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Europeanization and Secession: The Cases of Catalonia and Scotland

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In this article, I examine and compare discourses and strategies mobilized by pro- and anti-independence movements in the UK and in Spain in order to assess how the EU as an actor or as a political institutional context affects contemporary secessionist politics within member states. I argue that the EU provides a complex web of opportunities and constraints for pro- and anti-independence movements in the UK. The EU is both an arena for articulating claims and a source of allies, while appeals to images, histories and experiences of the EU and other European states can be mobilized discursively in reasoning for or against secession. I also argue that, overall, the EU appears to have provided more opportunities than constraints for anti-independence activists. In an indication of the relevance of Europe in contemporary secession debates, the article shows that arguments and beliefs about Europe were actively employed by activists to justify or criticize the premises underpinning reasons to support or reject secession, although more research is needed to determine whether these arguments about Europe resonated with voting publics in Scotland and Catalonia.

Keywords: secession; Europeanization; Scotland; Catalonia; referendum

The break-up of states has international implications and, especially since the collapse of the Soviet Union, it has become a concern for the European Union (EU). The EU has sought to influence secession outcomes in processes as diverse as the independence of the Baltic States from the Soviet Union; those following the bloody dissolution of Yugoslavia and later division of Serbia; and the separation of regions in Georgia and Ukraine (Coppieters, 2007 and 2010; Caplan, 2005). It has exerted pressure through measures ranging from diplomacy, enlargement conditionality, targeted sanctions, arms embargos and peacekeeping missions. The existence of

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around 20 significant independence movements in Europe means the EU is likely to remain implicated in secession processes (Coppieters, 2010: 240).

In addition to EU actions targeting non-EU and applicant states, the EU may influence secession within existing member states. Independence advocates may need to convincingly argue that their new state will easily join international organizations, fundamentally affecting economic prosperity and security (Tierney, 2013: 370). Indeed, many have observed that the prospect that a new state could continue to be part of the EU's common market and seek protection under its latent security umbrella appeared to reduce the costs and risks of separation (e.g. Keating and McGarry, 2001; Hepburn, 2010: 76). Minority nationalists have long used European integration as a political resource 'grafted onto their political discourse' to bolster demands for autonomy (Lynch, 1996: 16-17; Hepburn, 2010). The EU may also affect secession processes in less direct ways. The European sovereign debt crisis, for instance, may strengthen secessionist movements. In the Catalan case, various studies argue that the severity of the economic crisis in Spain bolstered economic arguments for secession and thereby helped turn the predominantly autonomist Catalan nationalist movement into a secessionist one (Guibernau, 2013: 383; Blas, 2013: 399; Serrano, 2013: 524 and 534). Others expect 'contagion effects', or independence for one stateless nation in Europe to encourage other highly mobilized movements to also pursue independence (Tierney, 2013: 359).

Together, these arguments suggest that the EU, either as an actor or as a politico-institutional context, may play a role in the politics of secession in Europe. As such these arguments can be considered arguments about "Europeanization", or the ways in which European integration affects politics, policies and institutions within European states. In this article, I examine discourses and strategies mobilized by pro- and anti-independence movements in the United Kingdom (UK) and Spain in order to examine how the EU as an actor or as a political institutional context affects contemporary secessionist politics within member states.

Independence debates in Scotland and Catalonia are the highest profile cases of secession movements within the EU at present. Scotland held an independence referendum on 18 September 2014, where the 'No' campaign won with 55% of the vote. In Catalonia, debates on independence top the political agenda, even if legal disputes between Catalan and Spanish authorities mean the promised November 2014 independence consultation may not take place. More importantly, the cases permit use

of a 'most similar' research design. Both Spain and the UK are longstanding EU members and leading advocates of independence in both Catalonia and Scotland favour immediate EU membership. These are cases, as Guibernau puts it, where a form of 'emancipatory nationalism' has emerged, which is a 'democratic type of nationalism […] defending the nation's right to decide upon its political future by democratic means' (2013: 372).

An advantage of focusing on discourse and political and argumentative strategies is that it acknowledges the importance of public deliberation for secession processes within the EU. In Europe, the break-up of states has taken various forms that included violent civil war (e.g. Yugoslavia), peaceful, but elite-led, negotiations (e.g. Czechoslovakia) and external intervention (e.g. Kosovo and potentially Ukraine). Nevertheless, within EU member states, impetus for the most significant contemporary independence movements is channelled through democratic processes, especially the electoral success of minority nationalist parties and campaigns for independence referenda. Consequently, the public sphere, and democratic process of deliberation therein, have become important fora in which secession outcomes are negotiated. In this context, it is useful to analyse debates on secession as a form of 'practical reasoning' in which agents conduct a critical dialogue to define an appropriate response to the circumstances in which they find themselves in a way that achieves goals realizing their values (Fairclough and Fairclough, 2012: 45). Analysis of secessionist discourse, understood here as 'ways of representing aspects of the world which can generally be identified with different positions or perspectives of different groups of social actors' (*ibid*: 82) can contribute to causal explanations of political outcomes insofar as discourse provides reasons for action (*ibid*: 80 and 95). More specifically, 'discourses provide agents with premises (i.e. beliefs about the circumstances of action, instrumental beliefs, values and goals) for justifying, criticizing, and on this basis, deciding on action […]' (*ibid*: 95).

While the article draws from existing studies highlighting a role for Europe in secession processes, it adopts a predominantly explorative research design informed by "grounded theory". This method aims to develop theory from coding, categorization and comparison of empirical data and this article uses a constructivist variant (Charmaz, 2006). Constructivist grounded theory is particularly suitable for analysis of discourse and employs an "abductive" approach, which permits formulation of empirically-derived, but theoretically-grounded, hypotheses, and thus

avoids important shortcomings of inductive reasoning characteristic of earlier variants of grounded theory (*ibid*: 186). It also has the advantage of providing opportunities to search for new hypotheses explicitly informed by existing theoretical research on Europeanization.

To this end, I analyse references to Europe in public statements by pro- and anti-independence public authorities, political parties and civil society groups in a sample of around 250 newspaper articles drawn from the 'Scottish independence' section of the British daily newspaper *The Guardian* (between 25 May 2012 and 11 March 2014), and the 'Catalan consultation' section of the Spanish daily *El País* (between 24 October 2012 and 22 January 2014). To deal with possible biases in newspaper reporting, I also analyse statements relating to European affairs and independence in pro- and anti-independence campaign websites, posters, pamphlets, public speeches, press releases and documents published by campaign participants. These include: material published by civil society groups—such as the pro-independence Yes Scotland (2014a, 2014b, 2014c, 2014d), the Scottish Independence Convention (2014) and Catalan National Assembly (2014a, 2014b, 2014c) and the anti-Scottish independence group, Better Together (2014a, 2014b); major policy statements against independence by the Spanish government (*Gobierno de España*, 2014) and the British government (Her Majesty's Government, 2014); speeches (Salmond, 2013a), policy statements (Scottish Government 2013a), press releases (*Generalitat de Catalunya* 2013a, 2013b, 2013c; 2014a; 2014b; 2014d) and parliamentary declarations (Catalan Parliament 2013) of pro-independence administrations in Scotland and Catalonia.

I begin with a brief discussion of key Europeanization concepts that emerged as relevant in the empirical research. I then turn to examine the efforts of pro- and anti-independence actors to influence the views of EU actors and other (predominantly) European states on the terms of accession for hypothetical Scottish or Catalan states to the EU. The next section examines discursive interventions by EU actors, such as the European Commission president, in domestic secession debates. The final section addresses discursive mobilization of the experience of the European sovereign debt crisis and "lesson drawing" from the experience of other European states to strengthen arguments for or against independence.

I argue that the EU provides a complex web of opportunities and constraints for both pro- and anti-independence movements in the UK and Spain. On the one

hand, the EU's multi-level polity provides opportunities for both kinds of movements to search for allies and to reinforce or challenge dominant discourses in the EU which are unsympathetic to independence movements within democratic states. Furthermore, Europe can be "used" discursively to bolster domestic campaigns through mobilization of negatives images of integration (such as the sovereign debt crisis) and horizontal referencing to positive experiences of secession elsewhere in Europe. Nevertheless, the EU appears to have given more significant opportunities to anti-independence campaigners than to their pro-independence counterparts in both the UK and Spain. Pro-independence actors failed to obtain support from sufficiently authoritative European actors, which refused to assure voters that on the central campaign issue of EU membership, a future independent Catalan or Scottish state would join in a timely manner or on favourable terms.

1. Europeanization and secession

Europeanization research focuses on the impact of European integration—and most often the EU—on the domestic arena, particularly member state politics, policies and institutions. EU treaties do not regulate formation of new states, even if they may affect what happens after a new state is born (Tierney, 2013; Caplan, 2005). As such, the concepts and research strategies associated with a *bottom-up* (rather than a *top-down*) Europeanization approach are more appropriate for this research (Lynggaard, 2011). A bottom-up approach focuses on changes that may occur without "misfit" or "pressure to adapt" to Europe, such as how domestic agents may "capture" or influence EU institutions or policies, or use EU discourse strategically to bring about preferred domestic changes (*ibid*: 23).

During empirical research on discourses and strategies employed by pro- and anti-independence movements in Spain and the UK, four key concepts linked to Europeanization research—opportunity structures, vertical and horizontal Europeanization, and "usages of Europe"—emerged as relevant for addressing the question of how the EU as an actor or as a political institutional context affects contemporary secessionist politics within member states. The most fundamental of these concepts is that of "opportunity structure" which draws on a scholarly analysis of social movements (Gamson and Meyer, 1996; Kriesi, 2007). It focuses on the effect of exogenous factors—i.e. the social, political or institutional environment in which groups operate—on the activities, influence and organization of collective

actors. Change in the external environment can alter the "structure of opportunity" for political action by enhancing or inhibiting prospects for mobilization, affecting the types of claims advanced or strategies pursued and the likely influence of collective actors.

The notion that the EU, like other phenomena external to political movements, may provide opportunities and constraints which influence the conduct and success of those movements, provides the basis for operationalizing the core notion of "European integration effects" at the heart of the research question. In other words, in order to understand *how* European integration affects contemporary secessionist politics within EU member states the following research question can be posed: *to what extent is European integration an opportunity or a constraint for contemporary secessionist movements and their opponents?*

The concept of "vertical Europeanization" focuses on institutional opportunity structures and the implications of the EU's multi-level polity for mobilization and alliance building between domestic and extra-state actors. Developed in work on the Europeanization of the public sphere (Koopmans and Erbe, 2003; Koopmans and Statham, 2010), vertical Europeanization involves 'communicative linkages between the national and the European level' (Koopmans and Erbe, 2003: 6). In *top-down* vertical Europeanization, 'European actors intervene in national public debates in the name of European regulations and common interests'. In the *bottom-up* variant, 'national actors address European actors and/or make claims on European issues' (*ibid*).

A role for the EU as an actor in domestic secession processes—and thus a rationale for '*top-down' vertical Europeanization*—is bolstered by new states' need to be recognized by existing states to obtain the privileges the international community accords with statehood. In theory, if not always in practice, EU co-ordination on recognition gives it a chance to influence the terms of secession (Caplan, 2005). Furthermore, now that Scottish and Catalan voters in particular have been asked to decide whether or not they want independence—in Scotland in a referendum, and in Catalonia, in the context of high-profile public debates—pro-independence campaigners have sought to authenticate the hypothetical argument that EU membership reduces uncertainty and costs of independence for small European states. Institutional rules empowering a variety of European actors in decisions about the enlargement of the EU—especially the European Commission and the European

Parliament, and national governments—make these actors authoritative arbiters in efforts to determine whether or not the EU will, in fact, facilitate independence. So far, the EU has not dealt with a situation where a new state separating from the territory of an existing member state seeks EU membership, and among legal scholars there is disagreement about the appropriate procedures for this unprecedented situation. Where EU membership is raised as an issue in independence debates, the views of actors likely to have a say in future accession processes may have significant implications; voters are likely to take those views into account when weighing up the likelihood that a new state will join the EU quickly and on favourable terms.

In secession processes, domestic actors may thus have incentives to develop such *"bottom up" vertical Europeanization* strategies to try to influence the views of European actors that may have a say in future accession processes. Furthermore, domestic actors on either side of secession debates may have an incentive to try to reinforce or reconstruct what Bruno Coppieter (2010) refers to as a developing EU "strategic culture" on secession. He argues that, despite the continuing importance of an individual state's historical experiences and priorities in its decisions on whether to recognize new states, and despite the many differences that emerge among member states when new states ask for recognition, the EU has developed a "strategic culture" on secession. This strategic culture is characterized by preferences for regional self-government models respecting territorial integrity, for reformist and democratic (rather than violent secessionist) movements and "just cause" over "democratic choice" rationales for secession (2010: 255). Catalan and Scottish independence movements clearly go against EU preferences for regional self-government models respecting territorial integrity and against secession for reasons of 'democratic choice' and thus have incentives to try to alter this discourse. On the other hand, their opponents may mobilize it to bolster domestic anti-independence campaigns.

Arguments focusing on the impact of discursive opportunity structures can be developed further with reference to theoretical work on "usages of Europe" (Woll and Jacquot, 2010) and horizontal Europeanization (Koopmans and Erbe, 2003; Koopmans and Statham, 2010). The concept of "usages of Europe" asserts that the 'EU can become a vector of change by providing new resources, references and policy frames, which national actors use strategically' (*ibid*: 113). In essence, the concept aims to highlight 'how actors engage with, interpret, appropriate or ignore the dynamics of European integration' through 'social practices that seize the EU as a set

of opportunities' (*ibid*: 116). As the following analysis shows, for instance, this concept is relevant for understanding how domestic actors mobilized arguments about blame for, and responsibility to respond to the consequences of, the financial crisis in Europe in debates about secession. It is also helpful for understanding forms of strategic usage of Europe which took the form of what Koopmans and Erbe (2003) and Koopmans and Statham (2010) define as *horizontal Europeanization*, which involves 'communicative linkages between different European countries' (Koopmans and Erbe, 2003: 6). Of particular interest here is what the authors define as a 'strong variant' of horizontal Europeanization which occurs when 'actors from one country explicitly address or refer to actors or policies in another European country' (Koopmans and Statham, 2010: 38). Such communicative links may take the form of domestic actors comparing their own situation with that in other countries as well as evaluating developments abroad. As I show below, the concept of horizontal Europeanization helps conceptualize the ways in which references to other secessionist movements may be used to: portray opponents in a negative light, and themselves in a positive light; mobilize participants within domestic movements; project possible future scenarios through reference to "success stories" and undermine the validity of opponent's arguments.

2. Lobbying on independence in Europe

Longstanding experience of mobilization in the EU's multi-level polity and the existence of organizational infrastructure and expertise in both Scotland and Catalonia permitted pro-independence movements to develop bottom-up lobbying strategies, principally focusing on European actors, to respond to difficulties in their domestic campaigns. This included mobilization of transnational networks and attempts to exploit EU treaty provisions permitting civil society actors to petition EU authorities.

In Catalonia, governmental and civil society actors from the pro-independence campaigners developed extensive externalization strategies, mostly but not exclusively focusing on European actors. In addition to mobilizing the expertise of its academic appointees in the *Consell Assessor per a la Transició* (Advisory Council for the National Transition), the Catalan government mobilized dozens of its commercial and diplomatic offices abroad and its secretariat for foreign and European affairs to implement its externalization strategy. In late 2013, the Catalan government sent a letter to all EU heads of state and government and the EU Commission emphasizing

the high level of parliamentary and popular support for the referendum; contradicting Spanish government arguments that it was unconstitutional to hold a referendum on Catalan independence; and asking for support for 'a peaceful, democratic and transparent European [referendum] process' (Ríos, 2014). The Catalan government also sent a memorandum to the foreign ministers of 45 countries and ambassadors and consulates located in Madrid (*ibid*; *Generalitat*, 2013b). The content of the memorandum was similar to the letter to heads of state and government, with the notable exception of the memorandum's attempts to counter arguments that Catalonia would 'cease to be a member of the EU overnight' if it separated from Spain. Catalan President Artur Mas exploited the symbolic potential of various visits to EU institutions (Ríos, 2013; Noguer, 2013e) (and foreign states like Israel and India) to allude to the goal of statehood, if not to directly search for supporters. In addition to a media campaign, including articles written by President Mas in major newspapers and meetings with international companies with an interest in the Catalan economy (Bassets, 2014), the Catalan government created an "amateur" diplomatic service, involving various municipal governments and private organizations, to make the case for Catalan independence abroad (Noguer, 2013c).

Pro-independence civil society organizations, especially the high profile *Assemblea Nactional Catalana* (Catalan National Assembly, ANC), also pursued externalization strategies, not least through the activities of its ten branches in Europe and eight in other, mostly Latin American, countries. In addition to pro-independence videos and pamphlets (including one targeting football fans) in various languages, ANC organized mass pro-independence demonstrations which explicitly pursued, among other things, the goal of attracting wide international press attention (Roger, 2013c). These included the above-mentioned demonstration in Barcelona on Catalan National Day (the Diada, 11 September 2012), which reportedly involved over 1.5 million people and one, a year later, where demonstrators created a human chain stretching 400 kilometres across Catalonia under the slogan "Catalonia road to independence". Furthermore, some 33,070 individuals signed an online petition which required President Obama to take a position on the right of the Catalan people to decide their future through a democratic referendum.[1]

However, the response of the White House to this and other calls for support for an independence referendum show the limited impact of most of these initiatives. Initially, the leading Catalan nationalist parties, *Convergència i Unió* (Convergence

and Union, CiU) and *Esquerra Republicana de Catalunya* (Republican Left of Catalonia, ERC), appeared to pursue internationalization with the goal of co-opting European actors, principally through appeals to European legal principles, as intermediaries between Spanish and Catalan authorities (Roger, 2013a; Catalan parliament, 2013). However, it soon became clear that EU authorities and heads of state and government in Europe and beyond were unwilling to play such a role. The White House responded to the Catalan petition recognizing Catalan distinctiveness, but viewed the independence referendum as an internal Spanish matter that should be solved in accordance with Spanish law (Roger, 2014b). Political leaders in France (Cembrero, 2014), the UK and Germany (Müller and Oppenheimer, 2014), as well as Brussels (Roger, 2014a), made similar statements. Catalan government leaders later claimed that the goal of internationalization was to keep the international community informed about events in Catalonia and counter Spanish government claims about the unconstitutionality of an independence referendum, rather than obtain explicit statements of support from international actors (*El País*, 2013a; Noguer 2013d).

In addition to wide international coverage of mass demonstrations like the Diada in 2012 and the Human Chain in 2013 (by, for example, *The New York Times*, CNN, the BBC and Reuters), one (short-lived) success came when Lithuania Prime Minister Algirdas Butkevicius affirmed, in reference to the Catalan case, that each country had 'a right to self-determination' and 'should find their own way'. He also compared the 2012 Catalan Human Chain with a similar protest in the Soviet Union in 1989. Pointing out that Lithuanians elaborated their own legal framework to proclaim their own independence, he also stated 'I welcome all peaceful forms to express solidarity of peoples and self-determination' (*El País*, 2013c). The Latvian Prime Minister Valdis Dombrovskis also appeared to support recognizing a new independent Catalan state (*El País*, 2013b).

However, the Spanish foreign minister called in the Latvian and Lithuanian ambassadors to explain the statements, and governments from both countries subsequently retracted them, rejecting any interpretations that might lead to comparisons between the Soviet occupation of the Baltic States and the situation in Spain (*El País*, 2013d). These actions were part of a broader strategy to counter Catalan efforts to externalize independence debates. The Spanish foreign minister was reported to have intensified contacts with his counterparts abroad and to have called ambassadors from all EU countries (González, 2013) to explain the government's

position on Catalan secession. Bilateral contacts, especially with French President François Hollande (Cembrero, 2014) and British Prime Minister David Cameron (Culla, 2013), culminated in public confirmation that these governments supported key elements of the Spanish government's position, especially the "domestic" nature of the issue and the need for Catalonia to reapply for EU membership in case of secession. The Spanish Ministry for External Affairs and Cooperation produced a 210-page report to the Catalan externalization strategy, which was sent to over 200 Spanish embassies and consulates (*Gobierno de España*, 2014).

The Scottish government also sought to externalize its pro-independence campaign, through, for example, meetings with diplomats in London, Edinburgh and Brussels (Carrell and Kassam, 2013; Carrell and Watt, 2013). The Scottish government was reported to be trying to find allies, especially among smaller Baltic, Scandinavian and East European EU members (Carrell, 2013f). Scottish government ministers made various trips abroad to Nordic and Baltic states to build 'strong, collaborative relationships across Europe in line with our ambition to become a modern, independent country and full equal member state of the EU' (Scottish government, 2013b). The Scottish First Minister, Alex Salmond, and other Scottish government ministers, gave keynote addresses dealing with international aspects of Scottish independence in places such as Hong Kong, New York, Paris and Philadelphia. In a high profile, symbolically significant, speech in Bruges in April 2014, Salmond sought to counter doubts about the likelihood of an independent Scotland staying in the EU with the argument that the Eurosceptic turn in British politics, signalled by former British Prime Minister Margaret Thatcher's earlier Bruges speech in 1988, was more likely to take Scotland out of the EU (with the UK) than Scottish independence itself (Salmond, 2014). Although the main pro-independence civil society organization, Yes Scotland, described itself as primarily a domestic campaign,[2] there were externalization initiatives by other groups. Artists from the pro-independence, National Collective, for instance, met with senior party leaders in Denmark in March 2014, resulting in public statements that Denmark would be likely to welcome Scotland into both the EU and NATO, and that membership could be arranged 'overnight' and was a 'mere formality' (Yes Scotland, 2014d). Data collected suggests that the international dimension of the British government's campaign against Scottish independence has primarily focused on

issuing joint statements with the Spanish president emphasizing that seceding states must leave the EU (Culla, 2013).

There were also several attempts at transnational collaboration between pro-independence campaigners. These included an (unsuccessful) attempt to register a European Citizens' Initiative in favour of 'internal enlargement' in case of secession of a territory within an existing member state.[3] In 2012, the International Commission for European Citizens, involving, *inter alia*, representatives from the Scottish Independence Convention and others from Flanders and Catalonia presented another (also unsuccessful) European Citizens' Initiative to enshrine the universal right of self-determination within the EU's legal framework.[4] Pro-independence groups from Catalonia, the Basque Country, Scotland and Flanders formed the European Partnership for Independence to co-ordinate international actions and promote the right to self-determination.[5]

3.   Intervention of European actors in domestic secession debates

The mainstream of Scottish and Catalan pro-independence movements favour EU membership after independence and, as such, the views of various EU actors likely to have a say in future accession processes are relevant for persuading voters that a new state will join the EU quickly and on favourable terms. If Scots voted "yes", the Scottish government stated that it expected to begin negotiations with both the UK and EU institutions to agree a 'smooth transition to independent EU membership [which] can take place on the day Scotland becomes an independent country' (Scottish government, 2013a: 220). According to the Scottish government, following the referendum and during negotiations on independence, the Scottish government would have still remained within the UK, and by extension the EU, 'without disrupting the continuity of Scotland's current position inside the EU single market or rights and interests of EU citizens and business in Scotland' (*ibid*: 220). It argued that Scotland's 40-year EU membership meant that Article 49 of the Treaty on European Union (on accession of new states) did not apply in the *sui generis* case of Scotland. Rather, Article 48 could provide for treaty amendment facilitating Scottish membership agreed by common accord of representatives of the member states (*ibid*: 221). The Scottish government also pursued 'continuity of effect', which sought to preserve current obligations (*ibid*: 221), including the UK's budget rebate and opt-

outs from economic and monetary union (EMU), justice and home affairs and the Schengen travel area (*ibid*: 222).

Similarly, Catalan nationalist parties unambiguously sought to 'construct Catalonia as a new state within the European framework' (Catalan parliament, 2013; CiU and ERC, 2013), an ambition that was also articulated during mass rallies, like the 2011 Catalan national day demonstration under the slogan "Catalonia, a new state in Europe". Catalan independence campaigners expected the EU to take a flexible approach as a result of for Catalonia's long-standing EU membership and the *sui generis* nature of the independence processes (*Generalitat*, 2013b; Catalan National Assembly, 2014a; Noguer, 2013c). In an appeal to the "democratic principles" of the EU, Catalan pro-independence campaigners argued that the EU could not deny Catalans their status as EU citizens because they already formed part of the EU. The Catalan government also argued that the EU would not hesitate to accept Catalonia as a member given its economic strength.

Although refusing to comment on individual cases, and claiming neutrality in a "domestic" matter, EU institutional representatives nevertheless contradicted the assumption that states seceding from existing members would automatically become EU members. Commissioners repeatedly outlined the view spelt out by Commission President José Manuel Barroso in a December 2012 letter to the UK's House of Lords:

> […] a new independent state would, by the fact of its independence, become a third country with respect to the EU and the Treaties would no longer apply on its territory. Under Article 49 of the Treaty on European Union, any European state which respects the principles set out in Article 2 of the Treaty on European Union may apply to become a member of the EU. (*The Scotsman*, 2012)

This position was both widely disseminated and restated on many occasions by other EU actors (see e.g. HM Government (UK), 2014; Roxburgh, 2013; Roger and Pérez, 2013; Abellán, 2014; *El País*, 2013e), including Vice President of the European Commission, Joaquín Almunia (*El Páis*, 2012), internal market Commissioner Michel Barnier (Roger and Pérez, 2013) and European Council President Herman van Rompuy (Cué, 2013). EU support for anti-independence positions was also expressed symbolically, in events such as press conferences. For example, President of the European Council Herman van Rompuy was willing to restate the position at a press conference in Madrid alongside Spanish Prime Minister Mariano Rajoy on the day

Catalan nationalists announced a date and referendum question for an independence consultation (Cué, 2013).

Their statements bolstered the position of the anti-independence movement in Spain and the UK. It permitted, for instance, Spanish Prime Minister Mariano Rajoy to universalize EU-related arguments against independence: he claimed the view that Catalonia would not immediately join the EU was a position that was 'clear to me, as it is for everybody else in the world' (Carrell, 2013f). Similar universalizing formulas were employed by UK government representatives (Carrell and Kassam, 2013). Furthermore, Barrosso's and Van Rompuy's statements were cited, alongside other experts, in major British and Spanish government reports outlining purported costs of independence (HM Government (UK), 2014: 62; *Gobierno de España*, 2014: 105; 214).

The possibility that new states might face several years of limbo between independence and EU accession, and that they might need to renegotiate membership terms, led to the identification of additional problems. Other member states might disrupt accession negotiations or veto favourable accession terms, especially those (like Spain) with significant independence movements (Gutiérrez, 2013; Carrell and Kassam, 2013; HM Government (UK), 2014, 55; Abellán, 2013a; *El País*, 2013b). Catalonia's euro membership might be compromised (El Páis, 2012; Abellán 2013a). Furthermore, other problems raised in debates included the possibility that Catalonia might have to reintroduce customs posts when forced to leave the Schengen Area and lose access to EU cohesion funding, while its citizens might lose the automatic right to move freely, or work and study, in other EU countries (Abellán, 2013a; Roger and Pérez, 2013).

In Scotland, the unpopular prospect that an independent state would be obliged to join the EMU was raised repeatedly (Carrell and Watt, 2013; Carrell and Kassam, 2013; HM Government (UK), 2014: 65). By remaining part of the UK, Scotland would be covered by the UK's euro opt-out. Doubts were raised about whether a new Scottish state had to join the EU's border-free Schengen Area, and thus introduce border controls between Scotland and other parts of the UK, as were doubts about whether Scotland would be able to keep a share of the UK's annual EU budget rebate.

4. The "Eurozone crisis" and lessons from other small nations

As an indication of the complexity of Europeanization effects on the politics of

secession within EU member states, analysis of independence debates in the UK and Spain suggest that discursive usages of Europe can provide both opportunities and constraints for participants in secession processes. Below I outline two of the most prominent arguments employed during secession debates, which drew on "images of Europe" and involved "lesson drawing" from other European states

4.1 *The Eurozone crisis*

Both pro-independence and anti-independence advocates used negative experiences of the economic crisis in Europe to bolster arguments for their cause. Pro-independence advocates linked the depth of economic problems in their territory to central government handling of the crisis and argued that an independent Catalan or Scottish state would have responded better. Defending spending cuts introduced by his government, Catalan President Artur Mas argued, for instance, that: 'We didn't make cuts on a whim, they are imposed by Europe and badly distributed by Madrid' (Noguer, 2012a). Similarly, Oriol Junqueras, leader of the Catalan nationalist party *Esquerra Republicana de Catalunya* (Republican Left of Catalonia) claimed 'the only way out of the economic situation for Catalonia is for the community to have a state' (Roger, 2013e). Similar arguments were made in Scotland, which is not part of a Eurozone state, but is part of a state with a government committed to reducing public spending to cut public deficits. The Deputy First Minister of Scotland, Nicola Sturgeon, argued that despite Scottish government efforts to mitigate central government welfare cuts, the current devolution settlement severely limited its scope for more radical action and the 'only solution is for this parliament to have full powers of independence so that we can devise policies to benefit the Scottish people and ensure fair and decent support for all' (Carrell, 2013d). First Minister Alex Salmond expressed similar sentiments (Carrell, 2013a).

Anti-independence advocates also appealed to the crisis context. Leaders of the anti-independence *Partido Popular* emphasized the inappropriateness of launching an independence process during such a severe economic crisis (Garea, 2012) while they, and others, expressed the fear that political instability and tensions created by independence debates could deepen the crisis (Manetto, 2013; and Noguer 2012c). Similar arguments were made by Scottish anti-independence campaigners and British Prime Minister David Cameron (Carrell, 2013c). In Catalonia, such arguments were sometimes accompanied by the argument that the independence consultation

was a strategy employed by Catalan nationalist elites to distract attention from unpopular Catalan government cuts and economic downturn (Noguer 2012b, Pereda 2012).

However, one of the most prominent examples of how Europe was employed discursively to undermine arguments for independence can be found in the UK case. Here anti-independence campaigners relied 'on the 'image of Europe' to communicate implicit content' (Woll and Jacquot, 2010: 113-115). The Scottish government proposed maintaining a currency union with the rest of the UK in case of independence, in which 'monetary policy will be set according to economic conditions across the Sterling Area with ownership and governance of the Bank of England undertaken on a shareholder basis' (Scottish Government, 2013a: 110). The principal challenge to the credibility of the proposal is that the main British parties rejected it, but anti-independence campaigners also sought to undermine proposals for a Scotland-UK currency union by mobilizing negative images in Britain of the EU's currency union. The clearest illustration of this strategy can be found in a pamphlet by the anti-Scottish independence organization, Better Together (2014a). The pamphlet mostly lists quotes from "experts" on problems with what it calls the '[Scottish National Party's] plan for a Eurozone-style currency union', a discursive formula employed repeatedly in the document. Narrations of problems experienced with the EU's currency union were employed to illustrate the purported unworkability of the proposed currency unions between the UK and a future independent state. At least five negative lessons from the European sovereign debt crisis were applied to a future Scotland-UK currency union, in this and other documents analysed. (1) *The difficulties of negotiating and managing (especially in times of crisis) a currency union among independent states* (*ibid*: 2; Carrell, 2013e and 2014). A particular concern in this regard was uncertainty about whether, in a future financial crisis, the rest of the UK would so willingly bail out Scottish banks, as it did in 2008 for the Royal Bank of Scotland and Bank of Scotland (Better Together, 2014a: 4; Carrell, 2013e). In a point emphasized by the Governor of the Bank of England, Mark Carney, in a keynote speech (2) *monetary unions need political union to work* (Better Together, 2014a: 4; Elliot, 2014). This was particularly problematic insofar as it would undermine the goal of Scottish independence. A related point was the lesson that (3) *there are systemic risks in monetary union if some members have less disciplined fiscal policies than other members, which would mean Scotland would*

have to accept constraints in its decision-making over fiscal policy (Better Together, 2014a; Carrell, 2013e). (4) *Market uncertainty about new UK-Scotland currency union arrangements could lead to high volatility and market turbulence, capital flight and high borrowing costs for Scottish authorities* (Better Together, 2014a, 6; Stewart, 2013). (5) *Some small nations have been overwhelmed by the global crisis* (Better Together, 2014b), such as Greece, Ireland and Portugal. As a consequence, the anti-Scottish independence movement argued that, by rejecting independence, Scots would continue to use a currency 'which is one of the oldest and strongest and most successful currencies in the world', one which meant the UK has 'been protected from the worst of the Eurozone crisis'. Moreover, by staying in the UK, '[i]n these economically uncertain times, Scotland has the absolute reassurance that comes from the financial back up of being part of the UK' (Better Together, 2014a, 2).

4.2 *Lesson drawing from the experience of other European states*

Analysis of statements by pro-independence campaigners in both Scotland and Catalonia referring to actors or policies in other countries (horizontal Europeanization) suggests that Europe can be used discursively to perform at least six different functions:

1) *Portray opponents in a negative light by comparing them with an exemplary other.* For example, pro-Catalan independence campaigners frequently contrasted what they saw as the UK government's willingness to negotiate, to tolerate political projects it disagreed with, and its pragmatic constitutional approach with the purportedly undemocratic "obstructionism" of the Spanish government. The Spanish government was seen to be "hiding behind" the provisions of the Spanish constitution to argue it could not authorize a Catalan independence referendum (Catalan National Council, 2014a and 2014b; *Generalitat*, 2014a).

2) *Portray the speaker's movement in a positive light by comparing themselves with an exemplary other.* In another mobilization of the Scottish case, pro-Catalan independence campaigners sought to underline that Scottish and Catalan movements were peaceful, democratic movements (Roger and Pérez, 2013). In an attempt to distance the Catalan case from events in Ukraine, Catalan authorities sought to invert established categories by combining function (1), implying that the Spanish government was more similar to

secessionists unwilling to rely solely on democratic methods to achieve their goals, with function (2), comparing Catalan authorities to the UK government by virtue of their commitment to democratic processes (*Generalitat*, 2014c).

3) *Mobilize participants in the speaker's movement by relating successes of similar movements to their own experiences*. This was explicit in the Catalan National Assembly's human chain campaign in 2013 (mentioned above), directly inspired by mobilizations in 1990 where 100,000 citizens in Estonia, Lithuania and Latvia held hands to demand independence from the Soviet Union (Roger, 2013c and 2013d). It could be argued that restaging the "Baltic Way" in Catalonia not only sought, in reference to function (2), to reinforce the self-image of the Catalan movement as a peaceful, mass, democratic movement, but also to rally pro-independence supporters in an act explicitly referencing a key moment of an independence movement that achieved its goals (Noguer, 2013b; *Generalitat*, 2013c).

4) *Warn opponents of undesirable but possible future scenarios*. While most Scottish and Catalan pro-independence campaigners avoided making, or specifically rejected, comparisons with violent secessionist processes in the Balkans (and Ukraine) (*Generalitat*, 2014c; Salmond, 2014; Yes Scotland, 2014b), radical Catalan nationalist party ERC explicitly referred to Kosovo as a model. In a move communicating the dangers of the Spanish government's refusal to hold a referendum, the ERC endorsed the extreme scenario of a unilateral declaration of independence—named the *via Kosovar* (Kosovan Way)—as a possible outcome if a referendum were not held (Roger 2013b). Similarly, in Scottish debates, references were also made to historic difficulties in Anglo-Irish relations, which were reported as veiled references to a conflict including bullying and intimidation (Watt, 2012) but also to the tragedy of the 1916 Easter Rising, the 1921 partition of Ireland and the Northern Ireland conflict, from which 'the poison still drips' (White, 2012).

5) *Underline the viability of Catalonia and Scotland as viable independent states*. In both Catalonia and Scotland, pro-independence activists frequently referred to successes of small economically prosperous European states (Catalan National Assembly, 2014c; *Generalitat*, 2013a; Salmond, 2014). However, in the Scottish debates, the contours of the Nordic model were more sharply sketched. The Yes Scotland campaign, for instance, produced posters listing

nine small countries more prosperous than, and ten small states ranked as more safe and secure than, the UK. The countries included in both lists were Iceland, Sweden, Finland, Ireland, Norway, Denmark, Luxembourg, Switzerland and Austria. Furthermore, pro-independence campaigners frequently alluded to the Scandinavian model, as one journalist put it, as 'an enviable club of small independent states each flying its own flag […] with dynamic wealth creating societies, and high taxes that pay for strong welfare provision' (Little, 2014). Various small, mostly Scandinavian states also provided models squaring the goal of many pro-independence campaigners for a nuclear-free Scotland with membership of the North Atlantic Treaty Organization (NATO) (Scottish Independence Convention, 2014) and for defining a security identity in which a new Scottish army would contribute to international conflict resolution (*ibid*). The Nordic Council not only provided a forum for consolidating new alliances after independence, but served as a model for how an independent Scotland could peacefully manage relations with others in the British Isles (*ibid*; Little, 2014).

6) *Undermine the validity of opponent's arguments*. For example, Norway's economic prosperity, despite being out of the EU (Scottish Independence Convention, 2014) and Norway's oil wealth (Yes Scotland, 2014a) were also employed to counter opposition arguments about, respectively, the costs of being a non-EU member and the costs of maintaining a strong welfare state. Similarly, the Yes Scotland campaign produced a poster of the control-free border crossing between the UK and Ireland to counter the argument that an independent Scotland would require reintroduction of border controls, while Salmond pointed to strong UK-Irish relations as a model for Scottish-UK relations in case of independence (Salmond, 2014). In light of doubts raised about the timing and costs of accession to the EU, pro-independence campaigners also sought to argue for the arbitrariness of the Commission's position (outlined above) with reference to the experience of other states. For instance, actors ranging from Catalan President Mas to the Yes Scotland campaign argued that the German Democratic Republic, which joined the EU in 1990 through unification with the Federal Republic of Germany, showed that rapid and flexible solutions to situations as unprecedented as those of

Scotland and Catalonia were possible (Roger and Pérez 2013; Yes Scotland, 2014c).

A number of differences between the cases can be observed. In an indication of the malleability of meanings that can be attached to secession experiences abroad, actors from different countries tended to select different fare from the same menu of contemporary and historical examples. Catalan and Scottish actors did not appeal to the same cases and referred to each other in varying degrees. Catalan campaigners referred to the Scottish case more than any other, while Scottish pro-independence campaigners generally paid scant attention to the Catalan case. Furthermore, pro-Catalan independence activists appealed more to paradigmatic features of secession processes in Scotland (but also frequently the Baltic states), while pro-Scottish independence activists tended to project the success of a future Scottish state through association with success of other small European states, especially Nordic states and Ireland. These differences can be related partly to differences in the nature of secession processes. Doubts about the legal context for a Catalan consultation, meant pro-independence activists had stronger incentives to legitimize a Catalan referendum by referencing similarities with other processes recognized as legitimate by the international community. By contrast, the legitimacy of the Scottish referendum was not in doubt, so there were incentives to construct paradigmatic cases highlighting the advantages of independence and counteracting critiques put forward by opponents. Historical context was also relevant. For example, frequent references to the Irish case by pro-Scottish independence activists can be explained by the likelihood of audience familiarity, but also the fact that both Scottish and Irish nationalists, respectively, sought, or had sought, to separate from the United Kingdom.

A second difference relates to the mobilization of negative images of the EU, and arguments raising fears of deeper integration into the EU in Scotland compared to those raising fears of an unravelling of EU ties in Catalonia. This reflects varying degrees of Euroscepticism in the two territories, which is much higher in the UK than in Scotland. The United Kingdom Independence Party is weak in Scotland and opinion polls show that Scots tend to be more Europhile than the English (Torrance, 2013: 127). Nevertheless, Scottish attitudes tend to mirror those of the English on issues like withdrawal of the EU (in one study as many as 37% of Scots wanted to leave compared to 50% in England) and staying in the EU (in the same study as few

as 42% of Scots wanted to stay compared to about a third in England) (Curtis, cited in Torrance, 2013: 127). By contrast, in both Spain and Catalonia, there are no significant Eurosceptic parties and support for EU membership in both Catalonia and the rest of Spain is among the highest in the EU (Keating, 2001: 77).

Conclusion

In the article, I examine discourses and strategies mobilized by pro- and anti-independence movements in the UK and Spain in order to assess the impact of the EU as an actor or as a political institutional context on contemporary secessionist politics within EU member states. Efforts by pro-independence campaigners to find allies that could help them to contest the construction of EU rules on enlargement as an obstacle to immediate EU membership on favourable terms, or in favour of the Scottish and Catalan "democratic choice" rationales for secession, produced meagre results. Leading statesmen and women emphasized the internal nature of independence issues and, particularly in Spain, the anti-independence campaign, led by the central government, was able to mobilize the diplomatic machinery of the state to apply pressure on states indicating support for Catalan independence. In practice, possibilities for lobbying and alliance formation beyond the state provided by the EU's multi-level polity did not alter the structure of opportunity for pro-independence campaigners. Rather, the institutional prerogatives of anti-independence actors in the EU's political and diplomatic systems (particularly when these were member state governments) provided anti-independence campaigners with resources not available to pro-independence counterparts.

Similarly, intervention by European actors in secession debates 'in the name of European regulations and common interests' (Koopmans and Erbe, 2003: 6) became a considerable constraint for secession movements because European leaders refused to reassure voters that membership of the EU, an organization posited by pro-independence campaigners as central to future prosperity, would be timely and favourable. Doubts created by EU actors about future membership provided opportunities for anti-independence campaigners to highlight variously conceived negative consequences of breaking away from existing states.

Mobilization of negative images of EMU as politically difficult, contrary to the cause of independence, and problematic for small states provided a powerful metaphor employed by anti-independence campaigners about what might go wrong in

a currency union between a future independent Scottish state and the rest of the UK. However, pro-independence campaigners could also refer to the experience of other European states to bolster their cause by portraying opponents in a negative, and themselves in a positive, light; mobilizing participants in their movement; warning opponents; projecting possible positive future scenarios through reference to "success stories"; and undermining the validity of opponents' arguments.

In sum, the research generates the following conclusions. Firstly, the EU provides a complex web of opportunities and constraints for pro- and anti-independence movements in the UK and Spain. The EU is both an arena for articulating claims and a source of allies, while appeals to images, histories and experiences of the EU and other European states can be mobilized as reasons for or against secession. Nevertheless, the EU appears to have provided more opportunities than constraints for anti-independence activists. In an indication of the relevance of Europe for contemporary secession movements, the research also showed how arguments and beliefs about Europe were actively employed in justifying or criticizing premises underpinning reasons to support or reject secession. What is not clear is how arguments and beliefs about Europe resonated with voting publics and, more specifically, the extent to which they were appropriated as reasons to support or reject independence. This is a question that can only be addressed through further research.

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