of such secessionist movements carefully, they would have

found three factors that would have caused concern: the overlap between identity and geography in England; the fact that opposition to EU membership ran across the political spectrum from center-right to center-left; and the skewed burden of proof in the argument about political competence and institutional independence in the debate between the "Remain" and "Leave" camps.

The crucial element is the overlap between identity and geography. If you look across the most successful separatist movements in Western Europe, the main element they have in common is a strong sense of self-identification - the Flemings in Belgium, the Basques and the Catalans in Spain, the Scots and the Irish in the United Kingdom. Those separatist movements that lack this trait, try to invent it. The Northern Italian separatists claimed to belong to Padania, rather than Italy, and to have Celtic rather than Italic roots that distinguished the true northerners from those who live in Rome. The point to note here, however, is that ethnic or cultural identity is only a precursor to the establishment of a distinct political community with its own cleavages, political parties, values, and traditions. Strictly ethnic or cultural movements, like the language nationalists in Flanders, the kilt-wearing Scots, or even the Irish Republican Army, need to evoke an image of daily life and mainstream politics that is distinctive if they are to succeed in broadening their appeal beyond the fringes.

Indeed, most European secessionist movements only started to gain lasting influence when they abandoned their strict adherence to cultural inclusiveness and began to address more mainstream concerns about growth, employment, and the quality of public service provision. In Flanders, this breakthrough came when the Flemish movement split, with the extremists going into a xenophobic nationalist movement and the more moderate separatists forming separate alliances with the Liberal party and the Christian Democrats. A similar phenomenon happened with the splintering of the independence movement in Catalonia after the introduction of the Spanish constitution in 1978. And

you can see that pattern at work through the pacification of Sinn Fein in Northern Ireland and the election of representatives from the Scottish National Party to the parliament at Westminster. You can also see the contrast in the evolution of secessionism in the Basque region and in Catalonia; the Basque movement remained wedded to violent terrorism and then retreated into isolationism, while the Catalan separatists spread across their regional political spectrum and focused on fighting one another as much as battling for independence.

This fragmentation of the Catalan separatist movement would seem to be a source of weakness and not strength, and in the short term it is. Over the longer term, however, it means that the separatist movement can draw support from across the political spectrum. All it needs for success in that context is the ability to unite disparate forces around a common political program. That movement toward unity is an expression of political competence that adds heft to the separatist agenda by making it credible for voters to believe that independence is more than just a dream. Moreover, it is hard to accomplish. Separatist movements need to have real governing experience as well as a broad political reach. This is where the devolution of constitutional authority becomes important. Often national political elites believe that by devolving authority down to lower sub-national units they will address separatist concerns and so diminish their salience within the electorate. That is only true if there is no strong coincidence between geographic organization and political identity - in other words, devolution only works where it is not needed. Where there is a strong coincidence between geographic organization and political identity, and where the separatist movement reaches across the political spectrum, then devolution tends to bolster the cause of independence.

The Flemish case provides the clearest example of this dynamic at work. When the national government devolved political authority to the Flemish region in a major constitutional reform in 1993, the result was to spread the separatist movement from the Christian Democrats and the Liberals across the political spectrum as parties competed for regional elections not just to show their competence and agendas but also to demonstrate their commitment to the Flemish political community. This process came to a head in the early 2000s with the emergence of a New Flemish Alliance that promised not only to unite the region but also to project its influence in reshaping the constitution of Belgium yet again. This party was not immediately successful, but it quickly gained experience by focusing on those levels of government where it could exercise authority. Now the New Flemish Alliance is not only the largest political party in Flanders but also the largest in Belgium.

The situation in Catalonia is different insofar as the political spectrum remains divided and no common separatist alliance has emerged as a hegemonic organization. Nevertheless, the separatists have come together with a two-fold agenda. The public face of this agenda culminated in a series of popular referendums on independence, the most recent of which took place on I October 2017. The quieter side of that agenda is arguably more important. Through its joint control over the Catalan regional government, the separatist parties have been building out the institutions they would require should Catalonia achieve its independence. In doing so, they not only demonstrated their political competence but also their recognition of the need for institutional preparation. In effect, the Catalan separatists became a real independence movement, and not just a protest against the unified Spanish state

The evolution of the Scottish National Party (SNP) under a devolved constitutional arrangement is the third illustration. The SNP not only gained the power to direct the Scottish Parliament, but they also were able to show the Scottish people a different way of doing politics with a strong and progressive record in strengthening public services and working with local constituents. This record was hard for the Conservative and Labor parties to match. The Labor party in Scotland was particularly wrong-footed

because the SNP was successful in stealing that party's economic and social agenda and then moving it slightly to the left. By the time the Scottish National Party was ready to call for its referendum on independence, the British government found it difficult to deny them the right to explore selfdetermination. The polling was against independence when the decision to call the referendum as taken. Nevertheless, the momentum shifted heavily toward the SNP as the September 2014 referendum date approached. In the end, the SNP lost that vote by a margin of just under ten percentage points. The point SNP politicians would make is that this gap was much narrower than anyone in London had expected.

The experience of these sub-national movements should have given British authorities reason to be concerned about calling a referendum membership because there was a strong association between identity and geography, particularly in England but also in parts of Wales. Increasingly, moreover, centrist voices in British politics began to adopt Eurosceptical positions and they were happy to express those views through the mainstream media and from positions of political authority. Finally, advocates of leaving the European Union could point to a long tradition of political competence and institutional independence. Such appeals only had to imply that the mixture of competence and independence could be re-established; the Leave campaigners did not have to demonstrate their case to win the argument in the same way that a subnational secessionist movement would. In short, the conditions for a Leave vote were favorable if we think about Britain's departure from the European Union in the same way we interpret the conditions for the success of a separatist movement.

#### LESSONS FOR ELSEWHERE FROM BRITAIN

Nevertheless, it would be an exaggeration to imply that a vote by the British people to leave the EU was somehow inevitable. The conditions were favourable, but it took more than that for the Leave vote to succeed. The same is true for secessionist

movements elsewhere as well. What is interesting to note about the major secessionist movements in Western Europe is that even the most successful among them has not yet won independence. The only real secessionism in Europe has taken place to the east of the old Iron Curtain in post-communist Czechoslovakia and Yugoslavia. Even there, moreover, secessionism was not a guaranteed success. Former Soviet states like Azerbaijan, Georgia, Moldova, and Ukraine all have secessionist movements in progress - called 'frozen conflicts' because subnational groups have wrestled control away from national authorities and yet they have not succeeded in establishing their independence. Hence Britain's departure from the European Union is a unique event, of sorts, with lessons that should help us understand whether other Western European secessionist movements are likely to follow down the same path.

Here again, three factors give cause for concern: the structure of party politics, and particularly how minority actors within the United Kingdom drew support from abroad while at the same time pushing more centrist politicians to retreat into self-isolation; the role of perception and distribution in fostering assessments of economic performance that ran counter to conventional models or even the movement of standard macroeconomic aggregates; and the ability of politicians to use clarity and consistency to trump qualification and inconsistency irrespective of the objective "truth" of the claims that they made. These insights are important insofar as they reveal how the Remain campaign was outmaneuvered throughout the referendum process.

The point about party politics hinges on an important distinction between the British electoral system and the system used to elect members to the European Parliament. The British vote for members of their national parliament in single-member districts much like the Congressional districts used in the United States. The formula used to elect members of European Parliament is proportional, which means that people vote in districts that will have multiple representatives who will be drawn

from different political parties roughly in the proportions with which those parties win votes across the district. This kind of proportional system makes it more likely that smaller parties will win representation that would be impossible to achieve in elections based on single-member districts.

The irony in this situation is that a staunchly Eurosceptic party like the United Kingdom Independence Party (UKIP) would have a very hard time gaining representation in the British parliament but it would have a relatively easy time gaining representation in the European Parliament. More important, winning seats in the European Parliament would make it easier for UKIP to gain the platform and the resources to spread its anti-European message. UKIP won its first three seats in the European Parliament in 1999; it won twelve and thirteen seats in 2004 and 2009, respectively; and it won 24 seats in 2014, when it received the largest share of the British vote in the European Parliamentary elections. This growing strength put pressure on David Cameron's Conservative Party and bolstered the anti-European wing enough to convince Cameron to call for a referendum on Britain's membership in the European Union. Cameron's goal with that referendum was not to take the UK out of the EU; rather it was to silence the anti-European wing within the Conservative Party long enough for Cameron to lead the 2015 parliamentary elections. When his Conservatives won that contest, Cameron had to live up to his prior referendum commitment. Both UKIP and the Conservatives were waiting to take advantage of Cameron's weakness. Making matters worse, Cameron tried to appease the Conservative Eurosceptics by pulling his party out of the most influential grouping in the European Parliament. While UKIP took advantage of its links to Europe, Cameron retreated into isolationism.

The hope among the pro-EU Conservatives was that they could win the referendum by explaining the negative consequences for economic performance should Britain leave the European Union. Their message was backed by a broad consensus among the

major think tanks and economic organizations including official bodies like Her Majesty's Treasury and the Bank of England - that Britain would lose growth and employment if the British people voted to leave the EU. The problem with this argument was that it made sense only to the already converted, meaning those who live in large cities or university towns with close ties to the rest of Europe. For people living in the countryside or in more depressed regions, the perception was altogether different. Although they might accept that economists were united around their models, these voters argued that the implications for them personally were marginal and might even be positive. They did not accept that they benefited from connections to the rest of Europe and they were open to any message that targeted their specific concerns rather than focusing on more general conditions.

The Leave campaign was quick to take advantage of this difference in popular perceptions of economic performance; they were also quick to make multiple and often inconsistent claims to be able to improve services and strengthen economic public performance. In making these claims, the Leave campaign did not rely on a large body of economic analysis. Instead, they made appeals to "common sense" which they bolstered by underlying the consistency of their anti-European commitments. These arguments proved easier to sustain than the contrasting views put forward by the Remain campaign and by the Cameron government. Part of the problem arose from a distrust of elites; a larger share came from the lack of credibility. Cameron spent much time criticising the European Union as he tried to appease the anti-European wing of his Conservative party and so found it difficult to pivot and praise the European Union in the context of the referendum campaign. Moreover, his appeals to "the experts" only underscored his lack of credibility. If the experts were right to support participation in Europe, then Cameron was wrong to appease the anti-European wing of his party and attack the European Union in the first place.

Within the context of this debate, the fact that the Leave campaign had little or no unity beyond the referendum largely escaped noticed. Experts who followed the debate closely tried to make the point that there was no consensus on what Britain would do if it left the European Union, and yet those observations were lost in the heat of the in-or-out debate. The irony of the British situation, of course, is that the situation reversed itself almost as soon as the referendum result was announced. Those minority groups that spoke loudest in favour of leaving the European Union, like UKIP, announced their mission accomplished, leaving the more centrist leaders of the Leave campaign with the responsibility for implementing the popular choice. This proved challenging both because of the economic consequences of a sudden change in Britain's relationship with the rest of Europe, and because the end of the referendum campaign revealed the divisions over what to do next.

The conclusion that governments who face secessionist movements will draw from this example is about the difficulties they face in campaigning to hold diverse sub-national units together; the conclusion that the secessionist movements will or should draw is about the ease with which their campaign to achieve independence can outpace their preparations to control what happens if and when they achieve that goal. You can see this lesson in the current posture of the New Flemish Alliance and the Scottish National Party; both movements are wellplaced to push for greater independence and yet unwilling to accept the risk that they might fail. They would rather continue work preparing the ground so that they will be ready for what happens afterwards. The Catalan government is in a different situation. The I October 2017 referendum took place before their institutional preparations had matured. Moreover, the heavy-handed response by the government in Madrid caused events to accelerate dramatically. Now the Catalan separatists are struggling to gain control over the pace of change in their region; they are also hoping to quiet down the tensions with Madrid long enough to reassert their political authority. Like the British, in some respects, the Catalan separatists have been overtaken by events. They remain united in the cause of independence, but their ability to continue to pursue that goal is far from certain.

## HOW LEAVING EUROPE AND LEAVING BRITAIN INTERACT

This is where the interaction between the British referendum and the growth of sub-national separatist movements becomes important. The most surprising challenge that the British government has faced after the EU referendum vote has been domestic rather than European. Although much of the press has focused on the on-again-off-again nature of the negotiations between Britain and the EU, the real drama - and, indeed, the real reason Britain's exit from the European Union has proven to be so complicated – has to do with the domestic constitutional implications within the United Kingdom. Two of these complications are the result of secessionist movements in Scotland and Northern Ireland. And it is tempting to imagine that these complications are uniquely British. Nevertheless, it is possible to see that other member states are worried about facing a similar fate. In that way, Britain's choice to leave the European Union has affected attitudes toward secessionism across the whole of Europe.

The case of Scotland is interesting in this context. The Scottish people voted overwhelmingly to remain inside the European Union, and the Scottish parliament is demanding to have a share in the policy authority that the British Parliament is repatriating from Brussels. Both demands create a bind for the British Conservative Party and the Leave group more generally. On the one hand, many of the political leaders who believe Britain should leave the European Union do so because they argue that the self-determination of the British people is the ultimate expression of sovereignty. This argument makes it difficult to deny the Scottish people the right to self-determination, particularly when their own

referendum results on Europe were so different from the rest of the country. On the other hand, many of the political leaders who argue for Britain's exit do so because they claim it is necessary for policy to be made by politicians as close to the constituents they represent as possible. This makes it hard to claim that the British Parliament at Westminster should monopolize policy making authority that could be devolved to the Scottish parliament. In a sense, the same arguments that the Leave campaign used against the European Union are now being used by the Scottish National Party against the Leave campaign. The British government risks losing further credibility in Scotland as a consequence.

The Northern Irish case shows a very different dilemma. The reason lies in the underlying ambiguity of the Good Friday agreement that brought peace between the Protestants and the Catholics of Northern Ireland. That ambiguity centres on the relationship between geography and identity. The Good Friday agreement makes it possible for the people of Northern Ireland to be both Irish and British at the same time. They are Irish insofar as there are no barriers to movement of peoples or economic activity from one part of Ireland to another, North and South. They are British insofar as the Northern Irish Assembly remains part of the British constitutional structure with a unique powersharing arrangement both within the region and between Great Britain and the Republic of Ireland. That arrangement is only possible – as is noted in the preamble to the Good Friday agreement - because both Great Britain and Ireland belong to the European Union. Once Great Britain leaves the EU, such ambiguity is no longer possible. Either the Northern Irish retain their freedom of movement North and South and surrender their close ties to the British constitutional arrangement, or they remain part of the British state and lose their freedom of moment. Once again, geography and identity are united in an unstable manner and the Northern Irish worry that violent separatism might return to the region as a consequence.

No matter how much European governments might wish for the opposite, the tension between Barcelona and Madrid is not going to go away easily. Indeed, the reaction of the Madrid government to Catalonia's bid for independence has all but assured that tension will remain close to the surface. The Catalan population is deeply divided between those who support independence and those who seek to maintain the unity of Spain. Pro-independence parties have learned to ignore their many differences and to collaborate in pushing their common agenda. Many the institutions they require to assert independence can be created relatively easily and the only way that the authorities in Madrid can prevent that from happening is to usurp the political competence of the regional government in ways that will continue to build up resentment.

It will not be impossible for the Spanish government to resolve this dilemma. Again, while many of the West European secessionist movements are successful in pushing forward their agendas, none has yet succeeded in gaining independence. The nation-state is a resilient and powerful political and economic organization. The point is simply that Britain's exit from the process of European integration is an important signal that the European political order is changing in fundamental ways.

# THE IMPLICATIONS OF MULTILEVEL DISINTEGRATION FOR EUROPE AND THE UNITED STATES

Whenever Europe makes the transition from one political order to another, the resulting instability inevitability rebounds against the United States. Indeed, the current administration headed by President Donald Trump seems to welcome that prospect because of the opportunities it represents. President Trump has been quick to support Great Britain's decision to exit from the European Union and he has been eager to find ways to negotiate trade deals with individual European countries rather than having to trade with the European Union as a whole. President Trump has also questioned the underlying

usefulness of the whole European project – just as he has at times appeared to question the continuing usefulness of the NATO alliance.

The question is whether it would really be in America's national interest to have the European Union dissolve or to see a reinvigoration of secessionist movements in places like Spain, the United Kingdom, or Belgium. From a short-term negotiating perspective, there may be advantages to having a number of much smaller trading partners from whom it is easier to extract meaningful concessions. From a longer-term security perspective, however, it would be challenging to imagine how Europe could organize a common policy toward migration from the Middle East or North Africa in the face of significant divisions. Although migration has not featured prominently in this analysis, it is no secret that this issue is a touchstone for identity-based political mobilization. Indeed, there is probably no other issue that unites separatist movements more obviously at all levels of analysis. The Catalan separatists are a rare exception.

A more divided Europe would contribute less to transatlantic security as well - both in terms of meaningful defense spending like the kind the Trump administration currently advocates and in terms of managing security problems arising in the geographic regions from Belarus to the Sahel. These security problems may not seem to affect America's national interest in an immediate and proximate sense, but they will have an impact as second-order effects accumulate over the longer term. Every US administration since the end of the Second World War has ultimately come around to recognize the need for transatlantic partnership in promoting America's vital security interests. This administration may start with a different tone and direction, but it is going to face that requirement at some point in the future. The question is whether the Europe that evolves will be adequate to partner effectively with the United States. The multilevel disintegration of Europe threatens that future partnership.

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