

Opening Pandora's box: the question of sovereignty and differentiated
integration in the European Union

Pandora szelencéjének kinyitása: a szuverenitás és a differenciált
integráció kérdése az Európai Unióban

Tudományos Diákköri Konferencia

International Relations BA

2. évfolyam

Róka Julianna

Témavezető: Kőváriné Dr. Ignáth Éva

Table of contents

1. Introduction	2
2. Research Methodology	3
3. The concept of sovereignty	4
3. 1. The Westphalian system and sovereignty	5
3. 2. The relation between sovereignty and international organisations	6
3. 3. The relevance of sovereignty	7
4. Sovereignty in the European integration	8
4.1. The federalist perspective	8
4. 2. The functionalist and intergovernmental perspectives	9
4. 3. Sharing of sovereignty	10
4. 4. The ‘Community Method’	11
4.4.1. The supranational character	12
4.4.2. The intergovernmental character	12
5. Grexit, the love and hate relationship between the EU and Greece	14
5.1. Greece in the European integration	14
5.2. The Greek debt crisis	15
5.3. EU’s financial crisis management	17
6. The United Kingdom as the ‘black sheep’	19
6.1. The UK in the European integration	19
6.2. Milestones of Brexit	20
6.3. ‘Sovereignty referendum’	21
7. Differentiated integration and its effect on Greece and Britain	24
7.1. Sovereignism and differentiated disintegration	24
7. 2. Types of differentiated integration	26
7. 3. Reforming and enlarging the EU	27
7.3. 1. Implications on Greece	30
7.3. 2. Implications on the UK	31
8. Conclusions	34
9. Bibliography	36

1. Introduction

The relevance of the topic can be explained in three core elements relating to conceptualisation, politics and future aspects. The origins of the sovereignty conflicts can be traced back to the confusion surrounding its conceptualisation. Contemporary politics tend to refer to the notion of holding power, but it is a more complex concept requiring holistic approaches. The current doubts are about whether we should refer to sovereignty as it was created by Jean Bodin (internal) and the Westphalian system (external) or in the context of international organisations and globalization, work with terms such as shared sovereignty? Power politics plays an important role in today's world by shaping the way international conflicts are handled. Sovereignty is essentially connected to people's autonomy on which these political affairs have influence, thus leading to the involvement of social aspects. Lastly, the study also finds it essential to map the possibilities of strengthening the European Union as the engine of Europe and increase its global importance. All these components lead us to an on-going debate both in national and international sceneries.

The study seeks to analyse the phenomenon of sovereignty conflicts within the highly complex nature of the *sui generis* cooperation, the European Union. The paper is structured in five main chapters. Firstly, it seeks to explore the concept of sovereignty, its types and its relevance. After describing the main concepts, the second section concentrates on how the question of retaining sovereignty among Member States appeared in the history of the European integration. In the third chapter, building on the previous examination, the paper presents case studies through analysing the sovereignty-related conflicts in the phenomena of Grexit and Brexit. The research aims to explore patterns in the attitude of these countries towards the concept of 'ever closer union' and while doing so, it highlights the main concerns over outsourcing certain levels of decision-making. Before concluding the findings, the paper considers how the concept of a 'multi-tier' Europe would interact with national sovereignty, especially its potential to alleviate future conflicts on autonomy. The emphasis in this case will be on the concept of differentiated integration.

The findings underscore the critical role of sovereignty in cooperative ventures and EU integration, tracing back to post-World War II debates. It argues that sovereignty did not disappear but- due to globalisation- all signs point to questioning its position and effective practice in such an environment as the European Union, which is an undefined authority connecting numerous sovereign states. The second half, attempts to put aside the theoretical aspects and focus on the variable of the exact events that resulted in Member States'

dissatisfaction. After analysing the phenomena of Grexit and Brexit, the study shifts the key element on how differentiated integration would affect these countries. The ‘two-tier’ Europe was detailed in a report by the Franco–German working group advocating for a ‘variable geometric’ differentiation, aiming to avoid a ‘Europe *à la carte*’ scenario and move towards a more cohesive Union. This research aims to scrutinise whether the Franco–German report would be a solution for the previously mentioned sovereignty conflicts. To get a holistic approach it also analyses ‘sovereignism’ as a new phenomenon dealing with this situation.

2. Research Methodology

The research draws upon primary and secondary academic sources. The former consists of treaties, agendas, reports, data and quantitative measures. The latter in the form of scientific papers, essays, work papers and academic literature. To get a more detailed picture in the case studies, articles, interviews, comments and reviews are also added. The writing applies a deductive approach meaning that it draws conclusions from a created hypothesis by either rejecting or confirming the statement. The research question of the study is; to what extent can differentiated integration, through the establishment of a European Political Community, serve as a viable mechanism for addressing challenges of national sovereignty sentiments? In order to create a hypothesis, the paper studies the question of sovereignty within the European Union in the cases of Greece and the United Kingdom from their integration until the emergence of the ‘exit’ idea. Therefore, the hypothesis is; the European Political Community through differentiated integration, learning from past cases, could serve as a solution to rule out future sovereignty disputes among its members. The relevance of the hypothesis is examined through the mentioned case studies emphasising the main motivations behind these ‘exits’. The research uses operationalisation by forming a hypothesis on an abstract level in order to generalize findings. (Walliman 2011)

The relevant actors of the research include influential Member States like France and Germany as key players of the integration process both in the past and the present. The case studies focus on Greece and the UK by analysing their economic, political and social backgrounds and how they have changed from the accession to the emergence of Grexit and Brexit. Even though the United Kingdom is not part of the Union anymore, the many facets of Brexit provide ample resources for the investigation of the main pillar of the study (sovereignty conflicts) and the influence it has on contemporary academics (the analysis of differentiated integration). In order to explain what triggered these mosaic words, the study elaborates on the influence of EU institutions and their main policies in the context of crises. The variables of the study

all connect together by looking for the concept of sovereignty in the international sphere (EU) through cases where it was challenged (Grexit and Brexit) and led to the idea of a ‘multi-tier’ system (European Political Community).

3. The concept of sovereignty

Sovereignty is essentially equated with independence, namely the fundamental autonomy of a state to exercise its powers without being subservient to any outside authority. It can be categorised by whether the ‘supreme’ power belongs to the people (popular sovereignty), the law (legal sovereignty), the parliament (parliamentary sovereignty) or the state (state sovereignty). (Volk 2022) The Westphalian system provided mutual respect and the recognition of state sovereignty among countries. Academics claim that this can be considered as the beginning of the international relations.¹ Post-Westphalia, the concept of sovereignty was challenged through international organisations. When entering a cooperation with intergovernmental or supranational character that mostly aims to be economically or politically united, countries ‘share’ their sovereignty by creating the term ‘pooled sovereignty’. However, many scholars argue that the term sovereignty is out-dated in our globalised world and it should not be a country’s concern when entering into mutually beneficial agreements. (Jackson 2003; Herzog 2020; Grimm 2015)

“Sovereignty is the absolute and perpetual power of a commonwealth...that is, the highest power of command.” (Bodin 1992, p.1) Jean Bodin, a French philosopher and the founding father of the term sovereignty wrote this description in his book called *The Six Books of the Commonwealth* in 1576. Although his observations go even back further in history, his conviction was that all states already had sovereignty, they just did not know how to ‘use’ it. Thus, Bodin defined four main characteristics of a sovereign: supreme, absolute, perpetual and indivisible. (Bodin 1992) At the time, he also claimed there is aristocratic, monarchical or democratic sovereignty without either of them being mixed with the other. Further philosophers elaborated on this thought, Thomas Hobbes claimed that power creates law and not the law creates power, which he expressed in a Latin term as *auctoritas non veritas facit*. (Bayer 2013, p.375) Jaques Rousseau argued that there is only one form of sovereignty which is democratic or in other words ‘popular’. He concluded that in order to fully exercise it as a society, civilians

¹Patton S. (2019). The Peace of Westphalia and its Effects on International Relations, Diplomacy and Foreign Policy, *The Histories*, Vol. 10 Iss. 1, Article 5. Available at: https://digitalcommons.lasalle.edu/the_histories/vol10/iss1/5
Acharya A. (2023). Before the Nation-State: Civilizations, World Orders, and the Origins of Global International Relations, *The Chinese Journal of International Politics*, Volume 16, Issue 3. Available at: <https://doi.org/10.1093/cjip/poad011>

have to let a higher authority make decisions that serve the common good thus creating a ‘social contract’ among the state and its population. (Tatar & Moisi 2022) According to John Locke, the people’s sovereignty is the power to abrogate the social contract, and this is what gives the government legitimacy. His theory introduced liberal constitutionalism which means that the base of political power is the universal consensus of the people. This concept acquires a body politic referring to the transformation of society into one political entity thus creating the first liberal conceptualisation of people’s sovereignty. (Tatar & Moisi 2022) It has also been defined that the notion of sovereignty is plenary and unitary. The former refers to all aspects of societal action such as political, economic and cultural. The latter highlights the indivisible character thus it cannot be shared or ‘pooled’ which has drastically changed in the upcoming centuries.

3. 1. The Westphalian system and sovereignty

After the Thirty Years’ War, the Treaty of Westphalia established the principle of state sovereignty within which we refer to the purest form of the term. Elaborating on this, nations respect each other’s territories and do not interfere in domestic affairs (internal sovereignty). The Westphalian system undoubtedly created the basic principles of international relations hence focusing on the conditions upon which states can negotiate excluding any kind of violence. After the 18th century, the focus in sovereignty shifted from the monarch to the nation or people. Creating the above-mentioned emphasis on ‘popular sovereignty’ and the source of power from the civil society. The two world wars brought significant changes in the way countries have started to act with one another, cooperation has become the key element in order to avoid further armed conflicts. (Tatar & Moisi 2022) International organisations emerged, and the question of external sovereignty had to be brought up. The United Nations was established in 1945 and created a framework for a multinational legal system. In the Principles of International Law Resolution 2625, the chapter of, *The principle of sovereign equality of states*, creates a base for mutual recognition of nations and their inalienable equal rights in the international scenery. (UN General Assembly, 1970) It can be seen in this structure that the states are interdependent and not ‘billiard-balls’ without connections. “The endurance of Westphalian sovereignty rests in the resilience of the discourse it gave birth to.” (Werner & Wilde 2001, p.288) This argument undermines the concept of realists who believe that based upon different interests, states collide with each other rather than interconnect. (Gadsby 2018) In the Post-Westphalian era, sovereignty referred to territory but with the emergence of international organisations the focus shifted towards the question of sphere of influence or power. When talking about institutionalisation, the members of an organisation accept the

‘outsourcing’ of decision-making. Thus arguing the fact that it is no longer possible to have the traditional term of ‘external sovereignty’ of states. (Bifulco & Alessandro 2020) The historian, Richard Burke, believes that sovereignty is often misinterpreted as the conceptualisation of power for various reasons. Firstly, sovereignty is a legal notion creating an overarching jurisdiction as a final tribunal. As it refers to the premise of the ultimate decision-making mechanism within a political community, sovereignty lives in the world of ‘power politics’ so it inevitably becomes associated with power. He argues that the real issue is the struggle to locate the sovereign. (Burke 2017) Member States of the European Union also often battle over the nature and position of sovereignty. Due to the differentiating interests of the 27 Member States and the debates over power allocation in relation to subordinate jurisdiction.

3. 2. The relation between sovereignty and international organisations

The European Union serves as one of the main actors of this study, but since it is a highly complex alliance its character needs further examination. To analyse any kind of international organisation one must look at the type of the institution. Intergovernmental organisation (IGO) by its definition means it involves two or more governments. Within this context, members agree in a treaty to align their interests for the common good. As they are subject to international law they are efficient in enforcing multinational agreements. (Harvard Law School, 2022) Supranational organisations (SNOs) differ in the scope of their autonomy. They can have rulemaking, adjudication and enforcement powers by the authorisation from its members. (Lindseth 2015) It can be challenging to categorise international organisations in one or the other as they might have both intergovernmental and supranational features and it is especially true for the European Union. Furthermore, the higher authority in the legal processes adds to the complexity of the question leading us back to sovereignty.

The European Union is also referred to as a *sui generis* organisation, meaning ‘of its own kind’. Debates about the nature of the Union have been ongoing since the birth of the idea. The EU’s organisational category has been located on a wide scale, with a ‘state’ classification standing at one end and an intergovernmental organisation at the other. The former argues that the EU is drifting towards being even more than a federation by having a growing number of common policies. In 2021, former MEP Daniel Hannan claimed that the Union meets all the criteria of statehood which are permanent population, defined territory and government. (Hoeksma 2021) His statement aimed to defend Brexit (further detailed in the study) but the argument is rather false as the respect of Member State’s essential state functions is included in the Treaty on European Union. (Treaty on European Union, 2012) Thus, circling back to the question of

sovereignty with the consideration of the treaties' content, Member States keep their autonomy and willingly share decision-making in specified areas which makes the EU an intergovernmental organisation. Although, a large portion of people argue that if we compare the EU to the United States, it is basically a federation without a constitution. Many also struggle to reason its categorisation and might refer to it as a confederation or "quasi-federation". (Körörsényi 2004)

3. 3. The relevance of sovereignty

After analysing the various theoretical as well as practical aspects of how sovereignty appears in our world we should also mention the studies that believe in the rethinking of the concept. The main reason for this is due to globalisation and the degree of such connection among countries that even if we keep autonomy in its original sense, we must look at it as a flexible variable. It must adapt to contemporary and future needs without being absolute, especially in the European Union, where the sovereignty of Member States is juxtaposed. It can also be understood through two definite perspectives; substance and exercise. (Bogdan 2003) Thus while remaining as the central notion of international law with substantial content, it should not be extremely restricted. In consequence, a non-absolute nature of the term should be formed within which the essence remains intact while the exercise becomes malleable. The binary character of sovereignty cannot function in such interconnectedness. "This structure consists of a rigid binary separation into internal/external, national/global, own/foreign, self/other." (Volk 2022, p.718) There should be more practical measures allowing us to analyse it in a globalised framework. In radical views such as the book of Don Herzog called *Sovereignty, rest in peace!*, the doubt of whether the concept should still exist appears, given that it is out-dated, and only leads to confusion and the escalation of international conflicts. He believes that when the term occurs in political or legal debates it only holds back the road to solution, so we must set it aside. (Tatar & Moisi 2022) Building upon this train of thought, others also interpreted it as a "self-limitation with the transfer of sovereignty rights to a superordinate political entity". (Volk 2022, p.725) Dieter Grimm even believes that there is a loss of sovereignty which will no longer act as a shield of democracy. (Volk 2022)

The above detailed historical aspects also confirm the idea of Carl Schmitt and Raymond Aron that the question of sovereignty comes up in international relations when there is a crisis. (Bifulco & Alessandro 2020) The further chapters will also support this hypothesis in various other contexts, such as in economic, political or social setbacks. From time to time it has been rethought in the given context which has led to the invention of new concepts such as "late

sovereignty”, “divisible sovereignty” and “multilevel sovereignty”. (Volk 2022, p.718) The emergence of international organisations has created power re-location questions relating directly to sovereignty. Although, according to some scholars, sovereignty is always at stake since it is a claimed status with discursive functions. (Werner & Wilde 2001) This can clearly be seen in the decades-long debate on the question of supranational or intergovernmental character of the EU during its integration.

4. Sovereignty in the European integration

In the previous chapter, we have seen how the traditional notions of sovereignty were challenged by the Westphalian system and the emergence of international organisations. Scholars and experts have already recognised that the process of transferring powers from individual states to the EU was not yet finished. This chapter guides through how the allocation of authority between the Member States and the alliance has changed in the framework of the views on European integration as well as the creation of EU institutions. In the later part of the study, these aspects will be incorporated into the attitude of the examined countries *vis-à-vis* the issue of national sovereignty. These two terms (sovereignty and integration) go hand-in-hand, especially when negotiating how much a Member State would like to share hers.

By having legislative, executive, and judiciary power, the EU raises questions about the indivisibility of sovereignty due to its unique structure. The relationship between Union law and national sovereignty seems to have one of the most complex structures. It still remains a special case due to the European history including strong national identities, fears of hegemony and varying interests posing a challenge to unification. (Lipgens & Loth 1949) The integration process had no choice but to challenge the traditional concept of sovereignty. In the beginning by establishing institutions like the Commission with a supranational nature. Scholars claim that the European integration process changed the essence of sovereignty thus inevitably affecting the relation between the EU and its Member States. From the creation of the European Community (EC) to the Maastricht Treaty three perspectives can be classified: the federalist, the functionalist and the intergovernmental. Essentially, these might intertwine and build upon each other which can be seen in the outcome of the final result. (Bifulco & Nato 2020)

4.1. The federalist perspective

The whole integration process started with discussions about the possibility of creating a United States of Europe. Even though the term is known from Winston Churchill, the first one to propose this idea was Carlo Cattaneo, an Italian philosopher and writer, followed by post-World

War One thinkers like Count Richard Coudenhove-Kalergi. He saw the establishment of a European federation in four steps. Firstly, holding a pan-European conference then creating an international arbitration which would pave the way for a customs union and finally drafting a federal constitution. (Villanueva 2005) The first stage was attractive to leading politicians but they all had definite ideas. During the Second World War, Altiero Spinelli became the leading figure of the European Federalist Movement and wrote the Ventotene Manifesto which represented the pinnacle of this perspective. This political perspective considered that the only viable solution to prevent future wars was the federation of Europe, and wished to create it as soon as possible. The plan was to establish a democratic supranational executive, legislative and judicial organ in place of the failed League of Nations. The first president of the European Commission, Walter Hallstein explicitly claimed the political nature of the integration in his reports, describing the European Economic Community as “a federation in the making”. (Hallstein 1963) He explained this by arguing that the entity is a creation made by law and the economic integration will eventually lead to a political unification. Paul Reuter, a jurist partner of Jean Monnet, noted that while there were similarities between Community law and national law, they were not perfectly harmonised like in a federal system. However, other federalists even refer to the European Court of Justice (ECJ) as an ‘embryo’ of a real Federal Court. Monnet’s vision was integration step-by-step and it became the normative way to carry out the Union. (Bifulco & Nato 2020)

4. 2. The functionalist and intergovernmental perspectives

Essentially, the functionalist theory argued that the community did not create a state authority for it to become a federation. It suggested that the focus should be on gradually integrating different economic areas which would lead to political unity eventually. Functionalists saw the same end to the integration process, only that the ‘mean’ differed from federalist theorists. David Mitrany, the founder of functionalism, believed that a federation would only create a closed system fostering regional divisions rather than harmonising interests. As he referred to it: “shrink Europe back within the narrow comforts of her own walls.” (Bifulco & Nato 2020, pp.23) Mitrany offered a multiregional way of thinking by adjusting cultures. Guy Héraud, an advocate of European federalism, also legally recognised the approach’s potential. In his 1953 article, he pointed out that in the proposition there was no Head of State or mention of a ‘European’ citizenship, only the Council of National Ministers acting as an interstate institution. The Community’s relations were still largely governed by international law and it lacked full autonomy to create laws independently. (Bifulco & Nato 2020) Later on, the emergence of the

neo-functional perspective brought about the spill-over idea. According to Ernst B. Haas, the new treaties of the 1990s confirmed that integration in one field leads to integration in another. Eventually, this will lead to ‘automaticity’ drawing in further and further integration. Relating to this hypothesis, post-functionalism highlights the significant influence of domestic politics and the mobilisation around sovereignty-related matters on the progression of European integration. (Brack et al. 2019)

The intergovernmental perspective originated from Stanley Hoffmann who argued that nation-states remain key actors of the process and have direct input in it. Although the theory did not give explanation to the integration crisis nor to the contemporary sovereignty questions, it gives us the aspect of why nations agreed on joining a supranational alliance. (Brack et al. 2019)

Based upon the historian Alan Milward, post-national aspirations were resolved in the restoration of the European nation-states. Table 1 aims to capture the underlying logic behind the concept of sovereignty and the resulting conflicts as outlined in the perspectives above. (Brack et al. 2019)

Theory	Main locus of power	Main underlying principle	Dynamics reconfiguration for of sovereignty	Effects on Member States	Resolution of sovereignty conflicts
Federalism	European federation	Supranationalism	Re-foundation of Europe	Superseded	Constitutionalism
Neo-functionalism	European (con)federation	Supranationalism	Functional over/back spill	Superseded	Conflicts law
Intergovernmentalism	Nation States	Pooled sovereignty	Inter-state Bargaining	Rehabilitated	Veto
Postfunctionalism	Nation States	Pooled sovereignty	Elections/referenda	De-legitimised	Opt outs, exits

Table 1: Characteristics of integration theories (Brack et al. 2019)

4. 3. Sharing of sovereignty

After decades of wars, dictatorships and instability, the main focus of European states shifted to reconstructing all the pillars needed to create a stable base for further socio-economic development. This goal could not be achieved alone, and Europeans were connected by a shared compassion, as only the UK, Switzerland, Sweden and Iceland did not experience dictatorships or military occupations in the period of the ‘total war’. The creation of the European Economic Community (EEC) can also be referred to as a response to the critical times of the participating

states. They have chosen to limit their own sovereignty in favour of collective peace with the method of economic integration and aiming for supranational governance. (Desmond 2004,) The United Kingdom was already against the idea claiming that the High Authority of the European Coal and Steel Community and the Commission of the EEC would diminish the traditional sense of sovereignty. It has been claimed by scholars that a shift in the concept of sovereignty towards a 'shared or pooled' character is occurring as the European Union expands and common policies are formed. This change leads to a re-evaluation of conventional notions of sovereignty and a modification of its understanding within the alliance. (Savasan 2009)

In one interpretation, the meaning of pooled sovereignty does not include the motion of relocation but rather 'held in common'. (Wallace 1999, p.506) It possesses an individual perspective but in some sense still implies the sharing of authority. As defined by scholars, when a state enters an international organisation, sovereignty is no longer absolute but rather means 'a seat at the table'. (Cooper 2004, p.44) There are several arguments defending the idea that members had control over the European integration through the creation of its institutions. The condition of accepting the initiatives was that they were favourable for the state from an economic, social and political point of view. This can be exemplified through the Empty chair crisis which was the withdrawal of the French delegation from the Council of Ministers due to the denial of the Hallstein Commission's proposal. It included the expansion of the Parliament's power and the proposal of financing the Common Agricultural Policy. Charles De Gaulle believed that these initiatives undermined French sovereignty and national interests. From one perspective, the opt-outs of states in certain cases demonstrate the diverse range of interests leading to a shift towards the implementation of 'differentiated integration'. This notion will be deeply analysed in the fourth chapter of the study. (Savasan 2009)

4. 4. The 'Community Method'

The analysis of how the European integration affected the question of national sovereignty among Member States has to be carried out against the backdrop of the organisation's unique nature. In order to scrutinise this effectively, the study dissects the supranational from the intergovernmental character within the EU. It seems fitting to use the term 'balancing act' for the institutional framework of the Union, meaning it balances out three representation needs at the same time: the interest of the Member States, the political will of the citizens and the general interest of the Union. (Sbragia 1993) Thus, the hypothesis that the founding fathers unconsciously applied this core in the process of institutionalisation can be made. The Community Method refers to such system created in the framework of the Treaty of Paris and

the Treaties of Rome. (Devuyst 2008) As the name suggests, this helped to move forward towards integrity and to recognise areas where the Union inevitably takes on a supranational character. As already mentioned in many parts of the study, this is why its structure differs from other traditional international institutions.

4.4.1. The supranational character

As the core of the integration, the European Commission acted in the whole Community's interests, thus taking up a supranational nature. It has a legislative role through the power to initiate new policies from which the Council can only diverge with unanimity. Its representative role towards third parties further strengthens its importance of symbolising the values of the Union. The two pillars of its legal order consist of the principle of direct effect and the supremacy of EU law. The latter is responsible for causing very complex sovereignty questions in legal issues while the former has rarely entered into force. The direct effect safeguards the protection of individuals' interests by enabling the reliance on EU law in their national courts. This notion alters the original form of sovereignty and rather reflects shared or pooled competencies as mentioned before. The European Parliament has continuously increased its sphere of influence through the treaties becoming the 'only multinational legislative assembly in the world'. (Savasan 2009, p.99) In consequence, the Treaty on European Union extended the involvement in the decision-making process with the Parliament by now to become a co- legislator. The political will of the citizens is expressed by its directly elected members. (Devuyst 2008) Contemporary debates about the restriction of the power of the institution are emerging due to the feeling of underrepresentation by smaller Member States.

4.4.2. The intergovernmental character

The modification of a treaty or the question of enlargement requires unanimity among states thus can be considered the most intergovernmental practice. This can be seen in the early decades of the Community when France vetoed the joining of the UK twice. Furthermore, the European Council consists of the heads of Member States safeguarding national interests. It has authority in shaping EU policies such as treaty reforms, Common Foreign and Security Policy principles and unified defence strategies. There are at least four meetings a year within which leaders conclude notable political declarations without having legally binding force. The Council of the European Union can also be classified as intergovernmental. While the EU Council's declarations must be adapted by national parliaments, it also holds a primary law-making force by creating binding legal acts. (Savasan 2009) The rotating presidency structure

enables the expression of each member's opinion in various policy fields. The adoption of legislative texts happens by unanimity, or qualified majority voting (QMV). A 'double majority rule' now applies to the latter, meaning that two conditions need to be met before implementing a decision. The scope of QMV has been expanded by EU treaties as it seemed to be a very controversial topic, currently about 80% of all EU legislation is adopted with this procedure. (Council of the European Union 2024) The above-mentioned Empty chair crisis is one of them which resulted in the Luxembourg Compromise (1966) that reaffirmed the veto right of states where national interests prevailed. Later on, the Single European Act enabled QMV for internal market directives and the Treaty of Lisbon further extended this form of decision-making. The sovereign sensitive issue of tax, social security, defence and foreign policy kept the unanimous voting. Other principles like subsidiary limits the EU's spheres of competence and foster the principle of proportionality. (Treaty on European Union, 2016) Many consider that the Ioannina Compromise is the descendant of the Luxembourg Compromise which was incorporated in the Lisbon Treaty in 2007. (Ziller 2017) However, it has been argued that in the form of the 'Luxembourg veto', countries informally retained this ability as it has never been formally instituted or revoked. "The 'veto' will be with us as long as a number of member states able to constitute a blocking minority stay committed to supporting an invocation almost automatically." (Beukers 2017, p.8)

The structure of the EU's governance has evolved over time with debates around supranational and intergovernmental decision-making. The original Community Method proposed to move beyond the limitations of post-World War II intergovernmental diplomacy. However, in practice, treaties were negotiated towards both characters which evolved into continuous controversies between the aim for supranational integration and national sovereignty, efficient decision-making and national veto rights and protecting smaller states versus traditional power dynamics. (Devuyst 2008, p.253) The research claims that all of the above-mentioned prove that this continuous internal tension became embedded in EU institutions during the implementation of European integration. This ultimately questions claims about the Union as "a feasible utopia being able to uphold the principle of sovereign equality of states." (Volk 2022, p.727) Through two case studies, the third chapter investigates how this phenomenon caused sovereignty conflicts between the Member States and the Union.

5. Grexit, the love and hate relationship between the EU and Greece

Greece joined the European Union in 1981, even though it had been an Associate Member for twenty years, it could only reach the required economic capability by the second enlargement. The country is considered to be a mid-sized European state with an outstandingly significant historical background. The respect of Greek philosophical and historical figures has been a determinative aspect of how other nations handle her in the field of international relations. Although, the country had a lengthy democratic history along with many crises resulting in an unstable economy. (Tsoukalis 2023) From a social perspective, this has created many inequalities and the migration of young people. Greek students going to study abroad along with low birth rates create an ageing population in the region. The reason for emigration is mainly poor living conditions as “it is no secret that changing countries is easier than changing one’s country”. (Krastev 2019, p.16) As agriculture and fishery create the primary sector of production and the shipping business flourishes, they always look for favourable ways of taxation. The politics of Greece is a rather sensitive topic as corruption has been ever-present due to weak governance structures, chronic bureaucracy, and the bribery of civil servants. (Smith 2014) However, according to the Corruption Perception Index, it has improved since 2012. (Transparency International 2023) Among its troubled surrounding countries – such as Turkey – neighbourhood politics is rather difficult. There have been five Balkan countries waiting in line to get accession to the EU, thus adding to the regional tensions and the complexity of negotiations between Greece and the Union.

5.1. Greece in the European integration

The country was the first to have associate status with the European Community in 1962 which gradually provided free movement, customs union along with a special attention to agriculture and taxation. Their goal was to further strengthen democracy and ties with the Western countries. In consequence, Greece officially applied for EEC membership in 1975. However, there was a political debate about the accession between the conservative New Democracy Party and the Socialist and Communist Party of Greece. The latter feared an increasing economic and political dependence on the Community. They rather favoured developing closer ties with the COMECON, the economic umbrella organisation of Soviet-bloc countries. The leader of the former party, Konstantinos Karamanlis, by having French connections, promised the country’s accession to the European Communities. The Mediterranean character added a new layer to the EC with Balkan and Orthodox features and paved the way for the joining of Spain along with Portugal. On the other hand, its geographical isolation without any

common borders aggravated regional inequalities within the Community. (Deschamps & Lekl 2016)

The most problematic aspect of Greece's accession was its so-called backward economy which obstructed the readiness for reaching *acquis communautaire*. In other words, Greece had a low level of income, 68% below the average GDP per capita of the alliance. (Oltheten et al. 2003) The economic structure of the Nine was designed for developed economies. This stood out the most in the ratio of agricultural workers which was three times more among Greek employees. The emphasis on agriculture resulted in quality products by which Italians and French felt threatened in terms of competition. This was also the case with shipping lobbies despite enlarging the European fleet to its global maximum. (Cholezas & Tsakloglou 2008) The Federal Republic of Germany supported the accession for economic reasons as Greece was already its trading partner, and it wanted to strengthen cooperation. Meanwhile, the French were supportive from a political perspective, aiming to stabilize democracy in the region. Due to these, the application was approved without a pre-accession period which was previously disputed as a result of economic differences. Greece has become a net recipient from the Community budget with an exemption on VATs. It was in the Council's interest to not create further tension since the British budgetary question was still at the top of the agenda in the early 1980s. (Deschamps & Lekl 2016)

The membership for almost half a century now, has been both successful and difficult. For the country the EU has been a 'protective shield' externally and a 'democracy catalyst' internally. (Tsoukalis 2023, p.157) Securing a place for the Republic of Cyprus during the 2004 enlargement can also be owed to the membership. On the contrary, EU policies are often ill-suited to the Greek's less advanced economy, as mentioned in the crises detailed below.

5.2. The Greek debt crisis

The European Union introduced its common currency, the euro, in 1999 which has to be implemented by all Member States after meeting the convergence criteria. (Treaty on the Functioning of the European Union 2012) Greece was not able to fulfil the conditions due to taxation problems and spending on social benefits as well as wages. The government spending has resulted in a high debt-to GDP going almost 40% beyond the maximum limit of the euro's implementation access for countries. To reduce public debt Greece either had to cut back on spending or missed out on the Eurozone opportunity. The American investment bank, Goldman Sachs, had the idea to mask the real government debt load through currency swaps, thus enabling the country to meet the adaption criteria. In this way, radical reforms can be avoided,

and the benefits of the euro can be kept. (Council on Foreign Relations, n.d.) As a result, the country adopted the euro and gained more trading partners and access to financial markets leading to apparent financial strength. Along the way, the debt-to-GDP rose above 110% and became the key factor in the default of Greece. The Great Recession of 2008 hit the country's economic pillars down like a domino. The implementation of the euro backfired and prevented the stabilisation through monetary policy. A year later, the credibility of Greece took a deep drop due to revealing its real budget deficit. In early 2010, Greece experienced a surge in borrowing costs following credit-rating agencies' decision to downgrade the country's sovereign debt to 'junk status'. (Sutton 2010) The EU created a bailout plan with the financial aid of the Commission, the European Central Bank (ECB) and the International Monetary Fund (IMF) creating the umbrella term Troika. The first suggestion has failed and led to increasing economic troubles while the second plan seemed to work. The Troika offered 130 billion euros of bailout, negotiated with creditors to cut down debts and further austerity measures applied on the Greek society. This period has been called the largest sovereign debt restructuring in history until the country started to pull out of the negotiations. (Council on Foreign Relations, n.d.)

Increasing taxes and cutting spending have created huge dissatisfaction among the public. The wages have fallen and unemployment has risen up to 20%. The unrest has led to a re-election of the ruling party in 2015, switching to a far-left party called Syriza. Alexis Tsipras became the Prime Minister of Greece and with his finance minister, Yanis Varoufakis they rejected austerity measures from the Troika. (Sullivan 2018) The disagreement created such a cleavage between Greece and the EU, that it escalated into the question of Grexit. In other words, Greece leaving the Union as they could not arrive at a consensus. The term was first used by Citigroup's Global Chief Economist Willem H. Buiter in 2012. He drafted a document with the analysis of the likelihood, the method and the implications of Greece leaving the Euro Area. In a shorter paragraph, he even included the possibility of the country exiting from the EU based on political aspects and economic disagreements. (Buiter & Rahbari 2012) The foundation of its economy had collapsed thus they saw no other way out than accepting the bailout money. The state's economy shrank by a quarter with a very high debt ratio directly affecting people's welfare. The debt crisis shows fiscal mismanagement, but the question arises which party mishandled the situation so badly that it ended in Greece's default?

5.3. EU's financial crisis management

The Great Recession caused economic issues in the whole Eurozone, but in the case of Greece, the bailout terms were defined as ‘draconian’. (Matthijs et al. 2019, p.220) After Syriza took a leading position, differentiation became the main element of its manifesto, the Thessaloniki Program. Tspiras asked for debt relief and a flexible Stability and Growth Pact reasoning with a German case from 1953. (Syriza 2015) They further asked for the exclusion of the IMF's involvement and drew up red lines on economic restriction measures. The Troika still stuck to their demands by refusing debt relief and higher spending. Further offers were rejected by the Greek government which led to capital controls, and the country's default on IMF loans. In a referendum held in 2015, 61% of votes opposed the bailout conditions, reflecting the public's demand for deviation from Eurozone rules, but the government ultimately accepted the creditors' demands for stability support from the European Stability Mechanism. The proposal of the Finance Ministry outlined two options: ‘radically improved proposals’ or a ‘time-out’ from the euro with possible debt restructuring. The latter was not possible under Eurozone terms which reflected too harsh institutional conditions. “Overall, Syriza's attempt at achieving meaningful differentiation within the single currency had been systematically thwarted by EU central constraints.” (Matthijs et al. 2019, p.221) Table 2 below shows how propositions changed over time and the final agreements reached at the Euro summit.

Table 1 Consecutive Greek proposals and eventual agreement

	Syriza's Thessaloniki Program (13 September 2014)	Greek proposals to Creditors (11 May 2015/11 June 2015)	Greek formal request for ESM support/reform proposal (July 8–9 2015)	Euro summit statement/ESM MOU (July 12 2015/August 14 2015)
Primary surpluses		2015: 0.8/0.6% 2016: 1.5% 2017: 1.5/2.5% From 2018: 2/3.5%	2015: 1% 2016: 2% 2017: 3% From 2018: 3.5%	2015: –0.25% 2016: 0.5% 2017: 1.75% From 2018: 3.5%
Debt repayment	“European Debt Conference” Growth indexation and Grace period QE: direct sovereign bond purchases	Schemes to swap ECB held debt with EFSF/ESM loans Further debt extension and GDP growth-index debt owed to GLF and EFSF End IMF lending	No debt relief measures mentioned	Three year ESM loan program No concrete commitments to longer grace or payment periods No nominal haircuts Continued IMF assistance
Economic reforms	Humanitarian measures More progressive income and property taxes Restoring higher minimum wage, employment rights and collective bargaining	Conditional privatization Collective bargaining and gradually restoring minimum wage Limit early retirement, recapitalization of social security and pensions, no cuts Liberalizing product markets Fiscal Council	Extensive privatization, transferring assets to independent fund Adjust income and property tax rates and raise corporate tax rate, raising VAT Limit early retirement, increase retirement age, phase out solidarity grant for pensioners Liberalizing product markets Fiscal Council	Cont'd extensive privatization with independent fund Tax reform including VAT and reversal of prior income tax reform 2010–2012 pension reforms back + compensate for 2012 court ruling against pension cuts Review and reversal of prior labor market reforms and product market liberalization Long-term comprehensive Social Welfare Reform Fiscal Council + quasi-automatic spending cuts

Source: Authors

Table 2: Consecutive Greek proposals and eventual agreement (Matthijs et al. 2019)

Economists often describe Greece's financial situation as turbulent. The country owed money to an increasing number of creditors, most of them being the wealthiest Member States such as Germany. The disparity in economic backgrounds between nations results in different values for the euro, thus complicating negotiations. To effectively aid economically less developed countries a closer union, like the United States' federation would be necessary, but lacking a strong sense of 'European identity', states prioritise stabilizing their domestic affairs, particularly during crises. (The Vox 2015) Furthermore, the withdrawal of a member state from the Eurozone is possible neither in the European nor in the international legal framework. In order to create the conditions of an exit, the fundamental treaties of the EU should be modified, leading to numerous legal, political and economic issues. (Gálik 2011, p.4) The economic impacts would cause extremely high inflation and the introduction of a new currency would attract many complications for both Greece and the remaining Eurozone states. All of these, would lead to the scepticism of a sustainable monetary union. (Gálik 2011)

From a theoretical point of view, scholars argue that the EU failed to find a solution to the problems caused by globalisation. In turn, it has become a target to blame for worsening the national issues to which there are no traces of effective response. Additionally, that the EU does not encounter negative narratives in a systematically coordinated way, thus failing maintain its good reputation. Furthermore, there is a weak tie between the citizens and the institutions, resulting in a disconnect and the lack of understanding on key issues. The lack of a mechanism for effective crisis communication, which would tackle disinformation and negative messages, is also alarming. (Terzi 2020) From a more abstract perspective, the solution offered by the European Stability Mechanism was *ordo-cum-neo-liberal*, meaning that the Union showed its power supremacy through the bailout packages. (Chatzistavrou 2020)

Even though Greece did not explicitly bring the question of national sovereignty onto the plate during negotiations, the birth of the term 'Grexit' reflects an underlying message of disintegration. According to a researcher from a 2010 review, the country's autonomy was violated: "the overt infringements on Greek sovereignty we're witnessing today, with EU policymakers now double-checking all national data and carefully monitoring the work of the Greek government sets a dangerous precedent." (Frizli 2010, p.1) Unlike in the following case with the UK, Greece did not want to leave the EU but rather the Eurozone in 2015. Although, we can find a linkage between the two as sceptical voices in Britain started to find audience around the same period. Grexit was the first disintegration referendum in the history of the EU. (Terzi 2020) Despite that Greece leaving the European Union only seemed like a real issue

for a short time, the first pillar of the alliance's effectiveness - the customs union - was called into question. The impact of this is also felt by the population itself, no wonder that people's scepticism towards the EU began to grow. Experts also claim that the reason for national outrages was because they felt unheard in the Union's democratic deficit and elitist structure. (Terzi 2020)

6. The United Kingdom as the 'black sheep'

Brexit is one of the most striking examples of how difficult it is to align the interests and objectives of multiple states with varying backgrounds. The UK's exit has come as a shock to the world and has shaken many people's confidence in the Union. This chapter analyses how the EU, as "the aggregate of its institutions" (Bickerton 2016, p.206) challenged the United Kingdom. It is a never-seen-before phenomenon which was the result of complex divergences between the alliance and the country itself. The chapter seeks to understand the main social, economic and legal reasons behind Brexit through an analysis of the voters, the integration process and legal mismatch. In connection with previous chapters, it scrutinises these aspects under the question of shared sovereignty. "Europeanization, and Brussels in particular, became associated with lack of control" (Bachmann & Sidaway 2016, p.48), so the leave campaign's slogan became 'take back control'. The question arises: why did the British feel like the EU was overreaching its spheres of competence? In addition, the common belief of the pro side was also that the membership was not delivering, but rather taking away. (Róka 2022)

6.1. The UK in the European integration

Britain had a bumpy road to accession which was characterised mainly by dissatisfaction. The reason can be found in the fundamentals of the two entities. The EU as an 'ever closer union' *versus* the UK as an 'isolationist'. In order to keep their sovereignty, the British were looking for opt-outs in many cases. Their point of view can already be seen in the answer given to the Schuman plan, which was that joining the Community would mean the "sacrifice of sovereignty". (Reynolds 1991, p.194) The country was also more tied to the Commonwealth countries economically than to Western Europe. Furthermore, due to the nature of its politics, the UK did not have the same 'keep control over West-Germany' ambitions as the French did. (Egedy & Gálik 2017, p.28) During the negotiations of the common market, the condition of the unified external customs system differed from the British Commonwealth preferences. This was understandable as an island needed more food exports than all of the six founding members. They were in favour of a free trade zone without a customs union. This idea was fundamentally rejected by De Gaulle who was not a supra-nationalist, but believed in economic integration.

The British interests were met in the context of the European Free Trade Association, a looser alliance without the abolition of customs on agricultural products. During the leadership of Harold Macmillan, the state drastically changed its foreign policy which included the announcement of wanting to join the common market. (Egedy & Gálík 2017) The negotiations included the plan of a Common Agricultural Policy which was definitely in contrast with British intentions. In addition, the French leadership did not support the accession even though they both shared the intergovernmental perspective of integration. De Gaulle vetoed the admission of the country twice due to the strengthening of UK-US relations and the fear of France's political 'devaluation'. (Egedy & Gálík 2017, p.47) One of the main advocates of the membership, Edward Heath felt its mission to convince Britain, mainly on the argument that the alliance is not a federation so there would be no harm to sovereignty. (Pylas 2020) The French president's resignation ultimately opened up the way for the UK to join the Community. The negotiations were lengthy due to debated questions in agriculture, fishery, trading and common currency. (Egedy & Gálík 2017) Britain wanted special treatment in all of these cases but the Six did not support 'opt-outs'. Even when they arrived at a consensus, they could not achieve many concessions, thus it was clear to see that the UK will become a net contributor. The legal aspects also did not align with the British parliamentary system that required the parliament's agreement on the enactment of international treaties. Due to the limitation of national legislation, it caused such controversies that they voted 104 times about the accession and accepted it with a very slim majority in the end. (Egedy & Gálík 2017) After all of this turbulent process, the membership came into force in 1973, but two years later there was already a referendum on leaving the EC, although it was voted down. (Pylas 2020) In conclusion, we can see how there were cleavages from the beginning which did not disappear over time.

6.2. Milestones of Brexit

All of the above-mentioned determined the attitude of British politics towards the EU which resulted in Euroscepticism in the society. In addition to the unstable roots, the management of events like the economic and migration crisis reinforced these sentiments. In a summary of the events, the Brexit referendum was voted on 2016 with an outstandingly close ratio between the Leave and Remain side. The British Prime Minister, Theresa May carried out this act by being the first leader to activate Article 50 of the Treaty on European Union. (Treaty on European Union 2012) The bargaining over the terms and conditions took over a year between the two parties. By the end of 2020, the agreement consisted of two parts: the first was the

legally binding withdrawal compromise while the second was the political declaration on the future relationship between the UK and the EU. The latter puts forward the economic, political and social outlines of the negotiations. On the last day of 2020, Britain left the alliance and no longer represents itself in the decision-making bodies but the rules have still applied during the transition period, for almost two years. Even though, during this time, citizens had the chance to adapt to the situation, severe outcomes have resulted from Brexit. It comes as no surprise, as London serves as one of the main financial hubs and cultural melting pots of the world. Scholars even claim that the capital city became ‘super-diverse’ over time. (Vertovec 2007, p.1025)

6.3. ‘Sovereignty referendum’

Euroscepticism in the UK could be considered different in terms of the isolationist perspective adapted since historical times. “For almost fifty years of being part of an extensive political and economic project, Britons failed to build their European identity or fully commit to the processes of European integration.” (Lukasz 2021, p.129) This reluctance was accompanied by the general lack of knowledge of British people about the European Union. (Hix 2015) Due to the traditional scepticism of the public, there was no need for a roughly detailed political agenda for Brexit to happen. The main advocates like the United Kingdom Independence Party exploited the already fragile sentiments of voters towards losing the country’s national identity, and the sovereignty of the British parliament. Furthermore, the media had a huge influence not just in encouraging the Leave side, but also invoking fear connected to the migration crisis. (Lukasz 2021) These pieces of information were oversimplified and ended up in the slogan ‘Take back control!’. The media coverage lacked a holistic approach and the understanding of the implications our globalised world has on national sovereignty.

In connection, many claim that Brexit originated from those who are ‘victims of globalisation’ and have been living under poor conditions. (Lukasz 2021) It gives us the opportunity to circle back to the effects of globalised times on sovereignty. This example perfectly shows how the global environment itself created uncertainty. As it can be seen in Figure 1, the majority of Leave voters were working class with lower incomes, and were thus in a disadvantaged social situation. The possible reason for this might not only be the lack of education of the lower classes, but rather the satisfaction of the upper classes with the status quo. On the other hand, Table 3 shows how voters with diverse ethnic backgrounds voted against leaving. Presumably, they live in Britain as a result of globalisation, so they were seemingly satisfied with the current situation. We might conclude that the effect of interconnectedness had dual outcomes in terms of decision-making.

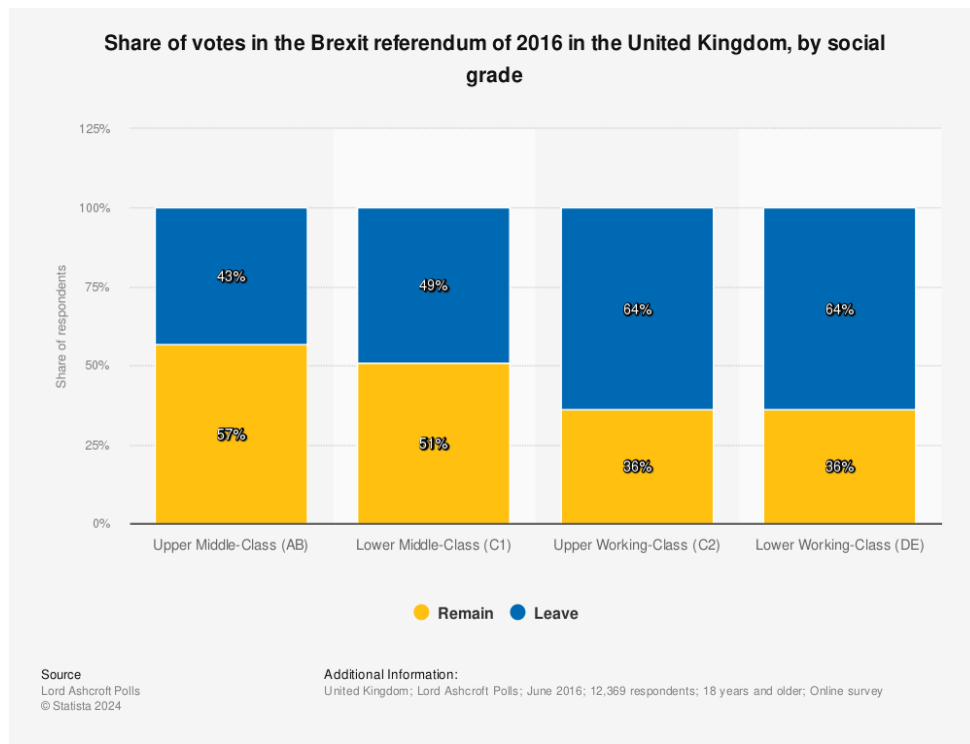


Figure 1: The ratio of Leave and Remain voters in terms of social grade (Lord Ashcroft Polls 2016)

Page 10

EU Referendum 'How Did You Vote' Poll
ONLINE Fieldwork : 21st-23rd June 2016

Table 3
Q.2 Which way did you vote in the/today's referendum?
Base: All respondents

Absolutes/col percents

	Working Status										Ethnicity					Religion									
	Total	NET: Working	Working full time	Working part time	NET: Not working	Not working but seeking work	Not working but seeking work/Student	Retired on state pension	Retired with private pension	House person	White	NET: BAME	Mixed	Asian	Black	Chinese	Other	Christian	Muslim	Hindu	Jewish	Sikh	Buddhist	Other	None
Unweighted base	12369	6827	4796	2031	5537	460	668	697	2752	960	11559	710	147	318	159	56	30	6625	205	84	98	20	64	212	4854
Weighted base	12369	6804	4777	2027	5560	462	662	707	2761	968	11571	699	145	313	156	55	30	6657	201	83	98	20	64	211	4829
For the UK to remain in the European Union	5949	3559	2535	1024	2387	198	394	218	1212	366	5422	478	97	209	114	38	19	2807	141	58	45	10	33	108	2633
	48%	52%	53%	51%	43%	43%	59%	31%	44%	38%	47%	68%	67%	67%	73%	70%	65%	42%	70%	70%	46%	48%	51%	51%	55%
For the UK to leave the European Union	6420	3245	2242	1003	3173	264	268	489	1549	602	6149	221	48	104	42	17	10	3850	60	25	53	10	31	103	2196
	52%	48%	47%	49%	57%	57%	41%	69%	56%	62%	53%	32%	33%	33%	27%	30%	35%	58%	30%	30%	54%	52%	49%	49%	45%

Table 3: The ratio of Leave and Remain voters in terms of ethnicity (Lord Ashcroft Polls 2016)

The geographical status of people is also highly connected to their political involvement and the parties they feel closer to. One of the defining characteristics of the politics of resentment is the way in which, particularly in small towns and rural areas, people express feelings of not receiving their 'fair share'. "They experience a feeling of being left out of political decision-making, and of having their interests marginalized because other groups (often minorities) are given priority by political elites" (Jennings, et al., 2019 p.54). They do not necessarily feel the advantages of being a European citizen as they feel that their values prevailed in a greater amount before the membership. (Róka 2022)

Pro-Brexiteers felt that the position of being a member undermined the British culture and national identity. They were rather in favour of decentralised decisions at the level of the individual nation. Another reason for their fear was connected to migration, as they felt that European immigrants posed a threat to keeping the traditional ways of life and national culture. (Bryant 2018) The two main elements on the agenda became regaining autonomy and control over migration, according to which scholars referred to it as a ‘sovereignty referendum’. As we know by now, the concept itself became unclear so further doubts occurred on how the UK would achieve sovereignty after leaving the alliance. (Lord 2023) This element of the state was not just restricted by the EU but adjusted so much to its legal system and been shared with third parties that the slogan of hard Brexiteers might have even its lost sense.

Parliamentary sovereignty, which refers to the UK Parliament as the highest source of authority in the country, which can pass laws without constraint, is another key British concept. (UKICE 2020) Due to the supremacy of EU law, membership in the EU hindered the exercise of parliamentary sovereignty by limiting some of the decisions that the UK Parliament might make. Although the Parliament itself agreed to these restrictions voluntarily, the EU institutions are often criticised for being given too much power and for applying austerity (Arnorsson & Zoega 2018, p.305).² Scholars argue that there is an ‘integration through law’ tendency with the European Court of Justice being the guardian of legal arrangements. This leads to ‘over-constitutionalisation’, which creates a mismatch between EU law, and the common law-based British legal system. (Schmidt 2020) The phenomenon can be explained by the Court of Justice of the European Union’s (CJEU) tendency to interpret the rules of Treaties as quasi-constitutional.

Brexit sheds light on the deep-rooted differences between the United Kingdom and the European Union. From the beginning – marked by scepticism and reluctance – to the referendum in 2016 resulting in the negotiations, Britain’s membership and exit reflect a complex relationship with intertwining social, economic and legal factors. It highlights the endeavour of reconciling national sovereignty with supranational integration. “In a country that has once ruled a quarter of the world, the perceived loss of control over their own political system, their economic perspectives, their destiny weighs heavier than in other places.” (Bachmann & Sidaway 2016, p.48) Even after all the social dissatisfaction expressing the loss of control, the decision to leave the EU resulted in many uncertainties. The quest for

² Róka J. (2022) The EU and the question of state sovereignty in the case of Brexit, Unpublished manuscript, Corvinus University of Budapest

sovereignty and retaining national identity now confronts the complexities of a globalised reality. The implications of Brexit extend beyond politics by involving economic and social issues as well. For the alliance, it serves as a reminder of the challenges of ‘united in diversity’, by highlighting the importance of autonomy.

7. Differentiated integration and its effect on Greece and Britain

The initial negotiations of the European integration can be defined by one party favouring Europeanism (integration) while the other nationalism (against integration). It can be argued that the European Economic Community was so attractive that even countries without closer cooperation intentions (UK) started to join. Scholars name the period that lasted until the Maastricht Treaty, a permissive consensus which turned into constraining dissensus. “Nationalism was gradually ignited by the leap forward in the integration process and then radicalized with the multiple crises of the 2010s.” (Fabbrini & Zgaga, p.1) Brexit being the last stroke in the growing doubtful mindset of European leaders, Member States created the Bratislava roadmap as a formal indication of their clear needs for changes.³ Europe has come across many crises since losing the UK and all of them centred on the ultimate question of getting closer or loosening the cooperation. In the fall of 2023, the Franco-German working group on EU institutional reform with twelve authors created a detailed version of how the Union should function in the future.⁴ This report focuses on how European integration could enhance and move forward without falling into the trap of creating a ‘Europe *à la carte*’.

7.1. Sovereignism and differentiated disintegration

In the studies analysed, sovereignism overlaps with populism but instead of being against elites in general, it is against supranational elites and the downsizing of the role of national institutions. “A narrative characterized by a fundamental critique of the EU although from within.” (Fabbrini & Zgaga 2022, p.2) The main distrust seems to be aimed in at the CJEU, the Commission and the ECB, whose supranational nature have been explained in the second chapter. Furthermore, it looks at popular sovereignty as the ‘symbolic chest for protecting national identity’ thus wanting a differentiated disintegration. (Fabbrini & Zgaga 2022, p.5)

³ Note. The Bratislava roadmap was proposed by the President of the European Council, the Presidency of the Council, and the Commission right after the Brexit referendum in order to address common challenges facing the EU at the times such as concerns over migration, terrorism and economic insecurity and outline measures to tackle the issues while keeping units among the members. (2016) <https://www.consilium.europa.eu/media/21250/160916-bratislava-declaration-and-roadmapen16.pdf>

⁴ Note. The Franco-German working group on EU institutional reform was written by twelve independent professionals on the topic of contemporary conflict resulting through institutional change and differentiated integration (2023) <https://institutdelors.eu/wp-content/uploads/2020/11/Paper-EU-reform.pdf>

Figure 2 below, provides a tangible diagram about different types of sovereignty grouped by the area where disintegration is needed and with a distinction between the interests of Eastern and Western European countries. One can recognise that the common ground for both regions' sovereigntists is institutional reform. In recent times, the practical implications of such approaches were initiatives such as the 'Union of European nations' from Marine Le Pen and a solely economic integration with the modification of treaties from Matteo Salvini. Besides French and Italian parties, Hungary along with Poland and even a Dutch party (Party for Freedom) echoed the voices wanting more national sovereignty. (Fabbrini & Zgaga 2022) The latter had the biggest share of votes in the 2023 general elections of the Netherlands, which indicates scepticism even from the founding members. (POLITICO research 2023) However, the Netherlands, during its Council Presidency of 2016, had already created a detailed program called "Europe where necessary, national where possible", examining the areas not only where more but also where less integration should be applied. (FUEN 2016)

These sceptical opinions made professionals rethink the idea of differentiated integration (DI) to avoid the actual loosening of the alliance. The question that arises is how exactly should DI operate, and what are the potential options.

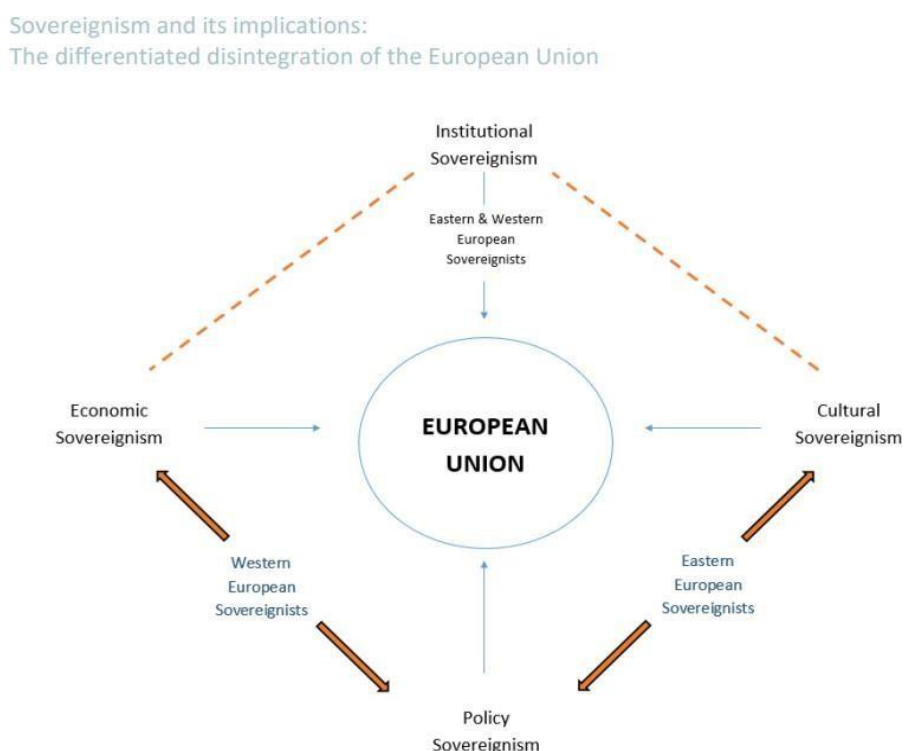


Figure 2: Features of sovereignty (Fabbrini & Zgaga 2022)

7. 2. Types of differentiated integration

The current president of Finland, Alexander Stubb, dedicated much of his research to analyse differentiated integration (DI), and believed that it would be a ‘nuclear weapon’ among the methods of reforming the EU. (Stubb, 2018) He distinguished DI by time, space and matter and made comparisons through its characters as well as mentioned examples. The first calls for a ‘multi-speed’ type with the underlying concept of achieving the same goals, just not at the same time. A transitional period would be given to states joining later, but a group of dedicated members should lead the way to the common objectives. In this context, differentiation has an expiration date and in the end all members ‘fully’ integrate. (Schimmelfennig & Winzen 2020) The transitional phenomenon already exists in forms of some treaties’ articles and in the Economic and Monetary Union (EMU). These enable less developed economies to reach, as an example, single currency, at their own pace. The *acquis communautaire*, as the core policy among countries, stays non-negotiable. (Stubb 1996) Figure 3 shows the number of differentiations in treaty measures over time. (Schimmelfennig & Winzen 2022)

Differentiation in space refers to ‘variable geometry’ or a ‘multi-tier’ Europe. It would also operate with a core that is uniformly integrated. Moving outwards, groups of states are getting less integrated. In this case, as there is no time limitation, it “admits to unattainable differences within the main integrative structure by allowing permanent or irreversible separation”. (Stubb 1996, p.287) The Schengen Agreement could serve as an example of giving free hand in border control policies. In addition, this type of DI allows non-member states participation in the outer circles of the Union. It has a dual typology, dividing states in core and periphery according to which circle they belong to. (Schimmelfennig & Winzen 2020) This might create an ‘imperial vision’ as there would be a clear division between the core and periphery. On the other hand, it could lead to a solution, too, as countries might prefer being on the periphery rather than cooperating very closely.

Integration according to matter is the least strict in terms of policies and common objectives. In the literature, Stubb refers to it as a ‘multi-menu’ or *à la carte* differentiated integration. States could pick and choose from the menu of policies they would like closer cooperation in. Their decision is permanent such as Denmark and the United Kingdom staying out of the single currency. Within this framework, there is maximum flexibility and a minimum number of common objectives. (Stubb 1996) This type would attract task-specific jurisdiction focusing separately on policies and functions. Furthermore, differentiation by matter involves ‘functionally overlapping competing jurisdiction’ that might lead to negative effects by

creating a hierarchical system. (Schimmelfennig & Winzen 2020) Europe *à la carte* lacks a core regulation which would lead to anarchy in the European community, but this might be the preferred way of members. As scholars argue “governments are more sensitive to the cost implications of regulation and more willing to consider non-compliance to avoid them”. (Asderaki & Markozani 2022, p.329) Stubb’s work has given the base for other professionals to use this categorisation as a core for researching differentiated integration.

a) Differentiation in EU treaties, 1958-2022

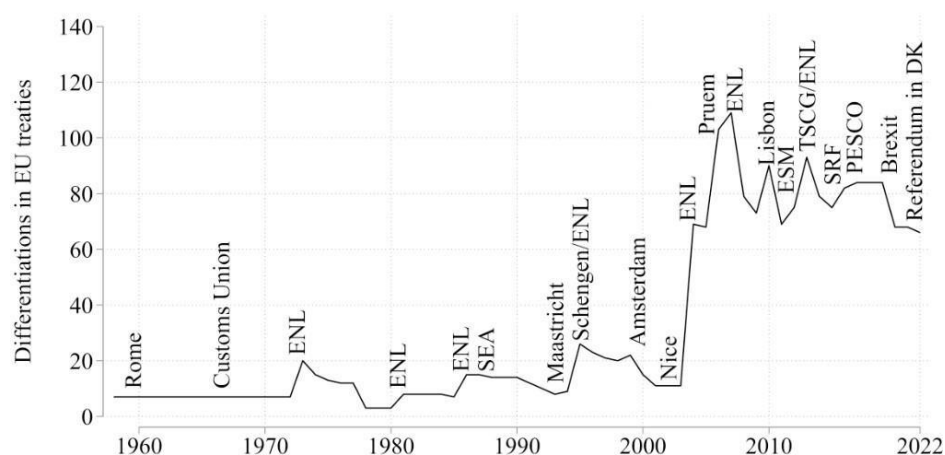


Figure 3: The development of integration in EU treaties (Schimmelfennig & Winzen 2022)

7. 3. Reforming and enlarging the EU

The Franco–German working group on EU institutional reform issued a paper suggesting new or altered policies in order to develop the Union in the challenging contemporary world. As presented in Figure 4, the research sets out a ‘triangle of aims’ that the discussed measures would like to achieve. The third chapter focuses on differentiation and even proceeding forward to enlargement. It operates with the idea of a ‘multi-tier’ Europe and aims to avoid the ‘multi- menu’ solution stating that the Community Method was created in order to avoid this high level of DI. As stated above, common obligations like the primacy of EU law, rule of law and all that is included in Article 2 of TEU are still mandatory for the Member States. It perceives the joint venture in a flexible manner, in addition to wanting to expand Article 20, also taking into account that some members have even higher needs. The process has an internal and external dimension, thus adapting to individual needs. Among the main principles, it calls for the use of existing institutions to achieve differentiated goals. (Franco-German Working Group 2023)

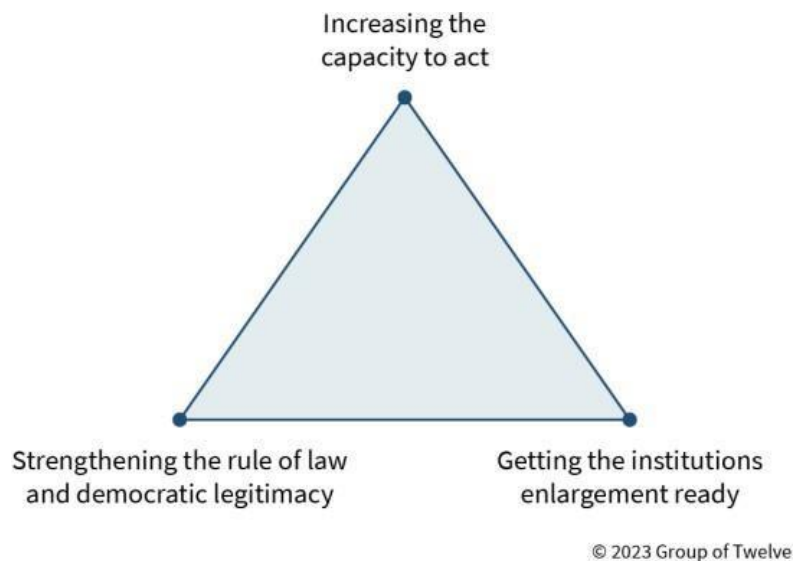


Figure 4: The triangle of aims for EU institutional reform (Franco-German Working Group 2023)

The report sets out four tiers as a sufficient number of layers, locating members upon the preferred level of integration. Figure 5 shows the visual perception of a multi-layered Europe with varying characteristics. Starting from the inner circle, which would consist of states who showed signs of deeper integration such as Eurozone and Schengen Area participants. The authors refer to it as ‘the coalition of the willing’. Moving towards the outside, the EU level basically remains in the current setup, if no Member States would prefer moving to the Associate Member status. The third level would allow European Economic Area countries to participate in the single market with the only obligation to the EU’s shared principles and values. The biggest circle, the European Political Community (EPC), would not include forms of integration, and would instead be a looser institution. It is being referred to as a ‘geopolitical convergence’, with the only common basis being a membership status in the Council of Europe and the European Convention on Human Rights. The cooperation on mutually beneficial policies would be guarded by a mixed treaty such as in the Energy Union. (Franco-German Working Group 2023)

In the context of the European Union, this structure would mean a two-tier system, re-locating some countries to a periphery circle as mentioned above, in Stubb’s understanding. In the summer of 2023, French president, Emanuel Macron emphasised the need for DI especially in light of enlargement including countries like Moldova and Ukraine. (Caulcutt 2023)



Figure 5: European integration in four concentric circles (Franco-German Working Group 2023)

Some researchers oppose this agenda, as they see it implementing radical changes rather than a gradual approach to solving problems. Jim Cloos, the Secretary General of the Trans-European Policy Studies Association, believes that they fall into the trap of over-institutionalisation and in this case, targeted changes would be necessary. He further argues that the ‘multi-tier’ differentiation is rather problematic as no country will accept the idea of a ‘second-class’ membership. Cloos sticks to the step-by-step approach and cannot see a viable solution in structural differentiation. He is also sceptical about extending opt-outs in new treaties as they have only been alterations of existing ones. “Thus, playing with opt-out clauses would open a can of worms.” (Cloos 2023, p.7)

In addition, this study argues that this structure would create tension not only between candidate states and the EU, but also among members within the alliance. It would create a waiting room for countries wanting to join, without granting membership status. In the framework of the two inside tiers, creating the right for core states to suspend a member if it no longer supports the objectives also adds to the dissatisfaction and complexity. Even if the system could move negotiations forward and resolve political deadlock, it further adds to the divide, as core countries would develop more dynamically. On the other hand, we could assume that it all depends on the perception of countries. In other words, the aforementioned states who fear for

their national sovereignty might prefer being in an outer circle to participating in deeper integration. The accession of Ukraine might also be brought forward through DI, thus creating a higher level of security and signal European unity to Russia. Since it is a relatively new idea, one could not get a grasp of the exact outcomes, but this paper tries to map the consequences it would mean for Greece and the UK.

7.3. 1. Implications on Greece

In order to get a more accurate response from Member States, we have to involve the previous white paper issued by the Commission in 2017 on five possible scenarios of the future. In scenario 3, titled *Those who want more do more*, also seen in Table 4, we can find the same measurements mentioned in the Franco-German report. Before the debt crisis, Greece was considered a core country, but during the conflict, the Syriza-led government believed that too much integration hindered the country's economic goals and national interests. Accordingly, it has been argued that the Greek position became context-dependent and unstable. (Tellidou 2021) At first glance, differentiated integration for Greece was rejected in the fear of losing financial help and full membership advantages. In the study of governments' opinion and the text of parliamentary debates from 2008 until before the COVID crisis in 2020, '*à la carte*' seemed like the more preferable model. This was further enhanced during 2015, when Member States' opinion on Greece leaving the Eurozone were divided. Germany wanted to expel the country for a minimum of five years while France was against the idea. (Rankin 2015) Later on, a 'multi-speed' model was emphasised due to the intentions of keeping the country in the core. (Tellidou 2021)

"Greece also objected to the idea of a two-tier Europe, fearing they would be treated as outsiders and excluded from important decision-making forums." (Eriksen 2022, p.44) Adding to the above mentioned thought, periphery states might feel left out and could not catch up to the core as their integration inevitably slows down, leading to a divergence in levels of development. (Eriksen 2022) From Greece's point of view, Kosovo is not recognised as a state, so its acceptance to one of the outer circles might collide with Greek interests. (Armakolas 2020) From a social aspect: "Citizens' rights derived from EU law start to vary depending on whether or not they live in a country that has chosen to do more." (European Commission 2017, p.20) During the debt crisis, people became strongly sceptical about the EU thus they might be in favour of a 'multi-tier' Europe that attracts less integration. This can especially be true in connection with the Dublin system which requires "that the EU member state an asylum seeker first enters is responsible for processing the asylum claim." (Katsioulis 2017) Besides financial

conflicts, this specific migration policy has been on the EU-Greece conference table for over a decade now.

In terms of types of differentiated integration, the study supposes that the ‘*à la carte*’ model seems to stand the closest to the country’s needs. Although, the abovementioned highlight the need for a minimum standard of common policies, which could lead us to a mixture of the ‘multi-tier’ and the ‘multi-menu’ structures. A research concluded by Bruegel - a Brussels-based think tank - scrutinised a hybrid differentiated integration model in which three fields of independent decision-making are pointed out: economic and monetary union; Schengen and asylum policy; and foreign, security and neighbourhood policy. (Demertzis et al. 2018) In these areas countries can decide in ‘clubs’, while a ‘bare-bones EU’ would be formed around the single market, European institutions, trade policies, treaties, the rule of law, and a commitment to fundamental EU values. (Demertzis et al. 2018)


Impact on policies

Single market & trade	Economic & Monetary Union	Schengen, migration & security	Foreign policy & defence	EU budget	Capacity to deliver
As in "Carrying on", single market is strengthened and the EU27 pursues progressive trade agreements	As in "Carrying on" except for a group of countries who deepen cooperation in areas such as taxation and social standards	As in "Carrying on" except for a group of countries who deepen cooperation on security and justice matters	As in "Carrying on" except for a group of countries who deepen cooperation on defence, focusing on military coordination and joint equipment	As in "Carrying on"; additional budgets are made available by some Member States for the areas where they decide to do more	As in "Carrying on", a positive agenda for action at 27 yields results; some groups achieve more together in certain domains; decision-making becomes more complex

Table 4: Impact on policies in case of Scenario 3, *Those who want more do more* (European Commission 2017)

7.3. 2. Implications on the UK

Due to the highest number of opt-outs during its membership, Britain was not obligated to many regulations, such as policies related to the EMU. Naturally, the UK does not want to be a part of the inner circles, but the question is how much they would like to cooperate? One of the authors of the Franco–German report, Oliver Costa, a Research Professor at Centre for Political Research of Sciences Po, in an interview explicitly said that they worked on the report for eight months but did not address the case of the UK. (Costa 2023) One could assume that

the current affairs of Britain are still so unstable since the exit that no one could tell its intentions. He said they could join larger circles but it is all dependent on the British authorities and how the upcoming years will form the relationship. As for the public, it might be appealing to join the single market and avoid fields in which they do not want cooperation. (Costa 2023)

A previous study carried out on post-Brexit relations claims that the Trade and Cooperation Agreement signed by the EU and the UK is a *sui generis* form of differentiated integration with measurements fitted to the needs of both sides. It suggests that the Union must create beneficial terms in the case of Brexit as it has been a warning sign for other members. Close attention should also be given to the avoidance of further fragmentation, and to upholding solidarity by less bilateral agreements between Member States and the UK. As an example, the increased work visa fees for five members and the British–Spanish social security arrangements added to the already complex negotiations of EU–UK relations. Even though the research sets out methods to avoid another exit, it also concludes that in the current form, Britain is not likely to join an institutionalised cooperation. (Wachowiak & Zuleeg 2021) Although, the EU recently raised the idea of the visa-free movement of young people, aged 18-30, between the Union and the UK. This can serve as an example of differentiated integration, as it is a version of the freedom of movement, but with additional limitations. (O’Carroll 2024)

Others argue that some form of an institutional setup is needed in external differentiation and that any kind of economic cooperation would also attract the application of the EU *acquis* in some ways. The regions of the United Kingdom that were in favour of remaining are advocates of keeping relations with the single market. Thus, scholars examined how efficient this special partnership would be if we compare it to the similar EFTA agreement and its implications. The nature of economic relations between EEA and EFTA countries is rather obscure. “...all EFTA states considered a traditional FTA with the EU insufficient, and they were willing to adapt their national law to EU rules by concluding agreements with the EU to ensure further access to the internal market.” (Gstöhl & Frommelt 2017, p.6) A small country like Lichtenstein achieved tailor-made arrangements both in the free movement of persons and access to the internal market, but the British case stands closer to the precedent of Switzerland. (Gstöhl & Frommelt 2017) The Swiss government had to comply with EU policies in many cases even without ever being a member state, so it leads us to the doubt whether one of the outer circles of differentiated integration would satisfy the preferences of the UK. A Free Trade Agreement model would be Britain’s choice if it sticks to the idea of ‘hard’ Brexit (own trade

policy, no free movement of persons, and taking back legal control) as joining, this time, the EFTA would still not satisfy the last two requirements. (Gstöhl & Frommelt 2017, p.13)

The case of the United Kingdom differs from Greece in many ways, but the study argues that the option of joining the EPC (in case of the establishment of a ‘multi-tier’ system) should not be ruled out. London is the only financial centre comparable to New York, so the EU’s economic and commercial leaders are trying to lure these companies to the continent. In order to achieve a common goal, this multi-layered system can even be a solution to strengthening economic relations. (Spisak & Tsoukalis 2023) The ‘multi-menu’ model might also resonate with British views, but as mentioned before, it would likely lead to economic disadvantages and complete disintegration. However, it is almost impossible to reflect on the exact implications the Brexit had on the UK due to various events that today’s political, economic and even social settings have not experienced yet, such as the pandemic, or the Ukrainian and Palestinian conflicts. Between 2021 and 2023, Britain had three Prime Ministers, making the task of discerning Brexit’s impact even more complex.

8. Conclusions

The European Political Community, through differentiated integration, and learning from past cases, could serve as a solution to rule out future sovereignty disputes among its members. In order to understand each element of the hypothesis the study analysed the concept of sovereignty, the European integration process, the past cases of sovereignty conflicts, and the aspects of differentiated integration. These lead to the question: to what extent can differentiated integration, through the establishment of a European Political Community, serve as a viable mechanism for addressing challenges of national sovereignty sentiments? To conduct an efficient study, the researcher used tangible variables through the cases of Grexit and Brexit. Due to the varying backgrounds of the countries involved and the nature of the events, it served as an effective example to point out past sovereignty conflicts. Their consequences attracted the idea of a ‘multi-tier’ Europe called the European Political Community in which Greece and the UK would also have differing roles. Furthermore, the paper elaborated on the most favourable types of differentiated integration in both states. All of the conducted research could serve as a general framework to categorise the other members and non-members alike.

Sovereignty, like any academic concept, has been a controversial topic ever since its emergence on the political scene. The theory was put into practice after the Thirty Years’ War when states recognised that in order to get along peacefully, they needed to respect each other’s autonomy. The armed conflicts of the upcoming years reinforced the need for non-violent cooperation which led to the establishment of international organisations. These have tested the traditional character of state sovereignty, and resulted in countries sharing their spheres of influence. Whether we are talking about a supranational or an intergovernmental international organisation, the contemporary world requires flexibility in the interpretation of sovereignty. The European Union was established through numerous debates about its character, as it defined the basis of future relations in which all members wanted to have an equal voice. The differing interests along with the creation of an efficient cooperation resulted in a *sui generis* institution. Each country with its own economic, political and social background increases the complexity of the EU, which is not only problematic in itself, but also culminates in crises affecting these areas.

The Franco–German working group’s proposal articulates a ‘multi-tier’ model with the European Political Community being the biggest outer circle, thus the platform for all European countries involved in any Union-related affairs, including the current candidate states. It

addresses diverse national interests, while aiming for a basic form of integrity. Although, tensions might appear, especially if it establishes clear divisions between core and peripheral states. The emerging idea of a differentiated integration within the European Union has profound implications for Member States including Greece and also for the former member, the United Kingdom. The phenomenon of DI emerged as a way to handle diverging interests in an environment of shifting paradigms of Europeanism and nationalism. For Greece, the ‘multi- tier’ concept raises concern about neglecting its needs as a peripheral state. Balancing economic constraints and national sovereignty, along with the influential experiences from debt crisis management, has fostered skepticism toward integration models. The UK’s pathway is still very unclear, and influenced by a complex interplay of economic, political and social factors. The Brexit referendum reflected the intention of creating distance, but recent times of crises suggest a nuanced approach. The study attempts to argue that even with its pitfalls, the establishment of a European Political Community could be an effective solution, but it is necessary to create a final report that avoids classifying the EU countries into two tiers in any way because duality leads to conflict. Nevertheless, the study agrees with institutionalisation, but not necessarily with the geometric definition of the integration process.

9. Bibliography

Primary sources

1. Lord Ashcroft Polls. (2016). Share of votes in the Brexit referendum of 2016 in the United Kingdom, by ethnicity [Graph]. In Statista. Available at: <https://www.statista.com/statistics/519308/eu-referendum-voting-intention-in-uk-by-ethnicity/> [Accessed 14 April 2024]
2. Lord Ashcroft Polls. (2016). Share of votes in the Brexit referendum of 2016 in the United Kingdom, by social grade [Graph]. In Statista. Available at: <https://www.statista.com/statistics/518395/brexit-votes-by-social-class/> [Accessed 14 April 2024]
3. Official Journal of the European Union (2012) *Consolidate Version of the Treaty on European Union*, Article 4, Available at: https://eur-lex.europa.eu/resource.html?uri=cellar:2bf140bf-a3f8-4ab2-b506-fd71826e6da6.0023.02/DOC_1&format=PDF [Accessed 10 April 2024]
4. Official Journal of the European Union (2012) *Consolidated Version of the Treaty on the Functioning of the European Union*, Article 140, Available at: <https://eur-lex.europa.eu/legal-content/en/TXT/PDF/?uri=CELEX:12012E/TXT&from=EN#page=62> [Accessed 10 April 2024]
5. Official Journal of the European Union (2016) *Consolidate Version of the Treaty on European Union*, Article 5, Available at: https://eur-lex.europa.eu/resource.html?uri=cellar:2bf140bf-a3f8-4ab2-b506-fd71826e6da6.0023.02/DOC_1&format=PDF [Accessed 10 April 2024]
6. Official site of the Council of the European Union (2024) *Qualified majority*, <https://www.consilium.europa.eu/en/council-eu/voting-system/qualified-majority/> [Accessed 10 April 2024]
7. Transparency International (2023) *Corruption Perception Index*, Available at: <https://www.transparency.org/en/cpi/2023/index/grc> [Accessed 02 April 2024]
8. UN General Assembly Twenty-fifth Session (1970) *Resolutions Adopted on the Reports of the Six Committee*, Available at: https://treaties.un.org/doc/source/docs/A_RES_2625-Eng.pdf [Accessed 02 April 2024]
9. The European Commission (2017) *White paper on the future of Europe: Reflections and scenarios for the EU27 by 2025*, Available at: https://commission.europa.eu/document/download/b2e60d06-37c6-4943-820f-d82ec197d966_en?filename=white_paper_on_the_future_of_europe_en.pdf [Accessed 02 April 2024]

Secondary sources

Academic sources

1. Acharya A. (2023). Before the Nation-State: Civilizations, World Orders, and the Origins of Global International Relations, *The Chinese Journal of International Politics*, Volume 16, Issue, Available at: <https://doi.org/10.1093/cjip/poad011> [Accessed 06 April 2024]
2. Armakolas, I. (2020). Greece: Kosovo's Most Engaged Non-recogniser. In: Armakolas I., Ker- Lindsay J. (Eds) *The Politics of Recognition and Engagement. New Perspectives on South-East Europe*. Palgrave Macmillan, Cham. Available at: https://doi.org/10.1007/978-3-030-17945-8_7 [Accessed 03 April 2024]
3. Arnorsson A., Zoega G. (2018). On the Causes of Brexit. *European Journal of Political Economy*, Vol. 55., 301-323. Available at : <http://dx.doi.org/10.1016/j.ejpoleco.2018.02.001> [Accessed 02 April 2024]
4. Asderaki F., Markozani E. (2022). The European Asylum Policy: Core state powers, flexibility, and differentiated integration. In Leruth, B., Gänzle, S., & Trondal, J. (Eds.), *The Routledge Handbook of Differentiation in the European Union* (1st ed.). Routledge. (pp.325-339). Routledge International Handbooks. Available at: <http://doi.org/10.4324/9780429054136-23>
5. Bachmann V., Sidaway J. D. (2016). Brexit geopolitics. *Geoforum; Journal of Physical, Human, and Regional Geosciences*, Vol.77., 47-50. Available at: <https://doi.org/10.1016/j.geoforum.2016.10.001> [Accessed 02 April 2024]
6. Bayer J. (2013). A szuverenitás politikaelmélete. *A szuverenitás a XXI. Században: eszmék, realitások és illúziók*, 374-382. Available at: https://epa.oszk.hu/00600/00691/00115/pdf/EPA00691_mtud_2013_04_374-382.pdf [Accessed 02 April 2024]
7. Beukers T. (2017). Not dead yet. Revisiting the 'Luxembourg Veto' and its Foundations, *European Constitutional Law Review*,13(1), 1-12. Available at: [doi:10.1017/S1574019617000013](https://doi.org/10.1017/S1574019617000013) [Accessed 16 April 2024]
8. Bodin, J. (2012). On sovereignty. In J. H. Franklin (Ed.), *Jean Bodin: On Sovereignty* (pp. 1– 45). Cambridge University Press. Available at: <https://doi.org/10.1017/CBO9780511802812.008> [Accessed 04 April 2024]
9. Bickerton C. (2016). From Nation-States to Member States: European Integration as State Transformation, *The search for Europe: Contrasting Approaches*, 202-215. Available at: <https://www.bbvaopenmind.com/wp-content/uploads/2016/01/BBVA-OpenMind-Christopher-Bickerton-From-Nation-States-to-Member-States-European-Integration-as-State-Transformation-1.pdf> [Accessed 02 April 2024]
10. Bickerton, C., Brack, N., Coman, R., & Crespy, A. (2022). Conflicts of sovereignty Contemporary Europe: A framework of analysis. *Comparative European Politics*, 20(3), 257– 274. Available at: <https://doi.org/10.1057/s41295-022-00269-6> [Accessed 02 April 2024]

11. Bifulco, Raffaele; Nato, Alessandro (2020). The concept of the sovereignty in the EU: past, present and the future, *RECONNECT project – Reconciling Europe with its Citizens through Democracy and Rule of Law*, Work package 4, Deliverable 3, Available at: <https://reconnect-europe.eu/wp-content/uploads/2020/05/D4.3.pdf> [Accessed 05 April 2024]
12. Brack N., Coman R., Crespy A. (2019). Sovereignty conflicts in the European Union; Brussels working papers, *Cahiers du CEVIPOL*, Available at: https://www.academia.edu/77549258/Sovereignty_conflicts_in_the_European_Union?email_work_card=title [Accessed 05 April 2024]
13. Buitter W., Rhabari E. (2012). Rising risks of Greek Euro Area exit, *Global Economics View Global Economics View*, Available at: <https://willembuitter.com/grexit.pdf> [Accessed 05 April 2024]
14. Chatzistavrou, F. (2020). The current status of dominance in the EU system of economic governance: Drawing upon the Greek case. In paper presented to the EU3D workshop. Available at: <https://ecpr.eu/Events/Event/PaperDetails/57190> [Accessed 09 April 2024]
15. Cholezas I., Tsakoglou P. (2008). The Economic Impact of Immigration in Greece: Taking Stock of the Existing Evidence, *Institute for the Study of Labor*, IZA Discussion Papers, No. 3754, Available at: <https://www.econstor.eu/bitstream/10419/35446/1/582910935.pdf> [Accessed 09 April 2024]
16. Cooper, R. (2004). *The Breaking of Nations: Order and Chaos in the Twenty-First Century*. Atlantic Books London. Available at: <https://cutt.ly/rw79KYiH> [Accessed 09 April 2024]
17. Demertzis M., Pisani-Ferry J., André S., Wieser T., Wolff G. (2018) One size does not fit all: European integration by differentiation, *Bruegel-PolicyBrief*, Issue. Available at: <https://www.bruegel.org/policy-brief/one-size-does-not-fit-all-european-integration-differentiation> [Accessed 12 April 2024]
18. Deschamps E., Lekl C. (2016). The accession of Greece, *Centre Virtuel de la Connaissance sur l'Europe*, Available at: http://www.cvce.eu/obj/the_accession_of_greece-en-61a2a7a5-39a9-4b06-91f8-69ae77b41515.html [Accessed 10 April 2024]
19. Devuyst Y. (2008) The European Union's Institutional Balance after the Treaty of Lisbon: Community Method and Democratic Deficit Reassessed, *Georgetown Journal of International Law* 39, no. 2, 247-326. Available at: <https://cutt.ly/Iw73kxH6> [Accessed 18 March 2024]
20. Eriksen O. E. (2022). On the legitimacy of differentiated integration. In Leruth, B., Gänzle, S., & Trondal, J. (Eds.), *The Routledge Handbook of Differentiation in the European Union*, (pp.34-49), Routledge International Handbooks, <http://doi.org/10.4324/9780429054136-4> [Accessed 20 March 2024]

21. Federal Union of European Nationalities (2016). EU Council Presidency of the Netherlands in the first half of 2016: “*Europe where necessary, national where possible.*” *FUEN*, Available at: <https://fuen.org/dk/article/EU-Council-Presidency-of-the-Netherlands-in-the-first-half-of-2016-Europe-where-necessary-national-where-possible> [Accessed 09 April 2024]
22. Frizli J. M. N., (2010). “Greece and the EU debt crisis”, *The Vienna Review, Academia*. Available at: <https://www.academia.edu/10410975> [Accessed 28 March 2024]
23. Gálik Z. (2011). Az eurózóna elhagyásának akadályai, *Magyar Külügyi Intézet*. Available at: https://www.academia.edu/8091443/Az_eur%C3%B3z%C3%B3na_elhagy%C3%A1s%C3%A1nak_akad%C3%A1lyai [Accessed 28 March 2024]
24. Grimm D., Cooper B. (2015) Sovereignty: The Origin and Future of a Political and Legal Concept, *Columbia Scholarship Online*. Available at: <https://doi.org/10.7312/columbia/9780231164252.001.0001> [Accessed 18 March 2024]
25. Hallstein, W. (1963). The European economic community. *Political Science Quarterly*, 78(2), 161–178. Available at: <https://doi.org/10.2307/2146121> [Accessed 05 April 2024]
26. Herzog D. (2020). *Sovereignty, RIP*. Yale University Press. Available at: <https://doi.org/10.2307/j.ctvzpv70z> [Accessed 18 March 2024]
27. Jackson J. H. (2003) Sovereignty - Modern: A New Approach to an Outdated Concept, *Georgetown Law Faculty Publications and Other Works*. 110. Available at: <https://scholarship.law.georgetown.edu/facpub/110> [Accessed 05 April 2024]
28. Körösenyi A. (2004). Demokráciadeficit, föderalizmus, szuverenitás, *Politikatudományi szemle*, Volume 3, Available at: https://real.mtak.hu/112516/1/2004_3_korosenyi.pdf [Accessed 10 April 2024]
29. Krastev I., Holmes S. (2019) *The Light that Failed: A Reckoning*. Penguin Books. Available at: <https://books.google.be/books?id=B5eGDwAAQBAJ&lpg=PP1&hl=nl&pg=PT39#v=onepag e&q&f=false> [Accessed 03 April 2024]
30. Lord, C. (2023). Conflicting Sovereignties and the Sustainability of the Brexit State. In Rone, J., Brack, N., Coman, R., Crespy, A. (Eds) *Sovereignty in Conflict*. Palgrave Studies in European Union Politics. Palgrave Macmillan, Cham. Available at: https://doi.org/10.1007/978-3-031-27729-0_2 [Accessed 14 April 2024]
31. Lukasz D. (2021). Euroscepticism or nationalism-which better explains the decision of the British to leave the European Union?, *Studies on Authoritarianism and Totalitarianism* 43, No. 1, Available at: <https://doi.org/10.19195/2300-7249.43.1.8> [Accessed 14 April 2024]
32. Matthijs M., Parsons C., Toenshoff C. (2019). Ever tighter union? Brexit, Grexit, and

- frustrated differentiation in the single market and Eurozone, *Comparative European Politics*, 17:209-230, Available at: <https://doi.org/10.1057/s41295-019-00165-6> [Accessed 07 April 2024]
33. Oltheten E., Pinteris G., Sougiannis T. (2003). Greece in the European Union: policy lessons from two decades of membership, *The Quarterly Review of Economics and Finance*, 774-806. Available at: [https://doi.org/10.1016/S1062-9769\(03\)00049-8](https://doi.org/10.1016/S1062-9769(03)00049-8) [Accessed 16 April 2024]
 34. Patton S. (2019). The Peace of Westphalia and its Effects on International Relations, Diplomacy and Foreign Policy, *The Histories*, Vol. 10 Iss. 1 , Article 5. Available at: https://digitalcommons.lasalle.edu/the_histories/vol10/iss1/5 [Accessed 16 March 2024]
 35. Reynolds, David: *Britannia Overruled. British Policy and World Power in the 20th Century*. London: Longman, 1991. 193. o.
 36. Savasan, Z. (2009). The Impact of European Integration Process on the Nature of Sovereignty. *Ankara Avrupa Çalışmaları Dergisi*, 8(2), 89-107. Available at: <https://dergipark.org.tr/tr/download/article-file/847774> [Accessed 06 April 2024]
 37. Schimmelfennig F., Winzen T. (2020) Concepts: Differentiated Integrations and Its Modes, Ever looser Union?, *Oxford University Press*, 15-19. Available at: <https://doi.org/10.1093/oso/9780198854333.003.0002> [Accessed 20 March 2024]
 38. Schimmelfennig F., Winzen T. (2022) Differentiated Integration in the European Union: Trends and Patterns, *Zeitschrift für Europarecht*. Available at: <https://eizpublishing.ch/artikel/euz/11-2022/differentiated-integration-in-the-european-union-trends-and-patterns/> [Accessed 20 March 2024]
 39. Schmidt, S. K. (2020). No match made in heaven. Parliamentary sovereignty, EU over-constitutionalization and Brexit. *Journal of European Public Policy*, 27(5), 779–794. Available at: <https://doi.org/10.1080/13501763.2020.1733635> [Accessed 22 March 2024]
 40. Sbragia, A. M. (1993). The European Community: A Balancing Act. *Publius*, 23(3), 23–38. Available at: <http://www.jstor.org/stable/3330840> [Accessed 08 April 2024]
 41. Stubb A. (1996) A categorization of Differentiated Integration, *Journal of Common Market Studies*, Vol. 34, No. 2. Available at: <https://doi.org/10.1111/j.1468-5965.1996.tb00573.x> [Accessed 22 March 2024]
 42. Tatar G. R., Moisi A. (2022), The concept of sovereignty, *Journal of Public Administration, Finance and Law*. Available at: <https://doi.org/10.47743/jopaf-2022-24-27> [Accessed 18 March 2024]
 43. Tellidou N. (2021) The Politics of Differentiated Integration: What do Governments Want? Country Report-Greece, *Robert Schuman Centre for Advanced Studies*. Available at: <http://dx.doi.org/10.2139/ssrn.3796225> [Accessed 20 March 2024]
 44. Vertovec S. (2007) Super-diversity and its implications, *Ethnic and Racial Studies*, Vol.

- 30 No. 6, 1024-1054. Available at : <http://dx.doi.org/10.1080/01419870701599465> [Accessed 18 March 2024]
45. Villanueva, D. C. (2005). Richard von Coudenhove-Kalergi's "Pan-Europa" as the Elusive "Object of Longing." *Rocky Mountain Review of Language and Literature*, 59(2), 67–80. Available at: <https://doi.org/10.2307/3655048> [Accessed 10 March 2024]
 46. Volk C. (2020) The Problem of Sovereignty in Globalised Times, *Law, Culture and Humanities*
 47. Vol. 18, 716-738. Available at: <https://doi.org/10.1177/1743872119828010> [Accessed 23 March 2024]
 48. Wachowiak J., Zuleeg F. (2021) The EU-UK Partnership and Implications for Differentiation Within the EU and Between the EU and Third Countries, *EUIDEA*, No.10. Available at: https://www.epc.eu/content/PDF/2021/euidea_rp_10.pdf [Accessed 11 April 2024]
 49. Wallace, W. (1999). The Sharing of Sovereignty: The European Paradox. *Political Studies*, 47(3), 503-521. Available at: <https://doi.org/10.1111/1467-9248.00214> [Accessed 07 April 2024]
 50. Walliman, N. (2011). *Research methods: the basics*. London, Routledge
 51. Walter L., Wilfried L. (1991). *Transnational organisations of political parties and pressure groups in the struggle for European union 1945-1950*, De Gruyter. Available at: <https://cadmus.eui.eu/handle/1814/21772> [Accessed 19 March 2024]
 52. Werner W., Wilde J. (2001) The endurance of sovereignty, *European Journal on International Relations* 7, 284-313. Available at: <https://journals.sagepub.com/doi/epdf/10.1177/1354066101007003001> [Accessed 18 March 2024]
 53. Zgaga T., Fabbri S. (2022) Sovereignism and its implications: The differentiated disintegration of the European Union, *EU3D Research Papers*, No. 22. Available at: <https://dx.doi.org/10.2139/ssrn.4118801> [Accessed 10 April 2024]
 54. Ziller, J. (2017). Defiance for European influence—the Empty Chair and France. In Jakab A., Kochenov D. (Eds), *The Enforcement of EU Law and Values: Ensuring Member States' Compliance* (pp.422-435). Oxford University Press. Available at: <https://doi.org/10.1093/acprof:oso/9780198746560.003.0025> [Accessed 10 March 2024]

Secondary sources

Professional sources

1. Burke R. (2017). The concept of sovereignty, *Serious Science*, Available at: <https://serious-science.org/the-concept-of-sovereignty-8402> [Accessed 21 March 2024]

2. Cloos J. (2023) A critical look at the report of the Franco-German working group on EU institutional reform, *TEPSA*, Available at: <https://tepsa.eu/analysis/a-critical-look-at-the-report-of-the-franco-german-working-group-on-eu-institutional-reform/> [Accessed 09 April 2024]
3. Gadsby J. (2018) An introduction to global politics, *Hodder Education*, Volume 27, Number 4, Available at: <https://www.hoddereducation.com/magazines/magazines-extras/politics-review-extras> [Accessed 20 March 2024]
4. Hix S. (2015) Brits know less about the EU than anyone else, *London School of Economics and Political Science*, Available: <https://blogs.lse.ac.uk/euoppblog/2015/11/27/brits-know-less-about-the-eu-than-anyone-else/> [Accessed 18 March 2024]
5. Hoeksma J. (2021) The European Union: From organisation ‘sui generis’ to democratic regional organisation, *The Federal Trust*, Available at: <https://fedtrust.co.uk/eu-from-organisation-sui-generis-to-democratic-regional-organisation/> [Accessed 05 April 2024]
6. Jennings W., Stoker G., Warren I. (2019) Brexit and public opinion: cities and towns-the geography of discontent, *UK in a changing Europe*, 54-56. Available at: <https://ukandeu.ac.uk/brexit-and-public-opinion-cities-and-towns-the-geography-of-discontent/> [Accessed 03 April 2024]
7. Katsioulis N. (2017) What “Return to Dublin” Means for Greece, *Friedrich Ebert Stiftung*, <https://www.fes.de/en/displacement-migration-integration/article-page-flight-migration-integration/what-return-to-dublin-means-for-greece> [Accessed 10 April 2024]
8. O’Carroll L. (2024) Brussels proposes return to pre-Brexit mobility for UK and EU young people, *The Guardian*. Available at: <https://www.theguardian.com/politics/2024/apr/18/brussels-proposes-return-to-pre-brexit-free-movement-for-uk-and-eu-young-people#:~:text=The%20European%20Commission%20has%20proposed,olds%20in%20a%20major%20concession.> [Accessed 18 April 2024]
9. Spisak A., Tsoukalis C. (2023) Three Years On, Brexit Casts a Long Shadow Over the UK Economy, *Tony Blair Institute for Global Change*, Available at: <https://www.institute.global/insights/geopolitics-and-security/three-years-brexit-casts-long-shadow-over-uk-economy> [Accessed 22 March 2024]
10. Sullivan, A. (2018) The greek debt crisis: A timeline. *DW*. Available at: <https://www.dw.com/en/a-timeline-of-greeces-long-road-to-recovery/a-45118014> [Accessed 29 March 2024]
11. Terzi I. (2020) Grexit and Brexit: Lessons for the European Union, *E-International Relations*. Available at: <https://www.e-ir.info/2020/05/04/grexit-and-brexit-lessons-for-the-eu/> [Accessed 29 March 2024]
12. Tsoukalis L. (2023) “Progressive Yearbook 2023” Greece and the EU: A turbulent love

affair, now more mature?, *Foundation for European Progressive Studies*, 155-162. Available at: [https://feeps-europe.eu/wp-content/uploads/2023/01/15.-Greece-and-the-EU -A-turbulent-love-affair-now-more-mature -by-Loukas-Tsoukalis.pdf](https://feeps-europe.eu/wp-content/uploads/2023/01/15.-Greece-and-the-EU-A-turbulent-love-affair-now-more-mature-by-Loukas-Tsoukalis.pdf) [Accessed 20 March 2024]

13. Pylas P. (2020) Britain's EU Journey: When it signed up, 16 years late, *AP*. Available at: <https://apnews.com/article/brexit-international-news-edward-heath-europe-c29a7dfaabb1103bc71e343e2b675d48> [Accessed 10 April 2024]

Other sources

1. Council on Foreign Relations (n.d.) Greece's Debt Crisis, *CFR*, Available at: <https://www.cfr.org/timeline/greeces-debt-crisis-timeline> [Accessed 03 April 2024]
2. EURACTIV (2018, October 12) Stubb: Multi-speed Europe is "like a nuclear weapon" [Video]. YouTube. <https://www.youtube.com/watch?v=fZsWWqvM3OQ> [Accessed 08 April 2024]
3. Lindseth P. L. (2014) Supranational Organisations. In Hurd I., Johnstone I., Cogan K. (Eds.) *Oxford Handbook of International Organisations*. Available at: <https://papers.ssrn.com/abstract=2517896> [Accessed 08 April 2024]
4. Rankin J. (2015) Eurozone crisis: which countries are for or against Grexit, *The Guardian*. Available at: <https://www.theguardian.com/business/2015/jul/12/eurozone-crisis-which-countries-are-for-or-against-grexit> [Accessed 03 April 2024]
5. Róka J. (2022) The EU and the question of state sovereignty in the case of Brexit, Unpublished manuscript, *Corvinus University of Budapest*
6. Smith H. (2014) Corruption still alive and well in post-bailout Greece, *The Guardian*. Available at: <https://www.theguardian.com/world/2014/dec/03/greece-corruption-alive-and-well> [Accessed 03 April 2024]
7. Sutton C. (2010) S&P downgrades Greek debt to 'junk' status, *CNN*, Available at: https://money.cnn.com/2010/04/27/news/international/Greece_debt_downgraded/ [Accessed 03 April 2024]
8. The President and Fellows of Harvard College (2022) International Governmental Organisations, Intergovernmental Organisations (IGOs) *Harvard Law School*, Available at: <https://hls.harvard.edu/bernard-koteen-office-of-public-interest-advising/about-opia/what-is-public-interest-law/public-service-practice-settings/international-public-interest-law-practice-setting/intergovernmental-organisations-igos/> [Accessed 28 March 2024]
9. The Vox (2015, July 2) How the euro caused the Greek crisis, Youtube [Video] <https://www.youtube.com/watch?v=ULQiCN0YNmw> [Accessed 10 April 2024]
10. Times Radio (2023, September 20) UK 'could join' a two-tiered EU, even after Brexit Olivier Costa [Video] Youtube <https://youtu.be/p-sFaQCvqi8> [Accessed 10 April 2024]