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DIFFERENTIATED INTEGRATION IN THE EUROPEAN UNION

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Differentiated Integration in the European Union

Avrupa Birliđi'nde Farklılaştırılmıř Bütünleřme

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LIST OF ABBREVIATIONS

- AA: Association Agreement
- AKP: Adalet ve Kalkınma Partisi (Justice and Development Party)
- Brexit: Britain and exit. The United Kingdom's withdrawal from the European Union
- CAP: Common Agricultural Policy
- CEP: Central Eastern European
- CEPOL: European Union Agency for Law Enforcement Training
- CFSP: Common Foreign and Security Policy
- CSDP: Common Security and Defence Policy
- CU: Customs Union
- DCFTA: Deep and Comprehensive Free Trade Area
- EA: European Agreement
- EAW: European Arrest Warrant
- EC: European Community
- ECB: European Central Bank
- EDA: European Defence Agency
- EEA: European Economic Area
- EFTA: European Free Trade Area
- EMU: European Monetary Union
- ENP: European Neighbourhood Policy
- EU: European Union
- EUROJUST: European Union Agency for Criminal Justice Cooperation
- EUROPOL: European Policy Office
- FRONTEX: European Border and Coast Guard Agency
- GDP: Gross Domestic Product
- Grexit: Greece and exit. Greece's withdrawal from the European Union
- IMF: International Monetary Fund
- JHA: Justice and Home Affairs
- NATO: North Atlantic Treaty Organization

PESCO: Permanent Structured Cooperation

SCO: Shanghai Cooperation Organisation

SWIFT: Society for Worldwide Interbank Financial Telecommunications

TEU: Treaty on European Union

UK: United Kingdom

UN: United Nations

WEU: Western European Union

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ABSTRACT

Integration has been one of the most important topics for European Studies. Moreover, for the progress and consciousness of the European Union, integration is a significant and influential element. However, integration does not occur at the same level for all member states. In this sense, different ways and levels of integration appear in the literature as differentiated integration. Research into differentiated integration has been unique yet complicated in the literature. At the same time, with new challenges such as the crisis in the European Union over Brexit, disintegration has also appeared on the scene and the literature has become even more complex. Therefore, this thesis aims to unite and summarise the literature on differentiated integration and explain how it has been occurring in the European Union. To do so, the thesis tries to answer the question ‘How did differentiated integration evolve historically in the European Union and impact integration?’ and focuses on the historical evolution of differentiated integration, as well as theorising differentiated integration. In the thesis, various types of differentiated integration will be explained. Moreover, practical examples of differentiated integration in member and non-member states will be included.

Keywords: Integration, Differentiated Integration, European Union, Brexit

ÖZET

Bütünleşme, Avrupa Çalışmaları için en önemli konulardan biri olmuştur. Ayrıca Avrupa Birliği'nin ilerlemesi ve bilinci için bütünleşme önemli ve etkili bir unsurdur. Ancak üye ülkeler için bütünleşme aynı düzeyde gerçekleşmemektedir. Bu anlamda farklı bütünleşme biçimleri ve seviyeleri literatürde farklılaştırılmış bütünleşme olarak karşımıza çıkmaktadır. Literatürde farklılaştırılmış bütünleşme üzerine araştırmalar benzersiz ancak karmaşıktır. Aynı zamanda Avrupa Birliği'ndeki kriz ve Brexit gibi yeni zorluklarla birlikte ayrışma da sahneye çıkmış ve literatür daha da karmaşık hale gelmiştir. Bu nedenle, bu tez, 'Farklılaştırılmış bütünleşme Avrupa Birliği'nde tarihsel olarak nasıl gelişmiş ve bütünleşmeyi nasıl etkilemiştir?' sorusuna cevap bulmayı ve farklılaştırılmış bütünleşme konusundaki literatürü birleştirip özetlemeyi ve bunun Avrupa Birliği'nde nasıl gerçekleştiğini açıklamayı amaçlamaktadır. Bu amaç ekseninde tez, farklılaştırılmış bütünleşmenin teorileştirilmesi ile birlikte tarihsel gelişimine odaklanacaktır. Tez boyunca farklılaştırılmış bütünleşmenin çeşitli örnekleri açıklanacaktır. Ayrıca, üye ve üye olmayan ülkelerde farklılaştırılmış bütünleşmenin pratik örneklerine yer verilecektir.

Anahtar kelimeler: Bütünleşme, Farklılaştırılmış Bütünleşme, Avrupa Birliği, Brexit

CHAPTER 1

INTRODUCTION

1.1. BACKGROUND OF THE STUDY

At the outset of the European Union, the founders of the EU – at that time the European Common Market - thought that economic integration would bring political integration along with it. Therefore, their goals were dominated by concepts such as the common market and customs union. This opinion was also supported by Haas (1961). He suggested that this spill-over effect would bring the actors together for cooperation, and supranational rulemaking would pave the way to the eventual EU. In addition to this tendency to integrate further, supranationalism would be created by a community of European people (Haas, 1968). The single market, the creation of the euro, and the eastern enlargement helped to pave this road towards political cooperation, economically and geographically. Haas (1961) stated that "integration among discrete political units is a historical fact in Europe, but disintegration seems to be the dominant motif elsewhere." Furthermore, he constantly addressed the question as to whether other regions could also discuss and imitate the European integration. It has been over sixty years since the initial foundation, yet the topic of European integration is still relatively untouched and worth researching. However, this time, the literature itself represents the 'dominant motif' that Haas located elsewhere.

The European Union is one of the most potent actors in the international arena. Its power comes from being supranational and representing not only its member states but also other European states, while giving them the opportunity to be represented with the help of differentiated integration. The European Union indeed has sovereignty over its member states to a self-confident degree. Nevertheless, what gives it the authority to represent other European nations (which are not even members)? My answer is that European integration and identity are caused by

interdependence. The high level of interdependency pushes states to limit their own sovereignty and seek cooperation (Keohane, 2002).

Consequently, cooperation requires different tiers of integration. Therefore, this dissertation highlights two points: 1) that integration is key to cooperation, and 2) that identity is a significant factor affecting integration. Thus, integration must be a leading topic for European studies and it must be studied thoroughly. Nevertheless, sixty years after Haas's work, integration is more than an irreversible process. It has become a more intentional and complex process. This is exactly why studies of differentiated integration are important.

Differentiated integration is a unique topic that has been discussed under several titles: as a theory, a process, a concept, and even an instrument of the EU. However, the studies remain dispersed, since there is yet to be a consensus on the definition of differentiated integration. On the other hand, differentiated integration has also been exposed to constant change because of the ever-changing dynamics of the European integration process.

1.2. PURPOSE OF THE STUDY

Since the signing of the Treaty of Maastricht, the concept of differentiated integration has been a critical topic in European integration. It has been discussed at different stages over the past few decades. With the emergence of Maastricht, the first works on the subject appeared on the scene. The second phase focused on the post-Euro period and the establishment of new policy areas. After the Treaty of Lisbon, scholars geared their attention towards conceptualising and theorising differentiated integration, as part of the third phase. Lastly, studies on differentiated integration aim to explain various European crises and the way forward. There has also been a focus on Brexit and differentiated integration in the fourth phase of the research (Leruth, et al., 2017). In addition to this updated agenda, some academics have dwelled on conceptualising differentiated integration. Moreover, scholars who

conduct systematic research into differentiated integration, such as Schimmelfennig, Leuffen, and Rittberger (2015), have brought novel concepts to the study.

This thesis aims to gather all the information that has been considered since the beginning of discussions of differentiated integration under one study, and to have a general look at differentiated integration in the European Union. The focus will be on the evolution of the discussions surrounding differentiated integration in the European Union. Moreover, the research will also include recent developments in the discourse in connection with Brexit and Turkey's candidacy. Ultimately, the aim is to create a single and broad literature review of the concept of differentiated integration in the European Union. With this, the lack of conceptualising differentiated integration might be accounted for, and the tangled research to adequately define it might be summarised systematically.

1.3. QUESTIONS AND DESIGN

Differentiated integration in the European Union has been a fascinating subject from the beginning of this study. Moreover, besides differentiated integration, European identity and culture have also influenced this thesis. Therefore, focusing on the evolution of differentiated integration in the European Union has seemed to be a perspective that is broad enough to cover all these exciting topics already mentioned, yet narrow enough to study. Consequently, this thesis will try to answer the question 'How did differentiated integration evolve historically in the European Union and impact integration?'. While answering the main question, three sub-questions occur as follows:

1. Connected to the main question, how did differentiated integration evolve theoretically, and what are the different models of differentiated integration in the literature?

2. How have current situations such as the euro crisis, Brexit and security concerns which have arisen after the Russian attack on Ukraine affected the discussions surrounding differentiated integration theoretically and practically?
3. How has differentiated integration in the European Union been applied to the non-member states; especially to Turkey?

The main question is quite inclusive. Integration and differentiation are interwoven in the very nature of the European Union. Therefore, there is no straightforward answer to this question. Instead, this question can only be answered if integration and differentiation are explained with detailed research and examples. Since the thesis aims at achieving such an explanation, the answer will appear once all the chapters are read.

However, the answer to the main question will be given in the second chapter for the first time. The second chapter will summarise the history of the European integration process. Afterwards, the chapter will cover the first attempts at differentiated integration in the European Union, involving member and non-member states. The time frame will start with the Maastricht Treaty. Then, the impact of differentiated integration on the European Union will be explained with a historical analysis.

Moreover, the main question is a general and inclusive question that cannot be answered in one sentence. On the other hand, it calls for analysis of the process rather than one single event. First of all, the time frame is quite extensive and inclusive. The thesis proposes the Maastricht Treaty as the beginning of differentiated integration officially. The conclusion of this time frame is Brexit, since Brexit is such an essential example of differentiated integration and disintegration in the European Union, and it occurred recently. Secondly, the process covers various events affecting the integration process both positively and negatively. The European Union's integration process generally represents a positive progression; however, we should also take the adverse events into account,

to see it objectively and comprehensively. Consequently, the answer to the main question is the thesis itself.

The first sub-question will be answered mainly at the end of the second chapter as well. The chapter will theorise differentiated integration as a system and a concept. Moreover, the chapter will include the Swiss, Norwegian and Ukrainian models of differentiated integration briefly.

The answer to the second sub-question will be included in the third chapter. In the third chapter, the current discussions on differentiated integration will be examined in terms of the euro crisis and Grexit, Brexit, and lastly, the security concerns over Ukraine's situation. Furthermore, the second sub-question mainly deals with Brexit, which has unleashed a relatively recent discussions in the European Union. Chapter three will include the current discussions in the EU regarding differentiated integration. The Brexit process will be detailed and analysed in the chapter from a differentiated integration perspective. Moreover, we will also see a new term in differentiated integration studies, differentiated disintegration. The United Kingdom, as a former member of the EU, decided to leave the union. This situation represents a process of reverse integration. Even though the UK was one of the primary exploiters of differentiated integration, we witnessed this time that differentiated integration did not solve the 'problem.' With an analysis of the UK's differentiated integration process, there will also be an analysis of the differentiated disintegration process. Therefore, the answer will be found in the fourth chapter.

The first part of the third sub-question will be answered mainly throughout the rest of the thesis. However, the second and fourth chapters will cover the direct answer regarding Turkey. Even though there is a single way of making an application to join the union, and also a single method of differentiated integration, the thesis will focus on specific countries such as Greece, Switzerland, Norway, Ukraine, and Turkey. States are actors with diverse interests, aims, and backgrounds. Therefore, the actual implementation of differentiated integration is also quite diverse. No two

states share the same route to adapt to the EU's integration process, hence the 'differentiated' aspect of integration. In the second chapter, there will be an explanation of differentiated integration as a concept, system, or theory. In this way, three different methods of achieving differentiated integration are explained.

Moreover, in the differentiated integration as a concept section, we will see Stubb's (1996) categorisation of differentiated integration. Thus, we will see various ways in which diverse concepts of differentiated integration are implemented.

The fourth chapter focuses on Turkey's differentiated integration into the EU. As in chapter two, with the examples of Switzerland, Ukraine, and Norway, in the fourth chapter the main topic is Turkey. Turkey's seemingly everlasting relationship with the EU started officially with the Ankara Agreement. Since then, integration has occurred intricately and in a multifaceted way. The way that Turkey or the EU approaches differentiated integration will be analysed in the chapter, along with Turkey's historical background towards European integration. Therefore, the third sub-question will be answered one more time.

Consequently, the structure of the chapters is as follows: Chapter One is to clarify the purpose and background of this study, as well as the methodology and limitations. In addition, this chapter aims to give an introduction to the thesis and give insight into the subject. Chapter Two gives a deep understanding of differentiated integration. It is aimed to be used more as a literature review to see all the background of the thesis subject. Here there will be an attempt to summarise the brief evolution of the topic of differentiated integration, and several studies will be analysed to understand this evolution. Chapter Three moves from history to today. Explaining the evolution of differentiated integration would not be accurate without discussing today's conditions. We have all witnessed unique events in the history of the European Union. Since this thesis aims to focus on the European Union and differentiated integration, any event related to these merits special attention. Therefore, Chapter Three will focus on Grexit, Brexit, and lastly the

unfortunate events of today: the Russian attack on Ukraine. Chapter Four will explain European Union-Turkey relations from a differentiated integration perspective. Lastly, Chapter Five will be the conclusion.

1.4. METHODOLOGY

To answer all the questions, the thesis will use process tracing as a research method. Collier (2011) summarises the contribution of a process as the identification and systematic description of a political and social phenomenon, evaluating old hypotheses and discovering new hypotheses and causal claims, getting an insight into causalities, and providing alternative means. This thesis will follow Collier's path to making a scientific contribution. Therefore, a systematic description of differentiated integration and a summary of the process will be undertaken. Moreover, the prior hypothesis will be evaluated, to see the evolution of differentiated integration, and a new hypothesis might be provided. Furthermore, finally, while focusing on the Brexit process and Turkey's differentiated integration, causalities will be investigated.

Collier (2011) again mentions that for good process tracing, therefore the characterising of a process, we must also indicate the essential steps. In this sense, differentiated integration is the dependent variable, and my aim is to describe the change in this dependent variable over time.

Consequently, this thesis will follow the critical events involving differentiated integration, to characterise this process successfully. The Treaty of Maastricht, the Central and Eastern European enlargement process, the European Monetary Union, and so on will be used as key events in this aim.

In addition to a qualitative method (process tracing), quantitative evidence such as referendum results will also be included. In this sense, Collier Brady and Seawright's (2010) statement on multimethod strategies is strongly supported. Furthermore, any additional written and verbal evidence to hand will also be used to analyse the process.

1.5. LIMITATIONS, CHALLENGES, AND OVERLOOKED POINTS

First, the European Union is a complex entity to follow up on. The area included is always a hot topic, and prone to constant change. When this thesis started to take shape, Brexit was nothing more than a discussion point. However, by the end of this thesis, Brexit is a relatively completed process. Therefore, any hypothesis has had very little time to be proved or falsified. Consequently, this thesis may need help in covering new developments in the area.

Secondly, the literature on differentiated integration is new compared to that on European integration. As scholars have stated, there are many concepts, sparse theories, and few data (Holzinger & Schimmelfennig, 2012). However, I have tried to sample the most critical studies on this topic.

Thirdly, and most notably, in the third chapter, I deal with the Russian attack on Ukraine and how this event has been mirrored by European Union, and particularly from the differentiated integration angle. Unfortunately, I had to merely focus on the aspects which affect the EU, since this is the primary concern of the thesis. Therefore, I had only a little to say about this tragic event from the perspective of the people of Ukraine. However, the trauma, fear, sadness, and suffering they have experienced have to concern us and be remembered for ever.

CHAPTER 2

DIFFERENTIATED INTEGRATION IN THE EUROPEAN UNION

2.1. INTRODUCTION

This chapter aims to give detailed information about differentiated integration, demonstrate it profoundly, and provide a broader perspective to the reader. Consequently, it is planned to give a historical background of differentiated integration and analyse it as a concept, theory, and system. While doing so, some critical studies will be used and analysed, in particular.

In the beginning, the chapter will separate differentiated integration from integration, and suggest a clear definition. Following that, the first attempts at it and the need for differentiation are explained. Later on, the attempts to study differentiated integration, and the research phases are focused on. Four phases of research and studies on differentiated integration are found in the literature. The first phase of studies focuses on conceptualising differentiated integration and making a clear definition of it. The second and third phases of the study focus on empirical and theoretical discussions, and finally the fourth phase focuses on new concepts of differentiated integration and a new research agenda, as well as Brexit and disintegration. Therefore, the following sections will also mention these studies.

Later on, the categorisation of differentiated integration will be explained with examples of English, German and French terminology (See Table 1.). On the other hand, differentiated integration as a concept and system will be analysed with the help of important studies in the literature. Therefore, this chapter of the thesis is quite important for introducing the basic literature on differentiated integration. On the other hand, while exemplifying and summarising these key studies, this part of the thesis will also suggest significant inferences from the literature.

Furthermore, differentiated integration will be studied in depth, and the perspectives of the grand theories will be viewed. And after the perspective of differentiated integration from the grand theories, different models of differentiated integration will be explained. The aim is to explain different models or modes of differentiated integration, to give a practical perspective to the topic after the theoretical perspective. Since the beginning of the chapter deals with theoretical discussions and attempts to study differentiated integration, the way application of the differentiation develops is provided with a theoretical background.

2.2. INTEGRATION AND DIFFERENTIATION IN THE EUROPEAN UNION

Integration occurs when political actors shift loyalties, expectations, and political activities, to become a part of the new centre by prioritising this new centre over their pre-existing nation-state (Haas, 1958). While this definition emphasises the shifting process, it also considers that the pieces of this new centre, therefore unification, are different from each other. As a result, there should also be a process of harmonisation.

Throughout the history of the European Union, fuller integration has been one of its most substantial aims. Enlargement and becoming more fully integrated were somehow related to the success of the Union. Different countries have represented different political, social, economic, and cultural initiatives as elements of this union. Taking into account their differences from each other, their capacity and willingness to integrate would by necessity be different from each other, as well. Consequently, the integration should sometimes be implemented on different levels, in different areas, or with different instruments. Therefore, although including all nations was seen as possible, not all member states were eager to comply with the same initiatives and meet in the same policy areas. As a result, applying different options to diverse wishes was the European Union's solution.

The European Union comprises various member states of different nationalities, languages, ethnicities, and traditions. The aim of the European Union has been bringing all these different states together, therefore, integration (Shore, 1993). When the European Union started the integration process, it was realised by the former fathers of the Union that there were missing points that blocked the integration (Shore, 2000). The fundamental common ground that was lacking was culture, as Schumpeter stated. Therefore, they had to bring the common culture of the member states together, to show that they had adequate reasons to integrate, since they shared common characteristics. However, there were no other commonalities for those states except for sharing the same continent. For this reason, the European Union had to dig up the buried history of Europe and use it along with the newly created patterns for Europe and the European Union (Shore, 2000). History gave them the source of Homo Europaeus, as Cris Shore stated, and the creation of European symbols provided an environment for the legitimacy of a European identity, therefore, what would pass for integration (Shore, 1999). The European flag, the Euro, the anthem of the Union, the woman of the year award, European Union booklets, and history books, have been symbols of Europe and supported the environment of European integration through their versatility.

Furthermore, the integration process has reached a positive juncture, with the establishment of a single market and the free movement of capital, goods, and people. However, the implementations carried out by the European Union are not only cultural symbols but also policies. By applying the same policies to all member states, the Union aims to have more unification. However, as mentioned above, not all member states have the same situation or willingness to implement the same decisions (Holzinger & Tosun, 2019). Thus, the European Union has used integration in a differentiated way in its member states.

Offering different options and allowing opt-in or opt-out in areas for further integration created another form of integration. Up until the late 80s, the integration process was up for discussion, with the main talking point being that it would

continue too slowly or that widening the Union with new member states would not be possible (Andersen & Sitter, 2006a). While deepening and widening were on the drawing board, member states' different wishes or ability to participate in a particular policy area was also discussed. As a final result, the results of these discussions were collected under the general title of differentiated integration.

Differentiated integration aims to customise the implementations, amendments, or institutions of the Union for the member states, according to their capacity and willingness. The member state can accept the instrument of the Union entirely or partly, or it can refuse the instrument. If the member state implements this instrument even partially, this member state is part of this common instrument; therefore, this promotes integration (Holzinger & Schimmelfennig, 2012). According to Schimmelfennig, Laufen, and Rittberger, due to this reason, differentiated integration is a tool of the European Union that has been used systematically rather than randomly. Therefore, it should be treated as a part of the EU's workings (Schimmelfennig et al., 2015).

Moreover, differentiated integration is a topic that has been broached previously in discussions on European integration. For example, over the Treaty of Maastricht, the concerns were about the European Union's borders and the deepening and widening processes (Andersen and Sitter 2006b). Especially with the Eastern enlargement of the European Union, the discussions about the integration process of the EU became a hot topic because, at that time, the newcomers were quite different from those already part of the EU. Therefore, differentiated integration for any other newcomer was an essential topic. In this sense, when Leruth, Gänzle, and Trondal (Trondal et al., 2017) summarise the stages of discussions over differentiated integration, they mention the first attempts as post-Maastricht, post-Euro, and big bang enlargements.

Stubb, Schimmelfennig, Leruth, Gänzle, Zielonka, Andersen, Sitter, Trondal, Holzinger, Kölliker, Piris, and Adler-Nissen are some of the scholars who have

worked on the topic of differentiated integration. In this part, calling differentiated integration a ‘discussion’ or a ‘topic’ would be more helpful since the later works will go on to conceptualise it in various ways.

Scholars and studies of differentiated integration have given us a broader perspective on mapping the European Union’s borders, because the actual borders of the European Union, thanks to the differentiated integration process, are fairly diverse. Mapping the actual borders aims to cover all the areas where European Union rules, rights, or policies are applied rather than just limiting it to full membership.

2.3. CONCEPTUALISING THE DEFINITION OF DIFFERENTIATED INTEGRATION AND STUDY ATTEMPTS

After focusing on the different studies about differentiated integration, it is important to look at the dynamics of the European Union. Unity is often what defines the European Union. Moreover, EU law and its application distinguishes member states from non-member states. However, what happens when a member does not apply EU law, or a non-member state wishes to exercise the law? Will there be chaos, or will this situation work somehow? Differentiated integration defines the position of multi-faceted integration in the European Union, where a non-member can apply EU law while members refuses to do it. Nevertheless, whether there would be chaos or harmony in complexity might be explained once the whole process of the application of differentiated integration is explored.

The Treaty of Maastricht shows the first examples of differentiated integration. However, the topic appears further back in history, with Leo Tindeman’s idea of easing entry, deepening, and widening the European Union (1975). Nevertheless, the idea went live with the Treaty of Maastricht in 1992, when the United Kingdom and Denmark decided not to join (opt-out of) the Economic Monetary Union (EMU). Moreover, Sweden’s decision not to join the single currency has given us

another example of opt-out. Therefore, we have witnessed the first examples of differentiated integration with opt-outs from the member states. Later on, with the Treaty of Amsterdam, the differential participation of member states in EU policy areas formally introduced and maintained differentiated integration in the EU.

The first phase of differentiated integration studies started with the aim of conceptualisation. Differentiated or flexible integration has led to various discussions on conceptualising its definition (Kölliker, 2006). Therefore, the very first academic works which appeared try to reach consensus on the definition (Warleigh, 2002). Later attempts try to conceptualise differentiated integration by using various groups of definitions and different categories focused on the concepts of time, space, a multi-speed Europe, and an a la carte Europe (Stubb, 1996) (Needs to appear in the list of references, Editor). Later, in another study, Stubb groups the European Union member states, referring to his definition of the concepts and considering the differences (Stubb, 1997). Finally, later attempts at conceptualising and constructing the definition of differentiated or flexible integration have been by Walker (1998), Kölliker (2001), and Warleigh (2002), and Warleigh decided that using the definition of flexible integration would be more accurate in terms of considering diverse national interests. Subsequently, the first case studies were influenced by these conceptual attempts, and they mainly focused on the Nordic countries (Mouritzen, 1993), in particular Denmark's demands and characteristics on integration (Petersen, 1998), and Norway's membership of the European Economic Area (Egeberg & Trondal, 1999). Consequently, while the primary research was focused on the Nordic countries, there was not necessarily any interest in studying the case of the United Kingdom.

During the second and third phase of differentiated integration studies, scholars focused on theoretical and empirical discussions, such as looking at the European Union's capacity to adopt differentiated integration (Andersen & Sitter, 2006), the effect of differentiated integration on reshaping the European Union's stratified polity (De Neve, 2007), and analysing the decisions made by member states to opt

out, considering the other member states' position (Jensen & Slapin, 2012). Constructivism, governance, and public administration also affect the studies in this phase.

Finally, in the fourth phase, scholars have focused on Brexit and differentiated integration (Leruth et al., 2017). Besides this new agenda, some academics have been returning to conceptualising differentiated integration. Moreover, scholars who conduct systematic research into differentiated integration, such as Schimmelfennig, Leuffen, and Rittberger, bring new concepts to the study, with the division of horizontal and vertical/internal and external differentiation (2015). The research into the United Kingdom and differentiated integration has been studied as a separate issue from that of Brexit.

2.4. DIFFERENTIATED INTEGRATION AS A CONCEPT

For a broader understanding of differentiated integration, this study assumes it is significant to examine and analyse some key arguments and studies. First of all, it is necessary to understand Stubb's (1996) categorisation of differentiated integration in the European Union, because this study discusses it as a concept. Secondly, Leruth and Lord's (2015) work on testing differentiated integration as a concept, process, system, or theory is crucial. Thirdly, Holzinger and Schimmelfennig's (2012) work on concepts of differentiated integration is a necessary reference point. And lastly, it is crucial to look at Leuffen, Rittberger, and Schimmelfennig's (2012) explanation of the variation of differentiated integration in the EU, to analyse differentiated integration from a theoretical perspective.

Stubb's (1996) categorisation of differentiated integration is essential, since Stubb offers a wide range of definitions of differentiated integration in the EU. Differentiated integration is a custom-made process for each state; however, we can still bracket some characteristics under the various definitions. Stubb offers a huge

variety of terminology for differentiated integration in several languages. From then on, studies on differentiated integration have proper terminology to use while researching differentiated integration. Even recent studies of differentiated integration build their structure based on Stubb's work. Even though the work is not recent and is open to discussion, no study rejects Stubb's categorisation or somehow controverts it. Therefore, Stubb offers a touchstone for European studies, with his work on categorising differentiated integration.

In his work, Stubb (1996) uses different terminology to cover all the types of differentiated integration, in English, German and French. Two-speed, multi-speed, step-by-step, strengthened solidarity, graduated integration, hardcore, variable integration, concentric circles, two-tier, multi-tier, multi-track, two-track, 'swing-wing,' circles of solidarity, variable speed, imperial circles, pick-and-choose, overlapping circles, structural variability, opt-in, opt-out, opt-up, opt-down, bits and pieces, ad libitum integration, multi-level, two-level, restrained differentiation, flying geese, magnetic fields, hub-and-spoke, and many circles are the English terms mentioned in Stubb's categorisation of differentiated integration. Even though the terminology looks complicated and even overwhelming, most of these terms can be grouped under similar meanings. Stubb (1996) subcategorises the terms under three main concepts; multi-speed, variable geometry, and a la carte. Moreover, as variables of these three concepts, he assigns time, space, and matter. Table 1 summarises this categorisation.

First, differentiated integration under the 'multi-speed' concept is related to 'time' as a variable. The concept leans on the assumption that the member states willing and able to apply some policies are the core members, and after their attention to the policy area, they will be followed by the others. Therefore, the application of objectives happens, but not at the same time. Moreover, in the end, time is the primary issue. Hence the result would be positive due to the application of the same objectives by all member states, even though it was not simultaneous. Two-speed, step-by-step, variable speed, and graduated integration are the sub-categories of the

multi-speed concept. While Stubb also adds French and German terminology to the sub-categories, it is accurate to summarise that any definition focusing on the issue of timing of the integration process is inclined within this concept.

On the other hand, with geometrical variables, space is the main element of integration differentiation. It is admitted, through this definition, that Europe comprises core countries and less developed units. Therefore, there are two different spaces assigned. Definitions include two-tier, multi-tier, two-level, multi-level, many circles, multi-track, two-track, circles of solidarity, imperial circles, restrained differentiation, multi-floor, two-floor, opt-up, opt-in, structural variability, swing-wing, terms which are sub-categorised under the term 'variable geometry', since all are related to the question of space. And the last concept of Stubb (1996) focuses on 'matter' and maintains a pick-and-choose situation. As the terminology itself is based upon a definition that offers an option from a selection of varieties, this spectrum of differentiated integration means the process the member states each choose to adopt. Maximum flexibility, opt-out, opt-down, and bits-and-pieces are some sub-categories of this concept.

Table 1. Stubb's categorisation of differentiated integration (Stubb, 1996, page 285)

<i>Variables</i> <i>Main Concept</i>	<i>Time</i> <i>Multi-Speed</i>	<i>Space</i> <i>Variable Geometry</i>	<i>Matter</i> <i>A la Carte</i>
Definition	Mode of differentiated integration according to which the pursuit of common objectives is driven by a core group of Member States which are both able and willing to go further, the underlying assumption being that the others will follow later.	Mode of differentiated integration which admits to unattainable differences within the integrative structure by allowing permanent or irreversible separation between a hard core and lesser developed integrative units.	Mode of differentiated integration whereby respective Member States are able to pick-and-choose, as from a menu, in which policy area they would like to participate, whilst at the same time holding only to a minimum number of common objectives.
Sub/related concepts and general jargon	<p>English Two-speed Step-by-step Graduated integration Differentiation Hard core Variable speed Flying geese Orchestrating Europe</p> <p>Français <i>Plusieurs vitesses</i> <i>Deux vitesses</i> <i>Intégration échelonnée</i> <i>Directoire</i></p> <p>Deutsch <i>Abgestuft Integration</i> <i>Kern</i> <i>Harter Kern</i> <i>Fester Kern</i> <i>Kerneuropa</i> <i>Teilintegration</i></p>	<p>English Concentric circles Opt-in Opt-up Two-tier Multi-tier Two-level Variable differentiation Swing wing Circles of solidarity Many circles Restrained differentiation Multi-track Multi-floor Structural variability</p> <p>Français <i>Cercles concentriques</i> <i>Géométrie variable</i> <i>Plusieurs niveaux</i> <i>Plusieurs voies</i> <i>Variante unionnaire</i> <i>Deux niveaux</i> <i>Plusieurs niveaux</i> <i>Noyau dur</i> <i>Noyau solide</i> <i>Directoire</i> <i>Différenciation restreinte</i> <i>Avant-garde</i></p> <p>Deutsch <i>Abgestufte Integration</i> <i>Harter/Fester Kern</i> <i>Kerneuropa</i> <i>Teilintegration</i></p>	<p>English Pick-and-choose Overlapping circles Opt-out Opt-down Bits-and-pieces Ad libitum integration</p> <p>Français <i>A la carte</i> <i>Ad libitum</i></p> <p>Deutsch <i>A la carte</i> <i>Ad libitum</i></p>

Even though Stubb's article is quite important for differentiated integration studies, we can say that this article is more an explanatory semantic work than a theoretical discussion. As frequently mentioned above, Stubb (1996) names differentiated integration as a concept rather than a theory, a process, or a system. However, this study has been used as a basis for later ones, and the classification of the definitions is widely accepted.

Leruth and Lord's (2015) study of testing differentiated integration as a concept, process, system, or theory is essential for this thesis. Firstly, Leruth and Lord accept differentiated integration as a feature of European integration. However, the authors highlight the difficulty of defining the notion, and the importance of differentiated integration on the current research agenda of European studies. Secondly, the authors claim that studying differentiated integration as a concept, process, system, or theory is necessary in order to understand differentiated integration. Moreover, differentiated integration should be understood and studied as a regular and permanent feature of European integration. Furthermore, Leruth and Lord offer a summary of the literature on differentiated integration and an explanation of it in practise, with the examples of Greece and the United Kingdom. Thirdly, the authors make several introductory statements on differentiated integration itself and differentiated integration studies. The first statement claims that differentiated integration is a self-explanatory entity, and both explanandum and explanans. Therefore, there is no need for an explanation, since differentiated integration can be the explanation itself for some insights into the integration process. The second statement indicates that Schmitter's (2000) claim that a good theory of European integration can also work for disintegration raises questions about integration theories and differential integration theories being consistent. The third statement posits that differentiated integration theories should also connect with theories of comparative politics, as well as with European integration theories. As a fourth statement, it is claimed that the roots of differentiated integration are in the states' domestic politics rather than in the integration process itself. Moreover, we can infer that the European Union is not the only entity that tries to manage problems

of interdependence; therefore, the EU is not the only body that experiences the integration of its members in different ways, which forms the fifth statement (I think I am right here? Editor) . And as the sixth (Am I right?), and final statement, the authors highlight the need for normative and analytical theories of differentiated integration. In conclusion, the question “Is differentiated integration complicating the cooperation, or is it giving each state freedom of choice over integration?” can be raised to produce further statements.

Lastly, Leruth and Lord (2015) state that differentiated integration is a real-life process in the EU. From the beginning of the 80s till today, member and non-member states have approached differentiated integration differently. Therefore, the research agenda should include studies that discuss how differentiated integration works in practice in various forms. On the other hand, differentiated integration may also carry systematic features. As a system, it includes the supply and demand approaches to differentiated integration. In other words, how the EU supplies the differentiated integration, and how states apply it in various ways.

Consequently, what we can get from Leruth and Lord’s works is that differentiated integration is much more versatile than we would imagine. It can be used and understood differently, such as in terms of process, concept, theory, or system. However, the critical point is not to deny the importance of differentiated integration, but to focus on its practice. Therefore, focusing on real-life applications and the evolution of differentiated integration in the EU, this thesis finds a base in Leruth and Lord’s study.

Holzinger and Schimmelfennig (2012) also see differentiated integration as a feature of European integration. The aim of their work is to review existing research areas and build up systematic knowledge. This aim is one of the main reasons why Holzinger and Schimmelfennig’s work is essential for this thesis. Put simply, the thesis tries to achieve the same aim which the authors designated.

Stubb (1996) uses time, space, and matter as variables for differentiated integration. However, Holzinger and Schimmelfennig (2012) find this classification problematic, since it does not include purely functional conceptions. Therefore, concerning Stubb’s categorisation, Holzinger and Schimmelfennig offer six dimensions: “permanent v. temporary differentiation; territorial v. purely functional differentiation; differentiation across nation states v. multi-level differentiation; differentiation (which) takes place within the EU treaties v. outside the EU treaties; decision-making at the EU level v. at the regime level; only for member states v. also for non-member states/areas outside of the EU territory” (2012). Table 2 gives an insight into the authors’ suggestions for further categorisation.

Table 2. Overview of models of differentiated integration (Holzinger and Schimmelfennig, 2012, page 298)

Dimension										
1	Temporary			Permanent						
2	Territorial									Functional
3	Differentiation at nation-state level							Multi-level differentiation		
4	Only inside EU treaties				Also outside EU treaties			Only inside	Also outside EU treaties	
5	EU decision-making						Club decision-making (intergovernmental)			
6	Only member states			Also non-members	Only members	Also non-member states		Only members	Also jurisdiction outside EU	
	1	2	3	4	5	6	7	8	9	10
Models	Multiple Speed	Multiple Standards	Avantgarde Europe	Core Europe, Concentric Circles	Flexible Integration	Variable Geometry	Europe à la carte	Optimal Level of Jurisdiction	Flexible Co-operation	FOCJ
Example	Many in Secondary Law	In secondary Law, e.g. environmental policy	EMU, basic rights charta	EMU; EEA, associated states	Enhanced Co-operation, Bologna (at the start)	Schengen	Bologna	Competence allocation in Lisbon Treaty	EUREGIOS	No example
References	Grabitz (1984); Stubb (1996, 2002)	Scharpf (1999)	Club von Florenz (1996)	Schäuble and Lamers (1994)	Centre for Economic Policy Research (1995)	Stubb (1996)	Dahrendorf (1979)	Fisher and Schley (1999)	Holzinger (2001)	Frey and Eichenberger (1996, 1997)

Finally, Holzinger and Schimmelfennig (2012) group the set of theories of differentiated integration into rationalist and normative/institutionalist approaches and make some conclusions: (1) Differentiated integration literature has an imbalance between over-conceptualisation and under-theorisation. (2) Existing categorisation and classification offer few examples of positive theory. (3) The

typology of differentiated integration should be theoretically valuable. (4) Measuring different types of differentiated integration is essential, and there is a need of indicators for this purpose. (5) Studies of differentiated integration focus mainly on the EMU and Schengen. Even though these cases are helpful, it is questionable how representative they are. (6) Studies and research is mostly into positive cases of differentiated integration. (7) There is a lack of information about differentiation in secondary law and Community legislation. (8) Researchers would like to know and explain how differentiated integration has developed over time, and the interaction of primary and secondary law. (9) The existing literature focuses on different stages of differentiation. Whether we can unify the explanation for these different types of differentiation or whether they require further explanation is a moot question. (10) It is crucial to know the effects of differentiation on the EU as a whole. (11) Other methods of dealing with heterogeneity and conflict in the EU should be included in differentiated integration studies.

The fourth study that it is crucial to analyse is Schimmelfennig, Rittberger, and Leuffen's (2012) study of the European Union as a system of differentiated integration. This study conceptualises the European Union as a system of differentiated integration and takes centralisation and territorial extension as variables for the differentiation. Moreover, the authors state that interdependence and politicisation are important conditions for differentiation. As a result, with the help of centralisation, territorial extension, interdependence and politicisation, we can explain vertical, horizontal, external, and internal differentiation in the European Union.

Schimmelfennig, Rittberger, and Leuffen (2012) make it clear that the European Union is a system of differentiated integration, and differentiation is not a temporary, accidental, or non-systematic feature of European integration. On the contrary, differentiation is essential for European integration and is distinguishable in two types: horizontal and vertical. Horizontal differentiation is related to territorial extension and emphasises that many integrated policies are neither

harmonised nor exclusively valid in the EU. Moreover, horizontal differentiation is separated into two: internal horizontal differentiation and external horizontal differentiation. While internal horizontal differentiation covers those member states not participating in all EU policies, external horizontal differentiation covers the non-member states participating in selected EU policies. In addition to horizontal differentiation, vertical differentiation represents the policy areas in the EU which have different levels of centralisation and have reached different levels of integration.

Furthermore, interdependence and politicisation are explained as critical variables for differentiated integration by Schimmelfennig, Rittberger, and Leuffen (2012). While interdependence supports integration, politicisation puts blocks in the way of integration. As a result, differentiated integration tends to occur when a high level of interdependence and politicisation come together.

Finally, Schimmelfennig Rittberger and Leuffen's work focuses on a comparative analysis of differentiated integration in the EU from the interdependence, politicisation, and integration perspective (2012). Defence Policy, Monetary Union, and the internal market are examples used by the authors to show the effects of different levels of interdependence and politicisation on differentiated integration.

Consequently, we can summarise the crucial points of Schimmelfennig, Rittberger, and Leuffen's (2012) research as follows: the study makes a clear distinction between vertical v. horizontal and internal v. external differentiated integration in the EU; therefore, there is a significant contribution to conceptualising differentiated integration. The authors use integration theories of interdependence and politicisation to explain the appearance of differentiated integration, which gives us a different perspective from which to study differentiated integration from the existing literature. Centralisation and territorial extension are also used by the authors for differentiated integration in native terms. The study is crucial for an understanding of real-life examples of differentiated integration. While the existing

literature shows us how these examples occurred in the EU (EMU, Schengen, etc.), this study shows us why these examples occurred from a theoretical perspective. And finally, the study is essential for a comparative analysis of differentiated integration, and for theorising it.

2.5. DIFFERENTIATED INTEGRATION AS A SYSTEM

After categorising differentiated integration and studying it as a concept, another important step is to study it as a system. Therefore, even at the beginning of discussions of differentiated integration, new ideas started to appear. A short time after the Treaty of Maastricht, Walker (1998) was already suggesting that we should work with 'different Europes' rather than a two-dimensional analysis of differentiated integration, since it was not adequate any more. He claimed that the situation was much more complex than two-dimensional, and that relations necessitate multi-dimensional analysis. Moreover, his work concentrate on understanding influential factors for differentiation from the perspective of the state, in terms of three different political arenas. The first arena is strategic politics, in which we have states and other political units such as the EU or other organisations. In this context, we have two differently integrated EUs. The states tend to favour a deeply integrated one, and think that a solid supranational organisation with fuller integration is better for them to seek out and protect their strategic interests.

On the other hand, there are states that think that weaker intergovernmental organisations with less integration would be better for them to protect their interests. The second arena is sectoral politics, with negotiations, competition, and preferences of state actors in particular sectors. Finally, the third arena is geopolitics, in which member states have a broader overall relationship.

Walker (1998) states that contingency, ambiguity, and disagreement, rather than design, certainty, and consensus are crucial elements for differentiation, besides the

political arenas. Contingency rather than design requires unplanned and situational needs and, therefore, differentiation. Ambiguity rather than certainty requires further developments and disagreement, and disagreement rather than consensus leads to negotiations and ambiguity again, which ends up with differentiation. In the end, Walker (1998) concludes that differentiated integration is an outcome of the divergent preferences of political actors rather than a designed organism; in addition, all in all, the European Union represents a system of differentiated integration.

Another opinion on the EU being a system of differentiated integration comes from De Neve (2007). De Neve uses the metaphor 'European Onion' to explain the layers of differentiation in the EU as a critical dynamic. The subgroups of European states and governance in Europe were designed as layers of the big Onion. The metaphor of the European Onion portrays the multi-layered aspect of European integration, with examples such as the European Economic Area, Schengen Zone, and the Euro currency. Not only member states but also non-members are included in the layers with different levels of integration. Consequently, we see that there is no one stage in the integration process; instead, there is a system with permeable layers that we should embrace. Even though De Neve agrees with the opinion that the European Union is a system of differentiated integration, he does not decide whether the European Onion is a permanent state in the integration process or a temporary stage which each state has to experience towards European integration.

Warleigh-Lack joins the others in accepting the European Union as a system of differentiated integration (2015). He supports the opinion that examining the EU as one case of regional integration will pave the way to understanding differentiated integration as a permanent feature of the EU. Rather than seeing it as an 'onion', Warleigh-Lack uses the metaphor of a 'spaghetti bowl' for European integration. In this sense, overlapping memberships and diverse rationales make the integration like a bowl of spaghetti. In the end, Warleigh-Lack concludes that differentiation is not integration gone wrong but a neutral feature for organisations in global-macro

regions; so, it is not only visible in the EU. Therefore, differentiated integration is most likely to appear when there is regional integration, and if we consider the EU one case of regional integration, we can understand differentiated integration more deeply. And finally, differentiated integration requires an explanation of its absence rather than its presence, since it is a natural feature of integration.

Schimmelfennig, Rittberger, and Leuffen (2015) aim to explain the European Union as a system of differentiated integration. While doing so, they argue that differentiated integration is a characteristic of the European Union rather than being accidental or crucial to integration. Two types of differentiation are distinguished: vertical and horizontal differentiation. Interdependence and politicisation are the key elements to distinguish these two different types. While interdependence promotes integration, politicisation inhibits it.

The main configurations are the unitary state and international organisations. We can distinguish these two through their policymaking, and the territory of this policy. While unitary state policymaking is located at its centre, the process is decentralised in international organisations. Moreover, while unitary states' policy territory is limited, that of international organizations is quite extensive. As a result, in their study, the level of centralisation acts upon vertical integration and territorial extension upon horizontal integration.

Vertical differentiation has resulted from interdependence, and horizontal differentiation has resulted from politicisation. Vertical differentiation is also associated with the level of centralisation of a policy, while horizontal differentiation is associated with the territorial extension of policy. Moreover, horizontal differentiation is also based on the rule that it occurs only if member states have uniform membership. Furthermore, two other definitions are added to horizontal differentiation: external and internal. External differentiation means that only one non-member state participates in a policy area. At least one member state does not attend to a certain policy area; this results in internal differentiation.

Moreover, both differentiations might appear together, such as in the Schengen zone (Schimmelfennig et al., 2015).

Analysing differentiated integration from a system perspective is crucial to see how the Union works. Moreover, we can study the supply and demand aspects of differentiated integration through this analysis. As differentiated integration is a double-sided process (there can be a demand for it from member states and non-member states, or through the Union as a whole), this can help us understand crises in the Union such as Brexit (Leruth & Lord, 2015).

2.6. MAJOR THEORIES AND DIFFERENTIATED INTEGRATION

This part of the chapter will focus on the study from Leuffen, Rittberger, and Schimmelfennig (2013) on differentiated integration and major theories all the way. The perspective of neoliberalism, intergovernmentalism, supranationalism, and constructivism on differentiated integration will be summarised.

To begin with, from the perspective of neoliberalism, differentiated integration is not ordinary; therefore, it is an anomaly. Consequently, the only result from differentiated integration can be a multi-speed Europe, which is temporary and will be followed by others; therefore, it will come to an end. On the other hand, other differentiations which are permanent are not welcomed. Moreover, differentiated integration is an unwanted situation from a neo-functionalist perspective, since it creates incompleteness and insufficient consensus between national elites (Haas, 1975). Yet it can be discussed from this perspective that since neo-functionalism welcomes only a multi-speed Europe, which assumes that states which are not applying a specific policy are doing so because they can, this is a problematic issue. For example, the Danish and British inability to opt out of the Eurozone can hardly be discussed in this context. Moreover, Curtin (1995) also supports the opinion that these opt-outs were political choices rather than obligations.

The second perspective is Moravcsik's liberal intergovernmentalism. From this perspective, we can say that differentiated integration is like traditional intergovernmentalism, because states seek their national interests, and differentiated integration can be used to pursue this aim (Moravcsik, 1993). Sepos (2005) claims that differentiated integration is part of the establishment of a core Europe, and is dominated by core member states. As a result, I would say that discussing differentiated integration through the intergovernmentalism theory does not support the concept of an affirmative multi-speed Europe, since national interest is at the centre.

And the last theory that we can relate differentiated integration to is rational institutionalism. From this perspective, since it is accepted that the root of RI is international interdependence, this would boost horizontal differentiation, as Schimmelfennig assumes. In this sense, interdependence would appear when a state cannot fulfil some needs alone, or when it makes more sense for it to cooperate. However, transaction costs, distribution of costs and gains, and enforcement problems can make cooperation harder, and sometimes unfavourable for states. But one should consider that these problems are valid only in the international arena. Yet since the member states or even non-member states would apply due to interdependence in trusting the European Union, it would be more accurate to accept that maybe not entirely but partly reducing these problems would be possible.

The relation of intergovernmentalism and differentiated integration can be explained with the theoretical scenario that differentiated integration does not exist. If differentiated integration does not exist, it would be possible that the state with the highest bargaining power would decide the extension of integration. Moreover, this specific state might be able to block any integration decision if it is not in their interest.

Other major theories related to differentiated integration are supranationalism and constructivism. Constructivism supports the opinion that social discourses and ideas are important for European integration. These decisions and ideas are crucial to structure international areas, especially social groups. We can separate the ideas into two groups: instrumental and principled ideas. While instrumental ideas include shared knowledge, principled ideas focus more on values and norms.

Another important factor is identity. Identity covers the answers to questions such as who we are and which group we belong to. Any person can identify themselves according to one identity by accepting the norms and values of a group of this identity and applying the knowledge of this group. In this sense, identity uses principled and instrumental ideas. While identity can also be shaped by nationality, blood ties, language, race, and so on, it can also be created, as has been the European identity, already discussed in this chapter. Therefore, implementing values, norms, and the knowledge of a certain group - in this case, it is European Union - can make the entity a part of this group.

Applying some of the Union's policy areas can develop to become a part of the European identity. However, it is debatable in the situation where an outsider tries to be included in this identity group, how much the dominant participants of that identity welcome it. This argument should also be considered today as we witness the Russian oppression of Ukraine. While Ukraine was considered an Eastern bloc country throughout history, primarily during the former USSR, today it is considered more as a part of Europe. But it should be noted that possible harmful oppression within Ukraine's borders with Europe would affect them directly.

From the constructivist perspective, integration starts with shared ideas; therefore, an ideational consensus is a crucial part of the integration. With threats to national norms, values, and identity, politicisation occurs and is followed by differentiation. Since the same rules and norms are not subjected to all member or non-member states, differentiation occurs in preferences, ideas, and, finally, in the integration

process itself. Some actors can prioritise different policy areas for their identity construction, or for their norms and values.

And the last theory that we can use to analyse differentiated integration is supranationalism. Supranationalism suggests that integration occurs with the rising level of centralisation and the extension of borders. In this sense, supranational organisations and transnational societies are important actors. These actors demand more integration, and vertical differentiation occurs with a strong level of centralisation. Transnational actors' preferences and expectations stimulate integration; however, those actors prefer more unification rather than differentiation. Since they believe that supranational organisation is above nationalist organisation, they tend to minimise the vertical differentiation in the process of integration, so as to enhance it in all policy areas and maximise the centralisation. On the other hand, supranational actors support the idea that horizontal differentiation makes it harder to govern the European Union; hence, they do not support horizontal differentiation. Moreover, external differentiation does not support centralised enforcement; therefore, they support the membership of countries rather than supporting opt-outs.

2.7. THE INTEGRATION PROCESS IN EUROPE

2.7.1. The Swiss Model of Differentiated Integration

The deepening and widening process of the Union prioritised a single market following the Single European Act in 1986. With the Single European Act, the evolution of the European Union started as it became the European Community (EC), and the internal market became borderless, with the free movement of people, capital, goods, and services. Bringing Central Eastern European (CEE) countries into the EU would promote the single market; therefore, European Agreements (EAs) were proposed to Switzerland, Liechtenstein, Norway, and Iceland. As a result, the European Economic Area (EEA) agreement was signed with European

Free Trade Area (EFTA) members Liechtenstein, Norway, and Iceland in 1992, including free movement of four (This does not make sense. Editor) and further enforcement. Conversely, another EFTA member Switzerland rejected the agreement in a 1992 referendum but stayed in EFTA. Therefore, Switzerland's differentiated integration process is not wrapped up in one assembler (This word is wrong. I would leave it out if I were you. Editor) agreement but two sets of bilateral agreements. The first set of these agreements, called EU-Swiss Bilaterals I, came into force in 2002, incorporating seven points of agreement. The second set, EU-Swiss Bilaterals II, with nine points of agreement, was signed in 2004. However, the number of Swiss Bilateral Agreements is over one hundred today, facilitating Switzerland's full integration into EU policy areas such as Schengen. Moreover, the EU requested further integration with Switzerland and wished to bring the bilateral regime closer to the EEA model; however a far-right party winning the 2019 Swiss elections put the blocks on this request (Duleba, 2022).

Integration is a complicated term for Switzerland. Even domestically, integration and expansion have been complex and non-linear (Cheneval & Ferrin, 2017). The cantonal system, linguistic differences, and religious diversification have restrained Switzerland from national harmony. However, instead of chaos, Switzerland represents a prosperous multicultural country. Unlike the European Union's wish to create one European identity, different identities are promoted and encouraged, especially with citizenship based at root level.

Switzerland has joined the Bretton Woods system, World Bank, International Monetary Fund, World Trade Organization, and United Nations, respectively. However, after the Second World War, Swiss foreign policy prioritised independence, sovereignty, neutrality, and autonomy in external trade. Therefore, Switzerland aimed not to join any organisation, so as not to endanger these priorities (Oesch, 2018). Even though joining these communities was a fraction of the full aims of their foreign policy after Second World War, Switzerland was reluctant to join the European Union, mainly because of the manner of sovereignty and

supranationalism in the Union. On the other hand, integration between the European Union and third countries has prioritised territorial security and economic stability. However, these two have never been a problem for Switzerland compared to other countries. Therefore, European integration seemed to be more attractive for Switzerland from the beginning. Nevertheless, the market and trading powers of the Union are appealing to every country.

Switzerland's differentiated European integration is described more as an economic arrangement than anything else. Furthermore, Switzerland's participation in the Single Market, Free Trade Agreement, Insurance Agreement, and finally, the Bilaterals has made the connection between the Swiss and the EU economically progressive with plenty of cross-border activity (Jenni, 2016).

2.7.2. The Ukrainian Model of Differentiated Integration

The former President of the European Council, Herman van Rompuy, made statement on the 27th of June 2014, during the signing of the Association Agreements. He indicated that: "We are here to sign the Association Agreements between the European Union and each of your countries. These are not just any other agreements – but milestones in the history of our relations and Europe as a whole. In Kyiv and elsewhere, people gave their lives for this closer link to the European Union. We will not forget them."

Ukraine has been increasingly in the neighbourhood of the European Union; therefore, it has always had importance. In 2014, this importance was crowned with the Association Agreement under the Eastern Partnership with the European Union. Similar agreements have also been signed with Georgia and Moldova. In this sense, the Association Agreement significantly contributed to the European Union's differentiated integration of third countries.

However, the process up until the time of the Association Agreement was not smooth for Ukrainians and the Ukrainian government. In 2013, the Ukrainian government refused to sign the Association Agreement with the European Union in order to maintain a good relationship with Russia. This refusal paved the way for the Maidan or Euromaidan demonstrations in Kyiv. The Ukrainian people demanded further integration with the European Union and the resignation of Viktor Yanukovych and the Azarov government. Despite Russia's oppression, the Ukrainian parliament approved the agreement with the EU. However, protests led up to the Revolution of Dignity in Ukraine.

Nevertheless, the importance of the Association Agreement is undeniable for Ukraine-European Union relations. The general framework has covered cooperation in the areas of the economy, security, freedom, and justice, as well as the common foreign and security policy, agriculture, fisheries, and taxation. Moreover, the Deep and Comprehensive Free Trade Area (DCFTA), as a part of the Association Agreement, aimed to liberalise EU-Ukraine trade relations, and support Ukraine's integration into the EU internal market (Loo, 2016).

Since the 1990s, we have witnessed the European Union making inroads into its Eastern neighbouring countries. Hence, in the end, this attention resulted in the 2004 enlargement. In 2004, with the 'big bang' enlargement, the EU accentuated the European Neighbourhood Policy (ENP). The ENP aimed to deal with the relations between the EU and its new eastern neighbours, the southern Caucasian and Mediterranean countries. On the other hand, the EU alluded to the fact that the ENP or AA was not a stepping stone for membership, but essential for integration. Since enlargement is limited economically and politically to the EU, the importance of the ENP is quite significant.

Moreover, the Association Agreement with Ukraine for the European Union means integration without membership (Loo, 2016). On the one hand, a third country benefits from EU law and the European market; on the other hand, European Union

member states' rights to benefit from this third country are characterised as association-cum-integration (Tyushka, 2017). As a result, we encounter external differentiated integration in the European Union again.

2.7.3. The Norwegian Model of Differentiated Integration

The relationship between Norway and the EU has constantly evolved, mainly through the European Economic Area agreement. Along with Liechtenstein and Iceland, Norway contributed to economic integration with the EU through the EEA. However, Norway cooperates with the EU outside the EEA in different areas, such as security, justice, agriculture, fisheries, trade, and the EMU (Leruth, 2013).

Economically, the majority of Norway's trading partners are EU member states. Therefore, trade is quite crucial for EU-Norway relations. Moreover, Norway was invited to be an associate member of the Western European Union (WEU), and integration in the security area started in 1992. From then on, their associate membership allowed Norway to share its national security concerns and be in touch with future developments in the Common Foreign and Security Policy. According to Norway, the WEU was a bridge between NATO and the EU; therefore, Norway supported this compromise. However, when WEU institutions were transferred to the EU thereafter, this shift in the balance negatively affected Norway-EU relations. Nevertheless, Norway played an active role in Concordia (the EU's military operation in the Former Yugoslav Republic of Macedonia in 2003) and Althea (the EU's military operation in Bosnia-Herzegovina in 2008). It signed an agreement with the EU to define its criteria for participating in future military and civilian peacekeeping operations in 2004.

On the other hand, Norway participates in the Schengen Agreement, Schengen Information System, FRONTEX agency, EUROPOL, EUROJUST, CEPOL, and EAW, regarding its integration in the Justice and Home Affairs Council, and in police and judicial affairs. Moreover, fisheries and agriculture are other areas of

European cooperation with Norway. Between the two parties, bilateral agreements regarding the regulation of fisheries and agriculture have been signed. Therefore, the cooperation between Norway and the EU has expanded in various areas.

2.8. WHY THREE DIFFERENT MODELS OF DIFFERENTIATED INTEGRATION?

The models of differentiated integration can be explained through more than three countries' integration processes. Each country has a unique place in European integration, since countries are actors with different characteristics. Nevertheless, some of them are important enough to be studied in detail, since this would help to show differentiated integration in practice. Switzerland, Norway, Ukraine, and Turkey have individual positions in terms of overall European integration. The implementation of differentiated European integration gives us a different perspective on European Studies. Switzerland is an example of differentiated integration with the aim of more economic integration, for a country with no intention of becoming a member.

On the other hand, the case of Ukraine shows an examples of differentiated integration, mostly through the economy and security, but of a state intending to become a member. Moreover, Norway exemplifies integration in diverse areas, but again with no intention of becoming a member. Finally, we have Turkey, with a long-lasting history of seeking European integration. Turkey's situation has sparked more attention in the academy than have Norway, Switzerland, and Ukraine. Besides, the process is much more complex yet broad and rich. Therefore, a complete chapter is dedicated to studying Turkey's differentiated integration, in addition to these three countries.

Nevertheless, this chapter has highlighted the conceptualising of differentiated integration, as well as mentioning the literature that covers it as a concept or system. In that sense, this chapter is mostly concerned with theoretical discussion except

for the last part, where three different models of differentiated integration are explained. Consequently, both theoretical and practical aspects of differentiated integration have been studied. However, since the practical aspect needs more attention, the next chapter will be studying the current discussions, with using the cases of Greece, the UK, and Ukraine as examples. Similarly, Turkey will also be studied henceforward (see Chapter 4).

CHAPTER 3

CURRENT DISCUSSIONS ON DIFFERENTIATED INTEGRATION

3.1. INTRODUCTION

This chapter will study the current discussions on differentiated integration. By doing so, the chapter will focus mainly on three examples: Grexit and the debt crisis, Brexit, and finally rising security concerns due to Ukraine's situation and Ukraine's differentiated integration. In the first part, the debt crisis and Greece's position in the European Union will be discussed. Later on, Brexit will be studied with this new term occurring in the literature. Since Brexit represents a unique event for the European Union, there will be a discussion of the differentiated *disintegration* accompanying Brexit. The last part will include the security concerns stemming from Ukraine's situation, under Russian attack, and with member and non-member countries' concerns affecting its differentiated integration in the European Union.

Differentiated integration in various ways has been detailed and explained in the previous chapters. Since this work aims to explain the historical evolution and process of differentiated integration, in the previous chapters the beginning and the progress of discussions have been studied. Nevertheless, this evolution has not stopped, since we live in a changing environment, and various actors interact constantly. Therefore, historical milestones and contemporary events are and should be considered while studying European Studies, and differentiated integration in the European Union.

Some of the discussions from a significantly long time ago are still on the table today, such as Turkey's application for membership of the Union. However, there are also some relatively new topics. Some are very recent, and to some extent, they are in a state of constant change. If we want to research the contemporary discussions mentioned above, it would be helpful to group them under three sub-

headings: The debt crisis and Grexit, Brexit and disintegration and, newly emerging security concerns from the Russian oppression of Ukraine.

At first glance, these three main topics might seem unrelated. Yet, at an advanced stage, it comes to the same thing in a discussion of differentiated integration. To add a little insight, the euro crisis and Greece's impending exit from the eurozone have highlighted differentiation in member states using the euro. Moreover, Brexit is a unique event for the European Union, and it especially exemplifies differentiation with disintegration. And lastly, the harrowing situation in Ukraine has raised awareness of security in the European Union and Ukraine's intended integration into the Union. Hence, in the following sections of this chapter, these three notable cases will be examined according to a timeline. Moreover, in the part appertaining to the topic of Brexit, disintegration will enter the literature this time with a unique example in the history of the European Union. Therefore, differentiated disintegration will also be included in the literature.

3.2. DEBT CRISIS AND GREXIT

Economic integration is a crucial element in the European Union's integration process. Identified with the single currency, the eurozone is a part of the deeper integration of the European Union. Economic growth, trade, and investments are considered determinants of the integration that came along with the eurozone. Therefore, in a fundamental sense, when a member struggles with some of these determinants, it is foreseen that the rest of the group (in this sense the eurozone) will be deeply affected. When the subject member state has a fiscal downturn, we expect the rest to support the state with economic assistance, and protect the common currency.

The Greek Ministry of Finance explained their deteriorating financial results, government deficit, GDP rates, and government debt for 2009 in their 2010 Stability and Growth Program. However, the results in the reports differed from reality; in particular, the reported GDP growth rates were higher than the actual

ones. Since there was no significant reduction in the government's debts once the economy was improving, debt gathered like a snowball at some point, and was impossible to resist. Even though the planned economic sanctions were to cover the predicament, the pre-existing massive amount of debt was so enormous that the market could not absorb it, even with a recession; therefore, it created interest-rate debt. The situation even worsened in 2009, with an upcoming general election in Greece. The forthcoming election made the government less keen on planning or strict with the budget. To keep up with the Union, Greece manipulated the country's official economic statistics for an extended period (EU Observer, 2010). This resulted in the market to Greece getting blamed for its challenging situation (Market to Greece? This is unclear. Editor). However, global actors such as the International Monetary Fund (IMF) and the other European Union member states, along with the European Central Bank (ECB) act, aligned to help Greece by covering the country's expenses with an outstanding amount of loans. Nevertheless, a greater need for bailout loans, the recession, bank recapitalisation, and private creditors' maturities forced Greece's hand once more, and they accepted an IMF loan yet again. Finally, after a review report, European creditor countries and the IMF decided on an adjustment package to help Greece to get through to 2020, to maintain a sustainable debt outlook.

Besides rescue plans coming from prominent global actors, some global economists advocated the option of Greece leaving the eurozone and reintroducing its national currency. In particular, lending Greece more and more money would end up harming member and non-member European states which had been creditors (Armitstead, 2013). In addition, Greece's political compulsion to build a coalition supported the idea of the country leaving the euro (Xypolia, 2012). The rising expectations of Greece's exit from the eurozone and further rumours have done nothing more than put Greece in even more challenging situation. In such a situation, no European bank would invest its money in a failing country; therefore, more credit problems would arise.

After all, the Greek exit did not happen, and Greece remains in the eurozone. Instead of relating the events and reminiscing about Greece's economic history, what is more important is to discuss the subject from a differentiated integration perspective. Furthermore, in the following section of this chapter (Brexit discussion), the importance of discussing Greece's exit will make more sense. Greece's exit from the eurozone would mean much more than there being one less member of the single currency. It would mean a literal defection from a single currency and, furthermore, other possible spillovers. Such a situation is more likely to cause significant problems in the European market, which is one of the most important fortresses of the European Union, and might even cause devaluation. And finally, this exit would raise the attention on other weak economies of the euro currency. As it was for Greece, the effect even that rumours can cause could have been critical.

Moreover, member states must have seen the importance of keeping the euro together, so they acted in a protective and concerned manner. Mainly Germany and France firmly announced that they would prevent any disintegration of the eurozone. Both German Chancellor Angela Merkel and French President Nicolas Sarkozy expressed their concerns respectively, as follows (Vincour & Thomas, 2011): "Germany and France feel obliged to strengthen the euro as our common currency and further develop it. And it is clear that for this to happen, we need a stronger interplay of financial and economic policy in the eurozone." "The euro has allowed us a lot of economic progress, but the euro is not just a right, it's a set of rules, a duty, a discipline... Consequently, if the rule is to be adopted by the 17, it will not be an optional rule but obligatory."

Consequently, exiting from the eurozone would have affected all processes of integration in the European Union. Such disintegration would have been a forerunner of the situation we are experiencing with Brexit. In this case, we could have branded Greece's exit from the eurozone in relatively the same way as the

process of the United Kingdom's exit from the European Union has been designated.

3.3. BREXIT AND THE EU

3.3.1. Brexit and Differentiated *Disintegration*

The way that the EU or its member states, or outsiders, use differentiated integration has varied according to the situation and the benefits aimed at. However, there is also one more phenomenon that should be discussed profoundly and conceptualised, to make progress in the study of differentiated integration in European Studies. Integration does not have to be permanent or continually developing, and in most cases most it is not. It might cause a slowdown in the European Union or in the subject state. Furthermore, the consciousness of European integration which is connected with common policies, institutions, and coordination and cooperation has been interrupted (Merican, 2017). But for the first time in history, the EU experienced something that completely reversed its processes of integration - Brexit. With the United Kingdom's separation, the EU had to step back from the integration process. Therefore, a new topic, "disintegration," emerged this time.

The United Kingdom's decision and vote to leave the European Union has created a benchmark, for scholars to reconsider disintegration studies. In terms of prognosis, studies on disintegration are relatively scarce and there is a lack of empirical evidence before the UK's exit. Several scholars contributed to disintegration studies pre-Brexit and to some extent predicted this disintegration from the EU as a result of the economic stagnation in the EU. First, Wright (2013) discussed Europe's foreseen future scenarios in an essay, from a disintegration angle. He states that from three possible scenarios – the collapse of the euro, a great leap towards further integration, and muddling through – muddling through is the only one that seems likely.

In contrast, the eurozone's collapse is unlikely, and additional integration is off the table. The eurozone has not collapsed, and is not expected to collapse any time soon, because no member state has left it. Even though we are talking about Brexit today, the United Kingdom has never actually been a part of the eurozone. Still, as stated by Wright (2013), even if a weak member leaves the eurozone, this would lead to many risks, primarily massive problems in adapting the country's banking system. From the core member states' perspective, once a state departs from the eurozone, speculations about the next country to leave will create enormous pressures in the market, and investors will be affected accordingly.

Moreover, the euro represents not only the economy but also the political commitment of the members bound to European integration. Therefore, the idea of exiting from the eurozone is something like a taboo subject. On the other hand, a giant leap forward for integration does not seem possible, because the member states act only when necessary, and even then, they tend to do the bare minimum.

In this sense, muddling through seems the only scenario that is verisimilar. Nevertheless, muddling through must be avoided as an alternative to collapse, and treated as a worst-case scenario. Since the Union does not have to be perfect but needs some improvements and regulations, even muddling through only means “prolonged stagnation”, and must be dismissed. So far, Wright focuses on the euro crisis as a possible reason for disintegration; however, he gives a solution as adopting fiscal integration. And finally, he claims that Britain’s exit could set in motion disintegration, therefore, the UK might be followed by other European states.

Additional to Wright’s work, Vollaard (2014) also tries to explain the possibility of European disintegration, and he tries to conceptualise it. He claims that theories are either state-biased or too narrow to explain this complicated situation. European Union studies would be one of the most suitable places to learn about European disintegration. Moreover, the literature on European integration can still be a

valuable source for conceptualising and explaining European disintegration. Because of the euro crisis, separating Europe into prosperous north and poor south has been discussed, along with the new term of Grexit and Greece's possible departure from the eurozone. Thus, the question of whether Europe is disintegrating was also in the table around 2012. The critical point is that the outcome of the disintegration is not necessarily a return to national statehood. (I think that's what you mean. Editot)

Leruth, Gänzle, and Trondal (2017) categorise the studies on the future of European integration in two ways. The first category includes studies based on the idea of "Brexit as a process of European disintegration". And the second is based on Brexit "as an opportunity to deepen the European integration process. Moreover, Brexit should be studied as a unique and ground-breaking case, and further studies should include this as a case of differentiated disintegration under the umbrella of European Studies. However, the authors suggest that existing studies discuss European disintegration at some level; the main focus is when the states do not integrate further and do not take more advanced steps. However, they do not focus on the problem of whether the EU will become less integrated (Vollaard, 2014). In this sense, once again, Brexit is unique and underlines the issue of the EU becoming less integrated. Consequently, investigating Brexit as a disintegration process would benefit the study of differentiated integration in European Studies.

3.3.2. Disintegration History in the EU

With the withdrawal of the United Kingdom from the European Union, the European Union experienced reverse integration and disintegration for the first time in its history. Even though the departure of Greenland from the European Community in 1983 had been experienced before, since Greenland is recognized as an Overseas Country, not as a member state, the action of the United Kingdom has gained special status. Algeria, Greenland, and the island of Saint Barthelemy departed from the European Community in the past; however, none left as an entire

member state. Nonetheless, Europe has experienced partial disintegration before, if not entirely. This gives new insight into the study area of differentiated European integration. The study takes a wholly new turn once the departure has been completed; however, it is also essential to consider a process which ended up in that way, especially from a European studies and integration perspective.

After the early stages of differentiated European integration, already explained in the previous chapters, in this chapter, as has been stated, the main focus will be on new arguments in the area and future research options. Leruth, Gänzle, and Trondal (2017) state that this new era should lead to agreement among scholars to study differentiated (dis)integration.

As mentioned before, this era requires special attention for the European Union. Many scholars have focused on explaining how and why Brexit happened. However, not only the reason which caused this departure but also the process needs consideration, since it is one of the most significant examples of European disintegration.

Under British Prime Minister David Cameron, the UK government decided to depart as a member state from the European Union, therefore, disrupting European integration. As explained in previous chapters, member states can remain in the EU but opt out from specific policies, which leads us to internal differentiation, or they can leave the EU but continue to apply some particular policies from the EU, which leads us to external differentiation. Regarding this, the United Kingdom's desire and discussions shifted to external differentiation with the 2016 referendum. The word "shift" is important here, to emphasise the United Kingdom's history with the European Union regarding differentiated integration. Concerning the previous chapters, the United Kingdom had been one of the primary applicants of internal differentiation in the Union, with examples of not engaging with either Schengen or the eurozone.

3.3.3. How to Study and Interpret Differentiated *Disintegration* with Brexit

As always, theorising differentiated disintegration is a crucial step. For this step, there should be a basic understanding of four terms: uniformity, differentiation, integration, and finally, disintegration. First, uniformity here represents a togetherness in policy areas of the European Union. The more member states and non-members agree to a specific policy, the more uniformity will appear. On the contrary, differentiation represents more opt-outs from this particular policy area and variance. This study has summarised such differentiation, and in which circumstances it occurs. Therefore, we will be using uniformity and differentiation antithetically. Secondly, integration and disintegration will represent opposite terms as well. (Schimmelfennig, 2018)

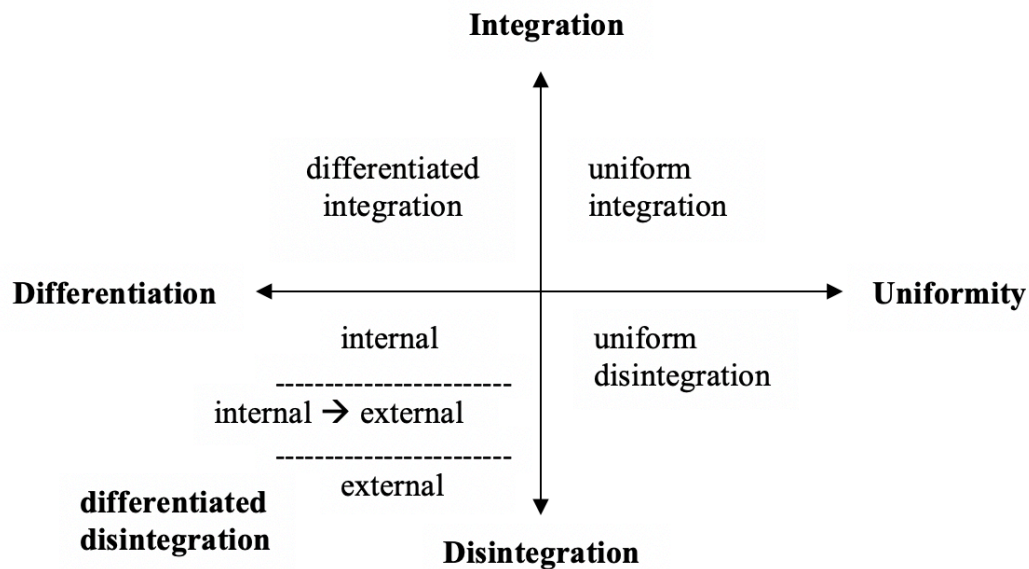


Figure 1. Differentiated disintegration (Schimmelfennig, 2018, page 1156)

Figure 1 shows four different possibilities in addition to four different directions. First, differentiated integration occurs when EU member or non-member states get involved in the EU integration process both by applying and not applying EU policies. In this regard, uniform integration would occur if these actors applied policies ‘uniformly,’ therefore with the togetherness mentioned above. On the

contrary, uniform disintegration would represent the complete opposite. Finally, we have differentiated disintegration as the main focus, and see it in three different parts. While internal and external differentiates member and non-member state situations, ‘internal → external’ is more like the process that the European Union experienced with the United Kingdom. Furthermore, what the United Kingdom has done is not united disintegration but rather differentiated integration since the UK wishes to be able to integrate in specific areas but not be a member state.

When the options differ from uniform integration to uniform disintegration, why has there been a shift from differentiated integration to differentiated disintegration? Once again, understanding the process here would show fluctuations in integration, especially the differentiated integration in Europe. Schimmelfenning (2018) raises the same question, and designates the UK’s role as from ‘defender of integration’ to ‘advocate of disintegration.’ One answer to these questions springs from a post-functionalist approach. Therefore, the rise in Euroscepticism, national identity, and the level and depth of integration can play a role as determinants. These factors might also be combined. As a result, Schimmelfennig (2018) hypothesises the increasing demand for disintegration as “(a) the spill over of integration into identity-relevant areas; (b) the rise of Eurosceptic parties; and (c) an increase in the availability or use of referendums on European integration”, and categorises differentiated disintegration with three different scenarios. First, an integrated state might look out for a shallower integration; therefore, internal differentiation occurs. Secondly, internally differentiated member states might ask to leave, and internal to external differentiation occurs. Lastly, an externally differentiated integrated non-member state might demand even weaker integration. Consequently, disintegration is possible for each member or non-member state having any integration with the EU and willing to cut the ties or loosen the integration. It should not be forgotten that the path between integration and disintegration is likely to affect internally integrated parties more than externally integrated ones, since the latter is in a weaker position towards the Union.

The second question that can be raised will clarify the direction of the disintegration. Why differentiated disintegration, why not unified disintegration? To answer this question, again we will look at Schimmelfennig's work and draw conclusions. Additionally, there will be only a discussion on state-demanded differentiated disintegration, since it is the only historical example we can find in EU relations. In this sense, when the state demands disintegration, adverse effects may not be as visible as when differentiated integration is applied. This might occur, for example, in a scenario where there is a new policy presented by an example treaty and state A, for some reason, is unwilling to integrate fully. As a result, there will be a process of differentiated integration, yet state A will not lose any advantages already attained. However, in the process of disintegration, when we assume that there is no further agreement between the sides, all advantages will be withdrawn by the Union. Especially when looked at economically, no agreement would satisfy the state as much as the single market within the Union would. To answer the question, this section of the thesis requires discussion of two points. One, if the UK were never uniformly integrated, is calling this departure 'uniform disintegration' accurate? The answer would have been yes if the UK had cut all the ties with the EU; consequently, all ties which are cut would still represent uniformity. Two, if the UK is not a member state any more but still has some level of integration with the EU, how do we interpret its current status? We can say that the United Kingdom is still demanding differentiated integration, since it has moved from internal differentiated integration to internal differentiated disintegration, and when it departed from the EU, it relocated to external differentiated integration. However, since it is not a member, but is still integrated in the EU (for instance, through trade agreements), it must be located in external differentiated integration.

Consequently, actors can move in the same zone and within the scope of other zones. Nevertheless, disintegration is not always or necessarily an opposing version of integration or being integrated (Vollaard, 2014). By departing from the European Union, even though the United Kingdom reversed the process from integration to

disintegration, it would not be accurate to claim that it is going in a completely opposite direction with this process. Consequently, this brings us yet again to the same point, where scholars would instead name this process differentiated disintegration. There is an undeniable disintegration; however, the situation has shifted from the UK being a Union member to it becoming a non-member, yet somehow still engaged. Finally, in the process of differentiated disintegration, there is still some level of differentiated integration, at least in the Brexit case.

Finally, what is to be learned from Brexit has yet to establish any consensus. However, Martill (2021) suggests numerous reasons to accumulate differentiation studies, when establishing links to Brexit. First of all, it is always helpful to reduce the complexity of the literature by gathering all the scholarly works together and understanding the relationship between Brexit and differentiation. Furthermore, secondly, even though there has yet to be a consensus on the results from scholars working on Brexit and differentiation, it is still helpful to highlight the discussion areas. Eventually, after all, congruent to Martill's statement, this section of the thesis, which focuses on Brexit, is aimed at studying diverse perspectives on Brexit and differentiated integration and disintegration, rather than studying the results.

3.4. RISING SECURITY CONCERNS AND DIFFERENTIATED UKRAINE

This part of the thesis will focus on Ukraine's recent situation after the Russian attack on Ukraine. What is happening in Ukraine is not only affecting one country but also has awakened suppressed fears especially for the neighbouring countries. Because of Ukraine's geographical position, it is more likely that the first countries affected will be the EU member states and the other non-EU European states. Therefore, the outcome of the security concerns due to Ukraine's situation should be studied from a differentiated integration perspective, to update the literature and analyse the effects on member and non-member states.

On the 24th of February 2022, when Russian military forces began to attack Ukraine, it was a staggering day for all and sundry. Under the guise of a humanitarian intervention, Russia attacked the Donetsk People's Republic and Luhansk People's Republic, and continued to amass military forces on the Ukrainian border. Further targeting the major cities such as the capital Kyiv, the attack became larger in scale. The first reactions from the United Nations and North Atlantic Treaty Organization were not delayed. In the United Nations General Assembly, over a hundred states condemned Russia's aggression, and demanded an immediate withdrawal of Russian military forces from Ukrainian land. The UN and NATO declared their outrage at the Russian attack on Ukraine. Moreover, the European Union also imposed significant sanctions to weaken the Russian economy profoundly. A ban on international money transfers and the SWIFT system for Russian banks was one of the most forceful sanctions.

Not to mention all the death and suffering that the people of Ukraine have undergone, Ukraine being a neighbour to the European Union greatly raised fears in member states. To stop this attack, national interests were set aside in the Union, and the Russian Federation and its elites' economic situation were jeopardised (Handler, 2022).

Putting this harrowing event aside, how the European countries were affected and what decisions have been made are essential topics to be considered within European Studies. Ukraine is already in an exceptional location on the map of European integration; especially when looking at the area of differentiated integration in Europe, Ukraine has a particular significance. The Ukrainian model of differentiated integration* has been studied by various scholars for years, and has contributed to the field of European Studies. As the primary concern of this thesis, this part will research the effects of Russian oppression on Ukraine, mainly on the EU member states, but also on several non-member states. This research aims to see the effects of this worldshaking event on differentiated integration in the European Union. Since Ukraine has had a particular position in the EU, the effects may be significant regarding differentiated integration.

First of all, Ukraine's importance for the European countries in a general sense will be briefly repeated. Secondly, the effects on the member states and some non-member states will be summarised again. Finally, the above-mentioned effects will be analysed in the field of differentiated integration. Nevertheless, because of the recentness of the events and unfinished process, and incalculable possible repercussions, it will not be possible to cover all the effects. After all, researching all the changed circumstances in the country after an attack is neither the topic of this thesis nor indispensable to this study.

Not only its significant location but also its religion, culture, and history promoted the irresistible likelihood of integration with the European Union. Poland, Slovakia, Hungary, and Romania are EU member states which are also Ukraine's bordering neighbour states. Therefore, any change in Ukraine would likely affect these countries first of all, and thus the whole Union. Thankfully, incoming help from these countries has provided a temporary refuge for the people from Ukraine.

Unsurprisingly, the effects of the Russian assault on Ukraine have spread all around the world expeditiously. Requests to join NATO from Sweden and Finland sparked security awareness further afield. A long-term advocate of a policy of neutrality, Austria considered the same option as Sweden and Finland. Therefore, a lack of belief in neutrality has arisen in Europe. Moreover, Belgium has fallen into the fear of a lack of energy and dependency on Russia. As a result, the decision to cut dependency on nuclear power has been delayed.

On the other hand, Bulgaria witnessed a retrogressive relationship with Russia, considered its own energy supply situation, and finally opened a new pipeline with its neighbour Greece, to transport gas from Azerbaijan. The Czech Republic has welcomed war refugees from Ukraine, since the Czech people also suffered a Russian attack in 1968. Denmark also made a historic decision. Prior to the Russian attack and security issues, one of the founders of NATO, Denmark, did not implement the European Union's security policies. However, in the new environment, Copenhagen made a recent decision through a referendum in June,

and President Frederiksen declared that from now on, Denmark would join the European Union more on defence and security policies. Estonia, France, and Germany have also tried to declare independence from Russian energy, by searching for alternatives. Besides member countries, requests also arose from non-member countries. For example, Moldova expressed its interest in becoming a member of the Union, and Brussels declared Moldova as a candidate for membership. On the other hand, Serbia believes that keeping good relations with Moscow, Beijing, and the European Union is essential. Consequently, this situation puts Serbia in a dilemma.

Four days after the Russian attack on Ukraine, President Volodymyr Zelenskyy requested Ukraine's immediate accession to the European Union. In June 2022, almost five months after the attack, twenty-seven EU leaders approved the European Commission's recommendation for Ukraine to get candidate status. Moreover, the Republic of Moldova has also been granted candidate status. As we witnessed before, having candidate status and then becoming a member state is a lengthy process, such as over thirty years. However, even this change in Ukraine's status showed us that the latest events have at least awakened an interest. The Kyiv Post declared on social media that 69 % of the Ukrainian people expect their country to be an EU member in the next five years. Forty percent of these people think that accession will take place within the next one to two years, while 29 percent believe it will take up to 5 years.

On the other hand, only 7 percent of the people think membership of the European Union is futile (Kyiv Post). However, as mentioned above, any procrastination in this process would disappoint the Ukrainian people (Matthijs, 2022). Even if the ongoing conflict would influence the accession process negatively, it is neither impossible nor unique. In 2004, Cyprus became a member of the Union despite an ongoing dispute between Turkey and Greece. Nevertheless, Turkey being a candidate member while Russia is further away from it is an essential difference between these two countries' situations (Matthijs, 2022).

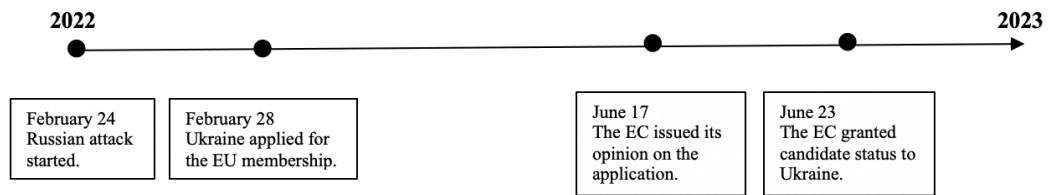


Figure 2. Timeline for Ukraine

The European Council's 23-24 June conclusions highlight Ukraine's future in the European Union (European Council, 2022). Figure 2 summarises the timeline of Ukraine and the European Union's relationship since the Russian attack. In its declaration, the Council stated that the EU condemned the Russian attack as an indiscriminate assault on Ukraine's sovereignty, and it promised to continue strong support for Ukraine economically and socially, including humanitarian aid. Moreover, the Council called on all the other countries to align with the EU's sanctions, especially the member countries. As a result, there is a progressive relationship between Ukraine and the European Union. Even without membership, the EU and Ukraine will likely implement a further and more profound relationship, and therefore deeper external differentiated integration will be observed. In the meantime, the other states are also progressive in terms of differentiated integration. As mentioned above, there are essential changes in the countries' national interests, which push them towards further integration with NATO and, most importantly, with the European Union.

Considering the rising security concerns due to Ukraine's situation, the second strongest advocate of differentiated integration in the EU, Denmark, has made historic decisions. Denmark and the United Kingdom have been the dominant users of differentiated integration in the Union. Denmark practised singularity, starting with the Treaty of the European Union (Sepos, 2005). A la carte or pick-and-choose integrations can be used to explain Denmark's activity in the European Union. Furthermore, when the member states set a common goal to reach with the European Monetary Policy (EMU), once again, Denmark did not attend to this aim.

Finally, Denmark had an opt-out from European defence cooperation for thirty years. However, the historical decision mentioned above considerably changed Denmark and European cooperation. On June 1st, 2022, around sixty percent of Danes voted for Denmark to join the European Union's Common Security and Defence Policy. From that date on, Denmark has had the opportunity of joining the military operations and missions of the EU. Furthermore, from now on, Denmark will also attend Permanent Structured Cooperation (PESCO) and the European Defence Agency (EDA) in the defence and security areas, to cooperate with the European Union (Danish Ministry of Defence, 2022).

3.5. EVER-CHANGING ENVIRONMENT

Consequently, differentiated integration exists in an ever-changing environment. The European Union considers each new situation concerning member and neighbouring countries. The changing environment is also affecting decision-making, both in the European Union and concerned countries. As this chapter has touched on, problematic timelines like the euro crisis, decisions affecting the whole Union like Brexit, and regional problems becoming global like the Russia-Ukraine crisis, change the literature of differentiated integration by adding new terms and concepts.

This chapter has tried to examine current global problems concerning the European Union, therefore the question of European integration. Greece as a member state, the United Kingdom as an ex-member state and finally Ukraine as a state willing to be part of the European Union have been exemplified. The next chapter will focus on Turkey as a candidate state, and a major part of the European Union's differentiated integration. Since Turkey has a special position in the history of the European Union, as a state which has had the longest term of accession process, integration is much more complex between these two parties and deserves special attention. Therefore, the next chapter will be completely dedicated to Turkey's differentiated integration in the European Union.

CHAPTER 4

TURKEY AND DIFFERENTIATED INTEGRATION

4.1. INTRODUCTION

The previous chapters have focused on theoretical discussions on differentiated integration, as well as the current issues. The Swiss, Norwegian, and Ukrainian models of differentiated integration are explained, along with Greece and the United Kingdom's differentiated integration. Moreover, Turkey is also included in the literature on differentiated integration. Since Turkey has represented a unique example in the history of the European Union, the thesis will go on to appraise Turkey's position in terms of differentiation separately.

This chapter will include Turkey's differentiated integration. Turkey's on-off love affair with the European Union is a complicated process. Furthermore, the process is neither linear nor precipitous. Nevertheless, Turkey, the European Union, and its members have profited from this relationship for years. Even though there have been breakaway points from both sides, the relationship continues. However, Turkey is still not a member and does not seem like becoming one any time soon. Therefore, this chapter will study this complex relationship from the perspective of differentiated integration.

The first part of the chapter will give a historical background to the relationship between Turkey and the European Union. Starting with the Ankara Agreement and lasting until today, a strong yet bumpy relationship has been going on. Therefore, it is necessary to describe this background before analysing the process from different perspectives. Moreover, in the proceeding parts of the chapter, Turkey's differentiated integration will be focused on. In the end part, we will see the future scenarios of European integration including Turkey with differentiated integration.

4.2. TURKEY AND THE EUROPEAN UNION: WHAT WAS THE PROCESS LIKE?

Article 49 of the TEU indicates that: “Any European State which respects the values referred to in Article 2 and is committed to promoting them may apply to become a member of the Union. The European Parliament and national Parliaments shall be notified of this application. The applicant State shall address its application to the Council, which shall act unanimously after consulting the Commission and after receiving the consent of the European Parliament, which shall act by a majority of its component members. The conditions of eligibility agreed upon by the European Council shall be taken into account.

The conditions of admission and the adjustments to the Treaties on which the Union is founded, which such admission entails, shall be the subject of an agreement between the Member States and the applicant State. This agreement shall be submitted for ratification by all the contracting States in accordance with their respective constitutional requirements.”

Relations between Turkey and the European Union officially began with the accession agreement in 1963. Before the other phases of the relationship, Turkey’s first aim was to gain candidacy status. To achieve this, Turkey had to fulfil the criteria specified by the European Union. To reach this point, Turkey had to make progress towards a more democratic system so as to start accession negotiations. This obligation was the most influential impetus for Turkey’s democratisation process. After achieving candidate status, the country had to implement political reforms, in order to open accession negotiations. In light of these, Turkey over the years has been initiating reforms in various areas. Furthermore, 1999-2005 were the years of the strongest development of the democratisation process of Turkey.

Turkey became a candidate state in 1999 in Helsinki. After achieving this status, it submitted its National Program for the Adoption of the EU in 2001 (Baç, 2005). Between 1999 and 2004, Turkey adopted various reforms towards democratisation and started accession negotiations. Therefore, this process increased the level of democracy in Turkey. Turkey adopted seven harmonisation packages and 34 constitutional amendments for the process (Aydın Düzgit & Tocci, 2015). In addition, it has conducted reforms in different areas, such as freedom of expression, women's rights, the role of the military, civil society, and minority rights (Aydın Düzgit & Tocci, 2015).

Starting with a new Civil Code in 2001, Turkey tried establishing gender equality in marriage (Baç, 2005). Gender inequality is one of the most significant obstacles in the way of establishing a fully democratised state. With this quick step, Turkey contributed to its democratic reforms. This Civil Code was also crucial for women in marriage regarding equality in sharing property and goods. Subsequently, the AKP government's made amendments to human rights and political rights, the Penal Code, and Anti-Terror laws, which were deemed as genuinely necessary to achieve European standards.

Following these new laws, the first and second harmonisation packages targeted freedom of expression and association. The third package was about the death penalty, broadcasting and education. In 2002, the death penalty was abolished in the third package, and retrial of all cases found to be against human rights by the European Court of Human Rights became possible. The death penalty was a very complex issue at this time because of the terror crimes. The families of people killed by terrorist groups were against this abolition. However, the death sentence can be seen as contrary to basic human rights, and there is a strong case that no one has the right to take another's life. Therefore, it was decided that penal codes should be extended to cover all penalties for all crimes, and that there should not be any need to kill someone to bring about retributive justice. Thus, abolishing the death penalty in peacetime significantly contributes to the application of human rights. Since

human rights are a crucial part of any democratic state, this also contributes to democratisation.

Turkey is a diverse yet united state, comprising different minority and majority groups. Allowing broadcasting and education in languages other than Turkish in the third package was another significant step in improving human rights and minority rights. Restrictions on those issues which concern minorities should not be imposed. The people who do not represent the majority group of a nation or religion etc., should not be ignored in any state that claims to be democratic.

Subsequently, the later packages increased the freedom of the press, freedom of association, religious and cultural rights, and gender equality. Nonetheless, changing the role of the military in civilian life was also crucial for democratisation. Increasing the number of civilians who were participating in the National Security Courts in 2001, changing the National Security Court into an advisory body in 2003, changing the rotation of the meetings from once a month to one every two months, assigning the right of determination of secretary-general of the council to the prime minister, and giving the right to be nominated for the position of secretary-general to civilians were the amendments that played a substantial role in the progress (Gürsoy, 2011). There had been considerable shifts in the law and regulations; nevertheless, the removal of the seats on the NSC from the Radio and Television Supreme Council, the Council of Higher Education and the Supreme Communication Board, and the Board of Inspection of Cinema, Video and Musical Works (Ünlü Bilgiç, 2009) were the most significant changes for freedoms in the human rights domain. The military has played a central role in security against Kurdish nationalism and political Islam in Turkey, and during the Cold War era, the Turkish elites prioritised military instruments (Aydın Düzgit & Tocci, 2015). However, military control over civilian life does not seem coherent in a democratic state. Consequently, these amendments and the improvements in the judiciary system were some of the EU's accession-targeted reforms during the "silent revolution" in Turkey.

In conclusion, since Turkey achieved candidate country status in 2005, there have been multiple amendments, alterations in law, and reforms in response to the steps to accession to the European Union. These reforms have been made obligatory by the EU for Turkey to be considered for accession and to start the accession negotiations. Promoting democracy and stability is one of the main features of the European Union (Cebeci, 2016). The reforms that had been implemented might have been carried out by “reluctant democratizers” for Turkey at that time (Kubicek, 2005). Even though these reforms were tighteners (I don’t understand this word. Editor), one cannot deny that, in the end, they significantly promoted Turkey's democratisation process, as the European Union aimed at conditionalities.

4.3. TURKEY’S DIFFERENTIATED INTEGRATION INTO THE EU

Turkey’s relations with the European Union have encountered many barriers throughout history; however, these relations remain. Even though the relationship between these two sides has not always been virtuous, it has not always been vicious, either. The asymmetric interests, conflicts, and misunderstandings burden Turkey’s EU relations (Yılmaz, 2008). Nevertheless, both Turkey and the EU have benefited from these relations in terms of political, security, and economic matters. Furthermore, risking the relationship would suspend all the achievements gained throughout history, as European Commission President Jean-Claude Juncker has stated (Kirişçi & Bülbül, 2017). Therefore, it is adequate to claim that even though there have been hard times in the mutual history of Turkey and the European Union, political, economic, and security-related factors have been practical factors in the continuation of their relations.

Firstly, Turkey is unique in terms of its geographic position and history. It is situated in a unique location, and provides bridges between different actors and areas, such as between the Middle East and the European countries. Besides its geostrategic position, Turkey generally has good connections with its neighbouring

countries, and aims to use soft power instead of hard power, even though this has changed recently (Müftüler Baç, 2011). Therefore, it is beneficial for the European Union to maintain cordial relations with Turkey. Moreover, Turkey's role has gained more importance considering recent global crises. As Keyman (2016) argues, ISIL and the refugee crises are the global turmoil of our era, and Turkey has an essential status as a buffer state. Considering Europe's concern about these two crises, Turkey backstops the terrorist actions and immigrant rushes to a considerable degree. Agreements between the EU and Turkey on refugee movements and settlements also demonstrate Turkey's essentiality in preventing the EU member states suffering from massive crises. Besides protecting them from crises, Turkey also undertakes a crucial role in Europe's energy security (Keyman, 2016).

Turkey and the European Union's relations on security-related issues stem from recent crises and historical events such as the Cold War. During and after the Cold War, it was important for Europe to create a 'self' image against 'the other.' Therefore, it was essential to have Turkey on Europe's side, and to consider it as one of the European states (Aydın Düzgit & Tocci, 2015). Moreover, with its strong military power and unique location, Turkey was crucial for Europe's security. In the meantime, it was also worth being a part of Europe for Turkey during a global danger like the Cold War.

From the beginning of the Union, security has been one of the main concerns of the member states, and the states that want to be part of the Union. Therefore, security is one of the main important areas for cooperation. Moreover, since one can consider that different actors have different security objectives, the European Union should be open to fulfilling these objectives extensively.

Since 2003, the Common Security and Defence Policy (formerly European Security and Defence Policy) has existed as a tool of the EU to act in the security area. Therefore, since 2003, the EU has been acting as a security provider in the global

arena. As mentioned above, when different actors (different member countries in this case) have different preferences about the resolution of security crises, the CSDP, which is built around unanimous decision-making, has a problem. Moreover, when the member states act in a way that advances their own preferences, this will affect the CSDP in general, and how the EU acts in the security arena. Alternatively, on the other hand, member states can also affect the EU's timetable by acting in this manner (Again, I'm not 100% sure this is what you mean here. Editor). European integration in terms of security has flourished, especially since the Cold War era. During this period, the need for security had to be supplied by Europe itself; therefore, especially the Maastricht Treaty focused on this issue. However, even when security was the topic which most concerned the EU, integration has always been challenging, and therefore external, and internal differentiation occurred (Schimmelfennig, et al., 2011). Foreign, security, and defence policy is the 31st chapter in Turkey's accession negotiations, which has not yet been opened.

Müftüler-Baç (2017) suggests that Turkey and the EU should cooperate and increase differentiated integration from a security perspective, by Turkey being part of Permanent Structured Cooperation (PESCO) and the European Defence Agency (EDA). Turkey has made a lot of effort (Is this what you mean? Editor) to be part of European security and defence.

Since the beginning of the period after the Second World War, Turkey and the EC/EU can be considered partners. Primarily in the term just after the war, the European countries aligned to prevent a possible war. Therefore, in this kind of defence area, becoming dependent on each other and alignment increases both the costs of war and integration. With its important geographical location, Turkey shone as an essential partner both for America and the European Community against the USSR, and became a NATO member in 1952.

Before the Cold War era and NATO membership, Turkey's identity was still on the side of the adversaries. Mainly because of the history of Turkey and that of the European state, it was hard to say that Turkey was one of them. However, with the identification of a common enemy, Turkey became closer allied to the aims and views of the Western Bloc, and shared the same values in terms of security; therefore, this surely invited the further integration of Turkey. Moreover, besides sharing the same enemy and values, and holding a geostrategic position, Turkey also had one of the most powerful military forces that might be handy for the European countries if and when needed (Aydın, 2003).

Secondly, Turkey's role as a buffer state, its geostrategic position, and its relations with neighbouring countries are related to security and political factors that are effective in the continuity of Turkey-EU relations. Therefore, it can be appropriate to integrate security-related aspects with political factors. Furthermore, as a democratic and secular country, Turkey is a model for other countries in the Middle East. Therefore, Turkey's image in other Middle Eastern countries has significant effects. Supporting Turkey makes sense for the EU, since the EU stands for human rights and democracies. In this sense, it might seem like accommodating Turkey is only beneficial for the EU; however, Turkey utilises the existence of the European Union. The European Union is not only to fulfil international responsibilities but also to provide a platform where countries can make their voices heard. With their growing relations with the European Union, Turkey has become further integrated into the international political arena. The European Parliament has supported these relations through the instrument of resolutions on Turkish politics (Müftüler Baç, 2000).

Furthermore, after 2001, when the constitutional articles were amended in 2002 with the Turkish parliament approving legal harmonisation, and the 2003 and 2004 reform packages, Turkey has made a significant amount of progress in terms of its legal and political system (Aydın Düzgit & Tocci, 2015). These reforms all happened with the help of the EU's implementations. Therefore, it should not be

ignored that the continuity of these relations also leans on the contributory implementations of the EU.

Lastly, economic factors support ongoing Turkey-European Union relations, besides the already mentioned security-related and political factors. After signing the Association Agreement in 1963, Turkey joined the EU's Customs Union in 1995. With the Customs Union, Turkey became a part of the free trade area of the EU. The reasons for participation in the Customs Union stem from Turkey's aim of paving its way for EU membership (Ülgen & Zahariadis, 2004). Therefore, even though Turkey has not yet reached its goal, the Customs Union gives us an excellent example of the factors influential on ongoing Turkey-EU relations.

The Customs Union has made more contributions than the Free Trade Agreement in eliminating burdens such as rules and obligations. Consequently, Turkey and the European Union adopted the decision to form the Customs Union in 1995, and put it into action in 1996. As a result, the CU has removed all tariffs on trade in goods. In addition, intellectual property rights, technical regulations, state aid, competition regimes, and an additional Free Trade Agreement on steel products and coal have been appended to the CU (Altay, 2021).

The system of the Customs Union has limits since, at least on the Turkish side, it was designed to be active until the EU granted full membership. Therefore, the deal has fallen short in some areas: investment, government procurement, agriculture, and the service industry. Another point of the deal is the need for more access for Turkish exporters to the European market for goods from the Turkish side. The European Council has focused on the fact that the deficiency in the CU 1.0 can be covered by three different options, which are the baseline option which is doing nothing, a CU-plus option, and a Deep and Comprehensive Free Trade Area alternative (EC, 2016) According to the author, the first scenario, which is the baseline, means keeping everything as usual, and this could lead to new unresolved disputes, especially in the area of trade. The second option, the CU-plus, basically

means renovating the existing CU 1.0, adding new FTAs, covering the missing areas such as agricultural products and public procurement, and adding new chapters to the CU.

Moreover, in the third scenario, a DCFTA could function instead of the CU, by covering industrial and agricultural goods, services, and government procurement areas as a broad Free Trade Agreement. The first and the last scenarios prioritise Turkey applying a large number of EU regulations and having a regional deal with the EU through open markets. According to the Commission, this engagement would affect not only trade relations but also the human rights situation in Turkey (EC, 2016). Therefore, as Altay (2018) summarises it, a plan of CU-plus, consequently CU 2.0, would act in a way as a privileged partnership rather than just being a trade partnership between the EU and Turkey. The sub-text of the privileged partnership suggests that Turkey and the European Union should utilise cooperation as an alternative path to full membership (Beyazit, 2014). With this partnership, Turkey might have more stabilisation and a stronger attachment to the EU. This would ease the relations and support Turkey in applying the EU *acquis*, thus minimising the cost for the European Union when Turkey becomes a full member (Altay, 2021). One point that can be argued is how to construct a privileged partnership. As mentioned above, the privileged partnership can be differentiated from the Customs Union; however, it might also be a similar model to the European Economic Area or even the Eurozone or Common Agricultural Policy. It is easier to imagine and construct a new system similar to those already existing.

Consequently, differentiating an existing system and adapting it for optimum relations would be much easier. Therefore, when we think of the different spheres within which the EU functions, such as the EEA, Eurozone, Schengen area, CAP, CU, and so on, we can better construct the model of a possible privileged partnership. Moreover, the construction of the new differentiation might also be from the perspectives of different countries which already have relations with the EU.

With the Customs Union, the EU began to gain control over the Turkish market. At the same time, Turkey had the chance to open up the international trade areas more comprehensively, and to develop its trade relationships by joining the Customs Union (Yılmaz, 2011). EU member states also have the chance to enlarge their markets, by including Turkey. Moreover, with the Customs Union, the EU has been given the opportunity to impose more regulations on Turkey and arrange Free Trade Agreements with third countries on behalf of Turkey. It is arguable that Customs Union aided Turkey to a large extent, and directly if we consider its impact on the growth rate of its GDP; however, it has also had positive effects on Turkey's trade relations and economic situation (Ülgen & Zahariadis, 2004). For instance, with the CU, Turkey became one of the leading trading partners of the European Union, and Turkey's share of global exports increased (Gros & Selçuki, 2013). The CU not only helped Turkey in terms of opening up the market but also liberalising its foreign trade; having such an agreement with the EU helped Turkey cover its welfare losses to a non-negligible degree (Ülgen & Zahariadis, 2004).

Despite all the odds, the rocky relations between Turkey and the European Union continue, with the help of the factors mentioned above. Both parties have helped each other and benefited from the advantages built by the circumstances of their relations. With its characteristics such as a developing economy, a big open market to the EU, a contributor to the EU's neighbouring policy, and as a buffer state, Turkey is quite important for the EU. Nonetheless, it would be a mistake to interpret Turkey-European Union relations as only beneficial for one side. The European Union as an international actor has made so many contributions to Turkey, especially with its enforcement in order to bring harmonisation with the Union. While Turkey assumed itself to become a member of the EU in the relatively short term, it became a partner of the Customs Union and has achieved economic progress and other advantages. Then to harmonise with the EU more extensively, Turkey implemented EU regulations which helped it quite a lot with its democratisation and civilisation processes. At the same time, the European Union

gained numerous rights to speak on Turkey (What does that mean? Editor). Furthermore, considering the benefits, costs, opportunities, and risks of other relationships, it seems rewarding for both parties to cooperate (Özdemir & Alikalfa, 2003). Thus, even though there have been many barriers and obstacles to finalising the membership process and full integration, both Turkey and the European Union have profited from their relationship throughout their history.

When Turkey applied for accession to the EU, it was already different from the other negotiating countries. In other words, Turkey was already integrated into the EU economically through the 1995 Customs Union for industrial products, and aligning with the EU's foreign and defence policies and the JHA politically, and through energy issues.

The accession process for Turkey has been quite cumbersome. Turkey's national preferences, the opposition of some member states, and Turkey's limited integration capacity have been some reasons for this cumbersome process. In light of these effects, the EU offered Turkey a 'full membership minus.'

Even though there has been a tense relationship between the two parties, the EU supports Turkey through the EU reform programme. Both parties agreed on a 'positive agenda' in May 2012. Since the EU describes the relationship with Turkey as an open-ended process, it has offered Turkey institutional ties but less than full membership.

4.3.1. Full Membership Minus and Privileged Partnership

Even though the accession negotiations started in 2005, Ankara has yet to make significant progress because of the political challenges. On the other hand, the European Union has also challenged the process through cultural, religious, and geographical factors and the EU's enlargement capacity (Lavenex, 2015). Especially right-wing political parties have been questioning the accession of Turkey quite harshly. In the end, German Chancellor Angela Merkel and these

right-wing politicians suggested the term ‘privileged partnership’ for Turkey (Altay, 2018). Moreover, after the 2016 coup attempt and state of emergency, the EU members started criticising Ankara, and Turkey’s membership became unlikely. Moreover, the then-current situation of Brexit and the loss of public and political support for EU membership on Turkey’s side affected the situation quite drastically (Saatçioğlu, 2019). Both Ankara and Brussels want to keep solid bilateral and well-established ties. Especially on the ongoing Syrian refugee crisis, Turkey has actively cooperated with the EU (Müftüler-Baç, 2017).

4.3.2. Positive Agenda

In 2011, the Positive Agenda became valid between the European Union and Turkey. European Commissioner for Enlargement and European Neighbourhood Policy, Stefan Füle, explained the initiatives on the agenda at the 67th Meeting of the EU-Turkey Joint Parliamentary Committee in Brussels. The emphasis is that the Positive Agenda is not a substitute for the accession process but complements and supports it. However, when we get into examples given in the same speech to objectify the agenda, it is possible to say that it bears a trace of differentiated integration about it. The first example focuses on the visa issue. It is suggested that there is improved visa issuance for Turkish citizens, easier application for visa fee exemptions and provision of more multiple-entry visas for those who want to travel in the Schengen zone.

Additionally, the agenda encourages the development of visa dialogue, and mobility and migration between the two parties. The second example focuses on the Customs Union and develops a more effective functioning of trade, as a strong alliance between the EU and Turkey. Finally, the third example focuses on cooperation against terrorism. On this subject, applying a law that protects personal data and cooperation with Europol and Eurojust is suggested to Turkey. Even though the Positive Agenda is not intended as a substitute for the accession process in overall presentation, the objectives identified strongly support differentiated

integration for Turkey. When discussed in detail, the objectives are pretty similar to the scenarios offered for Turkey's future with the European Union from the perspective of differentiated integration. In the following section, the scenarios will be explained.

4.4. INTEGRATION SCENARIOS WITH DIFFERENTIATION

In the March 2017 White Paper of the European Union, the Commission suggested five scenarios for Europe's future: carrying on with nothing but the single market, those wanting more doing more, doing less more efficiently, and doing much more together (European Commission White Paper). Cianciara and Szymanski (Uncited in the list of references. Editor) suggest that we can conceptualise these in two different lines: integration-disintegration and uniformity-differentiation (2019). To explain further, the scenario of doing much more together prioritises uniformity and integration. In contrast, the scenario of 'those who want more do more' is more likely to prioritise not necessarily disintegration but differentiation. Three scenarios were suggested by Cianciara and Szymanski (2019), resulting from discussions on the future of Europe. First, they indicate that there might be a uniform leap forward, the second scenarion, taking a few steps back together, and lastly, some moving forwards, and some moving backwards. In that sense, a uniform leap forward and taking a few steps back together emphasise uniformity, while some moving forwards and some moving backwards does the same for differentiation.

At the same time, a uniform leap forward (Scenario 1) and some moving forwards, and some moving backwards (Scenario 3) represent integration, while taking a few steps back together (Scenario 2) does represent disintegration. The more optimistic Scenario 1 claims that after Brexit, a political union would be created with the addition of other member states that will also adopt the euro. With the overcoming of divisions over the euro, this scenario suggests that the European Union will become a more unified polity area, with the rule that no new member states will be

accepted with opt-outs; therefore, there will be a definite distinction between members and non-members.

On the other hand, at the suggestion of former British prime minister David Cameron, since with the current crisis of the European Union an ever-closer Union is not possible, the second scenario suggests that 'less Europe' might be the solution. In Scenario 2, instead of focusing on the eurozone, it is better to focus on a single market, competitiveness, and security, giving the member states more flexibility. Therefore, power can flow back to the member states, and the European Union becomes a union of sovereign states. The main problem of this scenario is that it requires a uniform step back of all member states, which is very unlikely. Therefore, the authors think that this scenario tends towards differentiated disintegration. Furthermore, Scenario 3 supports more differentiated integration, since there is a movement forwards. As a result of this scenario, it is possible to imagine integrated core member states and others choosing their policy areas selectively; therefore, it results in more heterogeneity and differentiation in sovereignty and identity issues.

We can ask, 'which scenario is better for Turkey-EU relations?'. As explained above, a uniform step back or forwards is so unlikely, and even if they were possible, Turkey-EU relations would not flourish. When the integration process becomes more uniform, outsiders find it harder to attend to some policy areas. For Turkey, the authors claim that the more internal differentiation there is, the more external differentiation. Therefore, the internally differentiated integration process would extend external differentiation. As a result, Turkey could integrate more. This is also because the uniformity in the Union emphasises the gap between the members and the outsiders. In the beginning, focusing on a single market and security, Scenario 2 might seem to make for better Turkey-EU relations, since Turkey is already significantly integrated into the Union economically and from the security angle.

Nevertheless, in Scenario 2, a single market cannot bring the same benefits to Turkey, and Turkey cannot be taken from the Union, especially in terms of the free movement of workers. Furthermore, in terms of security, the obvious Cyprus issue, Turkey's military cooperation with Russia, and Turkey's decreasing alignment with the EU's CFSP all make the situation problematic. Lastly, Scenario 3 supports external and internal differentiation; therefore, we can say that the more heterogeneity in the EU, the more chance outsiders have for integration. As a result, Turkey-EU relations can be more developed under external differentiated integration in the EU.

4.5. TURKEY'S POSITION

Turkey's differentiated integration into the EU can be summarised in the areas of the Customs Union, CSFP, energy security, border security with refugee crises, and finally, the JHA. These areas prioritise the strong cooperation of the EU with Turkey and ongoing activities. As a result, Turkey's integration in these areas is inevitable. However, this situation may also cause a prolongation of the accession process, which gets a negative response from the Turkish government and Turkish citizens.

With the fatigue caused by the seemingly never-ending accession process, President Erdoğan (2013) stated that: "If we get into the SCO, we will say goodbye to the European Union. The SCO is better, much more powerful. Pakistan wants in. India wants in as well. If the SCO wants us, all of us will become members of this organization." These words support the idea that the endless accession process creates negativity, which overshadows the integration of Turkey with differentiation. Being part of the cooperation, presumed to be a powerful organisation, is becoming more valuable than getting closer to the EU with baby steps. Therefore, differentiated integration as a tool of the EU for Turkey's accession process drags us into a voluminous discussion.

Furthermore, apart from this interminable accession process, since 2016 the relationship between Turkey and the EU has been interest-based. Both sides have been pursuing their self-interest and benefit as well as looking to secure the outcome for themselves. In this sense, the type of relationship between these parties has shifted to a 'transactional relationship' (Bashirov & Yilmaz, 2020). As an example of the transactional relationship era, the deal concerning refugee traffic from Turkey to the member countries was signed in 2016 between the EU and the Turkish government. With this agreement, while Turkey took on the responsibility of preventing refugee traffic from Syria to the EU, the EU promised to pay Turkey for taking care of the refugees. Moreover, visa liberalisation and opening a new chapter in the accession negotiations were promised to Turkey (Dimitriadi, et al., 2018). Therefore, with this deal, the relationship between Turkey and the EU supported transnationalism.

After 2016, the meaning of EU membership changed in Turkey's foreign policy. Before membership represented a goal with an ideational background but with transactionalism, the membership had become a tool for Turkish foreign policy to keep relations alive. It is important to note that when the relationship turned completely into an interest-based interaction, the cooperation between the two parties became more fragile. In other words, when a situation does not favour the interests of either Turkey or the EU, one of the parties can break off the relationship easier. It is better observable in the refugee deal. Instead of solving the problem with the help of new policies or institutions, there has been an exchange between Turkey and the EU concerning their interests. The EU aimed to block the refugee flow as immediately and harmlessly as possible for the member states, while monetary help would work for Turkey. In the end, Turkey agreed on what the EU needed in exchange for its own needs. In this situation, if one of the parties would not be satisfied with the agreement, it is inevitable for it to be broken.

This chapter has tried to review Turkey's differentiated integration into the EU, as well as the relationship between Turkey and the European Union. Moreover, this

chapter has aimed to gain an insight into how the European Union has been applying differentiated integration on a non-member state over the years and how it has been affecting the integration and accession process from the viewpoint of both parties. On the other hand, in an apparently everlasting process like Turkey's accession to the Union, the impact and benefit of using differentiated integration have been explained.

Consequently, the thesis has addressed both member and non-member states benefiting or simply using differentiated integration in the European Union. When member states opt out from a policy area, what we experience is an integrated state choosing not to integrate further in that specific area. However, when a non-member state is allowed to integrate with a certain policy area of the European Union, there is a clear contribution to European integration. Therefore, the latter deserves closer attention, to see the effects of differentiated integration that has been claimed to be a contribution to European integration. In conclusion, as a continuation of previous chapters, this chapter has instantiated differentiation of integration by using Turkey as the final case.

CHAPTER 5

CONCLUSION

This thesis has tried to gather together the literature on differentiated integration and address the new discussions that give different perspectives from members' and non-members' points of view. All in all, a differentiated perspective on differentiated integration has been given. From general to specific, the areas that this thesis is focused on are European Studies, European integration, and differentiated integration. Hence, the study has touched on these areas, moving forwards to differentiated integration specifically.

To study differentiated integration, the most important part was to get a better knowledge of the literature. As stated at the beginning of the study, the literature on differentiated integration is broad, complex, and ever-changing. Therefore, by summarising and gathering the literature under one study, the thesis has aimed to contribute to the field of European Studies.

In this context, in the first chapter, the introduction to the topic and the way it diverged from the integration process are explained. How differentiated integration occurred for the first time in the European Union is highlighted. Later on, in the second chapter, the thesis focused on the theoretical and practical parts of differentiated integration. However, the chapter mostly focused on the theoretical part, explaining differentiated integration as a concept and a system. Moreover, categorising differentiated integration with various definitions is clarified. Finally, at the end of the second chapter, practical examples of differentiated integration from different countries' perspectives are given.

In the third chapter, the focus moved to the current discussions in the European Union concerning the topic of differentiated integration. The most important three arguments affecting the differentiated integration process in the European Union have been summarised under the euro crisis and Grexit, Brexit, and the Russian oppression of Ukraine. Besides these three countries, Turkey also merits special

attention in terms of European integration and differentiation. Since Turkey's history with the European Union is quite long and complicated, the fourth chapter is dedicated to Turkey's differentiated integration. Consequently, all four chapters covered the evolution of differentiated integration, from the beginning until Brexit.

Moreover, in the fourth chapter, the thesis aimed to focus on Turkey in depth. How the EU-Turkey relationship started, in what terms it continued to progress, and in what areas Turkey and the European Union have been cooperating is explained. Since Turkey is not a member state, we have seen examples of external differentiation in European integration with practical examples. It is important to give Turkey a special place in the thesis because of the complexity and shifting relationship between the two parties. As mentioned in the fourth chapter, the country's aim to be a member of the EU has had different aspects. While at the beginning it represented an ideational goal for Turkey, now with the shift in the relationship it became rather more of a tie between the EU and Turkey. Interest-based steps have shifted the relations into more of a transactional relationship. Therefore, this chapter has also shown the effects of differentiated integration with changing aims.

Distinctly from other studies on differentiated integration, this thesis aimed to cover the large part of the timeline and include most of the significant actions as well as statements that could be inferred from these actions. Analysing differentiated integration from both theoretical and practical perspectives would contribute to the literature as well. Moreover, not only differentiated integration but also differentiated disintegration is discussed in the thesis. As an ensemble of all the above, the thesis has tried to include discussions and examples, to create a versatile study distinct from other studies.

All in all, this thesis used qualitative data except for a small amount of quantitative data. Working with both qualitative and quantitative data would be more beneficial for studies, since it would yield broader results. Moreover, each state's situation and process concerning European integration is unique. Each state has a unique type

of relationship with the European Union. Giving background information on a state's relationship with the European Union and disintegrated integration not only summarises the topic but also overlooks most of the important details. Some studies focus on differentiated integration in only one country specifically and still, the literature tries to cover overlooked and missed points. In this thesis as well, each state that is used as an example needs special and further attention. On the other hand, the position of these states is in constant flux, just as is the rest of the world. Therefore, especially the third chapter will always need updating. Moreover; Grexit, Brexit, and the Russian attack are not the only crises concerning the European Union or its member states. There are many more events causing problems which concern the European Union. However, the timeline and the extent of the study has to be limited, since there is not a single work that covers everything. In this case, only three examples have been chosen. A study only focused on the discussions that occurred after the 2004 enlargement would be beneficial for further studies. At the same time, approaching differentiated integration from only a non-member state perspective would also spark attention in the literature.

In conclusion, the topic of this study originated from a simple question. If there is a term called membership, how do non-members also cooperate? The answer to this question resulted in this thesis. After all, the extent of the study of differentiated integration is enormous and rich, and needs to be studied even further. In a world that is changing every second, there is a constant need for an update on the research into differentiated integration.

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