POLICY, DISCOURSE, AND INSTITUTIONAL REFORM:

RECONSTRUCTING PRACTICES AND RECONCEPTUALIZING DEMOCRACY IN RESPONSE TO EUROPEANIZATION

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When Joschka Fisher on May 12, 2000 made a speech calling for a “federal Europe,” he did something unprecedented: he opened up a Europe-wide public debate about the future of governing (and not just governance) in Europe. In the past, such a public statement would more likely have remained part of confidential, intergovernmental deliberations among member-states rather than becoming an opening gambit addressed to the European public as well as to member-states. This suggests that Europe itself may be changing, as growing sensitivity to the problems of the “democratic deficit” at the EU level leads to attempts not just to democratize the institutions through the creation of a European government but also to democratize the process of finding solutions through Europe-level public deliberation.

That it has been a German calling for some variant of federalism is not surprising, given the country’s own federal governance structures, corporatist governance processes, and historically little concern about issues of national sovereignty and democracy when it comes to Europe. And that the British are likely to resist is also nothing out of the ordinary, given the country’s unitary structure, statist processes, and long history of seeing European integration as a threat to national sovereignty and democracy. But that the French seemed supportive at least at first of the federal initiative, given similarly unitary structures and statist processes, could be seen as extraordinary, unless one understands that for the French, Europe has always somehow represented an extension of national sovereignty and possibly even democracy.

But what none of these countries is considering, as they contemplate the prospects of a federal Europe, is that European governance structures and processes have already impinged significantly on national sovereignty and democracy. This is not simply a matter of a “pooling of sovereignty,” or a giving up of national autonomy in exchange for greater shared supranational authority and control. This is because the EU’s own quasi-federal governance structures and quasi-pluralist governance processes—to say nothing of the EU’s policies—have already “federalized” and “pluralized” national governance structures and processes to a significant extent. And this in turn has had major consequences for national democracies in terms not only of national practices, where political representation and interest intermediation are altered by the presence of yet another level and structure of representation or process of
intermediation, but also of national ideas regarding political representation and interest intermediation.

Different countries, however, have been affected more than others by the impact of EU governance structures and processes because of questions of fit. Countries such as France and Britain, with unitary structures and statist processes, have more significant long-term problems of adaptation to Europe’s quasi-federal structures and quasi-pluralist processes than a country such as Germany, with federal structures and corporatist processes. And this difficulty has manifested itself not only in the realm of practice, where traditional institutional arrangements and citizen interrelationships in France and Britain have changed more, but also in that of ideas, where French and British governments have had to contend with greater challenges to traditional conceptions of governmental autonomy, political rights, and even national identity than Germany.

Member-states’ responses to the EU have in consequence not only differed in the ways in which they have sought to adapt national practices to the new realities, by creating new patterns of governance. They have also differed in the ways in which they have thought to reconceptualize ideas about political representation and interest intermediation, by coming up with new discourses about democracy and participation at the national and European levels.

Ideas and discourse are in fact central to the success of new patterns of governance. This is because it is mainly through discourse, and the ideas contained within them, that new patterns of governance are legitimated. The process is a reasonably complex one that cannot be adequately elaborated on herein. But suffice to say that discourse serves to legitimate change not only through cognitive arguments designed to show the logic and necessity of new patterns of interaction but also through normative arguments which show their appropriateness by appeal to values, whether long-standing ones or newly-emerging ones, so as to redefine actors’ perceptions of self-interest and/or the general interest. And as countries adapt to European integration, the public’s general acceptance of the changes in democratic and participatory governance depends in large measure on the discourse, that is, on how key policy actors conceptualize those changes and communicate them to the general public. The problems for France and Britain, by contrast with Germany, is not just that there is less institutional “fit” with the EU on traditional patterns of governance and therefore greater demand for adjustment but also that the ideas and discourses about adaptation to the EU in these two countries act in their
different ways as impediments to public acceptance of the newly developing governance patterns.

In what follows, I first discuss the general impact of EU governance practices on national governance in terms of political representation and interest intermediation. Second, I briefly consider the role of ideas and discourse in the legitimation of institutional reform, with special attention to the nature of discourse in the EU by contrast with that of member-states. And finally, I use the examples of France, Britain, and Germany to explore the changes in national governance practices and the challenges to national democratic ideas and discourse as a result of European integration.

EU Governance and Its Differential Impact on Member-States’ Governance Practices

Although the EU is of course sui generis and cannot be compared readily to any national governance system, it is nevertheless useful to compare it to national systems in order to assess its degree of institutional “fit” or “misfit.” Degree of “fit” can tell us a great deal about the potential impact of the EU on national governance. Studies of a wide variety of policy areas have shown that questions of “fit” between EU policy or procedural recommendations and existing national policies and procedures help explain the outcomes—although other factors are also at work (e.g., institutional capacity to negotiate change). Instead of focusing on policy adjustment, however, here I focus on institutional adjustment, that is, on how the very functioning of EU institutions exerts adjustment pressures on national institutions, with a better “fit” exerting less pressure for change on national governance structures and processes than a worse “fit.” Moreover, I am only considering the process of Europeanization, that is, how national practices are affected by the EU, and not European integration, that is, how national practices enhance or diminish national actors’ impact on EU decision-making. The benefits of isomorphism work only in cases where the arrows are descending from EU to national level, and not where the arrows are ascending from member-states to EU level. (For example, one can argue that the very federal and corporatist characteristics that ensure that certain countries have a less difficult time adjusting to the EU institutionally and ideationally also make it more difficult for them to exert influence in EU treaty negotiations than unitary, statist countries.)
EU Governance

The EU’s governance structures come closer to federal rather than unitary ones, given a federal separation and diffusion of powers across differing governance levels and branches rather than a unitary concentration of power in one governance level and branch, the executive. However, rather than the typical vertical division of powers between center and periphery and the often also horizontal separation of powers between executive, legislative, and judicial branches, the EU has something of a “dynamic confusion of powers.” And whatever the resemblance to a national federal system, the EU has much greater problems with regard to political representation, given that it lacks not only the powers and resources of any such national system but also the democratic legitimacy which comes from having a common politics and party system, a shared sense of identity and public opinion, and a government fully accountable to the people who elect it. It does, however, remedy some of these problems through its governance processes, which provide significant interest access to decision-making.

The EU’s governance processes for the most part come closest to pluralist rather than statist or corporatist ones, given a process of interest intermediation where policy formulation is open to societal interests at the policy formulation stage but largely closed to them at the policy implementation stage, with a regulatory model of enforcement. This is in contrast to both statist processes, where policy formulation is largely closed to societal interests in policy formulation but more open in implementation through administrative or self-regulatory models of enforcement, and with corporatist processes, where formulation and implementation are open only to certain privileged interests, mainly business and labor. However, rather than the typical pattern of openness to interests in a highly political process of interest intermediation, the EU’s civil servants are more in control of the process as gatekeepers and more technical than political in decision-making. At the same time that the EU governance process avoids some of the greatest abuses of pluralist systems related to the politics of money and interest through a focus on the politics of the public interest, however, it is also less “pluralistic”—even if the Commission itself has largely remedied the situation through greater transparency and by opening up more avenues for interest participation.

Finally, although democratic accountability in the EU is reinforced by an “expertocracy” guarding the public interest, as Majone would argue, this “output-oriented” approach to democracy, in Scharpf’s terms, does not solve the fundamental problems of political
representation and, thus, democratic legitimacy, since it does not respond to desires for the more “input-oriented” approach of citizen representation through elections. In other words, the EU still does not have government by the people, even if it may have government for the people and even with the people (or at least some of the people, through interest group involvement in policy formulation). If the EU were to begin to move toward a political system of federalism, as Fischer has proposed, then such problems would be addressed. But this would not solve the problems within member-states with regard to the challenges to national democracy resulting from the encroachment of EU governance practices, not just in some distant future, but already today.

This is because the EU’s problems with regard to democratic legitimacy and accountability are only compounded by those resulting from the impact of EU governance on member-states. For in the course of European integration, the EEC/EC/EU’s governance structures and processes have increasingly taken precedence over the national in all member-states.

The Differential Impact of EU Governance on National Governance

The EU’s governance processes have reduced national executives' autonomy in national policy formulation by taking decisions at the EU level that in the past were the purview of national authorities on their own and by allowing access and influence to a wider range of actors—not just other governmental actors but also non-governmental actors, whether business or societal interests. They have also decreased national governments’ flexibility in policy implementation by promoting regulatory or legalistic enforcement patterns over other patterns of enforcement, whether administrative or self-regulatory arrangements. Equally importantly, the EU’s governance structures have usurped national parliamentary powers of initiative and/or review in an ever-expanding number of domains while undermining national parliaments’ powers of oversight over national executives (given their lack of authoritative power over national executives’ policy decisions made in the Council of Ministers). Moreover, the European Court of Justice has subordinated national judicial authority to itself even as it has contributed generally to the national courts’ growing powers. And finally, the EU has reduced subnational units' autonomy (in some cases newly-gained following national decentralizing reforms) with regard to EU rules governing a whole range of areas that they must implement, even as it has contributed to the regions’ growing independence.
with respect to the national executive through increasing European access by way of the Committee of the Regions and resources by way of the structural funds and other programs (even if the most significant changes come not from the institutional impact but rather the economic impact of the EU, in particular the growing regional competition).

In all of this, however, the European Union’s quasi-federal governance structures and quasi-pluralist governance processes have been more disruptive to member-states with unitary structures and statist processes than those with federal structures and/or corporatist processes. In unitary, statist systems, where power is traditionally concentrated in the executive, the EU has served to undermine the executive’s autonomy in policy formulation, eliminating the executive’s virtual monopoly over decision-making and flexibility in implementation by closing off traditional means of accommodation involving administrative discretion or self-regulatory arrangements. In addition, it has reduced the executive’s traditional control over other branches and units of government, in particular the national courts and subnational units, which have become more independent, while the legislature has diminished even further in power.

In federal and/or corporatist systems, by contrast, where power has traditionally been more dispersed, the EU has done less to undermine executive autonomy, given an executive which never had much autonomy in the first place because of the separate powers of the legislature, judiciary, and subnational units and the participation of the social partners in policymaking. It has also has done less to reduce flexibility in implementation, given that joint self-regulatory arrangements of a corporatist variety have been allowed to continue. Moreover, it has in the end caused less disruption to the balance of powers between executive, legislature, and judiciary as well as between center and periphery (although this did demand some major internal struggles leading to readjustments that returned the balance).

This differential impact, as we shall see below, has not only led to greater changes in governance practices in unitary, statist systems such as France and Britain than in federal and/or corporatist systems such as Germany. It has also meant greater challenges to national ideas about political representation and interest intermediation in the former countries than in the latter. This is because of differences in understandings of democracy and how it is properly ensured both with regard to political representation and interest intermediation.

In a unitary state, the underlying assumption is that democracy is best served by a strong, central authority with power concentrated both vertically and horizontally, such that the
government has the responsibility as well as the capacity to respond to citizens’ wants and needs effectively. The EU’s federal governance system undermines this understanding both as a result of the primacy of its multiple centers of power and authority and of how these serve to diminish the concentration of power and authority in the executive in unitary states. By contrast, the underlying assumption in a federal system is that democracy is best served by a division of powers which is always vertical between central and lower level units of government but also often horizontal between executive, legislative, and judiciary branches of government, such that citizens’ rights are certain to be protected from government excess through checks and balances on a government power that is dispersed among a wide variety of governing authorities. The EU only reinforces this understanding, given the multiple centers of power and authority that only add to those at the national level in federal systems.

Moreover, the underlying assumption in a pluralist system such as that of the EU (much like that of the US) is that participation is best organized by allowing societal interest groups into the formulation of policy but not into the implementation, where a regulatory state applies the rules without exception. This differs from statist systems, where participation is assumed best organized by limiting the access of societal interest groups to policy formulation but by accommodating them either at the implementation stage, by making exceptions to the rules for which interest groups had little input (i.e., France), or outside the policy process entirely, by allowing them to set their own rules of conduct (i.e., Britain). And it also differs from corporatist systems, where participation is assumed best organized by allowing certain privileged interests such as business and labor into both the policy formulation and implementation process. Given that the EU has allowed corporatist processes largely to continue at the national level whereas it has allowed societal interests into policy formulation while denying them the traditional accommodations found in statist systems, the impact of the EU’s pluralist processes on statist systems is greater than on corporatist.

Thus, in addition to the general problems for democratic legitimacy and accountability resulting from the presence of another level of governance above the national, the EU adds those resulting from the challenges to traditional conceptions of democracy in response to changes in governance practices. And because these challenges differ according to types of governance structures and processes, some countries will have had a more difficult time than others not only in adjusting their governance practices to the new realities but also their ideas about democracy.
And for this, principal policy actors’ discourses are key to the Europeanization process, not only in reconstructing their governance practices but also in persuading the public not just of the necessity of such reconstruction but also of its appropriateness.

**Institutional Change, Ideas, and Discourse**

Discourse has been the subject of increasing interest in recent years, as growing numbers of scholars have turned to it out of frustration with the rather static approach to change found in all three of the “new institutionalisms,” whether rational choice institutionalism, which has difficulty accounting for how political actors alter perceptions of interest; historical institutionalism, which encounters problems explaining how political actors establish new institutional paths; and sociological institutionalism, which does little to shed light on how political actors create new cultural rules. Discourse can provide insight into the political dynamics of change by going beyond the interplay of interests, institutions, and cultures to explain how political actors create an interactive consensus for change through communication. This is by no means to suggest that discourse can be understood without the variables of interests, institutions, and culture, since discourse cannot easily be separated from the interests which find expression through it, from the institutional interactions which shape its expression, or from the cultural norms that frame it. Rather, it is to insist that discourse can and (often) does exert a causal influence on political change, even if it is more of an intervening than an independent variable, as one of a number of multiple causes or influences, although sometimes it is the very variable or added influence that makes the difference, by serving to reconceptualize interests or to reframe institutional rules and cultural norms.

There is no room here to elaborate on the problems of demonstrating the causal influence of discourse, nor is it possible to summarize the many different approaches to discourse. Instead, I present briefly my own empirical framework for analysis which has the benefit of avoiding the normative prescriptions of some approaches to discourse while largely encompassing the empirical insights of a wide range of such approaches.

Discourse has two dimensions: the ideational and the interactive. As a set of ideas, discourse provides both cognitive and normative arguments for a given policy program, by demonstrating not only its necessity but also its appropriateness in terms of national values. This aspect of my definition of discourse has much in common with those who focus on the role of
ideas in policy change, on policy narratives, on the référentiel or frame of reference, on discourses, national identities, “norms,” national values, and collective memories.\textsuperscript{27}

As a set of interactions, discourse is the purview of the principal policy actors involved both in the coordination of policy construction and in its communication to the larger public. The coordinative discourse has much in common with those who study the groups at the center of policy construction, whether seen as epistemic communities, advocacy coalitions, discourse coalitions, the médiateur of the référentiel, or the norm entrepreneur at the norm emergence stage.\textsuperscript{28} The communicative discourse, by contrast, builds on those who focus on policy forums, on the discourse of democratic governance, on national political discourses, on the “norm cascade” of the “norm life cycle,” or on “communicative action.”\textsuperscript{29}

Although of less importance in the context of this paper, it is nonetheless of value to note that countries with different institutional contexts tend to emphasize different aspects of the interactive dimension of discourse, even though all polities nevertheless contain both coordinative and communicative discourses. In governance systems where power is concentrated in the executive (i.e., single actor systems with unitary structures and statist processes, as in France and Britain), the communicative discourse tends to be most elaborate—to convince the general public of the necessity and appropriateness of decisions taken by a restricted policy elite and, thereby, to avoid sanctions in the form of electoral defeat or protest in the streets (especially France). In governance systems where power is more dispersed (i.e., multi-actor systems with federal structures and/or corporatist processes, as in Germany), by contrast, the coordinative discourse tends to be most elaborate—to reach agreement among the wider cross-section of policy elites involved in policy construction who tend communicate the decision to their constituencies. Here, if the coordinative discourse fails to convince, the sanctions are immediate, in the form of no agreement.\textsuperscript{30}

While most countries can be divided into single actor systems with thin coordinative discourses and elaborate communicative discourses or multi-actor systems with elaborate coordinative discourses and thin communicative ones for most policy areas (with the exception of Switzerland, where the referendum system in this multi-actor system may demand as elaborate a communicative discourse as a coordinative one),\textsuperscript{31} this division does not work as readily with regard to the question of institutional reforms which affect democratic practices and ideas. For whether countries are single actor or multi-actor systems, when it comes to issues that affect the
core beliefs and values of a society—ones that go to the heart of a country’s democratic ideas and ideals—the communicative discourse is of the essence. This is where public communication, through speeches, debates, and deliberation, is of key importance, to legitimate changes already taking place and to persuade the public of the value as well as necessity of proposed changes. And this is where problems occur when a communicative discourse fails to legitimate and/or persuade—or simply does not address the issue at all.

The changes related to Europeanization are particularly problematic in this regard because of the fact that the EU itself lacks any adequate communicative discourse. Although the EU has a very elaborate coordinative discourse across the great variety of policy sectors where “network governance” has been coming into its own, such as in environmental policy, standard-setting, regional policy, benchmarking exercises, telecommunications, electricity, competition policy, and so forth, it has very little communicative discourse directed toward the general public on these issues let alone on the governance practices which produce these policies and, in so doing, impinge on national governance practices as much as on national policies. Instead of some EU level communicative discourse, we find national communicative discourses by national politicians about such policies and practices, and public deliberation within the national media, policy forums, and informed publics.

This is to be expected, given the lack of a common language, European media, EU level political parties, and European public opinion, let alone citizenry or directly elected President. But it also means that the EU’s communicative discourse is filtered through national communicative discourse or, rather, IS national communicative discourse. Although the Commission has been trying to alter this, with more attention paid to public speeches by the Commission President, to public relations efforts, and to the proliferation of EU symbols, EU internet sites, and the like, it is fighting an uphill battle. While it has been extremely successful with regard to the coordinative discourse through the creation of increasing numbers of networks, commissions, and forums around the policy formulation process, it has been singularly unsuccessful with regard to the communicative discourse. The problem is not really one of personality, although admittedly Delors was better at capturing public attention across Europe than his successors, but rather one of structure. Until the EU develops further not just toward a common language with a common media, political parties, public opinion, and so forth but more importantly toward a common political institutional system with a Europe-wide elected leader
with power and responsibility, a fully communicative discourse that has a status on a par with national communicative discourses is impossible. There are interim steps that can be taken, of course. And Joschka Fischer’s beginning dialogue about a European Constitution, to which Jacques Chirac, Tony Blair, and others responded, represents the beginnings of such a communicative discourse.

The issue for national leaders for the moment, however, is not so much about how to construct an EU-level communicative discourse. First, they would do better to develop a coordinative discourse amongst themselves that will enable them to reach agreement on a policy program for the future development of the EU. (The failure of the Nice Summit was a perfect example of their need to have been arguing through the issues to reach new understandings of the interests of Europe writ large rather than simply bargaining based on narrow national interest.)

The main issue now is rather about how to reconceptualize their ideas about national democracy in the light of the changes in national governance practices. For this, one would have thought that countries such as France and Britain which traditionally had more elaborate communicative discourses would have had the advantage over countries such as Germany which have traditionally had a much thinner communicative discourse. But because the challenges to French and British governance practices have been much greater than to those of Germany, the challenges for the discourse have been greater for these two countries as well. And in neither case have those challenges been very successfully met.

**France**

France has probably been most affected by European integration, given governance practices that are the polar opposite of those of the EU in terms of the concentration of executive power and the limits to interest participation in policy formulation. While the impact of the EU has changed French governance for the better in many ways, it has also caused problems that French policy elites have yet to resolve. These include not only changing practices which may actually result in less participation in policymaking but also unchanging ideas about French state sovereignty and its extension through the EU that engender unrealistic public expectations about government ability to predominate in the EU.
EU Impact on French Governance Practices

European integration has greatly affected both France’s unitary governance structures, in which the executive has traditionally predominated over legislature, judiciary, and subnational authorities, and its statist governance processes in which interest groups were largely kept out of policy formulation but accommodated as often as not at the implementation stage through the derogation of the rules. The formerly seemingly all-powerful French executive has lost its virtual monopoly in policymaking, given EU level decisions that bring in not just other governments but also societal actors that are traditionally kept out of policymaking at the national level. Moreover, the executive has also lost its traditional flexibility in policy implementation. This is because the regulatory model (which results not only from EU but also national deregulatory reforms) no longer allows the kinds of exceptions to the rules that were the stock in trade of the administrative state, where the laws were as often as not “adjusted” in the application in order to accommodate societal interests and to avoid confrontation.\(^{32}\)

What is more, the executive’s control over other branches and units of government has been eroding. The traditionally subordinated judiciary has been gaining in independence from the executive not only because of its empowerment by the ECJ to uphold decisions even against the executive but also because of internal dynamics which since the 1980s have seen the growth in power of the magistrates, especially manifest in corruption cases against top politicians as well as businessmen.\(^{33}\) Moreover, subnational authorities have also been gaining in autonomy from the center as a result of their ties to Europe, e.g., through the structural funds and lobbying efforts in Brussel, as well as because of national decentralization reforms in the 1980s that devolved economic development competencies to the regions (although “deconcentration” to the benefit of the prefects has joined with decentralization to ensure that a state-regional partnership remains with regard to participation in EU programs).\(^{34}\) Only the traditionally weak legislature, which never had much independent power as long as the government had a solid majority, has become even weaker next to the executive, with European integration having served to limit Parliament’s powers of initiative or oversight even further, despite reforms attendant upon the Maastricht Treaty.\(^{35}\)

These changes have altered French governance practices, and mostly for the better. But they have also generated problems for certain interest groups with regard to access to decision-making at the same time that they represent a major challenge to specifically French ideas about
political representation as well as interest intermediation. With regard to governance structures, the changes in the traditional balance of powers can certainly be seen as salutary: the greater horizontal division of powers provides a check on unbridled executive power through the growing importance of the judiciary, even if this is diminished somewhat by the decreased power of the Parliament; and the greater vertical division of powers provides for limits on executive control through the democratization of decision-making through devolution. With regard to governance processes, the changes in access and enforcement can also been seen as beneficial, mainly through the increased participation in policy formulation at the EU level and greater equality and predictability in the application of the laws in implementation at the national level.

But these changes also come with great costs, mainly because in certain instances they have only partially altered national governance practices and they often conflict with traditional French conceptions of democracy. Perhaps the most potentially disruptive of the changes comes with the application of the regulatory model to governance processes. The loss of the possibility of making exceptions to the rules is particularly problematic in a system where interest groups which have never had much access to decision-making in policy formulation now will no longer be accommodated in policy implementation, and are therefore more likely to resort to confrontation when their concerns are not met. This represents a threat not just to French societal stability but also to democratic legitimacy, given that French democracy has always been predicated on the state’s administrative discretion, that is, on its ability to adapt the rules to accommodate affected constituencies.

One answer for France, of course, is to allow greater access to interest groups at the policy formulation stage (so that there would no longer be the need to adapt the rules in the implementation), and to encourage greater interest organization and participation in EU policymaking. In some areas, this has indeed already been occurring, in particular with regard to business interests. But a thorough-going change in the policy formulation process is not easy to accomplish in a country where the state tends to act and society to react (although the Jospin government seems to be trying to bring about just such a change through expert commissions and concertation with social partners). What is more, it would further reduce executive autonomy and control—and thereby challenge traditional notions of democracy in which the executive, as representative of the French nation, one and indivisible, is expected to be in control over the decision-making process and solely responsible for its outcome.
EU Impact on French Democratic Ideas

Conceptual adjustment to governance changes that reduce executive autonomy is not easy for France. This is because the philosophical justification for extensive executive autonomy and control has its origins in Jacobin notions of the role of the state as the direct representative of the people, to do its bidding without obligation to any other authorities (which are to be subordinate to it, whether judiciary, legislature, periphery) and to formulate policy without intermediation by other actors (in particular organized interests, which have always been regarded as illegitimate if not organized by the state). European integration, naturally, violates these tenets. But instead of seeking to reevaluate this traditional conception of democracy in the light of recent changes in governance patterns, say, by reclaiming the Girondin past, French executives (with the possible exception of the current ones) have consistently obscured the fact that the executive has in fact lost autonomy with respect to Europe.

This has a long history in French political executives’ discourse on European integration and its relationship to questions of national sovereignty (understood as executive autonomy). And it is related to the fact that French leaders have consistently sought to show that European integration, instead of representing a threat to national sovereignty, has rather represented an enhancement of it. Europe, in fact, has generally been seen as an extension of national sovereignty, acceptable mainly because French leaders felt that the country, as one of the motors behind European integration, could predominate at the European level.

The extent and modalities of that acceptance, however, have evolved over time, with the major question being to what degree the nation-state could be subsumed into a “federal” Europe.38 In the early postwar period, policy elites’ discourse was divided on Europe, with some having a vision of France as part of a federal Europe embracing Germany (and thereby containing it) while others wanted only to maintain the old balance of power approach. At the inception of the Fifth Republic, however, any idea of a federal Europe was rejected by the leadership. Charles de Gaulle, with his renewal of French nationalism and his emphasis on ‘grandeur’ and ‘indépendance’ in foreign policy, insisted that the state could not be subsumed by Europe because it was there to defend republican values, and was sovereign “pour la nation et par la nation.”39 Instead of a federal Europe, there was to be a "Europe of nations," in which France would have a leading role, Germany would be contained, and Great Britain, with its alien "Anglo-Saxon" approach, would be kept out. Europe was to be “civilized” by France, as part of
the country’s mission civilisatrice that began with the Enlightenment and the French Revolution. But French national interest was also to be served by a Europe which was to be no more than a composite of nation-states in which France was to be first among equals.  

De Gaulle, in other words, was eloquent in his discourse on the defense of national autonomy. But even at this early date, and despite the “empty chair” crisis which dramatized his opposition to supranationalism, national autonomy was eroding. Such erosion, however, took a great leap forward beginning in the 1980s, as the governance institutions of the EU gained increasing powers and responsibilities in consequence of first the Single Market Act and then the Maastricht Treaty. The discourse itself, moreover, also changed, with a greater acceptance of a move toward federalism—but it did not acknowledge the loss of autonomy any more than did that of De Gaulle.

The change in discourse came after the great U-turn in economic policy in 1983, when Mitterrand began to construct a new vision of France and Europe. This new vision was one in which France in a more federal Europe was to be the country's future, France's grandeur was to be that of Europe, and France's sovereignty was to be extended within the context of a larger European sovereignty. Thus, Mitterrand presented Europe as a necessity for France, in particular to fend off economic decline (‘le déclin’ in the French discourse). But France was also to be a necessity for Europe, with France as a leader of Europe. As Mitterrand expressed it, the success of Europe presupposed French success while France and Europe were increasingly conjoined as units (“tout se rejoint, notre patrie, notre Europe, l’Europe notre patrie”). Most of the discourse, moreover, was focused on the economic issues, with European integration consistently presented as offering a shield against globalization.

Only a few on the left resisted this at the time and continued to do so subsequently, most notably Jean-Pierre Chevènement, concerned about the loss of sovereignty, and the Communist party, concerned about economic issues. On the right, by contrast, although the UDF and the RPR both took up Europe earlier, as of 1981, there was a larger split that came to a head only during the Maastricht debates of 1991, mainly between those who remained faithful to de Gaulle's vision of Europe (left-wing Gaullists such as Philippe Séguin and right-wing ones such as Charles Pasqua) and those who also chose to embrace Mitterrand’s new vision, whether because they always had one like this (mainly the UDF, which was federalist since the early post-war period) or because they, too, saw this as the only route to future grandeur (e.g., future
president Jacques Chirac). Serious public discussion of the sovereignty issues, however, as opposed to discussion among elites, only occurred during the deliberations surrounding the Maastricht referendum in the early 1990s, in particular following the debate between Mitterrand and Séguin. Séguin argued that to ratify the Maastricht Treaty was to give up national sovereignty and democracy—with an EMU controlled by technocrats taking decisions without consideration of national interests, French or other, and thereby contributing to the transition to an undesirable federal system in which French interests would be subordinated to those of foreign interests and French preferences would be overridden by foreign majorities. Mitterrand responded that neither national sovereignty nor democracy would be jeopardized—the technocrats in charge of EMU were simply executing the will of elected public officials and would fail in their role if they were to bring in considerations of national interest; there was no necessary transition to a desired (for Mitterrand) federal system, given the reluctance of other member-states; and neither French interests nor French preferences were in any danger of foreign domination, even if certain competences had naturally and necessarily been transferred over the previous thirty-five years to the European level.43

Once the Maastricht referendum was (barely) won, the issues were not raised again by members of the mainstream parties until the elections of 1997. In between, there was a virtual taboo among mainstream parties against criticism of EMU, or a “pensée unique” that refused to contemplate any economic problems with regard to it, let alone ones related to a loss of sovereignty. Only in the run-up to the 1997 elections did the divisions over European integration within the right and the left came back to the surface, as the “souverainistes” split from the mainstream right to create their own party and Chevènement split from the Socialists to do the same.

One could argue that the French focus on building Europe as a political actor, able to carry out its decisions, made it less concerned about the governance implications for national autonomy than, say, Britain or Denmark.44 As long as French policy elites could see France as in some sense enlarged through Europe, and as one with Europe, they would not conceive of it as having any ill effects on French state capacity or sovereignty. And in consequence, they have done little to try to reconcile traditional French conceptions of democracy with a new reality in which changes in governance practices related to European integration as well as national reforms have significantly diminished national autonomy.
There has been some change in government discourse about Europe since Jospin took over, however. The Jospin government has been seeking to redefine the traditional vision of France in Europe and the world, by making it more realistic and less heroic than that of de Gaulle or Mitterrand, by talking of the costs and benefits of Europe, and also making clear that France is a “national power of world influence” and Europe a regional power compared to the U.S. as “hyper power (hyperpuissance)—even if France’s “mission civilisatrice” to export French values to the rest of Europe remains. Much more than previous governments, moreover, the Jospin government has been willing to employ the concept of federalism, by seeing Europe as a ‘Federation of Nation-States,” and to trade sovereignty for subsidiarity. Or, as the 1999 European party manifesto put it, to bridge the “necessary federalism” of European integration with the ‘essential competencies of nation-states.” Thus, the Fischer initiative on federalism found some cautious acceptance in France, despite the fact that opposition to such an eventuality also had some strong pockets of resistance, not only on the “souverainiste” right but also in the governing coalition, as illustrated by the comments of then Interior Minister J. P. Chevènement to the effect that the German proposal for a federal Europe reflecting its own structures suggested that the country still had not recovered from its Nazi past.

In France, there is no federalist vision of the German variety, despite the fact that the main representatives of the French government made positive responses. Jospin, for example, has maintained that he is a “convinced European…never partisan of a Europe of the regions” but rather a “union of nations” because “the nation is where the heart of democracy beats, where the strongest solidarities are expressed, where the genius of each people is cultivated. Europe is not meant to replace the nations. It can, however, be their extension.” Chirac, moreover, while responding positively to Fischer’s initiative in his speech to the Bundestag, by agreeing that Europe needed to “reorganize the treaties” and “clearly define the division of responsibilities” and the boundaries of the EU through a democratic process, did not go as far as to suggest a federal system, and also made clear that national differences in government structure remained appropriate, since in contrast to Germany’s federal system, “by modernizing it, France has succeeded in maintaining a unitary tradition which helps to preserve the cohesion of its national community.”

But the problems of French democracy remain. The real problem is that while a federalizing, pluralistic Europe has already been changing democratic practice, these have not
been acknowledged. France continues to be depicted in the discourse as unitary and statist, even though less so by Prime Minister Jospin than President Chirac. It is telling that the socialists’ project for the “refondation républicaine,” which is to increase decentralization, state modernization, and parliamentary power, is to come after the next election.\(^{49}\) And all of this only prolongs the popular illusion that the government somehow has sole responsibility for policies that are in fact made jointly in Brussels; or that it is therefore accountable for actions taken in Brussels over which it has little or no control. Both are detrimental to French democratic legitimacy.

**Britain**

Britain has been somewhat less affected by European integration, given governance practices that ensure executive power in a more limited sphere and allow for somewhat greater interest intermediation in policy formulation. But here, too, the EU has both changed certain aspects of British governance for the better while causing unresolved problems in other areas. These include not only changing practices that result in greater rigidities with regard to participation in policymaking but also unchanging ideas about British Parliamentary democracy as threatened by the EU that risk engendering nearly insurmountable public opposition to further integration.

**EU Impact on British Governance Practices**

European integration has greatly affected both Britain’s unitary governance structures and statist governance processes, but less than France. The traditionally strong British executive has also lost autonomy with regard to EU level policymaking, but comparatively less because it never had quite as much, given somewhat greater societal access to policy formulation through Parliamentary lobbying, and did not give up quite as much, given opt-outs from EMU and the Social Chapter (until Blair). But the British, too, have experienced a great loss in flexibility in policy implementation. This is not so much because of the loss of the ability to bend the law in order to accommodate societal interests, as in France, since this is something the British would in any case not do given the greater British respect for the rule of law. It is because the British traditional emphasis on informal arrangements to accommodate societal interests instead of
formal legal rules has been undermined by the greater amount of formal, statutory law generated by the EU.

The executive’s control over other branches and units of government has also been eroding, although again not quite as much in France, because it never had quite as much. While the traditionally more independent British judiciary has simply become more so, the British Parliament, which has always had greater powers of oversight and has always exercised more voice than the French Parliament, has resisted more its loss of power, remaining more vigilant with regard to Europe, even if the lack of consensus has reduced its potential influence on decision-making. Only over subnational authorities did the executive substantially increase its control (in the Thatcher years). But devolution has been reinstituted even here (e.g., for Scotland, Wales, and London), more as result of internal dynamics however, than European pressures for subsidiarity.

These changes have also altered British governance practices, again mostly for the better. But they again generated problems for interest group involvement in decision-making at the same time that they represent a major challenge to specifically British ideas about political representation and interest intermediation. As with France, one can point to the growing horizontal and vertical division of powers as a check on a democratic governance system which has been called an “elected dictatorship.” And one could also see the changes in governance processes in terms of access and enforcement as positive, given increased societal participation in policy formulation by way of the EU and more equality and predictability in policy implementation because laws rather than voluntary agreements are involved.

These changes also come with great costs, however, because they have altered governance practices which are in some cases fundamental to traditional British conceptions of democracy. For Britain, probably the most disruptive of the changes has been the increasing rigidification of public life related to the dramatic increase in EU (as well as national) regulations, which have replaced the informal, voluntary arrangements with formal rules administered by independent regulatory agencies or enforced by the courts. This represents a threat not only to British societal autonomy, given the expansion of public powers over a wide range of areas traditionally left to private actors, but ultimately to traditional notions of democratic legitimacy, given that British democracy has always been predicated on leaving as much room as possible to private self-governing arrangements and “gentlemen’s agreements.”
The British have long prided themselves on their civility, that is, their ability to work out problems informally following long-established and long-accepted, but never formalized, rules—the best example of this being the lack of a written Constitution. The formalization that accompanies Brussels directives, and especially its insistence on compulsory, rather than voluntary, compliance rules, only encourages what the British see as the growing rigidification of a public domain which will only increase the likelihood of legal conflict as it undermines the traditional, informal process of conflict resolution. And unlike for the French, the British can find no answer to the loss of flexibility on this score, other than perhaps to seek to keep Brussels from enacting more rules and regulations.

**EU Impact on British Democratic Ideas**

Adjustment to the loss of executive autonomy has also been difficult for Britain because it, like France, operates with a simple notion of representation, with the executive, as an embodiment of parliamentary sovereignty, expected to be in control over the decision-making process and solely responsible for its outcome. But whereas in France the difficulties of adjustment to the loss of autonomy are focused primarily on the executive, in Britain they include parliament as well. Because the extensive autonomy and control of the executive, which has its origins in the historical power of the monarchy, has since the Magna Carta been tempered by the historically evolving power of Parliament, the EU’s encroachments on the powers of Parliament have been as much matters of concern as on those of the executive. In fact, because the British notion of sovereignty, vested in the “Crown in Parliament,” is one in which the crown equals the executive which equals the government, when governments invoke “parliamentary sovereignty,” the British executive is really speaking of executive or governmental sovereignty—by which it means autonomy. And thus, when the British executive inveighs against the incursions of the EU on parliamentary powers, it has as often as not been protesting EU incursions on its own autonomy while claiming to protect parliamentary prerogatives.

Such protests, however, go beyond concerns with executive autonomy alone 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 the British notion of political rights as embodied in parliamentary sovereignty is justified by reference to history and the traditional liberties of Englishmen, 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 French, therefore, European integration is likely to represent an enhancement of their universally established rights, and promoting European integration is part of their “civilizing mission.” For the British, by contrast, European integration is more likely perceived as a threat to their nationally, historically established rights. And because the defense of these rights has often also been perceived as a struggle against the continent and not only the crown, invocation of parliamentary sovereignty is imbued with deep, historical meaning that can be seen as fundamentally anti- (continental) European.\textsuperscript{53}

It stands to reason, therefore, that British executives would have greater difficulty legitimating European integration on a normative basis than the French, and that European integration for all concerned would be seen as a threat to national sovereignty rather than an extension of it, as in the French case. For those opposed, moreover, this threat has been perceived not just as a loss of executive autonomy but even in some cases as a loss of national freedom and identity—often found in Thatcher’s speeches on the EC, and most extreme in the case of one of her cabinet ministers, Nicholas Ridley, who in July 1990, likened giving up sovereignty in the context of the debate over European monetary integration to giving it to Adolf Hitler.\textsuperscript{54} For those in favor of European integration, by contrast, the loss of sovereignty has consistently been presented as worth accepting as a matter of interests. And where the normative came into the discourse in the justification of European integration, Europe was not to be a unique project, but part of the project of the ‘West,’ involved in defending freedom, democracy, and the rights of man, and therefore not to be separated from the Atlantic Alliance.\textsuperscript{55}

For most of the postwar period, British public discourse with regard to the EU has been cast in terms of gains and losses or problems and opportunities, has tended to be economistic, has typically expressed an overriding concern with the issue of sovereignty, and has preferred intergovernmentalism to any talk of a move toward a federal system.\textsuperscript{56} The common view was reflected in Churchill’s statement in 1953 that “we are with Europe but not of it. We are linked but not comprised. We are interested and associated but not absorbed.”\textsuperscript{57} And this attitude, rather than pushing the British toward Europe in the early postwar period, oriented them more toward the trans-Atlantic relationship with the United States. When they finally did join the EC, the reasons given by the government were more pragmatic or instrumental than anything else,\textsuperscript{58} while those opposed invoked national sovereignty and national identity. In the first application for membership in 1961, Conservative Prime Minister Harold Macmillan presented membership
as a commercial move to protect national interest. The view of those opposed was perhaps best expressed by Labor leader Hugh Gaitskell, who 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. Labor Prime Minister Harold Wilson’s discourse in the renegotiations on entry—which was meant to maintain party unity in a situation in which the majority of party members was hostile but an influential minority of the party leadership was in favor—was one which presented membership as “defending the national interest against interfering foreigners.” Few at the time saw joining as a potential threat to national sovereignty or identity, except for those on the right wing of the Tory Party such as Enoch Powell and the left wing of the Labor Party—but the difference between the anti-integrationists and the pragmatists (by contrast with the many fewer genuinely pro-integrationists) was less in their understanding of the relationship of Britain to Europe as in their assessment of the practical benefits and of the dangers to national sovereignty.

Under Thatcher as well, the language of interest continued to permeate the discourse, with politicians consistently depicting their actions as ones focused on “standing up for our interests” and “safeguarding our interests” (in the Conservative Manifesto in 1983) and to “fight tenaciously for British interests within” the European Community (Thatcher’s speech to the Conservative Party conference in Blackpool, Oct. 14, 1983). Instead of seeing Europe as part of a larger ‘grand design’ in which the country was to play a pivotal role, as did the French, the British saw their role in Europe as one of a sobering influence, of providing “proposals of severely practical focus” (Lynda Chalker on the SEA) and of off-setting the grand designs by not “letting ourselves be distracted by Utopian goals” (Thatcher, Bruges, Sept. 20, 1988) because “traditionally and rightly this country is cautious when series of radical proposals are put forward to change institutions” (Malcom Rifkind, Conservative). Only the Liberals had a consistently pro-European line which went beyond the language of interest to espouse more idealistic support of integration, and which dismissed sovereignty concerns.

Within the dominant discourse, however, there were two sub-discourses, one which presented integration as a zero-sum game with regard to indivisible, “crown-in-parliament” sovereignty, and which called for constant vigilance with regard to EC encroachments, the other which saw a close and cooperative relationship as furthering British interests within a larger sovereignty. Thatcher appeared to move between the two, using the first primarily in her early
years (1979-1984), as epitomized by her speech declaring “I want my money back” with regard to the EC budget; the second, more conciliatory subdiscourse in the middle period (1984-1988), when Thatcher used a more ‘communautaire’ language as she sought to lead Europe toward greater market liberalism; and the first again in her last years (1988-1990), with the Bruges speech of September 1988 claiming that, “We have not successfully rolled back the frontiers of the state in Britain only to see them reimposed at a European level, with a European super-State exercising a new dominance from Brussels,” this in response to the initiatives related to the social dimension and EMU. By the late 1980s, the two discourses were both present in government, with Thatcher and others (e.g., Nicholas Ridley) using the first, and numbers of her Cabinet Ministers (e.g., Geoffrey Howe and Nigel Lawson) using the second. For Geoffrey Howe, for example, sovereignty was a “resource to be traded rather than guarded.” Thatcher’s downfall can at least in part be attributed to her discourse, which made on-going negotiations on European Monetary Union with other EC member-states difficult, and threatened to isolate the country. And in the Tory party, interest won out, since the Conservatives, as the party of industry and finance, were not willing to be left out of EMU.

Major’s discourse was initially much more conciliatory and cooperative, but he was restrained by his party both on the social chapter, which the party would not have accepted, and on Monetary Union, for which he had to negotiate an opt-out. This was in large measure because of Thatcher, who had “captured the mood of Conservative party culture with her strident nationalism and her spirited rejection of “socialism by the back door.” And Major was unable to overcome this. What is more, as his majority became more and more narrow, he himself played on the nationalism, in particular with the BSE (mad cow) scare.

When “new Labor” came to power in 1997, the discourse on Europe changed, but only somewhat. By this time, the Labor party, which had in the early 1980s even advocated withdrawal from membership in the EC but which over time had become much more convinced that British interests were compatible with those of Europe, had become much more supportive of most EU initiatives than the Tories. In the electoral discourse about the EU, however, the main difference was that “New Labor” did not raise any sovereignty or institutional issues with regard to further integration. Blair presented entry into EMU as a purely economic issue—but as such, his policy proposal on the single currency in the run-up to the 1997 election looked very much like that of the Conservative party, cautious and cognizant of the “formidable
obstacles” that made British participation in the first round unlikely, promising a referendum if a Labor cabinet recommended it and Parliament agreed. Since then, however, there has been further divergence, as the Tories have ruled out British membership in the single currency for at least two parliamentary terms while Blair’s government committed itself in principle to entry if it made sense economically. But as the next election approaches, the commitment of the Blair government to EMU itself is increasingly in question. The new defense initiative with regard to Europe, however, appears among other things to be Blair’s way of counter-balancing the back-peddling on EMU. Moreover, Blair’s response to the Fischer proposal was as equivocal as the French. It recommended the creation of a second chamber—“to implement the agreed statement of principles” in which member-states would “decide what is best done at the European level and what should be done at the national level, a kind of charter of competences,” but as “a political, not a legal document,” while continuing to use the various treaties, laws and precedents as something like the British constitution—and without a “single, legally binding document called a Constitution for an entity as dynamic as the EU.”

The problem for Britain, in sum, has in some sense been the opposite of that of France. French governments, by having presented integration as an extension of national sovereignty and democracy, have minimized public awareness of the fact that European integration has had a significant impact on traditional French governance practices and have therefore failed to recognize that they need to reconstruct those practices and reconceptualize their ideas about French democracy in light of Europe-related changes. British governments, by having presented integration as a threat to national sovereignty, have maximized public awareness of the significant impact of European integration on traditional British governance practices and thereby have made it almost impossible to reconstruct those practices and to reconceptualize their ideas about British democracy in light of Europe-related changes. Moreover, by making the defense of British democracy the issue, they have made any changes related to European integration appear illegitimate. And because in Britain, as in France, the discourse has continued to depict an all-powerful government in a unitary and statist polity, any government that moves toward greater integration risks being seen as responsible for undermining British democracy.
Germany

Germany, finally, has been the least affected by European integration, mainly because of the better fit of its governance practices’ with Europe. Moreover, because the impact of the EU has changed Germany relatively little, given the continual adjustments that have maintained the traditional balances in German governance practices, it also has relatively fewer problems to resolve than either France or Britain. This also results from the fact that its unchanging ideas about German identity as European have ensured reasonably realistic public expectations about Germany’s place in the EU and little concern about its effect on national sovereignty and democracy.

EU Impact on German Governance Practices

European governance structures and processes have had much less impact on Germany, with its federal democratic governance structures and corporatist participatory governance processes, than on either France or Britain. There has in the first place not been the same loss of executive autonomy because the federal state never had much autonomy to begin with, given the separate powers of the judiciary, legislature, and subnational units. Germany's "semi-sovereign" federal state could not be autonomous in the manner of more unitary states because the German executive has little power to impose, given the autonomous powers of other governmental institutions at national and subnational levels, including the constitutionally-guaranteed powers of the Länder, the constitutionally-established independence of the Bundesbank, the legally separate collective bargaining powers of the social partners, and the separate jurisdictional powers of the courts. Moreover, although the Parliament, as in France and Britain, has lost legislative initiation, deliberation, information, and approval powers to Brussels, it has nevertheless retained more control over the executive than in either of the two other countries. This is because the decrease in some of the powers of the legislature to the benefit of the executive have been countered by Parliament-led adjustments that have served to reinforce its own powers and concomitantly those of the Länder which had eroded as a result of European integration, and were renegotiated at the time of the Maastricht Treaty. A greater problem for the Länder are EU policies that limit their autonomy in such matters as industrial policy, e.g., the EU decision against Saxony's aid to Volkswagen.

The most significant impact of the EU on Germany, however, has to do with the judiciary, which finds its much greater long-standing autonomy undermined by subordination to
the ECJ even as its independence from the executive has been enhanced. Although the German courts generally have increasingly accepted EU jurisdiction, the German Constitutional Court has been somewhat recalcitrant. The issue, however, has not been over questions of sovereignty but rather over democracy, federalism, and participation, with the Court questioning the appropriateness of the German government giving up its powers to a not-sufficiently-democratic set of institutions at the supranational level.

Even in policy implementation, Germany has not experienced the same degree of loss of flexibility as France or Britain. For Germany, which has not only always codified more laws than Britain but has also applied them without exception, unlike France, the superimposition of the EU regulatory model has generally not been as problematic. This is not only because Germany has in many domains already had a more legalistic approach but because those areas traditionally outside the more legalistic domain, those jointly administered by social partners, have largely been able to continue to operate as they have traditionally. The EU, in fact, has explicitly made an exception for corporatist participatory governance processes, allowing them to continue in those domains where they already predominated.

This is not to suggest, however, that Germany has not also had difficulties in adapting to the larger EU context. Because policy formulation occurs increasingly at the supranational level with a larger group of actors, and because in certain cases of policy implementation new regulatory relationships replace the traditional corporatist accommodations, German institutional actors' shared autonomy has in fact diminished. Moreover, certain institutions are losing their traditional autonomy, most notably the Bundesbank, given that with the European Central Bank officially in business, the Bundesbank has lost its lead role not only in Germany but also in Europe more generally. Finally, although the societal interests (primarily big business) that have gained supranational access have not reduced an executive autonomy that was in any case never there, they have increased their influence to the detriment of the traditional national balance of power. But all in all, the impact of EU institutions on Germany is less significant than for France and Britain. And this also has important consequences for democratic practices and ideas.

EU Impact on German Democratic Ideas

It stands to reason that a federal, corporatist state such as Germany would have had fewer lasting problems with regard to governance practices and ideas about democracy than unitary, statist systems such as France and Britain as a result of the expansion in the powers of the EU.
But this is not only because they have readjusted the relative powers of the executive and legislature to ensure against any permanent shift in power balance and been able to maintain corporatist practices. It is also because there is a better “fit” not only in terms of governance practices but also in terms of ideas. Because a federal state such as Germany operates with notions of “compounded representation” similar to those of the EU, where no one institutional body has control over the decision-making process and different bodies share responsibility for its outcome, it is likely to adjust more readily to having an added level of shared decision-making with no clear lines of responsibility (once they have accepted the legitimacy of that added level, of course). As we have seen, the adjustment has been much harder for unitary, statist France and Britain, which operate with more simple notions of representation and executive control and responsibility.

Moreover, Germany also does not have nearly as significant problems as 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 postwar 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 postwar 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 organizations. If sovereignty is seen to be situated anywhere, it is probably in the Basic Law itself, as reflected in the reverence in which it is held and the vigilance with which it is protected, which extends to the institutional balance of powers which it consecrates. For Germany, in fact, if there is any issue of sovereignty at all, it involves the organization of domestic authority in its federal institutions, which helps explain why the protection of the powers of the country's various domestic institutional structures has been its major concern in all negotiations at the EU level, much more so than for either France or Great Britain. Moreover, the closest thing that the Germans have had to a symbol of national sovereignty has been their currency. This explains
why giving up the Deutschmark in favor of the euro was seen as acceptable only if the replacement currency would have the same strength as well as the same symbolic value that it does in Germany, as a guarantor of stability. During the process of monetary integration from the EMS to EMU, in fact, sovereignty understood as the ability to maintain basic monetary values through price stability, along with the underlying the anti-inflationary values that had been internalized per se in the general population at large since the destructive hyperinflation of the 1920s, were little challenged mainly because the Bundesbank's restrictive monetary policies were generalized throughout the member-states. With the run-up to EMU, however, there were growing concerns that the euro would be less stable than the DM, as evident not only in warnings from academics and the media but in public opinion polls that at the time of the overwhelming Bundestag vote in favor were more negative than positive.76

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. "Europeanness" as "Germanness" was the way in which German national identity was reconstructed in the early postwar 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.77

Moreover, German national interest was reconstructed as European interest. This "federalist consensus" was consolidated by the 1960s, after the SPD had given up its opposition not to the idea of European integration but to the particular form it took in the 1950s, mainly for instrumental reasons. And this consensus remains to this day, having survived changes in government and, most significantly, changes in territory, as a result of German unification. For the Germans, therefore, European sovereignty is not an extension of a nationally constructed idea of sovereignty, as it is for the French, with all that that means in terms of a national identity based on grandeur and civilizing mission. Rather, 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.”
For German leaders, in fact, to be part of Europe was to facilitate its civilizing effect. Chancellor Kohl in 1984, in answer to the basic question “why we should say yes to Europe,” argued that it was “because we have learned from history,” “…because we want to reuni
Germany,” “…because we have made a decision in favor of democracy,” “…because we want
to defend freedom and democracy,” and “…because we want to realize welfare and social
justice.” Thus, support for Europe was couched in terms of a political community of values, or a
“community of destiny” (Schicksalsgemeinschaft). But even in Germany, especially since 1989,
there have been differences as to how policy elites thought Germany should act in Europe. For
the ‘normalists’, the idea was to make the most out of the advantages provided by existing
integration, but not to go much farther. Heightened interdependence was fine as a way of
enhancing German power, not limiting it. By contrast, the ‘liberals’ were much more focused
on subsuming a “burdened national identity” into a supranational, European identity, with
rebuilding the German nation-state as a subset of building Europe.

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
political institutional adaptation, however, than on of economic adjustment. This is because
Germany’s economic organization is inseparable from the political, with the social market
economy reinforced by federal structures (given the Länders’ powers in industrial policy) and
corporatist processes (given the role of the social partners). For Germany, therefore, the question
is whether the Europe-led neo-liberal reforms (along with the competitive pressures of
globalization and Europeanization) 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.

The question for France, with its "Europe as French" national identity construction, by
contrast, is primarily political institutional, and revolves around whether France will be able to
maintain its sense of leadership in the face of its increasing loss of control at the European level
and loss of autonomy at the national level. And in the case of Britain’s "Europe as not-British"
national identity construction, the main question is also more political than economic, and
centers on how the country will reconcile its prospective greater integration in European
monetary union and social policy with its centuries-old sense of going it alone.
For both France and Britain, therefore, the impact of the EU may demand not only a reconstruction of governance practices and a reconceptualisation of ideas about democracy but also a reconsideration of national identity. Not so for Germany, where the EU’s institutional “fit” has been such that it has engendered little need to reconstruct its governance practices, reconceptualize its ideas about democracy, or reconsider its national identity.

Conclusion

Thus, the very democratic governance structures and participatory governance processes of the EU, and not just its policies, have represented a tremendous challenge for EU member-states’ governance practices, democratic ideas, and even national identity. The impact of the EU’s quasi-federal structures and quasi-pluralist processes, however, has been greater for countries such as France and Britain with unitary and statist governance practices than for a country such as Germany, with federal and corporatist governance practices. The traditional concentration of power in the executive in French and British governance systems has made it much harder for the executive to legitimize actions that it no longer entirely controls but for which it is still assumed accountable, than in the German governance system, where the traditional dispersion of power makes it easier for the executive to legitimize actions over which it has always had has much less control and for which it has never in any case been held entirely accountable.

The differences stem from the harder time French and British executives, let alone the public, have in accepting that citizen representation and interest intermediation need not be concentrated on a single all-powerful authority but can rather be situated in a multiplicity of authorities and emerge through more plural points of access. But for this, they would have to reconstruct their governance practices and reconceptualize their ideas about democracy. And at the moment, they have barely come to recognize, let alone accept, the greater “federal” separation or sharing of power in the increasingly overlapping EU and national level governance structures and the greater “pluralistic” openness to citizen representation and interest intermediation in the increasingly intermingling EU and national level governance processes. Moreover, they have yet to revise their definitions of national sovereignty, to say nothing about their constructions of national identity. In France, where political leaders have obscured the
significant impact of European governance practices by presenting Europe as an extension of national sovereignty and identity, this would entail admitting that the EU has in fact diminished French “exceptionalism” along with state power and leadership. In Britain, where political leaders have made the incursions of the EU on national sovereignty and identity a constant subject of concern, this would require accepting that the EU has diminished British separateness along with governmental power and the space left to the private sphere. For Germany, no such redefinitions or reconstructions are likely to be necessary, given that political leaders have been able to present European and German identity as one while ensuring that the EU made few lasting incursions on national governance practices. But for all three countries, whatever the difficulties of adaptation, a discourse that engages the public in deliberations about the EU and its transformation of national governance practices and democracy is of the essence.
Footnotes


5 I see Europeanization and European integration as intertwined processes, but with European integration as the process of decision-making at the EU level. Such decision-making, including both the EU level governance practices (structures and processes) as well as the resulting
policies, generates the pressures for change in member-states’ policies and practices which I term Europeanization.


16 See Schmidt, “National Patterns of Governance.”
21 See Schmidt, “European ‘Federalism’ and its Encroachments”.
For more on the theoretical underpinnings of this approach, see: Vivien A. Schmidt, “Democracy and Discourse in an Integrating Europe and a Globalizing World.” *European Law Journal* vol. 6, no. 3 (2000): 277-300.


31 Ibid.

32 See Schmidt, *From State to Market?* Chapter 2; and Schmidt, “National Patterns of Governance."


38 For a brief overview, see: Thomas Risse, "An Europeanization of Nation-State Identities?" in Europeanization and Domestic Change, Maria Green Cowles, James Caporaso, and Thomas Risse, eds., forthcoming.


41 Ibid.


43 “Dialogue du Président de la République avec M. Philippe Séguin,” La Politique Etrangère de la France: Textes et Documents, septembre-octobre 1992 Ministère des Affaires Etrangères (Direction de la Presse, de l’Information et de la Communication), pp. 22-

44 See the discussion in Larsen, Foreign Policy, p. 106-107.

45 Cole, “Europeanization.”


47 Speech to the Socialist Party’s Summer University, La Rochelle, 03/09/2000.

48 Speed to the Bundestag, June 27, 2000.


55 Larsen, Foreign Policy, p. 57.


Cited in Larsen, *Foreign Policy*, pp. 55-56.

Larsen, *Foreign Policy*, p. 59

Larsen, *Foreign Policy*, pp. 66-68.


See George, “Cultural Diversity,” p. 60.

Ibid., p. 61.

Larsen, *Foreign Policy*, pp. 60-61.


On compounded representation, see Joanne Brzinski, Thomas D. Lancaster, and Christian Tuschhoff, "Federalism and Compounded Representation in Western Europe." Paper prepared for presentation at the First Workshop of the "Federalism and Compounded Representation" project, Emory University, Atlanta GA., (October 3-6, 1997).

In fact, joining the European Coal and Steel Community constituted not a loss but rather a regaining of sovereignty over industries that the allied forces had significant controlling powers. See: Saalfeld, "German Houses of Parliament," pp. 12-13.


See Risse, “Europeanization.”


Ibid., pp. 97-98.