

# Differentiated Integration and Disintegration in the EU after Brexit: Risks versus Opportunities

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## Abstract

Differentiation is becoming an increasingly salient feature of European integration. The multifaceted European crisis and the subsequent Brexit vote (paving the way for a ground-breaking case of differentiated disintegration) have led scholars and practitioners to think about the consequences of differentiated integration. This article draws on five empirical models of differentiation experienced by countries both inside and outside the EU: the European economic area model, the Danish model of (quasi-)permanent differentiation, the Swedish model of de facto differentiation, the instrumental model and the Brexit process of differentiation. It addresses the different risks and opportunities that each of these models entail. The article also introduces the contributions to this symposium, which aims at paving the way for future research on the consequences of differentiation in light of Brexit.

**Keywords:** differentiation; European integration; differentiated integration; disintegration; Brexit

## Introduction

Since the early 1990s the study of differentiation (both in terms of differentiated integration and disintegration) in the EU has evolved considerably and taken different directions. Most studies focused on its causes rather than on its consequences (Gänzle *et al.* 2020). Accordingly, the main objective of this symposium is to contribute to debates about the evolving conceptualization and consequences of differentiation, especially in light of the Brexit vote. It focuses on the short-term and medium-term consequences on all parties involved of the UK's decision to leave the EU, though all contributions acknowledge that most of these consequences will depend on the outcome of the UK–EU negotiations, as Brexit could become a ground-breaking and thus unpredictable case of differentiated disintegration (Leruth *et al.* 2019). Accordingly, this collection of short articles attempts to address key questions on the implications of Brexit on the study of differentiation in the EU: what are the political, legal and economic consequences of differentiation? What research methods can contribute to an understanding of the consequences of differentiation? And how does differentiated disintegration affect the UK and the EU's relations with third countries?

Although an institutional equilibrium has been advocated by intergovernmentalists (see, for example, Hodson and Puetter, 2019; Moravcsik, 2005), the EU remains an unfinished and unsettled institutional building site (Olsen, 2007) and thus also a promising research laboratory. Numerous studies have attempted to grasp differentiation as an *evolving* process (see for example, Holzinger and Schimmelfennig, 2012; Leruth and Lord, 2015; Stubb, 1996). This symposium shows that differentiation is a persistent and

mainstream phenomenon in Europe. This makes the study of European integration increasingly complex; yet while it has become important to understand differentiation, it remains difficult to grasp as it is an umbrella concept that includes a wide range of mechanisms beyond the broad concepts of variable geometries, multi-speed and *à la carte* strategies first discussed by Stubb (1996).

In this introductory article we examine some of the risks and opportunities of differentiation, as the academic literature remains divided. In order to do so, we draw on five broad empirical models of differentiation experienced by different countries across Europe: the Norwegian (or European economic area, EEA) model (see also Murray and Brianson in this symposium); the Danish model of permanent (or quasi-permanent) differentiation (briefly discussed by Burk and Leuffen in this symposium); the Swedish model of *de facto* differentiation; the instrumental model of differentiation; and a fifth, emerging model through Brexit, which has triggered a process of disintegration (Schimmelfennig, 2018; see also Svendsen and Adler-Nissen, and Cardwell in this symposium). We start from the assumption that these five models of differentiation are driven by the mechanisms of supply and demand: those on the demand side mostly consist of the national governments of one country or a group of countries that do not wish to follow the integrationist path taken by the inner core of the EU (bearing in mind that the positions advocated by domestic governments can be shaped by different actors such as public opinion, political parties or lobbying groups); while the supply side consists of pro-integrationist governments from member states that accept the demands to move away from uniformity (or, in the case of instrumental differentiation, imposes differentiation on new member states (Schimmelfennig and Winzen, 2020).

We first focused on what the existing literature tells us about benefits and dangers of differentiation in the EU. We then analysed the above-mentioned models of differentiation and attempted to map their benefits and risks, keeping in mind that differentiation in the EU is a moving target. We highlight some key challenges and uncertainties that scholars and practitioners should focus on in the next years and conclude by introducing each of the symposium's articles.

## 1. Is Differentiation Good or Bad for the EU?

Differentiation in the EU is far from being a new phenomenon. Even though some legal elements of differentiation date back from the Treaty of Rome, the ratification of the Maastricht Treaty and the subsequent creation of the political Union raised major concerns within some member states, with the UK and Denmark playing a crucial role in institutionalizing opt-out clauses. When Stubb (1996) wrote his 'Categorisation of Differentiated Integration', differentiation seemed to be a rather straightforward integration strategy to 'reconcile heterogeneity within the European Union' (Stubb, 1996, p. 283) in three main variants; namely, the 'multi-speed' (such as the Economic and Monetary Union; EMU), 'variable geometry' (such as the Schengen Agreements) and '*à la carte*' strategies (such as the Danish and British opt-outs). Since then, differentiation has taken new institutional, political and legal dimensions, exemplified by the introduction of the enhanced cooperation mechanism, Sweden's *de facto* opt out of the third stage of the EMU, and most recently, the UK government triggering

Article 50 of the Treaty on European Union to withdraw from the EU altogether. Perhaps the most comprehensive account of differentiated integration is the one offered by Leuffen *et al.* (2013), who categorize the EU as a system of differentiation, as over half of European policy areas do not apply uniformly across EU member states (for a chronological review of the existing literature on differentiation, see Leruth *et al.*, 2019).

Is differentiation a poison or a panacea (in the words of Lord, 2015)? Despite its increasing significance in most policy areas and beyond EU borders (Leuffen *et al.*, 2013), the consequences of differentiation remain unclear and contested. Its proponents have argued that such mechanisms can ultimately strengthen the cohesion of the EU. In the academic literature, Kölliker (2001), for instance, developed a theory of differentiation based on the collective goods theory and argues that differentiation creates centripetal effects in the long run, especially in the case of excludable networks and club goods. Others emphasize that the creation of a differentiated but institutionalized European social model could reduce inequalities across European regions (for example, Taylor-Gooby *et al.* 2017). In his volume *The Future of Europe*, Piris (2012) suggests that while some mechanisms of differentiation included in the Treaty on the Functioning of the European Union (such as the permanent structured cooperation, constructive abstention or enhanced cooperation) could improve the EU's efficiency and political legitimacy, a formal two-speed Europe (based on eurozone membership) with a core of avant-garde states would simplify the picture by creating two distinct groups to replace the existing informal clusters of member states (see also Chopin and Lequesne, 2016).

Similarly, over the past decade, differentiation has been advocated by key political leaders across Europe, notably as a response to the multifaceted crisis the EU has been facing since 2008. Before calling for a referendum on EU membership, Cameron (2013) stated that the EU needs 'a structure that can accommodate the diversity of its members – North, South, East, West, large, small, old and new. Some of whom are contemplating much closer economic and political integration'. Similarly, since 2007 all French presidents have promoted differentiation as the way forward. Macron (2017), for instance, has argued that differentiation could contribute to a stronger EU: '[L]et's embrace the differentiations, the vanguard, the heart of Europe [...]. No State must be excluded from the process, but no country must be able to block those wanting to make faster progress or forge further ahead'. This was further put forward as one of the European Commission's (2017, p. 20) five (initial) scenarios in the White Paper on the future of Europe, published as a response to the Brexit vote:

In a scenario where the EU27 proceeds as today but where certain Member States want to do more in common, one or several 'coalitions of the willing' emerge to work together in specific policy areas. These may cover policies such as defence, internal security, taxation or social matters.

This suggests that, ahead of the 2019 European Parliament elections, the Commission was considering an ever more differentiated Union as one of the ways forward, especially if there is a lack of political willingness to deepen European integration across all member states. What is particularly interesting is that differentiation is now promoted by several pro-European leaders and not by eurosceptics, who now tend to adopt a reformist agenda rather than formally advocating a (partial) exit of their country from the Union (as

exemplified by the French *Rassemblement National* or the Italian *Lega*'s ever-changing stance on eurozone membership).

However, other scholars have stressed that differentiation creates major risks and drawbacks for the European integration project. Walker (1998, p. 387) was among the first to criticize differentiation, calling it a non-project in its (then current) form, and warning against the risks of 'increased fragmentation, legal indeterminacy, declining democracy and political failure' if there were a lack of political will to propose an adequate framework of meta-constitutional institutions, rules and conventions to circumvent disintegration. In contrast to Kölliker's argument, the UK's experience of differentiated integration did not create the expected centripetal effects as the Brexit vote eventually led the British government to trigger Article 50, thus paving the way for what could become a ground-breaking case of differentiated disintegration (as explained below). This suggests that differentiation might be counterproductive in terms of promoting further integration in the medium to long run. In a recent contribution, Eriksen (2018) argued that differentiation created a problem of dominance by undermining the conditions for democratic self-rule through non-participation or (self)-exclusion from decision-making bodies, as exemplified by non-member states' participation in the inner periphery of the EU. In the political realm, few voices were raised against differentiation, with the notable exception of Jean-Claude Juncker, who in his 2017 State of the Union speech advocated a more united Europe as his sixth, preferred scenario to complement the Commission's White Paper. Other prominent instances of opposition to differentiation came from pro-European leaders in countries that have experienced differentiation. This was, for instance, the case of former Icelandic Prime Minister Jóhanna Sigurðardóttir, who campaigned for EU membership in the context of the 2009 national elections, or former Danish Prime Minister Lars Løkke Rasmussen, who has long campaigned to transform the Danish justice and defence opt-outs into opt-ins (for example, see Adler-Nissen, 2014).

In sum, differentiation has its pros and cons and its proponents and opponents, and it is best characterized as a double-edged sword (Chopin and Lequesne, 2016). Yet one would expect that different models of differentiation produce different trajectories of integration (or disintegration), with different sets of risks and opportunities. The following section investigates different models of differentiation that have been adopted by member and non-member states over the past decades.

## **2. Models of Differentiation: Risks and Opportunities**

Within the framework of this symposium, we consider five broad empirical models of differentiation. Three of these fits the Nordic countries' relations with the EU, as this region has historically constituted an integrationist laboratory. Indeed, while the Nordic countries have been categorized as reluctant Europeans (in the words of Miljan, 1977), there is no consistent Nordic model of integration (or, in our case, differentiation). Iceland applied to join the EU only in 2009 following the great recession, before the centre-right Gunnlaugsson government decided to freeze and eventually halt accession talks in 2015. Norway applied for membership on four occasions (1961, 1967, 1971 and 1992), which was ultimately rejected by its population twice in referendums (1972 and 1994). Denmark joined the European Community in 1973 but negotiated a series

of opt-outs of the Maastricht Treaty following an initial rejection of the treaty by referendum. Sweden joined the EU in 1995 but de facto opted out of the third stage of the EMU after holding a referendum in 2003. These two countries can be considered as being part of the outer core of the EU. In contrast, Finland, which became an EU member in 1995 together with Sweden, has not negotiated any formal opt-outs of the EU and is part of its inner core (Leruth, 2015).

Instrumental differentiation, the fourth model presented in this section, is widely applied following rounds of EU enlargement. It consists of a series of transitional arrangements between new member states and the EU institutions to pave the way towards full membership without delaying the accession process. The fifth model of differentiation presented in this article is in the making, as we question whether Brexit will contribute to the emergence of a full-fledged model of differentiated disintegration.

### *The Norwegian Model*

This model of differentiation (see Fossum, 2019), which also applies to Iceland and Liechtenstein, was established in 1994 with the creation of the EEA. Egeberg and Trondal (1999) established that even as a non-member state of the EU, Norway might be seen as even more (sectorally) integrated than existing member states such as the UK. Norway is by far the non-member most strongly integrated through a dense web of institutionalized relations (Egeberg and Trondal, 1999; Lavenex, 2009). The organizational structure within which Norway collaborates with the EU consists of separate institutional arrangements that serve as bridging arrangement between the European Free Trade Association, where Norway is the largest of four member states, and the EU (Fossum and Graver, 2018). When Norway entered into the EEA agreement in 1992 (implemented in 1994), this two-pillar structure was carefully designed as an unparalleled institutional solution to maintain the non-supranational characteristics of the arrangement. New EU legislation entering the EEA agreement must be agreed to by the EEA Council. In effect, Norway has maintained its de jure political sovereignty without constitutionally delegating political authority to EU-level institutions. From 1994 to 2019 more than 12,000 legal acts have been incorporated into the EEA agreement, with the effect that the EEA agreement includes about 69.7 per cent of EU directives and 17.5 per cent of EU regulations, in a total of 28.1 per cent of all EU legislative acts (NOU, 2012, p. 795). In addition, competence creep had made it difficult to shield off policy domains from each other, in which legislation outside the remit of the EEA Agreement, causing unintended consequences in adjacent legal fields. In effect, Norwegian law has been largely synchronized with development of EU's legislative acts over time.

But does EEA membership offer the best of both worlds? On the one hand, there is a wide consensus across Norwegian and Icelandic political parties that the EEA offers economic benefits to their countries, while the issue of EU membership remains divisive in Iceland or even ruled out among Norwegian elites, as the issue has been managed by including some gag rules (see Fossum, 2010). Yet, on the other hand, EEA membership without being a member of the EU deprives a country from voting rights and representation in the Council and the European Parliament, thus contributing to a major problem of democratic legitimacy. Politico-administrative sovereignty has been reduced, resulting from the increasingly close ties between the EU executive and the Norwegian central



administration, in effect largely circumventing Norwegian political accountability processes (Egeberg and Trondal, 2015). The democratic problems emanating from the commitments and obligations derived from the EEA agreement has been debated for over two decades, with no sustainable solutions in sight (for example, Eriksen and Fossum, 2015). Eriksen (2019, p. 14) fills an important gap in the existing literature by assessing what he refers to as the basic problem of differentiation, especially in the case of the EEA agreement:

Under conditions of complex interdependence and economic integration, the problem of dominance in the differentiated European political order is most severe for legislators in associated non-member states. This pertains in particular to the [EEA] Agreement, which the EU offers as a second-best alternative to full EU membership to qualified candidates. From a supranational perspective, establishing the EEA did not have the long-term effects anticipated. When the EEA Agreement was ratified in 1994 it was expected that EEA membership would pave the way towards full EU membership, thus institutionalizing a new form of variable geometry by accident (or what could be referred to as everlasting purgatory). Originally, the EEA was designed by Jacques Delors, with the aid of a team of Norwegian and EU civil servants, to be 'a new, more structured partnership with common decision-making and administrative institutions to make our activities more effective and to highlight the political dimension of our cooperation in the economic, social, financial and cultural spheres' (Delors 1989, quoted in Vahl, 2009, p. 13; Gänzle and Henökl, 2018); yet it has now become the established structure for the mutual arrangements. As the prospect of seeing Iceland or Norway joining the EU is low (due to Iceland's reluctance to join the common fisheries policy, on top of political divisions, and low public support for membership in Norway), EEA membership is thus best seen as a permanent form of differentiation, presenting both opportunities (mostly through access to the single market) and risks (through a lack of political representation and influence in EU institutions) for its members.

### *The Danish Model of (Quasi-)permanent Differentiation*

Together with the UK, Denmark was one of the pioneers to negotiate opt-outs of the Maastricht Treaty through the 1992 Edinburgh Agreement. These opt-outs concern Danish participation in the third stage of the EMU, justice and home affairs and the common security and defence policy. Since then, Denmark has been juggling with status quo and further integration, with successive governments holding referendums on several of the above-mentioned opt-outs. Since 1998 four referendums on EU-related matters have been held, the most recent one in 2015 which saw Danish voters rejecting the Rasmussen government's proposal to transform the existing justice and home affairs opt-out into a selective, case-by-case opt-in.

The Danish model of constitutional differentiation presents political opportunities (especially in the early 1990s) but also significant drawbacks. Their impacts have been analysed in a report produced by the Danish Institute for International Studies (2008) coordinated by Ian Manners. The report argued that while the 1992 Edinburgh Agreement may have been appropriate at that time, given the Danish electorate's rejection of the Maastricht Treaty, it have not had the intended effects to protect Danish autonomy (especially in the area of defence) or to maintain the country's influence in the EU decision-making system. This, the report concludes, is the consequence of major changes in the EU's size,

scope and political agenda since the ratification of the Edinburgh Agreement (see also Adler-Nissen, 2014 for a comparative analysis of Denmark and the UK post-Maastricht). Arguably, the permanent differentiation chosen by Denmark does not yield the same opportunities as countries belonging in the inner core of the EU. Moreover, as competence creep makes it difficult to shield policy domains from each other, opt-outs may be difficult to sustain in the long run as legislation in one policy domain might produce unintended consequences in others. Opt-outs might thus be difficult to maintain in the long run. Similar problems have occurred in the case of Norway, where agriculture policy falls outside the EEA agreement but is still strongly affected by EU legislation in policies on food, veterinary matters, competition, and so on. As such, the permanence of differentiation risks is undermined over the course of time due to the interconnectedness of public policies and the ensuing incremental (Pierson, 2004), or stealthy, process (Majone, 2009) of policy integration. The main problem, however, is for Danish governments to convince voters that revoking the existing opt-outs would be in the country's best interests, especially given that the Danish eurosceptic movement has been well structured since the initial referendum on the Maastricht Treaty. Hence, the Danish model of differentiation is best interpreted as a quasi-permanent one, whereby Danish governments attempt to transform opt-outs into opt-ins, albeit with limited public support.

### *The Swedish Model of de Facto Differentiation*

Unlike Norway, Denmark and Iceland, Sweden did not negotiate any formal differentiation. Yet, it is not by accident that the country did not join the third stage of the EMU. The decision to postpone eurozone membership was initially taken by the Persson I minority government on the advice of the Calmfors commission in 1997. This was mostly driven by political reasons, as the ruling Social Democratic Party was strongly divided on the issue and relied on the support of the anti-EMU Centre Party in the Swedish Parliament. In addition, throughout the late 1990s opinion polls suggested that only about 25 per cent of the Swedish population would support eurozone membership (Aylott, 2005). A referendum was eventually held on 14 September 2003 and 55.9 per cent of Swedish voters rejected participation in the eurozone.

Yet Sweden is still legally bound to join the third stage of the EMU, even though the country has remained outside the exchange rate mechanism ERM II (one of the key criteria for adopting the euro), arguing that such adoption is voluntary (Campos *et al.*, 2016). Accordingly, the Swedish model of de facto differentiation has its limits, as it only works as long as it is tolerated by the European Commission. As stated by Brianson and Stegmann McCallion (2020, forthcoming),

Sweden's non-participation in the euro for reasons of choice, not economic viability, sat uncomfortably alongside the EU's emerging consensus that [differentiation] was acceptable only if limited to the idea of multiple speeds on a shared journey to a common destination rather than its more radical forms.

Sweden's subsequent decision not to opt in the European banking union, mostly as the Swedish government wanted to avoid becoming a second-class member with no influence (Spendzharova and Bayram, 2016) further consolidated this de facto model of differentiation.

Although it can be classified as a form of temporary, multi-speed model of differentiation, the Swedish lack of political willingness to join the eurozone effectively created another form of integrationist purgatory. Without holding referendums on this issue, the Czech Republic, Hungary and Poland (three countries that are equally legally bound to participate in the ERM II and to join the eurozone ultimately) adopted this Swedish stance. Parallel to the EEA Agreement, which was first aimed at paving the way towards EU membership, such model of differentiation risks becoming permanent as the socioeconomic and political conditions driving further integration are not met. Yet the legal question over this de facto opt-out will need to be addressed sooner or later by all parties involved. Even though the EMU membership question has not been salient in Sweden since the 2003 referendum, the current situation poses more risks than opportunities from a political and legal perspective. Existing studies suggest that countries experiencing permanent or quasi-permanent differentiation (be it de facto or de jure) suffer from a decrease in influence in Brussels, with the UK and Denmark's opt-outs in the area of freedom, security and justice illustrating such tension between autonomy and influence (Adler-Nissen, 2014).

### *The Instrumental Model*

Finding its roots in the early 1970s with the first round of enlargement, the instrumental model of differentiation was defined by Schimmelfennig and Winzen (2014) as a series of transitional arrangements negotiated between the EU and candidate countries for EU membership. Its use has become increasingly important with each enlargement round, given that widening the EU was also accompanied by the deepening of European integration. Its main objective is to avoid or overcome political deadlock during accession talks. Such transitional agreements mostly deal with single market and expenditure policies and tend to involve poorer member states. Two further categories of instrumental differentiation can be discerned: exclusion from some benefits of EU membership (discriminatory differentiation) and exemptions from the obligations of membership (exemptive differentiation). In both cases demand tends to be driven by the EU rather than by applicant countries.

Does this model of temporary differentiation present more risks or more opportunities for new and existing member states? Schneider (2007) and Schimmelfennig (2014), among others, focused on its consequences to determine whether the measures taken were biased against some new member states or created good conditions for their integration in the Union. Schimmelfennig found that (1) exemptive differentiation is more frequent than discriminatory differentiation, and that (2) in general, equal treatment between new member states joining in the same enlargement round prevailed, as there was very little evidence that poorer countries were more discriminated against than richer ones. Schneider (2007, p. 101) further argued that where discrimination occurs, it is 'to render enlargement politically viable where at least some EU members would have opposed the admission of those states otherwise'. Accordingly, the instrumental model of differentiation (which was applied in all six enlargement rounds albeit to different extents) is deemed to be beneficial for all parties involved in enlargement rounds to reach an agreement in accession talks. Given that instrumental differentiation has a temporal dimension, it presents limited risks to new member states to become second-order members sitting outside the inner core of the Union.



*Brexit: Full Rupture or Differentiated Disintegration?*

The whole idea of Brexit has been difficult to grasp since David Cameron's Bloomberg speech, especially given the evolving visions proposed by the British government under Theresa May and Boris Johnson. Two years before the referendum, Vollaard (2014), Webber (2014) and Zielonka (2014), among others, reflected on what European disintegration would look like. And three years after the referendum, it is still too early to determine whether the UK will seek to keep on cooperating with the EU in specific policy areas, and what the consequences of Brexit will be for the future of European integration.

Schimmelfennig (2018, p. 1154) argued that Brexit triggered a new process of differentiated disintegration, which he defines as 'the selective reduction of a state's level and scope of integration [which can lead] to internal differentiation if a member state remains in the EU but exits from specific policies, or external differentiation if it exits from the EU but continues to participate in selected EU policies'. As such, there may be many shades of differentiated disintegration; yet it also implies that a post-Brexit UK would still participate in some EU policy areas or belong to some EU agencies, either as an associate member or as an observer. A full rupture without cooperation between the UK and the EU would constitute a form of total disintegration, and thus not fit this idea of differentiated disintegration.

Even though the idea of disintegration (both in terms of differentiated disintegration and of full rupture with the then emerging Union) was also discussed as an extreme scenario by the European Council following Denmark's initial rejection of the Maastricht Treaty (European Council, 1992), this is the first time that a member state has formally sought to withdraw from the Union by triggering Article 50 of the Treaty on EU. The lack of precedent creates a series of challenges for both parties, as demonstrated in the contributions included in this symposium. On the one hand, the UK would need to find its place in a post-Brexit Europe (see Murray and Brianson in this symposium). On the other hand, a possible (at the time of writing) no-deal exit for the UK could weaken the EU in areas such as security and defence, prompting practitioners to favour maintaining close partnerships in such policy areas (see Svendsen and Adler-Nissen in this symposium).

As with the four other models outlined above, it is likely to take years before scholars and practitioners can grasp the consequences of Brexit for all actors involved and determine whether it effectively constitutes a full-fledged model of differentiation. This symposium offers a series of contributions that aim at stimulating the debate on how this emerging model of differentiation should be analysed.

**Conclusion: An Ever more Differentiated Union?**

Is the EU moving away from an ever closer Union towards an ever more differentiated one? The different paths of integration taken by member states and third countries suggest there are viable alternatives to full membership. However, temporary forms of differentiation constitute the most widely used and accepted model, while permanent (or quasi-permanent) models remain controversial. The emerging British model of disintegration discussed above may create more risks than opportunities, at least in the short run, prompting other eurosceptic parties to distance themselves from such demands and switch

towards a reformist agenda ahead of the 2019 European Parliament elections. As such, verdicts on the opportunities and risks associated with differentiation have a temporal dimension that is sometimes forgotten during crises: what might be seen as a risk in the short run, may become opportunities in the horizon. Situations like Brexit pave the way for analysing continuity and change as well as mechanisms that might determine causation. As politicians are searching for new and diverse forms of political association in Europe, analysts are in search of categories and mechanisms.

One additional model of differentiation that is worth mentioning is the mechanism of enhanced cooperation. It is one of the rare instances of positive differentiation, as it offers the option for some member states to move forward without affecting the current pace of integration. As European leaders are contemplating several options to move the European integration project forward (through the establishment of the European pillar of social rights and prospects of establishing the European Union Force Bosnia and Herzegovina crisis response operation core as part of the permanent structured cooperation), the use of the mechanism of enhanced cooperation has become an increasingly available tool. This is made explicit under scenario 3 of the European Commission's (2017) White Paper on the Future of Europe: 'the procedure is designed to overcome paralysis, where a proposal is blocked by an individual country or a small group of countries who do not wish to be part of the initiative'.

This symposium offers a series of contributions analysing the political, legal and societal responses to the Brexit vote through the lens of differentiation. Burk and Leuffen suggest that scholars of differentiation should experiment with new methods in order to analyse its consequences, as illustrated in their analysis of the UK's decision not to join the eurozone. Cardwell offers a legal analysis of differentiation in the context of Brexit to determine whether the EU is well equipped to accommodate future demands for differentiation. Svendsen and Adler-Nissen demonstrate that an analysis of the consequences (and management) of differentiation requires a close examination of everyday social practices of officials, while Murray and Brianson focus on the negative consequences of Brexit by investigating the role of the UK in a post-Brexit world and arguing that the UK should seek a new role as a middle power on the European continent, taking the example of countries like Australia, Norway and Japan.

The symposium hopes to pave the way for further studies of European integration in light of Brexit. At the time of writing, the future relationship between the UK and the EU is still unclear. However, what is clear is that Brexit has opened a new chapter in the history of European integration and in its study.

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