

Adapting to Europe: Is it Harder for Britain?

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Britain has had difficulties adapting to European integration. The problems result not so much from the EU-related changes in national policies, which have actually been rather moderate, or from the EU-related changes in governance practices, although these have been significant, affecting national institutional structures, policy-making processes and representative politics. They do not even follow from the serious challenges that the EU-related changes in governance practices pose for traditional ideas about democracy. Rather, they come from the lack of a discourse capable of legitimating such changes. To demonstrate this, the article considers Britain's problems in comparative perspective with those of France, which has had greater changes in policies and practices, greater challenges to national ideas, but a more legitimating discourse, and Germany and Italy, where changes in the practices and challenges to ideas have not been as significant.

When the French and then the Dutch voted 'no' in their national referenda on the Constitutional Treaty, the British government was let off the hook. Having pledged to hold a referendum as well, the two resounding rejections of the treaty enabled the Blair government to avoid the dangers of a debate that would have been framed as one of Britain 'in or out of Europe'. The lack of any such debate, however, leaves Britain where it has always been: ambivalent about being in Europe, uncertain about its role and resistant to any EU initiatives that are perceived as in any measure taking away from Britain's autonomy of decision. The discourse on Europe, moreover, remains the same: British governments justify continued participation primarily on economic grounds while avoiding any discussion of the issues of sovereignty, identity and democracy that are the rallying cry for Euro-sceptics.

The question this raises is: Why is belonging to the European Union so difficult for Britain? For an answer, this article considers the extent of change in Britain's public policies and governing practices in response to the EU, the degree to which this has challenged national ideas about which policies and practices are appropriate and how national leaders have responded to the changes and challenges in their discourse. To establish some qualitative measure for evaluating the changes in policies and practices, the challenges to ideas and the quality of the discourse, the article compares British experiences to those of the three other biggest EU member states, which are closest to Britain in economic weight, population size and importance in Europe—France, Germany and Italy.

Britain has comparatively little problem adapting to Europe with regard to the EU-mandated changes in policies, since these have demanded significant transformation only in a limited number of policy areas (e.g. the environment)—and much less than in France, Germany or Italy (e.g. the euro or deregulation in public service



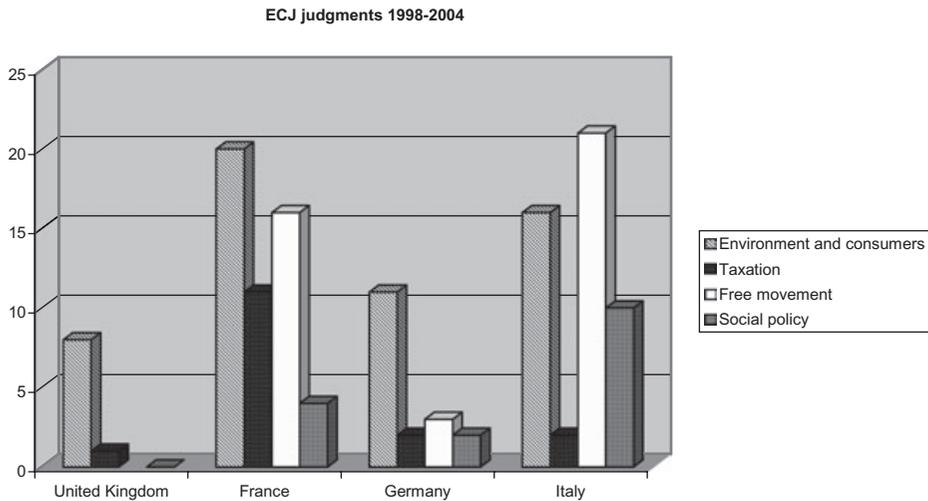
utilities). Britain does have a problem with the EU-related impact on national governing practices, which has disrupted the traditional balance in domestic governing structures, undermined long-standing patterns of policy-making and submerged national politics—albeit less so than in France. But, its real problem follows from the EU's challenge to traditional ideas about democracy and the lack of a legitimating discourse with new ideas about Britain in Europe to legitimise the changes in practices. Although Germany, Italy and France in particular suffer from similar problems, only in Britain has the very idea of EU membership itself been seriously in question for such a wide swathe of political elites as well as the public for such a long time.

Britain's (Lesser) Problems Adapting to European Policies

As the EU's 'awkward partner' (George 1990), Britain has been particularly vociferous in protesting against the incursions of the EU on national policies. The British have expressed fears of a European 'superstate', imposing policies that threaten national sovereignty, identity and democracy. They have voiced concerns about European economic policies reducing flexibility, increasing red tape and thereby destroying British competitiveness. They have evinced reservations about joining the single currency for reasons of both economics and sovereignty. And, they have shown resistance more generally to the increasing number of rules and regulations coming out of Brussels.

And yet, the British have done remarkably well in the European Union with regard to projecting their preferences in a wide range of policy areas as well as in complying with EU policies. They have promoted greater integration in security and defence, starting with the St Malo initiative, together with France. They have pushed ever more enlargement to the east, despite periodic resistance from other member states, whether France in the early 1990s with regard to the Central and East European countries, or Germany, most recently in the case of opening accession talks with Turkey. They have pressed for continuing deregulation and liberalisation in the microeconomic arena. And, they have a much better record of compliance with EU policies than France, Italy or Germany, as illustrated by Britain's record with regard to infringement proceedings between 1998 and 2004 (see Figure 1).

Most significantly, however, the British have adapted their national policies in response to EU requirements in a wide range of areas without having to change most of their policies nearly as much as France, Germany or Italy. This is because Britain has, for the most part, reformed ahead of the EU in the economic arena, having transformed its economic governance rules in response to the pressures of globalisation. The privatisation of state-owned firms in both the public utilities and competitive sectors beginning in the mid-1980s went much further, much faster, much earlier than any other EU member states at the time. The deregulation accompanying such privatisation, moreover, which replaced voluntary self-governing arrangements and informal government–industry relationships with independent regulatory agencies for the financial markets and public service enter-

Figure 1: European Court of Justice Judgments 1998–2004

Source: Compiled from ECJ, <http://europa.eu.int/eur-lex/en/index.html> (cases up to February 2004).

prises such as telecommunications, gas and later the railways, anticipated many of the deregulatory initiatives of the European Community (Schmidt 2002, Ch. 2).

As a result, whereas other member states have had to transform their approaches to economic governance in a wide range of policy areas in response to EU pressures, Britain has most often simply absorbed EU-related policies without substantially changing its own policies or institutional arrangements. This was the case of the financial markets, for example, where Britain's 'big bang' in 1986 came way ahead of any European decisions in the area, as a reaction to the US stock market deregulation and the competitive challenges to the City (Lütz 1998). Although France's 'little bang' came at the same time, and also had little to do with the EU, having been the means to ensure the successful sell-off of public enterprises (Schmidt 1996), Germany's transformation occurred only in the mid-1990s, in response to the growing competitive pressures from European capital market integration (Story 1996), spurred on not so much by the European Commission as by internationalising German banks that urged liberalisation to remain competitive (Lütz 1998). Italy, however, was clearly pushed by the EU.

In the deregulation of telecommunications, similarly, Britain absorbed the EU policy reforms of the mid-1990s, since it had already privatised and deregulated in 1984. France, Germany and Italy, by contrast, all had to transform their telecommunications sectors in response to EU policy. Although both Germany and France—but not Italy—had engaged in some internal reforms before this, it was only when pushed by the Commission that they finally agreed to a European policy that deregulated the market (Thatcher 1999).

In the EU-related deregulation of electricity, too, Britain was little affected, given that it had deregulated already in 1990. France and Germany, by contrast, both of which had largely resisted Commission pressure to reform in the sector through the 1980s and early 1990s, had to transform the sector following the electricity liberalisation directive of December 1996. But, whereas Germany embraced change, going beyond the directive to fully liberalise the industry, France resisted, insisting on maintaining its single dominant nationalised player and concerned about negative public reactions and strikes by public service unions (Eising and Jabko 2001).

In the case of air transport, Britain, having privatised and deregulated in the mid-1980s, actually exported its own model to the EU level. Here again, while Germany embraced change with the privatisation of Lufthansa in the mid-1990s, France actively resisted, reforming only as much as it had to, and Italy dragged its feet (Kassim 1998).

Moreover, no European regulations or directives have had any significant impact on monetary policy in Britain (Artis 1998). By joining the EMS but not the ERM in 1979, Britain managed to maintain a large measure of monetary autonomy, something given up only briefly subsequently between 1990 and 1992, with the (disastrous) foray into the ERM. After this, the opt-out from EMU ensured that the EU would continue to have little impact on British monetary policy. Whereas Germany was also little affected by the EMS and, until recently, even by EMU, since it imposed its macroeconomic patterns and prejudices on the other members, France had to transform its entire macroeconomic policy-making system, beginning with the turn to monetarism in 1983 in response to major economic crisis and to ensure that it could remain in the EMS (Loriaux 1991). For Italy, the EU-related transformation came in the mid-1990s, and was even more dramatic with the turn to sound fiscal policies in the run-up to EMU (Sbragia 2001; Radaelli 2002).

There are areas, however, where Britain has had to transform itself entirely. In environmental policy, the UK arguably underwent the greatest transformation after a long period of inertia, going from a traditionally decentralised and voluntary approach to a more proactive, transparent and preventative approach in the 1990s, as the EU forced it to intervene in areas that it had traditionally devolved to front-line agencies and to move to more regulatory or legalistic enforcement (Jordan 2002, 41, 198–200). Particular policies, of course, had a differential impact depending upon their content. Thus, whereas Britain and France by contrast with Germany had a relatively hard time with the EU's 1980 Drinking Water Directive, since it prescribed uniform standards and formal patterns of interest intermediation largely modelled on Germany's legalistic approach (Knill and Lenschow 1998), Germany had the harder time and Britain the easier with the 1993 Environmental Management and Auditing Systems Regulation (EAMS), which demanded a self-regulatory process that was largely modelled on the British approach (Héritier, Knill and Mingers 1996, 207–265).

In the social policy arena, it is more difficult to make any such generalisations. Britain was greatly affected by the gender-related decisions of the European Court of Justice (ECJ) beginning in the 1970s. But, in other areas it was little affected

because of the opt-out on the Social Chapter of the Maastricht Treaty negotiated by John Major. Once Blair opted in, however, Britain did have to transform its policies in a number of areas because of real 'misfit' in policy content. But, it attained a reasonably good compliance record nonetheless. France, by contrast, often had a better 'fit' with the mandated policies but a worse compliance record, while Italy had both less fit and worse compliance (see Falkner et al. 2005). The reasons for this, however, have more to do with governance practices, as discussed below.

Britain's (Greater) Problems Adapting to European Governance Practices

Whereas Britain has been less affected than France, Germany or Italy in terms of EU-related changes in public policies, it has been as affected if not more so in terms of EU-related changes in governing practices. The problem for Britain is mainly one of institutional 'fit', as it is for France. The EU is a highly 'compound' polity characterised by a very high level of dispersion of governing activity through multiple authorities, with a quasi-federal division of powers vertically and horizontally, semi-pluralist policy formulation and regulatory implementation processes, and consensus-oriented, non-majoritarian politics. As such, the EU fits better with national polities like Germany and Italy that are also compound, with federal or regionalised states, corporatist policy-making processes and proportional representation systems, than with more 'simple' polities like Britain or France, where governing activity has traditionally been more concentrated in a single authority through unitary states, statist policy-making and majoritarian politics (Schmidt 2005).

This makes for differences not only in the way member states interact with the EU—in 'uploading' their preferences for EU policies or 'downloading' EU rules in policy implementation—both of which are arguably easier for 'simple' polities where power is more concentrated in the executive, but also in how they adapt their institutions to the EU—which is arguably harder for simple polities as a result of less institutional 'fit.'

Changes in Institutional Structures

The EU 'federalises' the institutional structures of all of its member states—as national executives have become EU-level decision-makers in exchange for giving up national autonomy. Similarly, national legislatures have lost traditional legislative powers of initiative while gaining greater powers of oversight (Duina and Oliver 2004; Norton 1996). Moreover, national judiciaries have become interpreters of EU law and sub-national units, implementers of EU regulations, at the same time that both have become more independent of the national executive (Stone Sweet 2000; Hooghe 1996). But, the EU's resulting quasi-federal system has been more disruptive to the traditional balance of power among national branches and levels of government in simple polities with unitary states like Britain and even more so France than in compound polities with federal states like Germany or regionalised states like Italy.

In Britain and France, traditionally unitary states in which the executive has benefited from great concentration of power, executives have lost significant autonomy as a result of the diffusion of decision-making upwards to the EU, downwards to more autonomous regional authorities and sideways to more independent judicial authorities. The loss of executive autonomy has been less significant for more federal states like Germany, given that the executive has always had to share power and authority with other national and sub-national units of government. For a regionalised state like Italy, by contrast, the executive has increased its concentration of power even as national courts have gained in independence and regions in autonomy.

Paradoxically, although the diminution in national parliaments' legislative powers of initiative has been potentially more problematic for a federal state like Germany, it too has in the end affected unitary states like Britain and France more profoundly. In Germany, when the executive's growing EU-related legislative role threatened the national legislature's balance of powers, the parliament was able to negotiate a rebalancing of powers with the central executive at the time of the Maastricht Treaty (Saalfeld 1996). In France, by contrast, the parliament's traditionally highly limited powers have only become more limited, despite reforms, with parliament exercising only very weak control over the executive with regard to oversight (Rizzuto 1996; Maurer and Wessels 2001). In Britain, too, parliament has lost power and influence, although it has managed to retain its traditionally greater powers of oversight and voice, allowing the House of Commons to exercise moderate control over the executive (Norton 1996; Maurer and Wessels 2001; Kassim 2005). In Italy, a highly regionalised but technically still unitary state, greater effectiveness has counterbalanced the parliament's loss of significant powers of initiative and approval.

The EU's promotion of greater independence of the judiciary from the national executive has also had more of an impact on unitary Britain and France than on federal Germany or regionalised Italy. In France, for example, the courts' increasing independence from executive control has been the result of internal dynamics related to the rise of the Constitutional Court and the growing investigative powers of the magistrates and not just of their empowerment as an enforcement arm of the EU (Stone Sweet 1992). Such independence has been particularly unsettling to the executive, concerned about hold-ups to reform initiatives due to Constitutional Court decisions or ministerial resignations resulting from magistrates' corruption investigations. It has also been more resistant to applying EU law than either Germany or Britain (Conant 2002). In Italy, where the courts have traditionally been even more subordinated to the executive than in France, a similar dynamic has taken place. By contrast, in Britain, where the courts have always been relatively independent and the precedent-setting approach of British common law matches EU practice, the executive found it easier to accept the increased independence of the judiciary. But the courts bristled at giving up their prerogatives and have referred fewer questions to the ECJ than have France or Germany (Conant 2002). Concern has mostly been directed at the sheer volume of EU law, which has been seen, in the words of Lord Denning, no longer like 'an incoming tide flowing up the estuaries of England. It is now like a tidal wave bringing down our sea walls and flowing inland over our fields and houses' (cited in Alter 1998,

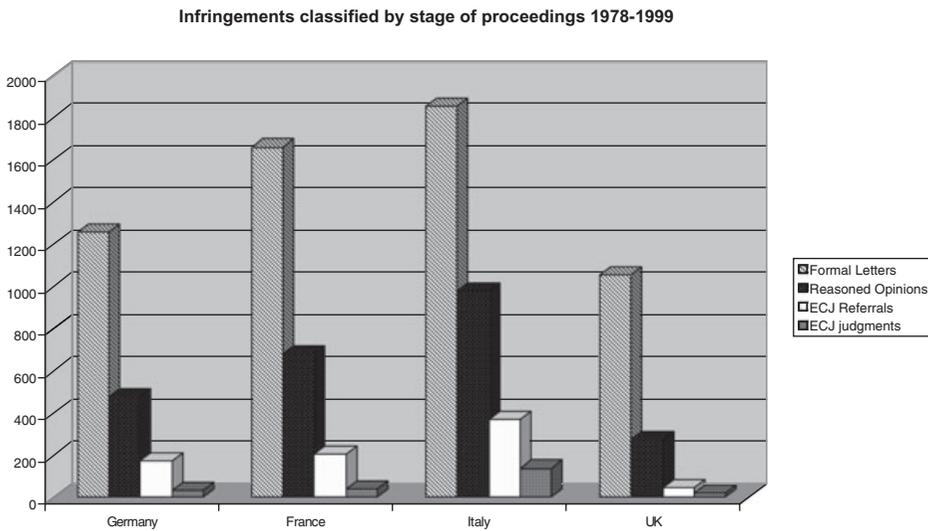
135). In Germany, where the courts are even more independent than they are in Britain and the importance of law as a regulatory instrument parallels EU practice, the problem has been neither with the even greater independence of the courts nor with the proliferation of EU laws. Rather, it has been with constitutional issues related to the precedence of EU law over German (Stone 2000).

Finally, closer linkages with the EU through regional policies, committees and funds have been more empowering for the regions of unitary states *vis-à-vis* the executive than for those of federal or regionalised states, which have always had their own autonomous resources and powers. EU-related increases in supranational access and funding have only added to the growing autonomy of the regions of unitary France, which benefited from decentralising reforms only in the 1980s (Schmidt 1990), and even more for the newly emancipated 'regions' of Britain, beneficiaries of the devolution that started in the late 1990s for Scotland, Wales and Northern Ireland with elected legislatures, but which has yet to begin for the recently created English regions (Loughlin 2001). The EU has also been empowering to the regions of formally unitary Italy, which gained significant autonomy beginning in the 1970s, and have long had an uneasy truce with the central government. For federal Germany, the EU had a disempowering impact initially, when the regions lost power as a result of the executive deciding at the EU level on policies that had long been their domain, but subsequently regained the traditional balance through compensation by a seat at the table in the EU on issues that affect them.

One caveat, though. Although unitary states may have lost more autonomy in the process of Europeanisation than either federal or regionalised states, their very structure has nevertheless better enabled them to project their preferences on to the EU in the process of European integration. This stands to reason, since the executives in unitary states are in principle (if not always in practice) better able to control the various ministries involved in European policy-making by creating unified co-ordinating structures which ensure that national preferences are expressed through a single voice at the EU level. This has been the case for Britain and France, both of which have had strategic ambitions to influence the EU across policy areas (Kassim 2003, 157–158). But it has not been the case for formally unitary but regionalised Italy, handicapped by a lack of administrative capacity. In federal states, the projection of preferences is more difficult, since the formal structure alone makes central co-ordination difficult, given the autonomous powers of the different branches of national authority on top of regional participation in EU-level decisions. This helps explain why Germany has to hope that 'hundreds of arrows may be more effective than one shot with Big Bertha' (Derlien 2000).

Institutional structure also helps explain member states' differential capacity to apply EU decisions, with regard to both transposition of EU directives and their implementation. Unitary states have a potentially greater capacity to apply EU decisions because of the concentration of power in the executive and the executive's lack of need to negotiate with sub-national regional authorities, as in federal or regionalised states. Other factors, however, also come into play. This is because institutional capacity to apply EU decisions does not necessarily ensure the political will to apply them, if national executives are opposed to the measures, or the

Figure 2: Infringements of the Internal Market Classified by Stage of ECJ Proceedings (1978–1999)



Source: European University Institute (compiled by Tanja Boerzel)

<http://www.iue.it/RSCAS/Research/Tools/ComplianceDB/Index.shtml>

administrative capacity, if national executives are not efficient or effective in transposing or implementing the measures. Infringement proceedings against member states between 1978 and 1999 provide a very rough bit of statistical evidence for this (see Figure 2). Generally speaking, institutional design provides a plausible preliminary explanation for the poor compliance record of federal Germany and the stellar record of the unitary UK. By contrast, the absence of political will better explains the even poorer record of the unitary French case, given the high level of infringements which dropped fast after notification of infringement, while the lack of administrative capacity best explains the Italian case, since it failed to respond even when faced with the possibility of court action. Studies of compliance patterns in particular policy areas, such as social policy, reinforce this argument even as they show how much more complicated the range of reasons for non-compliance may be (Falkner et al. 2005).

Changes in Policy-making Processes

The EU also ‘pluralises’ all of its member states’ policy formulation processes—by allowing access and influence to a vast array of policy actors in a semi-pluralist system of EU-level decision-making and in mandating greater openness at the national level. And, it ‘juridifies’ their implementation processes—by pressing

national administrations into more regulatory and legalistic modes of enforcement. But this, too, has generally been more disruptive to the statist policy-making patterns of simple polities, which have traditionally limited interest access in policy formulation but accommodated interests through 'flexible' policy implementation—whether through administrative discretion (in France) or self-regulation (in Britain). This is because the EU includes societal actors in policy formulation processes from which they had long been excluded and excludes them from implementation processes in which they had long been included. The EU has been less disruptive to the corporatist patterns of compound polities, which allow a limited set of 'privileged' interests—mainly business and labour—into policy formulation and implementation. This is because the EU adds societal actors to those already included in policy formulation while in policy implementation it only sometimes excludes societal actors traditionally included (since it mostly makes exceptions for corporatist processes).

In policy formulation, the learning curve for French interest groups hoping to exert influence at the EU level was perhaps steepest, as lobbying required approaching policy-makers early with technical information rather than relying on political arbitration late in the process. Having learned at the EU level, however, French interests have become more impatient with their lack of access at the national level—witness the increasingly loud complaints of the big business association, the MEDEF (Schmidt 2002, ch. 6). British interests had much less to learn or to object to, having honed their lobbying skills in relations with parliament and their negotiation skills with the bureaucracy, although they also gained in influence (Greenwood 2003). Nonetheless, British state actors also continue to control access at the national level. In fact they have increased their 'steering' of policy-making as long-standing policy networks have been breaking up while self-regulation has been replaced by regulatory agencies and legalistic controls in an increasing number of domains (Jordan 2002; Bache 2000; Moran 2004).

In policy implementation, both countries have had difficulties with the EU's regulatory and legalistic requirements, but very different ones. In France, where EU requirements go against traditional patterns of administrative discretion, organised interests that have not gained access to EU policy formulation and are denied the accommodation of the past see no other alternative than to engage in confrontations with national authorities, as in the cases of truck drivers blocking highways to protest against EU-mandated liberalisation and public service workers striking to protest against privatisation and deregulation. In Britain, where the EU's codification of the rules goes against traditional preferences for self-regulation and informal agreements, the problem has been in the increasing numbers of laws that deny organised interests the voluntary rules and self-governing arrangements of the past, leaving them to complain of the increasing rigidity of the public sphere with the proliferation of statutory rules. When Margaret Thatcher, in her famous speech in Bruges in 1988, declared: 'We have not successfully rolled back the frontiers of the state in Britain only to see them re-imposed at a European level', she was not just voicing her objections to EU initiatives on social policy and the single currency. She was also indicating more generally held British concerns about any Brussels-generated rules that would result in a reduction in the space left open to the private sphere. The resistance to replacing voluntary rules with statutory ones

helps explain strong British objections to a Commission proposal to institute a law to regulate takeovers largely based on the UK's own City Code on Takeovers and Mergers, on the grounds that it would threaten the UK's non-statutory system (*Financial Times*, 21 November 1997). It also helps explain the UK's five-year battle against the passage of the Environmental Impact Assessment Directive (EIA) on land-use planning, despite the fact that it merely formalised existing practice in Britain (Jordan 2002, ch. 10). And, it fits with the more general concern over red tape.

In compound polities such as Germany and Italy with corporatist or even clientelistic (Italy) policy formulation and implementation processes, the problems of adaptation are not as great. New interests have joined long-standing interests in policy formulation at both EU and national levels while, in policy implementation, corporatist processes have mostly continued and legalistic patterns have been reinforced, and clientelism has been discouraged. For Germany, this has entailed the least disruption, even if specific policy areas may have switched from corporatist processes to legalistic or regulatory and vice versa. In Italy, however, which has traditionally had clientelistic patterns and has been even more prone to derogation of the rules than France, the potential disruption—and confrontational response—is likely to be even greater than France if and when it implements the rules.

Changes in Representative Politics

Finally, the EU 'de-politicises' all member states' representative politics. National partisan politics finds very little outlet at the EU level, given that European political parties are weak and not very cohesive, while issues are decided in co-decision procedures between the Council—where qualified majority voting may apply—and in parliament, where super-majorities are often needed. This has tended to put more of a damper on the more highly polarised, politically-charged politics that results from the majoritarian representation systems of simple polities than on the more compromise and consensus-oriented (albeit partisan) politics that follows from the proportional representation systems of more compound polities.

In Germany and to a lesser extent Italy, the complex negotiations and search for consensus and compromise that go on in the EU are not so different from their own politics. Compromise in negotiated settings has always been a *sine qua non* of proportional representation systems, however partisan the politics, especially since the government generally does not have the power to impose. In Britain and France, by contrast, where majoritarian electoral systems generally provide for stronger governments with little need to negotiate or find consensus, the ambiguity of EU-related compromises is likely to cause more problems for politicians and greater disaffection in electorates used to more politically demarcated policies and positions. What is more, it undermines conflict-based political cultures which expect the government to impose its electoral programme without compromise, although in France unpopular programmes are immediately sanctioned through protest in the streets whereas in the UK's 'elected dictatorship' the main sanctions come from elections. Voting abstention rates from the mid-1980s to the late 1990s support this view, as France and the UK have higher abstention rates that have

climbed more steeply, up by 14 per cent and 16 per cent respectively from reasonably high levels of 22 and 25 per cent, than Germany and Italy, where abstentionism was up by around 7 per cent from low levels of around 11 per cent (Bréchon 2002, 103).

The problem for the EU is that its governance practices essentially involve *policies without politics*, that is, policy-making without partisan political positions or elected government as such. Instead of party politics of the left/right variety, we find at best the politics of interest, whether of national interest through the Council, of public interest through the European Parliament or of organised interest through the Commission. The problem for the national level is that its governing practices instead involve *politics without policy*, that is, political accountability without full responsibility or control over EU-mandated policies and often also without political commitment to them (see Schmidt 2004 and 2005). Because national citizens lack a system in which one can 'throw the scoundrels out' at the EU level, national politics takes the heat for EU decisions.

Not surprisingly, when directly consulted through the referenda on the Constitutional Treaty, national electorates chose to respond on the policy issues on which they have no direct say. For the Dutch, the issues were the costs of the euro, enlargement and Dutch identity, tied to concerns about immigration on the one hand and tolerance on the other. For the French, on the left the main issues were the perceived neo-liberal economics of the EU and its impact on the welfare state while on the right the focus was the impact of the EU on national sovereignty and identity, also tied to enlargement.

The failures of the referenda in France and the Netherlands, much as the low turnouts in other member states with positive majorities, such as Spain, attest to the problems of politics in all member states. Until citizens begin to see Brussels as an equally important place to voice concerns, apply pressure and protest—through pluralist policy-making processes at the EU level—national politics will continue to suffer from the bottleneck caused by national governments being the main focus of national discontent. However, while such greater EU-level activism might help alleviate some of the EU-level democratic deficit, it can do nothing for the national democratic deficit. This is because the EU not only alters the traditional workings of national institutions, it also challenges traditional ideas about national democracy. And, national leaders have generally failed to provide legitimating discourses for such changes.

Britain's (Greatest) Problems: The Lack of New Ideas and Discourse

Thus, Britain has comparatively fewer problems than France, Germany or Italy with regard to EU policies generally, given its better 'fit' with a wide range of micro-economic policies and its opt-out in the macroeconomic arena, even if it has had to transform its approach in environmental policy and has some concerns in the social policy arena. Moreover, although Britain does indeed have problems with regard to the impact of the EU on national governance practices, these are less significant than for France with regard to the loss of executive autonomy and parliamentary power.

Britain's track record is better than those of Germany, France and Italy with regard to transposing and implementing EU law, despite its dislike of how many laws there are, and how these increase the rigidity of the public sphere. In addition, national interests have had less to learn than the French in exerting influence at the EU level, while state actors have actually increased national control over policy-making. And yet, the discourse about Europe tends to be largely negative, with Fleet Street's blaring headlines about EU scandals and (specious) incursions such as its outlawing of square gin bottles and curved bananas.

So, why does Britain complain so much about the impact of the EU on national policies and practices? For this, it is necessary to consider how the EU challenges national ideas about democracy and how national leaders have responded to such challenges in their discourse to the general public.

One of the major problems for all member states, and not just for Britain, is that while national governance practices have changed, sometimes dramatically, in the process of Europeanisation, national leaders persist in speaking as if the old ideas about democracy still applied, as if little has changed, though everything has. Although EU-related policy issues are often at the forefront of national discourse, as politicians blame the EU for unpopular policies or take credit for popular ones without mentioning their source, the 'polity' issues involving EU-related changes in governance practices are rarely addressed except at certain defining moments—times of treaty referenda or accession agreements. Even though this is understandable, since politicians are not likely to use their scarce political resources to speak about changes that are complicated and difficult to sell, and there are no electoral incentives to do so, it adds to the problems of national adaptation to Europe (Schmidt 2004). These problems have been dramatised most recently by the fiasco of the ratification of the Constitutional Treaty.

French Ideas and Discourse

For France, the EU-related changes in governance practices that disperse governing activity through multiple authorities are a direct challenge to the Jacobin philosophical foundations of the *République une et indivisible*. Democratic legitimacy in France has traditionally been based in a unitary state and embodied in an autonomous executive that is the direct representative of the people, charged to do its bidding without obligation to any other authorities (which are to be subordinate to it, whether judiciary, legislature or sub-national) or interests (in particular organised interests, which have always been regarded as illegitimate if not organised by the state), with obligations to promote national interests and protect citizens' rights. For national leaders, the main question has been how to create a discourse—and set of policies—that serves to reconcile these ideas with European integration. They did this by emphasising France's leadership in Europe while downplaying the impact of the EU on national governance practices.

For Charles de Gaulle, with his renewal of French nationalism and his emphasis on *grandeur* and *indépendance* in foreign policy, France was to increase its own power in the world through Europe, since Europe was a '*multiplicateur de puissance*'. Moreover, in Europe, France would defend republican values, as part of its '*mission*'.

civilisatrice (civilising mission) in '*une Europe des patries*' (a Europe of nations) in which the state could not be subsumed by a federal Europe. Mitterrand, by contrast, had a vision of France in a more federal Europe, in which the success of Europe presupposed French success, with the two increasingly conjoined since *tout se rejoint, notre patrie, notre Europe, l'Europe notre patrie* (everything comes together, our nation, our Europe, Europe our nation) (Mitterrand 1986, 15, 104). For Mitterrand, further integration was a way of modernising the republican tradition and of ensuring the continued *grandeur* of France in a globalising world (Risse 2001; Larsen 1997, 97) without, however, as he made clear in the debate on the Maastricht Treaty, negatively affecting national sovereignty or democracy ('Dialogue', 1992). This largely remains the mainstream discourse today, despite growing ranks of dissenters. Thus, we find President Chirac calling Europe a 'federation of nation states', defending the idea of the French unitary state against German Foreign Minister Fischer's proposals for a European 'federal' system—by insisting that such a system was not for France, given its 'unitary tradition which helps to preserve the cohesion of its national community' (Speech to the Bundestag, 27 June 2000)—and telling the members of the European Parliament that 'To build and perfect Europe in the 21st century is to pursue France's great adventure ... to make the great voice of France heard: it will spread afar these high standards and these republican values to which our compatriots are so deeply attached' (Speech to the European Parliament in Strasbourg, 6 March 2002).

The problem with this discourse is that whereas in earlier years French leaders could point to France's role as the 'motor of Europe' in tandem with Germany with regard to EMS, the Single Market and EMU, in more recent years French leaders have not been at the forefront of change. Much the contrary. And, this may be why they have been all the more eager to show symbolically that France continues to lead at the European level by plumping Frenchmen for major positions in the EU—as in their push to have a Frenchman be commander of the southern fleet of NATO or head of the European Central Bank. But, this cannot obscure the fact that French leaders have followed much more than led in the 1990s, and sometimes quite reluctantly, as in the case of the *service public* industries. The recent failures of the discourse came home to roost with the referendum on the Constitutional Treaty in 2005 when pro-ratification leaders focusing on EU-level institutional reforms and French leadership in Europe were drowned out by voices for the 'no' vote, which focused on the national-level impact of EU policies related to liberalisation, enlargement and immigration—when they were not more simply voting against the government leadership and decisions taken without consultation.

British Ideas and Discourse

For Britain, the EU-related changes in governance practices also represent a challenge to national ideas about democracy. But here, instead of focusing on the loss of executive autonomy, as in France, they include parliament as well. This is because Britain, rather than having had a centralising monarchy followed by a centralising revolution that concentrated power in a republican state, has had a centralising monarchy that ever since the Magna Carta has found its executive power

tempered by the historically evolving legislative power of parliament. This has meant that sovereignty, rather than being associated solely with the executive as the embodiment of the state, as in France, was vested in the duality of the 'Crown in Parliament', constituting a sovereignty shared between the executive and the legislature. This ensured that any increase in the power of EU institutions would therefore be seen as a threat not just to executive autonomy but also to parliamentary sovereignty (Pilkington 1995, 98).

British concerns about the encroachments of the EU, however, go beyond the question of sovereignty to tap into more deep-seated notions of political rights that also make European integration more difficult to countenance for the British than the French. Whereas French notions of political rights are justified philosophically, by reference to the universal rights of man as declared at the time of the French revolution, the British notion of political rights as embodied in parliamentary sovereignty is justified by reference to history and the traditional liberties of Englishmen (Gamble 1985, 73). Thus, while European integration for the French can represent an enhancement of their universally established rights as well as part of their 'civilising mission', for the British it is more likely to be perceived as a threat to their historically established rights (Wallace 1986, 383).

Complicating matters further is the fact that, unlike France, which took a lead in Europe as one of the early members of the Community, Britain has been a late-comer, having joined the EEC in 1973, and has been a 'reluctant partner' at that. Britain's reasons for joining, moreover, have emphasised membership in an economic community rather than, as in France, political leadership of an intergovernmental union. And, national leaders have always been much more divided on the very fact of EU membership than the French. Those in favour have generally supported membership on grounds of economic interest, and rarely sought to counter the arguments of Euro-sceptics who raised 'polity' issues regarding parliamentary sovereignty, national unity and political rights (Preston 1994, ch. 7; George 1990, 93, 96). In the first application for membership in 1961, Conservative Prime Minister Harold Macmillan presented membership as a commercial move to protect national interest, whereas Labour leader Hugh Gaitskell rejected membership on the grounds that it would be the end of 'a thousand years of history' and the end of the Commonwealth. But interest won out then, as it did in the second and successful application, when Labour Prime Minister Harold Wilson presented membership as 'defending the national interest against interfering foreigners' (George 1994, 55, 59). Similarly, Conservative Prime Minister Margaret Thatcher saw the EU as to be embraced for its economic value, which she thought of as a 'free enterprise *Europe des patrie*' (Thatcher 1993, 536). But, for Thatcher the embrace was not to be too close since, as she often said, Britain's problems have always come from Europe, the solutions from the United States.

Even Labour Prime Minister Tony Blair, although much more of a 'convinced European' than his predecessors, has not directly addressed the 'polity' issues. On EMU, Blair's argument was very much like that of his predecessors, presenting entry as a purely economic question, with a commitment in principle to join 'if the economic conditions are met' because 'it is the national interest that will always come first' (Statement to the House of Commons, 23 February 1999) and ultimately

promising a referendum. By the election of 2004, however, the referendum on the euro had become moot, because Blair had promised to hold a referendum on the Constitutional Treaty instead. This would have been very hard to win, even if Blair had couched it as a question of Britain being in or out of Europe, pitting current economic interests against old political values, since the pro-European Labour leaders, just as the pro-European Tory leaders (of which there are now very few), have not prepared the public. Their silence on the polity issues has left Fleet Street and the Euro-sceptics unchallenged with regard to the negative polity discourse.

The result is that the public has been made maximally aware of the drawbacks to Europeanisation but of few of the benefits, such that any government that moves towards greater integration risks being seen as undermining British democracy. Therefore, although Britain has fewer problems than France in adapting to EU policies or practices, national ideas about the impact of EU policies and practices on national democracy, given the lack of positive discourse, remain much more negative.

German Ideas and Discourse

It stands to reason that the EU would represent less of a challenge to the organising principles of national democracy in Germany than in France or Britain. This is not only because of a better 'fit' in governance practices but also because Germany operates with notions of 'compounded representation' similar to those of the EU (Brzinski, Lancaster and Tuschhoff 1999), where legitimacy, instead of being focused on the actions of a single authority, is situated in the interactions of the multiple actors in the system as a whole.

Germany also has far less significant problems than France or Britain with regard to the impact of European integration on national sovereignty. For Germany, in fact, national sovereignty has never been the issue in the post-war period that it has been for France and Britain. Because the state has never been more than at best 'semi-sovereign', given the structure of its institutions, Germany lacks the French conception of national sovereignty as an embodiment of state power or the British equation of national sovereignty with the country's self-sufficiency. Moreover, Europe could never represent a threat to national sovereignty, as in Britain, since the executive has never had the autonomy of the British executive, nor could it represent an extension of national sovereignty, as in France, since post-war German ambitions could certainly never countenance such a thing. For Germany, sovereignty has not even been a constitutional issue, since the German Basic Law (Article 24) explicitly allows the transfer of sovereign rights to international organisations.

Germany's lack of a sense of national sovereignty can also be understood in terms of national identity constructions. For the Germans, Europe was neither what the British saw as the 'other', as a threat to sovereignty, nor what the French saw as a furthering of national identity, as an extension of sovereignty. Rather, Europe *is* Germany's national identity, and sovereignty is subsumed under the larger Europe, if it is considered at all. 'European-ness' as 'German-ness' was the way in which German national identity was reconstructed in the early post-war period. This was

a deliberate effort both to reject the previous German national identity associated with a militarist and authoritarian nationalism and to ensure that Germany would have a peaceful future as part of a more federal Europe (Risse 2001). Thus, European identity is an extension of a nationally reconstructed idea of German identity, in which the notion of sovereignty plays no critical role, and where integration was to ensure, in Hans-Deitrich Genscher's reiteration of Thomas Mann's famous phrase, 'not a German Europe, but a European Germany'.

The main question for Germany today is how its national construction of identity as 'German as European' will fare as European integration continues. This is less a question of institutional adaptation, however, than one of economic adjustment. For Germany, the question is whether the Europe-led neo-liberal reforms (along with the competitive pressures of globalisation and Europeanisation) will ultimately challenge the corporatist governance foundations of Germany's social market economy, and whether the euro will be stable and strong enough to replace the Deutschmark to the satisfaction of the citizenry.

Italian Ideas and Discourse

In Italy, rather than a challenge to the organising principles of national democracy, the EU's governance practices have served as an enhancement of them. This is because European integration has been seen as a reinforcement of sovereignty through the rescue of the nation state, a guarantor of political rights and an embellishment of national identity (Ferrera and Gaulmini 2004). For Italy, where the state until the 1990s had been characterised by paralysis along with clientelism, Europeanisation could only rectify the problems of a democracy unable to govern effectively. This includes forcing the state to implement the rules, welcome in principle if not always in practice, since they are disruptive of citizens' informal political 'right' to the derogation of the rules.

Thus, the discourse of national leaders has been mostly positive in terms of its national impact, even if under Prime Minister Silvio Berlusconi a modest amount of Euro-scepticism has been vocalised. The Italian public, however, remains even more positive. Because exercising leadership domestically has itself been a near-impossible task until the 1990s, national leaders have rarely sought to propose any grand initiatives, having been content to follow rather than lead and to use the EU's leadership in their discourse to legitimise the executive's empowerment at the national level. For Italy, the main problems with European integration are most likely to come when it is forced to implement the rules.

Conclusion

The problems for Britain, in short, come from ideas and discourse that effectively exaggerate the negative aspects of the impact of EU policies and practices and do not come to terms with the changes. The main question for Britain is how the country will reconcile its prospective greater integration over time with its centuries-old sense of going it alone. For France, by contrast, the problems come from ideas and discourse that downplay the impact of the EU. The main question

for France is how the country will reconcile itself to the loss of leadership in the EU and autonomy at the national level. Germany and Italy do not have these problems. They have others, less linked to the clash between governance practices and democratic ideas than to national economic adjustment to the EU (for Germany) and compliance with EU rules (for Italy). For all countries, however, but especially Britain and France, what is necessary is a reevaluation of traditional ideas about sovereignty, identity and democracy, with a new discourse that speaks to the current realities—positive and negative—of the nation in Europe.

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