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Europeanization of tax discourses in Ireland and the United Kingdom 2001-2015

Content analysis and discourse analysis of
newspaper coverage of the CCCTB

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List of abbreviations

BEPS	Base Erosion Profit Shifting (OECD proposal)
CCCTB	Common Consolidated Corporate Tax Base
EC	European Community
ECJ	European Court of Justice
ECSC	European Coal and Steel Community
EFSF	European Financial Stability Facility
EPS	European Public Sphere
EU	European Union
INM	Independent News & Media
MEP	Member of the European Parliament
MNE	Multinational Enterprise
MP	Member of Parliament (in the UK)
OECD	Organization for Economic Co-operation and Development
TD	Teachta Dála (Member of Irish Parliament)

Chapter 1 Introduction

This is the year for Europe to put its tax house in order. That was the title of a joint piece by EU commissioners Pierre Moscovici and Margrethe Vestager. The piece was published in several major newspapers across Europe, such as *Le Monde*, *Frankfurter Allgemeine Zeitung*, *El País*, *The Guardian*, *The Irish Times*, and others on January 17th 2015.¹

Getting its ‘tax house in order’ is not limited to the EU area. Figuring out tax legislation is also a global challenge. The OECD has made similar tax cooperation proposals as the EU. The OECD and the EU have different end-goals, but both fit into a broader theme of increased scrutiny laws on public international tax matters and a desire for more financial transparency. The catalysts for this change have been the financial crisis and the European debt crisis, which have also led to increased focus on global financial inequality.

The yearning for a better European tax system and more financial transparency has increased during the recent years. One possible method of improving financial transparency in the EU is to introduce a common European corporate tax base. This has been proposed by the EU Commission several times in order to provide an impartial division of taxes for companies operating across borders (MNEs). A common consolidated corporate tax base, or CCCTB for short, is a legislative proposal by the EU Commission of a single set of rules to calculate taxable profits. This set of rules is limited to how you count taxable profits, not what the tax rate should be (Tax Justice Network, 2012, p. 28). The CCCTB is especially interesting from a financial perspective, because it has the potential to play a major part in the battle against two types of international tax avoidance, namely the usage of tax havens and transfer pricing (Picciotto, 2012, p. 16). There have been attempts to create a common European tax base since 2001,² though it was first in 2011 that the Commission proposed the Common Consolidated Corporate Tax Base directive (CCCTB).³ In June 2015, the EU member states agreed to introduce the CCCTB within 18 months (EU Commission, 2015c).⁴ We will look at how the debate about this proposal has developed in Ireland and the UK.

¹ See Annex I for full text.

² First EU Commission working paper proposing a CCCTB: “Towards an Internal Market without tax obstacles. A strategy for providing companies with a consolidated corporate tax base for their EU-wide activities”(EU Commission, 2001). The arguments in that paper was later delivered as a key note by the EU Commissioner in charge of the Internal Market and Taxation (Bolkestein, 2002).

³ The Neumark report (1962) was the first to suggest corporate income tax harmonization within the Internal Market. (Dankó, 2012, p. 216)

⁴ Press release: “Commission presents Action Plan for Fair and Efficient Corporate Taxation in the EU” (EU Commission, 2015a)

1.1 Research questions

The goal of this thesis is to increase the understanding of the EU tax regime debate, and describe the relevant parts of the Irish and British tax discourses. Furthermore, the ambition is to shed light on the European component of these two public discourses. There has been suggested in the European integration literature that there is a scope for Europeanization as a concept to increase our understanding of European competition policy (Cini & McGowan, 2009, p. 213), which in a broad sense the CCCTB is a part of. Thus, our main overarching question is: **Has there been a Europeanization of the tax discourses in Ireland and the United Kingdom? If yes, to what extent?** In order to examine this question, it is first necessary to deconstruct the concepts of *Europeanization* and *European Public Spheres*. This is done in chapter 2, under the headline ‘analytical framework’ and its sub-chapters. Moreover, this thesis will examine three complementary questions. To what extent has the CCCTB attracted media attention? Is it possible to detect an increase in the representation of the EU (vertical) or foreign (horizontal) voices in the public discourses? Lastly, is there a convergence of the news frames in Ireland and the UK?

The subsequent analysis then delves deeper and asks; if there is Europeanization of the tax discourses, why is that? At the European level, the different member states are competing, but on the global level, the EU needs to compete as a coherent economic block against USA and China foremost (Mazower, 2000, pp. 402-411) as cited in (Garavini, 2010, p. 191). This leads to a particular challenge for EU member states. The challenge for the national governments within the EU is how to reconcile the proponents of Globalization and the criticism by Eurosceptics. Both claim to act in the interest of the nation state, though their perspectives differs between a European and a global perspective. There are different types of Eurosceptics,⁵ but in general, it is someone with a skeptic perspective on EU institutions and European integration. Additionally, the EU Commission has gained a wider scope of political areas to use their right of legislative initiation on (De Wilde & Zürn, 2012, p. 142). However, the UK, Germany and France can make decisive policies when it is in in their favors. For Ireland, it is unclear whether the scenario of a more centralized EU with increased powers to the EU Commission, or a more intergovernmental rule of the EU that tends to favor the larger member states, is in their interest.

⁵ See (Leconte, 2010, pp. 43-67) for a review on different types of Euroscepticism.

There has been widespread discussion during the last decade on the fiscal and financial issues in Europe and for the European Union.⁶ Different economists have prescribed their preferred solutions, and taxation reforms could be one possibility. However, there has been little discussion about the tax discourses themselves in Europe. Tax discourses describe how we talk about taxation and tax policies. As explained below in chapter 1.2, public opinion and tax discourses can have a direct impact on the priorities made by the EU institutions.

1.2 Taxation on the agenda in the European Public Sphere

Tax discourses can have a considerable impact on any institution, as the French nobility experienced in 1789 (Acemoglu & Robinson, 2012, pp. 283-284; Standage, 2014, pp. 160-161).⁷ Today, the impact of tax discourse is less violent, though they can still influence the whole of Europe. In 2007, *The International Tax Review*⁸ called the Commission's tax regime proposal a 'quiet revolution' (Cussons, 2007). This implies a large legal change with little discussion. However, LuxLeaks made tax schemes a clamorous topic in November 2014. LuxLeaks was a journalistic project which revealed that "Pepsi, IKEA, AIG, Coach, Deutsche Bank, Abbott Laboratories and nearly 340 other companies have secured secret deals from Luxembourg that allowed many of them to slash their global tax bills" (ICIJ, 2015). The journalistic project was a collaboration between 80 journalists from several European newspapers. The Irish Times in Ireland and The Guardian in the UK took part in this research project, and that may help explain why they had a higher number of articles about the CCCTB published than their national counterparts (Irish Independent and The Times). Further, The LuxLeaks case was especially embarrassing for the EU Commission, as EU Commission president Juncker was prime minister of Luxembourg when these secret deals were signed.

There can be no doubt about the importance of public discourse for the Commission's priorities. Here we understand public discourse as the sum of all open debate on a public issue. According to DG-TAXUD, "[t]he public discussion of LuxLeaks provided for a considerable public pressure on all Member States to intensify the battle against tax evasion and avoidance" (EU Commission, 2015d). Additionally, in 2013 the New York-Times bestseller "Capital in the

⁶ For an exploration of the link between Euroscepticism and the financial crisis see (Serricchio, Tsakatika, & Quaglia, 2013).

⁷ However, the causes was not limited to taxation, demographic changes lead to lower wages, and contributed to the peoples dismay at the French nobility (Piketty, 2014, p. 25).

⁸ *International Tax Review* is a UK-based news magazine about international tax matters.

Twenty-First Century” by Thomas Piketty generated a public interest in taxation and inequality on a global scale.

In Europeanization research, the term ‘public spheres’ refers to the lateral space where public discourses occur. A European Public Sphere (EPS) is qualitatively similar to other public spheres, but the geographical area is Europe (see chapter 2.3.1 for an elaboration on EPS). For our purpose, there is no need to draw all the borders of Europe.⁹ However, we assume that it must at least include the EU member states. We will research the public discourse on taxation empirically using newspaper articles.

1.3 Why Ireland and the United Kingdom?

The justification for analyzing the Europeanization of the tax discourse in Ireland and the UK can be separated in three categories. These categories are; European integration theory, differences in their respective national economies and sampling validity. Before we discuss the three categories, we clarify the connection between European integration and our sampling of the discourse.

Debates on European integration have evolved in various ways since it emerged as a research field after the European Coal and Steel Community (ECSC) was created in 1952. The Communications theory by Karl Deutsch was early proposed as a measure of integration compatibility. The criteria for Communications theory would be a minimal amount of transactions¹⁰ across a political sphere to support integration. In addition, Deutsch would count the total number of political transactions and social transactions between the units, and these two kinds of transactions needs to be balanced for integration to take place (E. B. Haas, 1958, p. 284). This method has been criticized, as it does not explain any causes for integration (E. B. Haas, 1958, p. 285). However, one steadfast component of European integration research has been the focus on language and discourse.¹¹ This thesis continues this strain, and use newspaper articles as data to examine the discourse, and to demarcate the start and ending of a discourse. Discourse analysis which is a part of our method, sees the discourse as interesting in itself. Thus it is unimportant if the contributors to the newspaper articles and pieces believe what they write

⁹ For a discussion on Europe as a concept and its history, see (van der Dussen & Wilson, 2005).

¹⁰ Transactions is understood in the broadest sense, also including social, political, cultural as well as economic transactions.

¹¹ For a study on the status of different languages within the EC see “The status of German and other languages in the European Community” (Ammon, 1991).

or not (Wiener & Diez, 2009, p. 165). It is the contribution to the discourse and not the intentions that matters.

The first category of justification is European integration theory. According to the first article that mention the CCCTB of the examined newspapers; Austria together with Germany¹² and Finland are seeking cooperation on cross-border tax rules, while the UK and Ireland are opposed to “tax harmonization at any level” (McLauchlin, 2006).¹³ Thus, both the UK and Ireland have the same perspective on the CCCTB proposal, but their attitude towards the EU is vastly different. Ireland is seen as a pro-integration force within the EU, and the EU has made Ireland more visible on the international stage after they entered the union (DFAT, 2015, p. 69). The UK in contrast, is perceived as one of the most Eurosceptic member states (Gifford, 2014; Lubbers & Scheepers, 2005). Consequently, the British discourse on the EU is dominated with eurosceptics complaining about loss of sovereignty and great power status, and another group arguing for further integration based on economic and geopolitical reasoning (De Wilde & Zürn, 2012, p. 144). Within the EU council, their bargaining powers also differ, as the UK is regarded as a large member state, and Ireland as a small member state. Thus, their experience with the EU varies broadly, though on this particular proposal (CCCTB), the official views of Great Britain and Ireland converged. With regard to European integration, there are reasons to compare the discourses in the UK, Germany and France as Meyer (2005) has done. Although a comparative study including ‘the big three’ (Germany, France, The UK) such as Galtung’s essay on intellectual styles¹⁴ are interesting and necessary, they would not reduce the number of variables in the way a comparison between Ireland and the UK can with regard to tax discourses. Here we are mainly concerned with comparing tax discourses in countries that opposed the CCCTB.

The second category of justification is the differences in the national economies. After the 1960s, nation states are on the course of weakening control over their national economies due to globalization (Hobsbawm, 2012, pp. 181-183). This affects the nation states in a particular way with regard to state income. As national economies are threatened by the trans-national

¹² As usual in European integration, Germany has often been calling for reform, while the UK prefer the status quo. (Cini & McGowan, 2009, p. 214).

¹³ In 1998, as a first step towards tax harmonization, the Commission introduced a voluntary code of conduct for business taxation (EU Council, 1998), which led the Netherlands to change some of their legislation (Radaelli, 2003, p. 527). Nevertheless, on the case of ‘patent boxes’, we learn that “NDL, LUX and BEL (Belgium) all decisively argued against a further discussion of this area” after an EU meeting in April 2012 (M. Becker, Müller, & Pauly, 2015).

¹⁴ Structure, culture, and intellectual style: An essay comparing saxonic, teutonic, gallic and nipponic approaches (Galtung, 1981).

economy, they have to co-exist and interweave with it (Hobsbawm, 2012, pp. 181-183). Ireland and the UK have done this in different manners, especially since the 1990s. Ireland has the lowest corporate tax rate among OECD countries. The 12,5% corporate tax rate has led to an influx of multinational companies¹⁵ holding their profits in Ireland, and their contribution to the economy is essential (Barry, 2010; Honohan & Walsh, 2002).¹⁶ However, this Irish model on co-existing with the trans-national economy has led to controversies. For instance, the tax plans offered by Ireland to foreign companies undermines the national economies of the other EU member states.¹⁷ This critique is not limited to the EU, as even the OECD published a report on the effects of harmful tax competition in 1998 (Andersson, 2013, p. 659). The Irish model focusing on low corporate taxes resembles the ‘beggar thy neighbor’ policies of the 1930s when countries competed for market shares.¹⁸ In addition, the tax plans are criticized on ethical grounds (Doyle, Hughes, & Glaister, 2009), and some even argue that the tax competition is harmful to Ireland as well (Killian, 2006; Kummer, 2014; Sweeney, 2010).¹⁹ The UK has counteracted the Irish legislation and responded to the tax competition somewhat with their own tax laws to prevent tax avoidance.²⁰ The challenge is how to prevent tax avoidance without undermining the four freedoms of the EU’s Internal Market. In 2006, the European Court of Justice (ECJ), on request by the British judicial system, determined the legalities on cross-border tax bases (ECJ, 2006). This was done in the *Cadbury Schweppes case*. The domestic British court appealed the European Court of Justice whether the freedoms of the internal market also mattered when the motive for establishment in another member state is tax avoidance. The ECJ then made a distinction between actual representation and ‘wholly artificial’. If the company set-up was ‘wholly artificial’, then other member states could claim taxes. During the last decade we have seen a trend towards the judicialization of the EU, which means that the ECJ has received (or appropriated) increased powers (Sweet & Brunell, 2013). The verdict in the Cadbury-Schweppes case led other member states to introduce laws in

¹⁵ Geoffrey Jones defines multinational enterprises (MNEs) as “a firm that controls operations or income-generating assets in more than one country” (Jones, 2005, p. 5).

¹⁶ The four components that drive tax competition in the EU is discussed in (Genschel, Kemmerling, & Seils, 2011).

¹⁷ For a technical discussion on how MNEs plan their taxation and Irish tax law incitements see (Bjørstad, 2013).

¹⁸ Mario Monti focused on the elimination of ‘beggar-thy-neighbor’ policies during his tenure as EU Commissioner for Competition in the Internal Market from 1999-2004 (Radaelli & Kraemer, 2008, p. 14).

¹⁹ However, there is no consensus on the economic or the democratic effects of tax competition (Ganghof & Genschel, 2008).

²⁰ A discussion of the legal limitations for EU member states to protect their national tax base without violating the freedom of the internal market is available in (Hilling, 2013) and (O’Shea, 2007).

compliance (Hilling, 2008).^{21 22} Next, we point out why this case is important for the British and Irish national economies, and then we look at the third and last justification.

The UK hosts several large MNEs and most of these are of British origin, therefore they are also indigenous companies. In contrast, the Irish economy is more reliant on foreign MNEs. Thus, we also examine if a higher or lower reliance on foreign multinational companies in the economy affects the public discourse around the CCCTB. Geoffrey Jones defines multinational enterprises (MNEs) as “a firm that controls operations or income-generating assets in more than one country” (Jones, 2005, p. 5) Hence, only companies that is included in the definition of multinationals is affected by the CCCTB.

The third category of justification is sampling validity. First, both countries have been member states for the same amount of time. Therefore, any gradual Europeanization of the news media have had the same time to evolve. The second and most important aspect of the sampling validity is language. As explained in the research design (see chapter 2.4), the sample size of articles are: N = articles mentioning CCCTB. This is the English acronym, news media from other member states may use the English one, or they may use an acronym constructed in another language. For instance, a search on the keyword “CCCTB” in the Danish newspaper Børsen gives two results (13.12.2012²³ and 19.12.2014²⁴), while a search in the Danish newspaper Berlingske Tidende yields no results. It is difficult to say whether these are the only two articles from these sources, or if they have used other terms to describe the proposal. Thus, for the feasibility of the analysis, and the validity of the findings, two member states with the same language used to cover EU affairs have been chosen. In a similar manner, a comparison between the discourses in Germany and Austria could prove fruitful. In addition, the term ‘UK’ is used throughout this thesis instead of ‘Great Britain’ since they are the polity represented in the EU Council.

²¹ The technical name for the laws are Controlled Foreign Corporation rules, or CFC-rules when abbreviated.

²² See (Almendral, 2013) for a discussion on the consequences for member state law because of this ECJ verdict.

²³ http://finans.borsen.dk/artikel/1/247902/london_kan_vinde_paa_europaeisk_finansskat.html?hl=Q0NDVEI,

²⁴ <http://borsen.dk/nyheder/avisen/artikel/11/101215/artikel.html?hl=Q0NDVEI>,

1.4 Literature review

The theoretical assumptions available to provide a framework in European studies are diverse and multi-disciplinary. Most of the focus on European integration comes from studies of international relations, comparative politics and social theory (Wiener & Diez, 2009, pp. 6-11). This overview consists of two parts. In the first one, the focus is on the theoretical debate on the democratic deficit, Europeanization and public spheres. The second part will deal with the empirical research on EU taxation.

The foundation for our research questions is the debate about the democratic deficit. The following scholars provide the most prominent contributions in this debate: Majone (1998), Moravcsik (2008)²⁵ and Follesdal and Hix (2006). In addition to the question of the institutional framework, the lack of a European ‘demos’ has been highlighted as democratically troublesome. Hence, scholars in European Studies developed the concept of Europeanization. However, there are several different meanings applied to Europeanization, which can be an elusive concept. It can mean both uploading of laws from the nation-state to the EU, and downloading of laws from the EU to the nation-states. We however, understand it in a third way, as ‘raising a political issue or sphere to the European level’. This happens within public spheres (Risse, 2010). The mechanisms of how a political issue is raised to the European level is discussed in chapter 2.3. Some of the authors who have enriched the concept of Europeanization the most are Risse & Van De Steeg (2003),²⁶ Börzel & Risse (2003)²⁷ and Radaelli, C. M. & Exadaktylos, T. (2010).²⁸

On the empirical side, there have been few scholarly attempts to examine the Europeanization of tax discourses.²⁹ However, some notable works exist. Most remarkable is the article “Europeanizing Corporate Taxation to Regain National Tax Policy Autonomy” (Kellermann, Rixen, & Uhl, 2007), which advocates the implementation of CCCTB. A common view in Ireland is that any harmonization of a European tax regime comes at the cost of national sovereignty (Faughnan, 2007). Though, Kellerman et. al. argue that a Europeanization of corporate taxation is essential for ‘real national tax sovereignty’. The argument of Kellermann-Rixen-Uhl is based on the assumption that policymakers operate in an open economy.

²⁵ See also (Moravcsik, 2002) and (Moravcsik, 2004).

²⁶ An Emerging European Public Sphere? Empirical Evidence and Theoretical Clarifications (Risse & Van de Steeg, 2003).

²⁷ Conceptualizing the Domestic Impact of Europe (Börzel & Risse, 2003).

²⁸ New directions in Europeanization research (Radaelli & Exadaktylos, 2010).

²⁹ The book, *The Politics of Corporate Taxation in the EU*, engage in the same topics, but focus on the political rather than the discursive trends (Radaelli, 1997).

Consequently, they argue that the member states can only handle the challenge of tax competition collectively at the European level. This paper examines the public discourses and debates in Ireland and the UK around corporate tax Europeanization. In general, Irish governments have refuted Kellerman-Rixen-Uhl's argument in Irish media. This paper differs from the research of Kellermann, Rixen and Uhl, by using newspaper articles to determine a presence of Europeanization in public spheres instead of the legislation.

Similar research on Europeanization across member states has also been done on the period 1997-2002 by Meyer (2005), largely using the same criteria as those proposed by Thomas Risse. There are also examples of research on Europeanization and European Public Spheres covering special EC events, such as EU summits and EU crises by J.-H. Meyer (2010) and Triandafyllidou, Wodak, and Krzyzanowski (2009). Nicola Smith and Colin Hay have done a comprehensive work with their "Mapping the Political Discourse of Globalisation and European Integration in the UK and Ireland Empirically" (Smith & Hay, 2008). Smith and Hay have mapped the Europeanization in general, as opposed to on one particular subject (tax discourse) which is preferred here.

Besides articles on Europeanization of discourses, there are noteworthy examples of theses written in various research traditions on the subjects of Europeanization and taxation. In history and political science these include the study of Europeanized public spheres during the EU Parliament election in 1994 and 2009 in Denmark and Germany (Grønning, 2011), EUs influence on taxation policies in Cyprus (Ringstad, 2014) and how the European Commission acts as an agent in tax policy (Lang, 2014). An example from financial economics is tax planning in multinational companies using Microsoft as a case (Anggraeni, 2015). An example from law is also included, because a description on 'how law structures provide incentives for multinational companies to use tax havens' (Bjørstad, 2013) is useful if we want to understand the legal characteristics of tax planning. The work by Grønning has been a useful guidance on how one can combine quantitative and qualitative data using newspaper articles in Europeanization research. The research by Anggraeni and Bjørstad is a reminder of the multi-disciplinarity of the research. In addition to shedding light on the connection between Ireland and multinational companies, the theses mentioned provides a fresh financial perspective as well as a law context on international tax regimes. Nevertheless, an analysis of the tax discourse, such as this thesis, may better explain how changes in the European tax regime came around.

1.5 Argument and structure

Risse argues that Europeanization of the public sphere in general had not reached the UK in 2010 (Risse, 2010, p. 130). This analysis provides evidence that this is changing, but that the Europeanization of the British public discourse is very weak, at least for debates about European taxation one would expect a higher saliency.

The key components that determine the temperature of the discourse are Euroscepticism³⁰ in the UK and saliency³¹ in Ireland. Bluntly put, the British media does not debate European issues, and the Irish media is eager to debate European proposals that may restrain their tax policies. In addition, we find some correlation between the differences in the discourses, based on the variables of religion, economic complexity, political corruption, media tradition and newspaper ownership. This claim is a result of the method described in chapter 2, the observations made in chapter 3, and the analysis in chapter 4.

In chapter 2, we discuss the method and theoretical framework. The key approach for this thesis is the complementary use of the quantitative content analysis and the qualitative discourse analysis on newspaper articles. For a discussion on the selection of newspaper articles, see chapter 2.2. The analytical framework on European integration and the constructivist ontological perspective is described in chapter 2.3. The research design in chapter 2.4 features a comprehensive guide on assumptions about the topics selected and a model for the coding that was undertaken.

In chapter 3, we describe the discourses and observations about trends in the discourses. The chapter starts with a comparison of trends between the newspapers in Ireland and the UK, with the Brussels-based European Voice as a benchmark. Afterwards, in chapter 3.4, we look closer at how the news coverage of the CCCTB has shifted from a vertical ‘Capital - Brussels’ perspective in 2008 to a horizontal ‘capital - capital’ perspective in 2015. Lastly, we identify how the newspapers link the CCCTB with a pre-defined list of topics (religion, solidarity, corruption and export).

In chapter 4, we analyze the fundamental components that determine the discourse; Euroscepticism, saliency and religion. The chapter starts by claiming that the difference between a lively debate in Ireland and the absence of debate in the UK is due to different strains

³⁰ See chapter 4.1 for our discussion on the discursive effects of Euroscepticism.

³¹ By saliency, we mean that the status quo of the current tax regime is important for the Irish Republic. The main point is being able to attract foreign MNEs. See chapter 4.3 for an elaboration.

of Euroscepticism. Then, 'religion' is used to explain parts of the differences in the Irish and British national economies, drawing on both Weber's protestant thesis and the concept of economic complexity. Saliency is also due to the shape of the national economy, at least for Ireland

Risse claims that British newspapers are more interested in European foreign policy and monetary issues than institutional issues (Risse, 2010, p. 145). However, this paper finds that British newspapers are hardly interested in monetary issues such as the CCCTB. Based on the analysis of topics in chapter 3.5 and economic complexity in chapter 4.3, we find that the CCCTB is simply a more salient issue for Ireland, than the UK.

Political corruption may be at a higher risk in countries that engage in tax competition. In chapter 4.4, we discuss how the relationships between governments and the media in Ireland and the UK have exacerbated and mitigated the risk of corruption.

As discussed in chapter 4.5, we have found that the type of newspaper ownership may influence the reporting on CCCTB. Both non-dividend-paying newspapers report more often on taxation than the media conglomerates owned by Rupert Murdoch and Denis O'Brien. We also used the shadow economy as a variable, but it did not yield any significant results.

Chapter 2 Method and theory of analysis

There are many different ways one can use text as a research object. Our motivation to research the discourses can be traced back to the linguistic turn at the start of the 20th century and the cultural turn starting from the 1970s. One of the first quantitative analyses of newspapers appeared in 1893, but content analysis as it is used today was first synthesized by Bernard Berelson in his book *Content analysis in communication research* (Berelson, 1952; Krippendorff, 2012, p. 17). Next, we will look at the philosophical evolution of content analysis and discourse analysis that is relevant for this thesis.

The main argument of the philosophical movement behind what we call the linguistic turn, was that text can only offer us knowledge of what was said about something, not how something in history ‘was’ (Jordanova, 2000, p. 79). Further, the linguistic turn proposed that language is the primary ingredient when we construct a social reality. This view on history and reality is at the core of our ontological perspective or world view as one may call it, and it is a continuation of the structuralist theory developed by Ferdinand de Saussure (Cheng, 2012). The linguistic perspective makes it compelling to do an analysis of the text written in newspapers. Up until the linguistic turn at the beginning of the 20th century, most historians constructed long periods and continuations, and added to national myths. This has however changed, and today there is a greater awareness on the limits of historical writing. Now there is a greater inclination for historians to discover ruptures and trends in discourses (Foucault, 1989, p. 9). This study follows that thought on ruptures, and is an investigation of the period that began in 2001 with serious discussions about a European tax regime. This period and these discussions ended on 16.08.2015, when The EU member states agreed upon the Common Consolidated Corporate Tax Base (Kelpie, 2015).³² Up until June 2015, Ireland and the UK were among the member states that openly opposed any harmonization of a European tax regime, and consequently they opposed the CCCTB. This paper aims to analyze the Europeanization of public spheres in Ireland and the UK, with regard to the tax discourses, from the Commission’s press release on taxation in 2001 and until June 2015.

Another major change in historiography was the cultural turn in the 1980s (Pakier & Stråth, 2010, pp. 4-5). The scholarly debates that the linguistic turn and the cultural turn produced have opened up several avenues of methods to conceptualize the process of Europeanization. The two main strands are rational choice institutionalism and constructivist institutionalism (Börzel

³² However, as noted in chapter 3.2, we can expect the discussion on a CCCTB to be re-ignited before 2016.

& Risse, 2003, pp. 2-3). Briefly explained, rational choice focuses on the institutional structures and the redistributive effects. For instance, veto rules in the EU Council is one type of an institutional structure, and the Irish bailout had a redistributive effect, transferring money and liquidity from one country to another.³³ While the constructivist view focus on political culture and normative agents. For instance, a higher degree of media scrutiny abate political corruption and cronyism.

Rational choice and constructivism are not mutually exclusive, but this thesis focuses on the constructivist perspective. For example, the piece by Moscovici and Vestager³⁴ is a clear normative statement trying to promote a specific political culture for EU member states through public discourse. It is not a rejection of the rational choice perspective, but a matter of using the proper method for the data that is gathered. Moreover, the ontological perspective of this thesis is social constructivist. This means that we understand collective identities as something that cannot be deduced from a group, but that each member of the group constructs it (Risse, 2010, pp. 20-22). We also follow the social constructivist logic of Risse on communication, and understand public spheres as something that is created when it is debated or reported in public (Risse, 2010, p. 120).³⁵

In order to analyze the public spheres, it is first necessary to build a corpora of documents (Foucault, 1989, p. 11). This study use newspaper articles as its corpora, as similar works on Europeanization have done (C. O. Meyer, 2005; J.-H. Meyer, 2010; Risse & Van de Steeg, 2003). Second, the public spheres analyzed is limited to the current interest on taxation and tax avoidance. This combination of newspapers articles as the corpora and tax discourses as the empirical data, led us to a notional preference for discourse analysis. However, the research data proved better understood when using both discourse analysis, which is qualitative, in supplement to quantitative methods. The different strands of discourse analysis (Fairclough, Mulderrig, & Wodak, 2011; Van Dijk, 2011) shed light on the task, and provided alternatives that were more useful for research on Europeanization of public spheres. In this case content analysis, which is a quantitative method. The major difference between discourse analysis and content analysis is what you infer from the text data. Since our text data is based on newspapers articles, it makes sense to use content analysis that investigates what the text is explicit about

³³ With the ECB, the picture is more complex, but redistribution is the ultimate effect of bailouts.

³⁴ “This is the year for Europe to put its tax house in order”, published on 17.01.2015 in various newspapers, see Annex I for full text.

³⁵ For a comprehensive commentary on social constructivism’s contribution to the understanding of Europeanization see (Wiener & Diez, 2009, pp. 144-159).

(Denscombe, 2013, p. 280). In contrast, discourse analysis is better at discovering what a text implies, and is a useful tool when it comes to scrutinizing political speeches and editor letters in newspapers. The research method used in this thesis surfaced in a hermeneutic manner, meaning that the process of creating coding instructions was undertaken simultaneously as the data was analyzed, and then refined to provide meaningful inferences.

2.1 Content analysis

Content analysis prospers as a method in analysis of quantified text, as opposed to discourse analysis that is engaged in the implication of text, though both methods deal with text as the data. The purpose of content analysis is to look for a hidden message. In this particular content analysis, we also look for a hidden ‘un-message’. A ‘un-message’ is something that is consciously omitted or not reported. We look for this (un-)message by exploring the frequency of occurrence, rather than scrutinizing implied meanings as in discourse analysis (Denscombe, 2013, p. 280). Furthermore, during the last decade, most empiric research on Europeanization has been content analyses of newspapers, where the aim has been to determine whether an European public sphere exists or not (Risse, 2010, p. 113).

Hence, our focus of attention is to materialize content that would imply a Europeanization of the tax discourse in Ireland and in the UK. Rather than to dissect the newspaper articles on their own, we look at the sum of press coverage received by the CCCTB, and how this has evolved over time. We follow a common path in content analysis, and use headlines as our unit of investigation (Denscombe, 2013, p. 281). This quantified data can give us an outline of the public discourse in the countries analyzed. The differences that the quantified data highlight will be scrutinized in the next chapter.

Unfortunately a shortcoming of content analysis is that it may neglect the context of the written words (Lynggaard, 2011, p. 5). To provide context when necessary, this thesis introduces qualitative elements in addition to the statistical and quantitative style of content analysis. This is mainly done by emphasizing authorships of noteworthy articles. For instance, (former) politicians and audit company employees are likely to have an agenda when they submit op-eds on tax regimes to newspapers. To research how they affect the tax discourse we use power relations and influence relations to determine the direction of their impact. The existence of relationships between different actors is a given for a public discourse to exist at all. However, some groups, such as MNEs, may have better capabilities to voice their opinion than low-

income households, or even ill-prepared nation states. Power-relations and influence relations are a common variable in discourse analysis³⁶, and this has been utilized to some degree in chapter 4.4 (political corruption) and 4.5 (newspaper ownership), where possible influences on the discourse is examined. Here it is necessary to note that the lion's share of post-realist discussions of power distinguishes between power as a capability and power in a relationship. Capabilities are necessary for a power relation to exist (Evans & Newnham, 1998, p. 447). Examples of capabilities are the skill and resources of the diplomatic forces, or the PR resources of MNEs. Moreover, we separate power relations and influence relations on whether coercive actions are used. These are naturally difficult facts to come by, but we assume that power relations involve governments, and influence relations involve MNEs.

2.2 Data sources

The empirical sources used as data in this paper have been retrieved electronically. These include journalist articles, editor opinions, and letters to the editor that have been published on the webpages of *The Times*, *The Guardian*, *The Irish Times*, *The Irish Independent* and *European Voice*. Some content analyses exclusively probe journalist articles, while others include op-eds and editor opinions. In this paper, they have all been included for two reasons. First, the authorship of some of the op-eds are significant for the analysis. As Max Weber put it in the infancy of content analysis research, “the relations between newspapers and political parties and its relations to the business world is an enormous area for sociological inquiry” (Weber, 1924). For instance, the first op-ed (and article) in Ireland on the CCCTB was written by a KPMG³⁷ employee. Also, the former Irish finance minister Alan Dukes wrote a critical CCCTB op-ed about the French perspective in *European Voice*. Second, the British data material is rather narrow, and to get an understanding of the European tax discourse in the UK it would not be sufficient to investigate only articles by journalists.

The British newspaper duo *The Times* and *The Guardian* are the same as those used in Meyer's analysis of Europeanization, and is a common duo for public discourse analysis in the UK. The duo also supported opposing sides in the 2015 British Parliament election with *The Times* supporting the Conservatives and *The Guardian* supporting Labour. However, during the period analyzed, *The Times* has supported both Labour (Blair in 2001 and 2005) and the Conservatives

³⁶ See for instance the discussion on The Foucauldian move: Discourse, Power and Reality in (Diez, 1999)

³⁷ One of the “big four” audit companies who give tax advices, with 164 000 employees worldwide. For a discussion on audit companies role in tax avoidance see (Sikka & Hampton, 2005).

(2010 and 2015).³⁸ The Times is particularly interesting because Rupert Murdoch's media empire News International is the owner of this newspaper. Allegedly, Eurosceptic newspapers led by Rupert Murdoch swayed the British government not to introduce the euro.³⁹ Tuntsall also argues that the newspaper editors influence their correspondents more than before, and that any claim to neutrality is unconvincing (Tuntsall, 2004, pp. 266-267). In addition, the former conservative chancellor Kenneth Clarke claimed that "the conservative press is almost without exception edited by way-out Eurosceptics" (Crowson, 2011, p. 133).

Regarding the Irish newspapers, similar analyses on Europeanization of topics have been hard to find, and scholarly tradition likewise. However, The Irish Times and the Irish Independent are obvious choices for several reasons. First, they are the two Irish daily newspapers with the highest circulation numbers. Second, they complement each other as The Irish Times is regarded as a social-liberal quality paper, and Irish Independent is more tabloid but has no particular party affiliation. The Dublin-based international media conglomerate Independent News & Media (INM) owned about 80 % percent of the newspapers sold in Ireland in 2001.⁴⁰ The Irish Government reviewed the media situation then, and concluded the newspapers in Ireland were sufficiently diverse, with The Irish Times (and Irish Examiner) supplementing Irish Independent (Truetzschler, 2004, p. 116).

The four newspapers ranked by circulation numbers after Irish Independent and The Irish Times, are Irish versions of British papers,⁴¹ and they are therefore meaningless to study.⁴² Nevertheless, a comparison between the British and Irish versions of The Sun, The Daily Star, The Daily Mail and The Daily Mirror could prove insightful. The Irish Examiner is one paper that could be included in future content analyses of the Irish public media, since it is the other quality paper in addition to The Irish Times, but located in Cork instead of Dublin. Consequently, one could compare the discourses in the Irish regions of Leinster (Dublin) and Munster (Cork), in a similar fashion to our comparison of Ireland and the UK, by using the research design provided in this thesis.

³⁸ <http://www.supanet.com/business--money/which-political-parties-do-the-newspapers-support--25923p1.html> (05.09.15).

³⁹ During the 2008 Lisbon Treaty referendum in Ireland, the Murdoch-owned newspapers Irish Daily Mail, Irish Star and The Sunday Times campaigned against the treaty (Leconte, 2010, p. 203).

⁴⁰ In 2012, INM was sold to Denis O'Brien.

⁴¹ The Herald being one Irish exception.

⁴² The large influx of British newspapers during the 1990s was seen at the time as problematic for the media diversity by the Irish government's Commission for the Newspaper Industry (Horgan, 2001, pp. 159-160).

The Brussels-based European Voice is the benchmark used in this paper to determine the level of Europeanization and saliency of the CCCTB proposal. European Voice was founded in 1995, and came out in print during the period analyzed. This is the reason why it was chosen over other internet-based newspapers such as EUobserver and EurActiv. A similar research, comparing print and digital media could be interesting in order to understand whether there is a difference in the discourses between print and digital, though this is far beyond the scope of this paper. All the examined news articles, editorials and op-eds in our data-set have been published on print and on the internet.

A possible weakness of using daily newspapers is that the development on the CCCTB proposal may not be regarded as breaking news. Therefore, news about the CCCTB can be underrepresented in daily newspapers in comparison to weekly newspapers such as The Economist and less frequent periodicals like the New Left Review. A prevalent critique of content analyses is that a ‘focus on quality newspapers introduce an elite bias’ (Risse, 2010, p. 114). This common weakness is avoided in the Irish side of the comparison, by using the two far most popular daily national newspapers, one tabloid and one quality newspaper.

2.3 Analytical framework

The analytical framework in this paper is based on an understanding of Europeanization, which has developed over the last decades. During the 1950s and onwards, it was a focus on how ‘spillover’ in the internal market led to further European integration. This theory was explained from a rational choice perspective and is known as neo-functionalism.⁴³ During the 1970s, the theory of neo-functionalism was criticized when European integration seemed to halt. This change of path was something neo-functionalism could not explain, and the theory went out of fashion (Jensen, 2013, pp. 60-61). Nevertheless, the new theoretical pathways that have been explored since the 1980s continue to use two assumptions that originate from neo-functionalism. One of the pathways are constructivism, which we use as our ontological perspective. Similarly to neo-functionalism, constructivism assume that states are not unitary actors and that the EU is a political community⁴⁴ (Eilstrup-Sangiovanni, 2006, pp. 100-102).⁴⁵ With the constructivist perspective in mind, we are more interested in the feedback-loops

⁴³ Neo-functionalism also include elite socialization and supranational interest group as concepts. However, the point is that the European integration theory now offers a greater variety of perspectives. That is foremost constructivism in addition to rational choice.

⁴⁴ These assumptions are also relevant for liberal intergovernmentalism and multi-level-governance.

⁴⁵ See (E. Haas, 2006) for a discussion of the connections between neo-functionalism and constructivism.

between the levels of governance and public discourse, than to focus on spillover-effects as the key concept. Today the different discursive approaches are adequately developed to provide analytical frameworks and methods in European integration research (Wæver, 2009, pp. 164-166).

2.3.1 European Public Spheres

In the content analysis, we want to examine whether reporting on the CCCTB has led to Europeanization of the public sphere in Ireland and the UK. ‘Public spheres’ is a concept developed by Jürgen Habermas. He argues that they have gradually emerged since the 17th century, and increasingly after the creation of centralized nation states and the mass media (Habermas, 1962).

Following Risse, a public sphere is not a container that exists, but something that is created each time a subject is discussed. Also, a public sphere must be open to all for participation (C. O. Meyer, 2005, p. 122; Risse, 2010, p. 115). Furthermore, Risse argues that “transborder communication emerges if and when the same issues are being discussed at the same time using similar frames of references” (Risse, 2010, p. 108). Here we need to distinguish between the convergence of news frames (or framing⁴⁶) and ‘frames of references’. A ‘convergence of news frames’ is the action that happens when the public discourse is Europeanized. In chapter 3.3 we illustrate the level of convergence. By ‘frames of references’ we understand ‘a particular set of beliefs or ideas on which you base your judgement of things’ (Sinclair, 2009, p. 630).⁴⁷ An understanding of how the EU makes policies is one such belief. This understanding needs to be shared across member state borders. As a demarcation between different ‘frames of references’ it is useful to lend Huntington’s division of civilizations. Both Ireland and the UK are a part of the Western civilization (Huntington, 1997, p. 157), and therefore they have the same ‘frames of references’.⁴⁸ Whether or not they agree on the speed of European integration, normative matters regarding the ‘democratic deficit’, or legislative methods within the EU is not of our concern. The concept of a European Public Sphere is disputed among scholars (Mechi, 2010, p. 157). Our empirical research aim to clarify the matter by analyzing tax discourses in Ireland and the UK, and determine whether they are part of an EPS.

⁴⁶ See for instance (De Vreese, 2002) for a study on framing in television news.

⁴⁷ Another definition is “a common European news agenda” (Schlesinger, 1999). In our case, it is better to use ‘frames of references’ at the micro level, and ‘at the same time/issue cycles’ at the macro level.

⁴⁸ This leads to the interesting question whether countries like Ukraine and Serbia can be part of an EPS.

However, a possible weakness in the approach of content analysis is that we assume that the mass media constitute neutral expressions and transmission of public debate and discourse (Risse, 2010, p. 113). Journalists and editors of newspapers may have different agendas and motivations to report on events. Therefore, we must be aware of the fact that the public discourse can be different from what the media reports. Thus, we do learn about the tax discourses, but there may exist a media bias. Further, the historical ties between Ireland and the UK may facilitate cross-border discourses. Therefore, the results could be different if we compared Ireland and Denmark. This means that there might already pre-exist a shared public sphere between Ireland and the UK that simplifies the cross-border discussions on European topics because of previous political ties.⁴⁹ An early example of a shared information ecology is the circulation of newspapers from Northern Ireland within the Irish Republic to circumvent the domestic attempt to censor newspapers in 1932. Another example is the sporadic interest by British newspapers in Irish affairs, such as the Beef scandal that was secluded in Irish media (Horgan, 2001, p. 161). Nevertheless, the critique that historical ties distorts the picture is unavoidable when we choose countries with the same official languages to assure the sampling validity. However, linguistic assimilation, which happened in Ireland, does not necessarily cripple the future development of a nationality (Hroch, 1985, p. 9).

2.3.2 Misfit and Europeanization

Börzel and Risse have extended the literature on European integration with studies on how the feedback mechanisms between the different levels of governance influence the EU (Börzel & Risse, 2003). One important addition is the concept of misfit between the EU and the national level of governance. According to their framework, “Europeanization must be inconvenient”, it cannot be something that develops smoothly. For us, this makes it possible to investigate Europeanization of the tax discourse due to the Irish and British misfit with the Commission proposal from 2001 and up until the agreed proposal in June 2015. Further, Börzel and Risse define Europeanization as “a process of institution-building at the European level” so as “to explore how this Europeanization process impacts upon the members states” (Börzel & Risse, 2003, p. 59). They split these processes in three categories, policies, politics and polity. The relevant Europeanization processes for this paper is ‘policy narratives and discourses’(policies), public discourses (politics), and collective identities (polity) (Börzel & Risse, 2003, p. 4). As

⁴⁹ The Act of Union from 1801 relegated Ireland to the status of a British colony, until they became independent in 1922 (Byrne, 2012, p. 209).

mentioned, we focus on these because the analysis is primarily concerned with describing the discourses, and how they relate to identities and European integration.

Today, the most common collective identities are membership to the ‘imagined community’ of nation states. It is often taken for granted that our primary collective identity is national. Or as Benedict Anderson put it, “nation-ness is the most universally legitimate value in the political life of our time” (Anderson, 2006, p. 3). However, the national collective identities in Europe has their roots in the end of the 18th century, when nation states were increasingly centralized (Hobsbawm, 2012, p. 3).⁵⁰ This exemplifies that collective identities can be constructed, and so can a European collective identity.⁵¹ Collective identities, or a European ‘demos’, are often mentioned as the necessary cure to the democratic deficit in the EU. It has to be mentioned that this view is disputed. Marxist historians argue that the ‘politics of identity’ is an indication of a sickness, in this case social disorganization, and collective identities are neither the diagnosis nor the therapy for the problem (Hobsbawm, 2012, p. 177).

2.3.3 Criteria for Europeanization

We can assume that there has been a Europeanization of the public discourses if the following criteria are fulfilled. (1) EU’s CCCTB has been discussed at the same time in Irish and British newspapers, as in the Brussels-based European Voice, which acts as a benchmark for the discourse. We define ‘same time’ as a correlation in issue cycles (see chapter 2.4.3, chapter 3.1 and chapter 3.3). (2) The same topics are linked with the European tax regime debate by the newspapers. This means a similar emphasis on how the CCCTB would affect the nation state⁵² (see chapter 2.4.1 and chapter 3.5). Moreover, (3), the EU proposal has been discussed with similar intensity in Ireland and the UK as in the European Voice. These criteria are derivatives of the ones used by Christoph Meyer (2005), who in turn makes use of the ‘Eder-Kantner-criteria’ (Kantner, 2006). The Eder-Kantner criteria identify a European debate when “the same issues are discussed at the same time using the same criteria of relevance” (Risse, 2010, p. 116). Others have also used similar criteria for Europeanization when they have done a content analysis of European news (C. O. Meyer, 2005). For instance, de Vreese et.al. did a study on ‘The News Coverage of the 2004 European Parliamentary Election Campaign in 25 Countries’

⁵⁰ See (Anderson, 2006, pp. 37-46) for an account of the origins of national consciousness.

⁵¹ For a further discussion on whether a European collective identity can exist see (Liebert, 2012, pp. 96-103) and (White, 2012, pp. 103-111).

⁵² Topics: Religion, trade, export, corruption and solidarity.

(De Vreese, Banducci, Semetko, & Boomgaarden, 2006). For further discussions on Europeanization criteria, see (Börzel & Risse, 2003; Kantner, 2006; Kemmerling, 2010; Lynggaard, 2011; C. O. Meyer, 2005; Radaelli, 2004). Nevertheless, following the scientific criteria by Karl Popper, we acknowledge that we can only falsify hypotheses, and not verify them. Hence, an absence of a European Public Sphere is possible to prove, but not the existence of one. However, we can suggest that one may exist.

Finally, we search for an Irish and a British public response in the media to Margrethe Vestager and Pierre Moscovici's article dated 17th January 2015, "This is the year for Europe to put its tax house in order", as a general sample for Europeanization of the tax discourses. This is in addition to the thematic topics discussed in chapter 2.4.1, and which are examined in chapter 3.5.

2.3.4 Euroscepticism

Several different typologies of Euroscepticism exists (McLaren, 2013, p. 355).⁵³ ⁵⁴ ⁵⁵ The different typologies uses a variety of explanations for Euroscepticism. However, in this thesis we are more concerned with the consequences of Euroscepticism than its causes. In chapter 4.1, we examine how Euroscepticism affects the presence and absence of EU topics such as the CCCTB, in the Irish and British public discourses.

Euroscepticism is here understood as a "citizen's generally negative attitude towards European integration" (Boomgaarden & Freire, 2009). To determine the level of Euroscepticism in Ireland and the UK, we use the hard and soft Euroscepticism dichotomy. FitzGibbon suggests that the hard/soft model⁵⁶ of Euroscepticism can be used to determine the level of Euroscepticism in civil society (FitzGibbon, 2013, p. 107). Below we examine the difference between hard and soft Euroscepticism, and provide an example of each type.

⁵³ See for instance (Taggart & Szczerbiak, 2013) for a study on government participation and Euroscepticism in political parties. Especially on radical right parties there is extensive research, see (De Vries & Edwards, 2009; Mudde, 2007; Vasilopoulou, 2013).

⁵⁴ different ontological perspectives on explaining Euroscepticism exist, for instance (Van Klingeren, Boomgaarden, & De Vreese, 2013) who discuss whether identity or economics explain individual Euroscepticism. and Simon Hix, who explain Euroscepticism as anti-centralization from a rational choice institutionalist perspective (Hix, 2007).

⁵⁵ See (Lubbers & Scheepers, 2010) for a discussion on the recent trends in political and cultural Euroscepticism, and (Leconte, 2010) for a typology of Euroscepticism.

⁵⁶ The soft/hard model of Euroscepticism was first developed in (Taggart & Szczerbiak, 2002).

Hard Euroscepticism is apparent when some citizen's has a principled resistance to the EU. One example would be the British National Party (BNP) and the UK Independence Party (UKIP) in the UK. Soft Euroscepticism is not a principled resistance to European integration, but deals with the challenges that can occur when some aspects of the EU is perceived to be at odds with the national interest. One example of soft Euroscepticism is the initial Irish refusal of the Lisbon treaty.⁵⁷

For the analysis, we want to know whether Euroscepticism has an impact on public spheres or not. Here we adopt a national perspective. Using Taggart and Szczerbiak's model, and define Ireland as a soft Eurosceptic member state, and the UK as a hard Eurosceptic member state of the EU. In addition, studies have shown that Protestant countries are more Eurosceptic than other EU member states (Boomgaarden & Freire, 2009).⁵⁸ This lends credibility to our categorization of the two countries, and add a 'religious context' to the analysis. In the next chapter, we change our attention from the theoretical perspective of an analytical framework, and discuss the methodical approach of this thesis.

2.4 Research design

At the most fundamental research level, our analysis is an exploratory design. We ask if something (in this case a European Public Sphere) is present, and then we evaluate which factors are important (Wisker, 2007, p. 72). That approach is best carried out with the research design for content analysis and qualitative data suggested by Martyn Denscombe (Denscombe, 2013). First, 'a sample of texts' was chosen by one simple criteria. This sample consists of all articles that have been published online, by the newspapers European Voice, Irish Independent, The Guardian, The Irish Times and The Times, which mention the acronym CCCTB. This resulted in 172 newspaper articles in total. All the text (headlines and body text) was used in the quantitative content analysis. Secondly, the text was broken down to smaller components. The headline in each article is the unit that has been analyzed qualitatively. Perceptions of 'us' and 'them' are useful in empirical research on discourses in order to provide further context (Lynggaard, 2011, p. 5). Thus, the coding unit for us/them (and below: we/they) applies to the headline. Thus, at this stage two repositories of text exist. One repository containing all the text, (headlines and body text) and another containing exclusively the headlines. The reason for this

⁵⁷ However, this can also be due to a loss of confidence in the current Irish government.

⁵⁸ See for instance (Minkenberg, 2009) for a discussion of the national church's role in Euroscepticism.

division is that the full body text proved too ambiguous and mentioned too many groups for a ‘we/they’-framework to be purposeful. Several articles used ‘they’ for many different groups, and trying to rank the groups by importance would be too subjective and damage the reliability.

The second repository of text was analyzed with a simple exercise in word counting to determine how newspapers link topics to the CCCTB. This method is called text mining or data mining (Krippendorff, 2012, p. 221). The four terms we searched for was ‘religion’ (including ‘catholic’ and ‘protestant’), ‘corruption’, ‘solidarity’ and ‘export’. These four terms were searched for in both the headlines and the body text of all articles in the sample. The justification for choosing these four are that we want to test certain assumptions about cultural and economic factors. Religion is included because that is the major cultural difference between the Irish Republic and the UK. Based on this assumption about cultural difference, we introduce Weber’s protestant hypothesis in the analysis in chapter 4.2. The keyword ‘corruption’ was selected in the same way: the assumption being that religion is the major cultural difference between the Irish Republic and the UK,⁵⁹ and that this affects the rate of corruption in a nation state. Studies have shown that the rate of corruption in general is higher in the catholic than the protestant European countries (Della Porta & Mény, 1997). It is difficult to say if a vigorous debate about corruption is an indication of more or less corruption. However, by counting the mentions of corruption in CCCTB-related articles, we can see hints to whether correlations exist or not. ‘Solidarity’ is another keyword we looked for, as it is a fundamental component of collective identities. In a sense, defining the question of what solidarity is, and whom to share solidarity with is at the core of the issues that the EU is facing. The CCCTB can have redistributive effects across member states in the EU, and we have counted the keyword ‘solidarity’ to get an indication of whether the tax regime debate is framed in normative terms. The last keyword we looked for was ‘export’. The Irish government’s industrial strategy has focused on foreign export-oriented companies instead of an indigenous industrial base since the 1960s (Truetzschler, 2004, p. 115). We are interested in findings that show a bias in the Irish and/or British tax discourses that are linked with the consequences of that strategy. Below, we discuss the analytical assumptions that have been made about these four keywords.

⁵⁹ An early example of an analysis of cultural differences between Ireland and the UK based on religion is the book “A Discourse on the Religion Anciently Professed by the Irish and British” by an Irish theologian (Ussher, 1631).

2.4.1 Topics

After the European debt crisis erupted, tabloid newspapers have emphasized different variables to explain the difficulties that various EU member states have experienced in relation to the Economic and Monetary Union (EMU). Often the cultural differences between the northern and southern EU member states have been emphasized. However, instead of analyzing the variables in the political economy, we want to discover whether any of the ideas related to the concept of a north-south divide in Europe and the EU, is discussed in the debate about a European tax regime. This suggested conceptual division of North and South Europe often goes along the demarcation between catholic and protestant nation-states.⁶⁰ Consequently, we want to look for any mentions of religion (and protestant, catholic) in the news articles.

In addition, we want to look for mentions of ‘corruption’, as the CCCTB is supposed to make tax regimes more transparent. The ‘corruption’ variable has particular value when it is tested against the Irish discourse. First, the corruption in Ireland is dependent on three variables, namely the Irish political system, Irish political culture and religion, and the Irish media (Byrne, 2012, pp. 220-237). Therefore, it is natural to look further into the topic of ‘corruption’ when we are doing a content analysis that includes two Irish newspapers. Second, and this applies to all four topics, the higher number of articles in the Irish Republic (152) than in the UK (7), makes it simpler to identify any topics in the Irish tax discourse.

Mentions of ‘solidarity’ would strengthen the case for a European collective identity and the possibility of a European Public Sphere. However, we expect to find few references to the elusive concept of solidarity in the tax discourses. During the fall of 2011, it was a scope for normative arguments based on solidarity when increased spending on bailouts was discussed. However, it was argued in pragmatic terms around the national parliaments in the EU member states, and European politicians did not refer to it in debates as a duty of European solidarity (Closa & Maatsch, 2014).

Lastly, a tendency of mentioning ‘export’ is understood as a preference for trade over taxation transparency. The category of articles mentioning export can tell us about the concerns in a nation state, and is useful to guide further research. We cannot suggest that export and taxation transparency are mutually exclusive as the export-oriented and CCCTB-supporter Germany would disprove. However, with the right (or wrong) conditions in the national economy this might become a dilemma for policymakers. Germany (and The UK) have far more diverse

⁶⁰ For a comparative study on how Euroscepticism is linked with Religion see (Minkenberg, 2009).

national economies than Ireland due to their size. We suggest that economic complexity⁶¹ is the qualifying variable deciding whether it is a choice or not.

We have also looked for mentions of other member states in the newspaper headlines. If the title included the word ‘member state’, this has been recorded as any member state. The common content analysis standard of uniform distribution is applied in chapter 3.5 to detect an emphasis on particular topics in Ireland or the UK. If there is a deviation from the average, we can suggest that there is a bias in the reporting (Krippendorff, 2012, p. 190).

2.4.2 We-They categorization

The concept of ‘other’ is a common distinguisher in collective identities (Uricchio, 2008, p. 16). The headlines of the queried articles are coded to determine who ‘we’ are and who ‘they’ are. Each category was given three alternatives. The possible options for ‘we’ are nation state, Europe or ambiguous/none. Since the main theme for this category is collective identity, only explicit references to a member state has been recorded. For instance, ‘Paris’ or ‘Sarkozy’ may refer to the political power center in France, but it excludes far too many (French) to give meaning in our dataset. The purpose of this category is to observe horizontal width in the public discourse. There is however one exception regarding Irish newspapers. When newspapers refer to “State’s” or “Country will...”, then that is coded as Ireland. However, more ambiguous references such as ‘Celtic Tiger’ are not recorded as Ireland, as it can also be a reference to a period of time for Ireland. For ‘they’, the options were the EU, another EU member state or ambiguous/none. Here we have understood EU and EC as synonymous.

These categories are chosen because we want to explore the identities used in the public discourse. In a similar manner, one could also bring to light differences in the portrayal of EU institutions with regard to European public spheres. Such an atomization of the EU in public discourses is not interesting for this paper, as it is the relationship and identification with Europe that is investigated, and not the public opinion about the separate EU institutions.

This broader focus on public spheres is the reason why headlines such as “Semeta⁶² seeks tax co-ordination”, ‘they’, in this case Semeta, has been coded as ambiguous/none. While in the headline “EU tax cooks spoiling recipe for member states”, EU is coded as ‘they’, and ‘member states’ is coded as nation state in the ‘we’-category. However, there are also headlines where a

⁶¹ Concept developed in (Hidalgo & Hausmann, 2009), and used in chapter 4.3

⁶² Algirdas Šemeta is a former EU commissioner.

‘they’ is recorded, but a ‘we’ is not recorded. For instance, this happens when the subject of the sentence is a group with an external identifier such as MEPs. You cannot choose to identify yourself as an MEP unless you are elected by others to be one. In contrast, you can choose to identify as a European or not. One example is “McCreevy slams EC ‘hidden’ tax plan”. EC is thus coded as ‘EU’, but ‘we’ is coded as ambiguous/none since the subject is a person, and not a group I can identify with at will. In addition, ‘Brussels’ is treated as a synonym for EU in the coding, since this is a reference to the capital of European integration.

When the thesis finds that ‘we’ is more often used in Ireland than in the UK, that may have nothing to do with the EU.⁶³ ‘Politics of identity’ is a public reaction to social disorganization (Hobsbawm, 2012, p. 177), and if the social changes have been more dramatic in Ireland than in the UK, an increased hunger to belong would be expected.⁶⁴

2.4.3 Patterns of vertical and horizontal Europeanization

This thesis uses the content analysis standard of *stable temporal patterns* to determine whether the CCCTB is a national or a European question. We determine this based on how the reporting has changed over time.⁶⁵ However, there is a need to distinguish between stable temporal patterns and issue cycles when we speak of changes over time. One example of inconsistency in the temporal patterns is when a newspaper no longer follows the issue cycles of a topic, while other newspapers continue (Krippendorff, 2012, p. 191). This is the case with European Voice, which we describe in chapter 3.3, on the convergence of news frames, and discuss media ownership as a probable cause in chapter 4.5.

Nevertheless, when we observe changes in the general reporting on the CCCTB over time, most of these are due to issue cycles. An issue cycle is the period that the media takes interest in a topic. Thus, when something becomes a hot topic, the media is more likely to report affiliated events. The clearest example in this study is the apex of media attention on EU monetary and financial issues around 2011. From 2011 until the end of 2013, Ireland participated in the European Financial Stability Facility (EFSF),⁶⁶ and EU financial matters was a very salient issue in Ireland during this period. However, we might observe changes that deviate from the

⁶³ See table 2 in chapter 3.4.

⁶⁴ Although, it was in the UK that Thatcher famously claimed that “there is no such thing as society”.

⁶⁵ The Marxist historian Eric Hobsbawm argues that the EU has “not replaced the ‘national economies’ as the major building blocks of the world system” (Hobsbawm, 2012, p. 181), and he would probably suggest that the CCCTB is definitively a national question.

⁶⁶ See (Baldwin & Wyplosz, 2012, pp. 538-539) for a discussion on the EFSF.

normal pattern, and these are essential to scrutinize further. In addition to the European Voice case mentioned in the previous paragraph, we compare the patterns of vertical and horizontal Europeanization in Irish and British newspapers. In chapter 3.3, I comment on a shift from a vertical to a horizontal Europeanization of the public sphere that encompasses the debates around the CCCTB. The division of vertical and horizontal Europeanization was introduced by Ruud Koopmans and Jessica Erbe in a paper where they challenged the alleged public sphere deficit (Koopmans & Erbe, 2004) as cited in (Risse, 2010, p. 158).⁶⁷

A horizontal Europeanization means that Irish and British newspapers make reference to other member states in articles and headlines on the CCCTB. “Vertical Europeanization refers to the degree to which EU actors are regularly referred to in national public spheres, while horizontal Europeanization concern communicative linkages between different member states” (Risse, 2010, p. 122). One might ask why it matters for the EU, if the Europeanization is vertical or horizontal, or even both? An absence of a horizontal Europeanization may tilt the perspective towards a purely domestic view on EU issues (Leconte, 2010, p. 214). Moreover, if there is a purely domestic view, it is unlikely for a European collective identity to emerge. Consequently, the chances for a European public sphere encompassing tax discourses is remote if the view on EU issues is purely domestic. Next, we examine the data on the tax discourses in Ireland and the UK, in order to determine the degree of Europeanization.

⁶⁷ In addition, Koopmans and Erbe distinguish between weak and strong Europeanization, though the difference between vertical and horizontal is sufficient in this thesis.

Chapter 3 Identifying the Irish and the British discourse

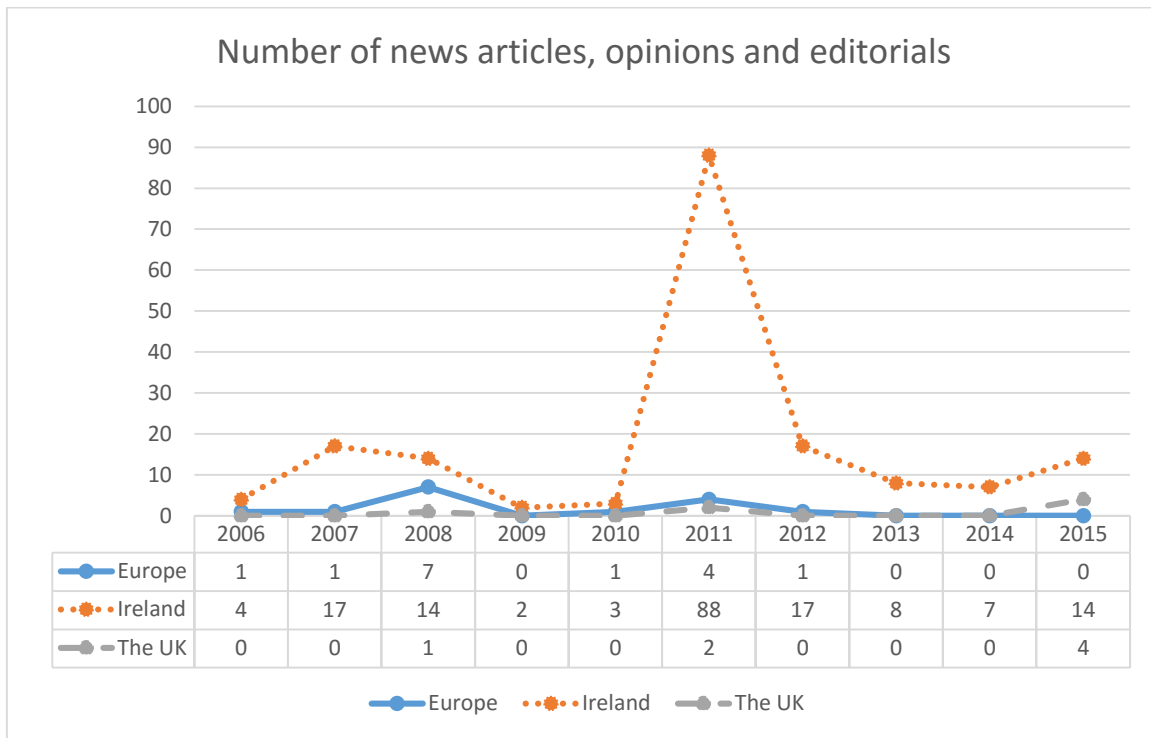
As mentioned, we use newspaper articles to evaluate the Irish and the British discourse. Aggregating Irish Times and Irish Independent as Ireland, and The Times and The Guardian for the UK, gives us the following chronology of total newspaper articles published, and issue cycles, as shown in figure 1 below. These numbers are however not comprehensive data on journalist articles from the surveyed countries on the CCCTB. For instance, the weekly branch of The Times publishing, The Sunday Times, has written nine articles about the CCCTB, 6 in 2011 and 2 in 2013. This inquiry however focuses on daily newspapers, and the metadata on weekly newspapers has therefore been excluded. The total number of articles surveyed was 172, 152 in Ireland and 7 in the UK. An interesting extension to this survey would be a comparison of the discourses in weekly newspapers, such as The Sunday Times in the UK and The Sunday Business Post in Ireland, both as a comparison of British and Irish weeklies, and as an extended scope in the research of Europeanization.

3.1 Comparison of the two national discourses

Issue cycles are the spikes in attention to a specific political issues over time (Risse, 2010, p. 116). For a long-spanning case like the evolution of the CCCTB, there will be highs and lows in attention by the Irish and the British media according to developments in Brussels, Dublin and London. These different periods are illustrated in Figure 1 below, and can be separated in the periods of 2006-2009, 2010-2012 and 2015-onwards. It is important to note that the first EU press release about a CCCTB is from 2001,⁶⁸ though neither of the surveyed papers wrote anything about it until at least five years later. This point certainly lends credibility to state centric theories of international relations and European integration, as 2006 was the first year a member state (Austria) publicly supported the CCCTB.

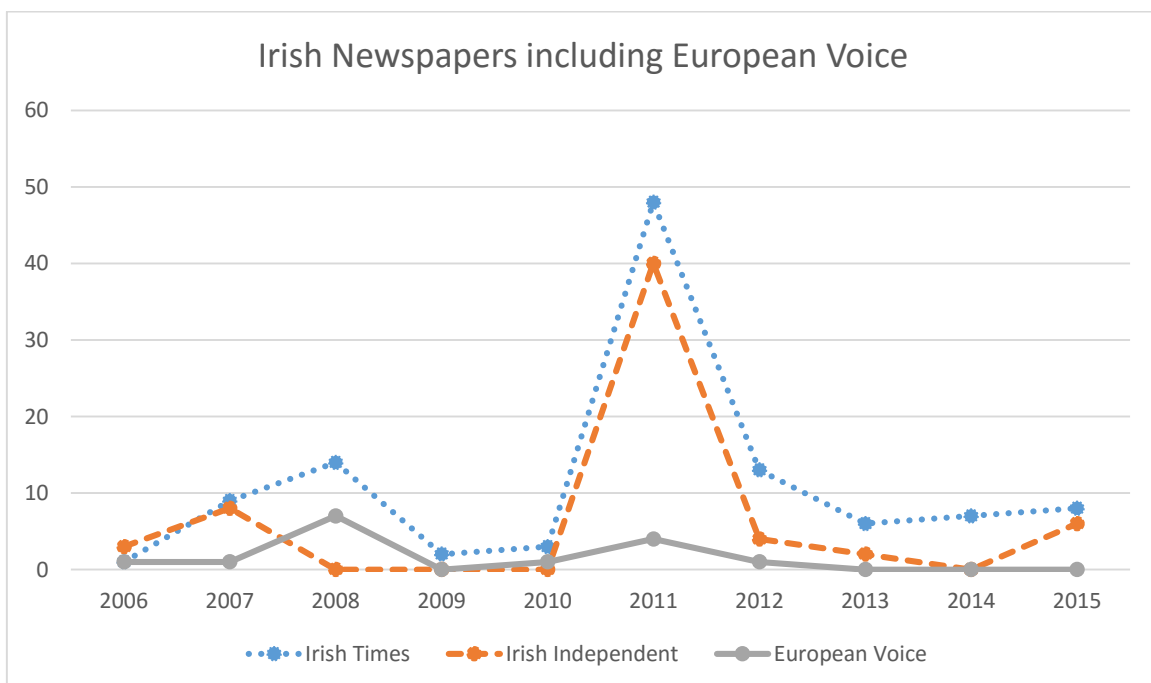
⁶⁸ See (EU Commission, 2001). However, it was first proposed as an EU directive in 2011 (Taylor, 2011).

Figure 1 – News articles, opinions and editorials available online.



If we break the numbers down nationally there are signs of corresponding *issue cycles* in Ireland and in the European Voice.

Figure 2 – Irish articles compared to European Voice.



This study uses content analysis and discourse analysis in a complimentary fashion. Therefore, noteworthy authorships are discussed in a qualitative way to illuminate relevant power and

influence relations⁶⁹ in Ireland and the UK. Both the Irish national newspapers, Irish Independent and The Irish Times, published their first piece about the CCCTB in 2006 with rather titles. The piece in Irish Independent was titled “EU tax plans could be catastrophic for Ireland” and was written by the KPMG tax partner Mike Hayes (Hayes, 2006). KPMG is known as one of the “big four” auditing companies in the world (Shaxson, 2011, p. 176). This is important because we can observe from the outset of the debate that multinational enterprises (MNEs) are framing the tax debate in Ireland, rather than TDs,⁷⁰ political parties or civil organizations. As we will discover, the title by Mike Hayes has been close to the perspective of the Irish Government on the CCCTB.

In April 2006, the Irish Independent published the second op-ed about the CCCTB, just four days after the piece by Mike Hayes. This time the author was MEP Eoin Ryan, who was the Dublin MEP from 2004-2009.⁷¹ The piece by MEP Eoin Ryan was titled “Common EU tax a threat”, and it was a support and response to Mike Hayes’ article. The tone of the piece is clear in its opposition to the EU proposal, and the MEP believes that “Ireland has much to lose under the Common Consolidated Corporate Tax Base. We cannot accept such a regime” (Ryan 2006). Ryan leaves us no doubt to decide who ‘we’ are (Ireland) and ‘they’ are (EU legislators). However, using the ‘we’/‘they’ identities as evidence against a European Public Sphere in Ireland might lead us to a false conclusion. The fact that the private sector (KPMG) and elected MEP’s discuss European issues in national daily newspapers is proof that the EU is a salient topic in Ireland.

The article “Austria seeks tax allies” by Anna McLauchlin in European Voice, dated 22nd February 2006, is the only article that pre-dates the op-ed by Hayes in the Irish Independent in this dataset. McLauchlin’s article states that Ireland and the UK is opposed to the CCCTB, which continued to be the undisputed public stance of the Irish and British governments up until June 2015. Austria had the presidency of the Council of the European Union from January until

⁶⁹ See chapter 2.1 for a description of power relations and influence relations.

⁷⁰ Teachta Dála is the title for elected members of Dáil Éireann, the lower house of the Oireachtas (Irish Parliament). TD is the equivalent to the British Member of Parliament (MP).

⁷¹ When he ran for re-election in 2009 of the Dublin MEP seat for Fianna Fáil, he was not re-elected. Fianna Fáil was in government at the time, and the public had lost confidence in the party largely due to the banking crisis. Fianna Fáil lost seats in many constituencies and the results was called disastrous and a ‘wipeout’ (Irish Examiner, 2009).

June in 2006.⁷² ⁷³ In March 2006, the EC met in Brussels, and a European tax regime was on the agenda of the Austrian EU presidency.

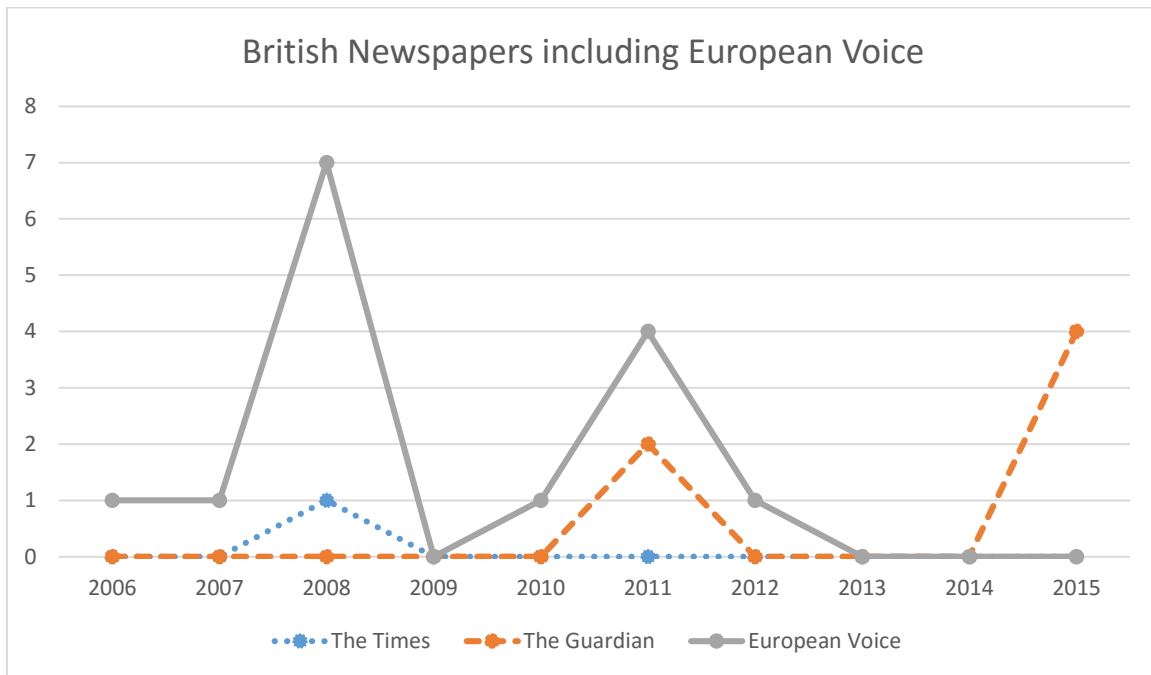
British newspapers however, did not report the Austrian EU presidency's initiative for a European tax system. It was not until June 2008 that the financial journalist and City Diary Editor of The Times, Martin Waller was the first to write about the CCCTB in our British sample.⁷⁴ This is –seven– years after the Commission made its intentions for a new directive clear in a press release. Further, the scope of Waller's article was broader than the Irish articles up until this point, in the way it included descriptions of the French and Dutch referenda on the EU constitutional treaty, and saw the CCCTB as one part of the reasons for the Irish no-vote in June 2008. The title of his article is as clear as the Irish versions, "A taxing problem that refuses to go away". The rhetorical question at the end of the piece is equally unambiguous when he asks, "which bit of the word 'no' did you fail to understand, Brussels?" The articles by Hayes and Ryan in Ireland, and by Waller in Britain seem to echo each other. The interesting point is that Ireland is the protagonist for all three reporters. Now, let us take a step back and connect these observations with the concept of collective identities. From the two first Irish articles, the distinction between 'them' and 'us' is between the Brussels bureaucrats and the Irish people. In the first British article we see a similar pattern, except that the term 'us' is broadened to include the British and the Irish peoples against the "Euromasters". However, the British addendum of the national 'we' concept to include the neighboring island is asymmetric. Britain is not included in the 'we'-concept used by Irish newspapers. 'We' can mean the UK and Ireland against Europe in British newspapers, but the national 'we' in Ireland does not include the British (with regard to this particular discourse).

⁷² See chapter 4.6 for a deeper analysis of the potential causation between the size of the shadow economy and the Europeanization of the tax discourses in Ireland and the UK.

⁷³ Interestingly, Austria is the OECD member state with the smallest size of its shadow economy as a percent of official GDP (Schneider & Williams, 2013, pp. 54-55).

⁷⁴ City Diary is a column in The Times covering business and finance in the London City district.

Figure 3 – British articles compared to European Voice.



The fact that The Guardian did not report on the CCCTB until May 2011 is a big surprise. The Guardian is often regarded as a liberal and pro-EU newspaper in the UK. This has however not led to a higher interest in how EU tax system proposals potentially affect London’s financial district. In accord with The Times, the first article about the CCCTB published in The Guardian was more about Ireland than it was about the EU’s impact on the UK. This is no coincidence, learning that it was written by the Irish economist and guest blogger, Stephen Kinsella of the University of Limerick, who is also a consultant for the Bank of England (Kinsella, 2015). The title “Ireland’s financial crisis: Look who gets burned in Kelly’s ‘big bang’” gives us luminous clues to the national focus. ‘Kelly’ is here a reference to the Irish economist Morgan Kelly who argued that Ireland should not agree to the IMF-EU bailout. Again, this leads us in the false direction of concluding that we are dealing with a national Irish issue when in fact Kinsella’s article is a response to Morgan Kelly’s article in the Irish Times (7.5.2011). This is clear evidence of horizontal Europeanization, and a response to an Irish Times piece published in The Guardian tells us that at least the public spheres of the UK and Ireland are integrated regarding discussions of EU policies.

3.2 Periodization of the discourses

There are three different peaks of interest in the CCCTB in the period 2001-2015, as we have seen in figure 1, 2 and 3. There is also a correlation of these peaks in the European Voice, the Irish newspapers and the British newspapers. From 2001 until the Austrian presidency of the European Council started in January 2006, there were –zero- articles in the European Voice, Irish Independent, The Guardian, The Irish Times or The Times mentioning the acronym CCCTB.

In retrospect, there are several good reasons for this lack of reporting on the prospects of a CCCTB. First, the eastern enlargement was a bigger and more ambitious project for the EU during this period of time. The focus was rather on broadening the geographical area of the single market, than on deepening the integration among the existing members. Second, the effects of the crashing American housing market had not yet reached Europe. The world economy was doing well up until 2006-2007 with 5,5% GDP growth per year, though the euro area was hit hard by the financial crisis and went from 3% growth in 2007 to 0,5% growth in 2008 and 2010 is the only year with more than 2% growth for the euro area (IMF, 2015). The financial crisis thus had direct implications for European issues. With a change of focus from the economic potential of the BRICS⁷⁵ to the financial distress of the PIIGS,⁷⁶ taxation became a more salient issue with proposals as the Tobin tax⁷⁷ again being discussed (i.e. Irish Independent 10.10.2012).

The first news cycle revolves around The Lisbon Treaty, which was signed in December 2007 and shifted the pendulum from EU enlargement towards deeper integration again.⁷⁸ Debate on EU tax laws increased in Ireland where it also coincided with the Irish bank bailout of 2008. There have been many banking crises around the world before, but this crisis was different. It was the first banking crisis in an EU member state after the introduction of the euro. Therefore, the Irish government and the Irish central bank were restrained in new ways. To make matters even worse, the Irish government spent close to 30% of its GDP on bank bailouts in 2010 (Baldwin & Wyplosz, 2012, p. 530). The controversial point was that the fate of Irish banks was largely determined by outside events in Europe, EU policies and decisions by the Troika

⁷⁵ Acronym that encompass the emerging markets in Brazil, Russia, India, China and South Africa.

⁷⁶ Unflattering acronym for Portugal, Ireland, Italy, Greece and Spain, which struggled with debt in the Eurozone.

⁷⁷ The Tobin tax was first proposed in the 1970s as a deterrent to short-term speculation. James Tobin suggested to do this with a small charge (0,1%) on all foreign currency transactions to reduce volatility. (Financial Times Lexicon, 2015).

⁷⁸ In 2004 and 2007, the eastern enlargement saw the EU increase to 25 member states.

(EU, ECB and IMF) (Eichengreen, 2010, 2015).⁷⁹ The second news cycle for the CCCTB synchronizes with the EU/IMF bailout of Ireland, lasting from 2011 until 2013. After the bailout-program ended for Ireland in December 2013, the CCCTB was overshadowed by other news. For instance, European Voice has not reported on the CCCTB after the Irish bailout-exit, and the Irish newspapers toned down their reporting on its progress. Then there is a third and last cycle starting around the EU leader summit in March 2015, and lasting until the end of June 2015 with increased reporting on the topic by Irish Independent, The Guardian and The Irish Times.

It is fair to expect that we will see a renewed public interest in the CCCTB before Christmas 2015. There are three good reasons for this. First, The EU Commission launched their roadmap for the CCCTB directive in October 2015 (EU Commission, 2015c). The intention for this roadmap is to create debate. Second, the open letter by Britain's shadow chancellor MP John McDonnell, Thomas Piketty, and others, published in the Guardian on 04.11.2015 is likely to fuel the debate on tax avoidance.⁸⁰ The letter is titled "A year after LuxLeaks, it is high time for EU action on corporate tax-dodging", and the text is no less subtle. Third, the EU Commission's verdict on Irish state aid will be published in November or December of 2015 (Fairless, 2015).

3.3 Convergence of news frames

The convergence of news frames is a method in content analysis used to demarcate a public sphere. As we have seen in chapter 3.2 on the periodization of the CCCTB debate, there are three peaks of media interest, namely in 2008, 2011 and in 2015. These three peaks are called issue cycles (Risse, 2010). If the issue cycles are synchronized, we can claim that the news frames have converged and that a European Public Sphere exists. However, whether the issue cycles are synchronized is not a clear yes-or-no answer, and we need to distill the findings.

⁷⁹ For observations on the Troika's role during the Irish banking crisis see (Whelan, 2014).

⁸⁰ See Annex II for the full text.

Table 1 – Synchronized issue cycles.

	2008	2011	2015
<i>Ireland</i>	Yes	Yes	Yes
<i>The UK</i>	No ⁸¹	Yes ⁸²	Yes
<i>Brussels (EV)</i>	Yes	Yes	No

Looking at table 1, we see that European taxation was a salient issue in 2008, 2011 and 2015. In fact, The Irish Times has written about the progress of the CCCTB each year since 2006. The UK has had a lower intensity in their coverage, and it was first in 2011 that The Guardian became part of the same public sphere as the Irish newspapers on this particular topic. However, the data is very limited, and it is difficult to say if the lone guest post by Stephen Kinsella made any impact on public discourse. European Voice was indeed a part of the same public sphere on European tax as Ireland in 2008 and 2011. For instance, there is both reporting in a descriptive manner, as well as op-eds by Irish politicians and European academics. But, during the 2015-issue cycle, EV published zero articles about the CCCTB. It is unclear why, but newspaper ownership could be one reason.

This is a limited sample, but our data suggest that during the discussions on the Lisbon Treaty and a European tax in 2008, news frames in Irish newspapers and the EV was synchronized. The CCCTB proposal gained traction after Algirdas Šemeta became European Commissioner for Taxation and Customs Union, Audit and Anti-Fraud in July 2009, according to the Irish Times in their article about a “Fresh EU move to harmonise tax rules” (09.09.2010). This EU move seemed to materialize in 2011 when they reported, “EC proposes common tax regime” (16.03.2011). During this stage around 2011, a European tax regime was a salient issue for Irish newspapers, The Guardian and European Voice.

In the next stage, we observe a surprising change in the public discourse. After the debate on EU tax directives fizzles out and Ireland leaves the EU/IMF-bailout, there is a shift in the lateral space (in geographical terms) of the public discourse. Irish discourse is the constant presence, but now the subject of a European tax regime is reported in the UK and not in our Brussels benchmark European Voice. Starting around November 2014, the European tax debate was reignited by the LuxLeaks and SwissLeaks cases, and the EU Commission’s proceedings into

⁸¹ Martin Waller’s article from 18.06.2008 mention the CCCTB, but it does not refer anyone. Thus, it is not a part of the discussion about a European tax regime in the same way as the example from 2011.

⁸² Just two Guardian articles mention the CCCTB this in 2011, but one is an answer to an Irish article.

the alleged tax deals that American tech giants received, and whether these tax deals constituted to breaches on state aid rules in the EU.⁸³ ⁸⁴ The Irish Times reported that the “Inquiry into Irish tax deal with Apple is high priority” (21.11.2014). Again, when EU tax regimes are discussed in Brussels, this is widely reported in Ireland.

From the beginning of March 2015 until the end of June 2015, we find eight pieces in The Irish Times and six pieces in the Irish Independent about the CCCTB. Even in the EU-averse public discourse of the UK, we can see an interest in the matter. The Guardian published four articles during June 2015 about the CCCTB, which is surprising when you consider that this is out of a total of six articles since the proposal was first launched. European Voice was chosen to be a benchmark of Europeanization and to represent the news frames within the Brussels EU-bubble. However, the European Voice has stopped reporting about the CCCTB altogether. European Voice wrote its last piece on the CCCTB in April 2012. Furthermore, European Voice has not written about the European tax regime proposal since the ICIJ disclosed in November 2014 the tax deals that Luxembourg, The Netherlands and Ireland provided to corporations. In matters of Europeanization, this has interesting implications. If we now consider the changes in table 3.1 from 2008 to 2015, we can observe a shift from vertical Europeanization to horizontal Europeanization during this period. As mentioned earlier, “Vertical Europeanization refers to the degree to which EU actors are regularly referred to in national public spheres, while horizontal Europeanization concerns communicative linkages between different member states” (Risse, 2010, p. 122).

⁸³ The EC treaty bans state aid (including tax relief) because it distorts competition in the EU (Baldwin & Wyplosz, 2012, p. 321).

⁸⁴ See (Cini & McGowan, 2009, pp. 162-198) for a historiography on how the EU deals with state aid practices.

Figure 4 – Change from vertical to horizontal Europeanization.



This shift from a vertical to a horizontal Europeanization of the public spheres may be linked to the current trends in European integration. Recently there has been a focus on ‘new intergovernmentalism’ in Common Market Studies (Bickerton, Hodson, & Puetter, 2014; Puetter, 2012) which fits our observations well. See (Schimmelfennig, 2015) for a critique of Bickerton et. al. In the next chapter, we will discuss why the public discourses on EU tax directives have developed in a particular manner.

3.4 Perceptions of ‘us’ and ‘them’

When a possible British entry to the European Community was debated in the House of Commons, Prime Minister Edward Heath tried to overcome the ‘us’ and ‘them’ dichotomy. He declared on October 28th 1971 that future relations between Britain and Europe would no longer be a question of ‘them’ and ‘us’ (May, 1999, p. 92). This daring prophecy would not stand the test of time, as we will see below. If we zoom in on how ‘we’ and ‘they’ are used differently in the European Voice, British newspapers and Irish newspapers, we can draw some unsurprising conclusions. Similar comparison between The Irish Republic and the UK concerning Europeanization has been done using political speeches (Hay & Smith, 2005). However, a wider audience reads newspapers than political speeches. Therefore, newspapers are a better measure of the public discourse.

Next, we will look at the findings in the newspapers. For instance, EV never use the concept of ‘we’ in headlines about the CCCTB.⁸⁵ Further, European Voice never refers to the EU as ‘they’, and six out of fifteen times, the headline includes a reference to a member state. In contrast, the

⁸⁵ Except the guest post by Irish Alan Dukes, who refers to the Irish on 16.04.2008.

British newspapers repeatedly refer to the EU as ‘they’ (4 out of 7 articles). Since there is a big difference in the total number of articles, percentages have been added for explicitness.

Table 2 – Articles’ use of ‘we’.

The concept of ‘we’ in headlines	Europe	Nation-state	none	N=total articles
European Voice	0	1 (6.67%)	14 (93.33%)	15 (100%)
The Times	0	0	1 (100%)	1 (100%)
The Guardian	0	2 (33.33 %)	4 (66.67%)	6 (100%)
Irish Independent	1 ⁸⁶ (2.5%)	15 (37.5%)	24 (60%)	40 (100%)
The Irish Times	0	28 (25%)	84 (75%)	112 (100%)
Sum	1 (0.57%)	46 (26.43)	127 (73%)	174 (100%)

There is little in the previous table that leads us to the affirmation of a collective European identity when cross-border tax issues are discussed. Interestingly, we observe that in shares of articles, the Irish and British newspapers use the nation state as ‘we’ about the same amount of times (20-40% of the time). European Voice has a ‘we’-reference due to Alan Dukes’ guest post, and in this case it is a reference to Ireland.

Table 3 – Articles’ use of ‘they’.

The concept of ‘they’ in headlines	EU	Other member-state	None/ other/ ambiguous	N=total articles
European Voice	0	6 (40%)	9 (60%)	15 (100%)
The Times	0	0	1 (100%)	1 (100%)
The Guardian	4 (66.67%)	1 (16.67%)	1 (16,67%)	6 (100%)
Irish Independent	15 (37.5%)	4 (10%)	21 (52.5%)	40 (100%)
The Irish Times	25 (22.32%)	17 (15.18%)	70 (62.5%)	112 (100%)
Sum	44 (25.29%)	28 (16.09%)	102 (58.62%)	174 (100%)

When we look at how ‘they’ are used in headlines for articles about the CCCTB, an expected pattern appears. European Voice did not use the EU as ‘they’, while The Guardian (66.67%)

⁸⁶ On 03.05.2007, they wrote, «I am quite certain that it will make the EU less competitive».

used it twice as often as the Irish newspapers (22.32% & 37.5%). This is likely due to British Euroscepticism (Leconte, 2010, p. 215). We can add that the media does not encourage a ‘we’-feeling between Europe and Britain, and that this is in accord with what Andrew Geddes found in 2003 (Geddes, 2004, p. 231).

3.5 Identifying topics

Which topics have been linked with the CCCTB in the national discourses? Four different topics was searched for in the data material, and some weak patterns emerge. This was done with a simple counting of keyword appearances, and the result may differ with a multivariate analysis. See table 4 below for details.

Table 4 – Topics related to the CCCTB debate.

Topics by keywords	Religion	Solidarity	Corruption	Export	N=total articles
European Voice	0	0	1 (6.67%)	2 (13.33%)	15 (100%)
The Times	0	0	0	0	1 (100%)
The Guardian	0	0	1 (16.67%)	0	6 (100%)
Irish Independent	0	0	0	6 (15%)	40 (100%)
The Irish Times	0	5 (4.46%)	0	6 (5.36%)	112 (100%)
Sum	0	5 (2.87%)	2 (1.15%)	14 (8.05%)	174 (100%)

Religion is the biggest cultural difference between Ireland and the UK. Therefore, we wanted to see if any newspaper mentioned ‘religion, protestant or catholic’ in the same text as ‘CCCTB’. Studies have showed that there is also a higher rate of corruption in catholic than in protestant countries (Della Porta & Mény, 1997). A bias in the co-occurrence of ‘religion’ and ‘corruption’ would therefore prove interesting. This is not the case, as no article mentions religion at all together with ‘CCCTB’. ‘Solidarity’ was only used in the Irish discourse, which strengthens the belief that Ireland belongs to the continental west-European discourse, and the UK resides outside it (Risse, 2010). Corruption is only mentioned in European Voice and The Guardian, despite the far lower number of total articles than the Irish newspapers. This may be linked to the Irish Media’s limited scrutiny of corruption, as suggested by Byrne. This argument is developed in chapter 4.4 on political corruption. Next, we will look at factors that have influenced the tax discourses in Ireland and in the UK.

Chapter 4 Factors determining the tax discourses

Below we investigate six different factors that may have contributed to shaping the European tax discourse in Brussels, Ireland and the UK. Also, European Voice has only been examined with regard to newspaper ownership, as the other factors consider national data, and using either Belgian or European data would do more to clutter than help the research.

The first factor, Euroscepticism, deals with why the Europeanization of the discourse is almost non-existent in the UK. The five following factors focus more on Ireland than the UK due to the lack of public discourse about a European tax regime in the UK. Consequently, the sample size from the British tax discourse is very small.

The six factors are; Euroscepticism, religion and its indirect impact on topics, the size of the shadow economy, the presence of foreign MNEs and the salience of CCCTB, political corruption and silence around topics, economic complexity and how it affect topics, and lastly newspaper ownership and how it may have led to a shift in reporting.⁸⁷ The key question and over-arching theme is then, whether the discourse is mainly influenced by cultural (see chapters 4.1 and 4.2) or political and economic factors (see chapters 4.3 – 4.6).

4.1 Euroscepticism and discourse

Below we study how different factors affects the Europeanization of tax discourses in Ireland and the UK. We find that Euroscepticism is the primary variable for the UK, regarding the Europeanization of any discourse.^{88 89} This is no surprise, as the EU is often described as “a centralized autocracy, run by socialists, the Germans or whoever is the latest *bête noire*” (Reynolds, 2000, p. 309). While the UK has been described as the ‘don’t know, not interested and don’t trust’-capital of the EU (Geddes, 2004, p. 231). That unfavorable attitude towards the EU in the UK has certain implications. Even ‘Europe’ is portrayed in the UK as something across the channel, which Britain in any case is not a part of (Crowson, 2011, pp. 1-2). Thus, on one level, the British media in general is not willing to discuss difficult EU dilemmas. And, for parts of the British media, newspapers may be even less interested in EU topics due to

⁸⁷ As cited in (Rapple, 1997, p. 71) Noam Chomsky lists five filters a topic must pass to reported in American media: Ownership, advertising, source of information, reaction from powerful lobby and ideology of anti-communism. With some variation, these could be applicable to Ireland and the UK as well.

⁸⁸ For a recent empirical study of Euroscepticism using Karl Deutsch’s transactionalist theory see (Kuhn, 2011).

⁸⁹ See (Hooghe & Marks, 2007) for a study on the sources of Euroscepticism in public opinion, political parties and the media.

structures in newspaper ownership, which is discussed in chapter 4.5. However, a contrasting view on the sequence of Euroscepticism and discourse exists. In his article about the politics of integration discourse, Thomas Diez argues from a Foucauldian perspective that the UK is Eurosceptic because ‘Europe’ and other concepts are contested (Diez, 1999). If that is the case, a discourse analysis before and after the EU referendum, promised by David Cameron, would be interesting. Consequently, a comparative analysis of what the British meant with ‘Europe’ in 1975, when they voted yes in the UK EC membership referendum, and when the promised referendum is held, could also be insightful. Next, we change perspective to the other side of the Irish Sea.

Ireland has also had its share of critics commenting on the EU. For instance, the Lisbon Treaty process was far from straightforward. Civil organizations was established and the debate was vocal. However, withdrawal from the EU was never a goal for the Irish critics of the Lisbon Treaty, and instead what they wanted was reform (FitzGibbon, 2013). This is in contrast to the UK and the conservative party in particular, where debates about the EU can be characterized as shifting between aloofness and hostility,⁹⁰ and membership in the euro has been ruled out (Gifford, 2014, p. 1). In addition, the fact that all counts of ‘solidarity’ appeared in Ireland suggests that the European collective identity is stronger in Ireland than in the UK.⁹¹ The concluding remarks for Euroscepticism’s impact on tax discourse are different in Ireland and the UK. The soft Euroscepticism that is prevalent in Ireland creates an atmosphere for open discussions. Furthermore, in the period 1994-2004, Ireland is the sole EU member state where increased media attention on European issues has led to lower political Euroscepticism (Lubbers & Scheepers, 2010, p. 805). In contrast, the hard Euroscepticism that exist in the UK closes down the public sphere, and EU initiatives are hardly discussed at all, with only seven articles shared between The Times and The Guardian, compared to a total of 152 in the Irish Independent and The Irish Times.

⁹⁰ See (Reynolds, 2000, pp. 280-287) for a discussion on the rise of Euroscepticism within the conservative party.

⁹¹ Five articles from The Irish Times mention ‘solidarity’ and ‘CCCTB’ in the same news article. See table 4 on page xx for details.

4.2 Weber's protestant hypothesis

'The protestant Ethic and the "Spirit" of Capitalism'⁹² by Max Weber is still relevant⁹³ and may provide clues to why there is a difference between the Irish and British discourses on the CCCTB.⁹⁴ As one would assume, both Irish and British newspapers report on EU tax laws without a religious perspective. However, there are traits in the national cultures that can be traced back to their religious history. The cultural phenomenon that Weber describes is "protestant ascetism's significance for modern capitalism" (Swedberg, 2000, p. 119).

The assumption that a higher number of multinationals are spawned in protestant than catholic countries was one reason to include Weber's protestant hypothesis. However, this assumption is wrong. Geoffrey Jones argues that the drivers behind the growth of multinational companies we have seen after the industrial revolution can be explained otherwise. He highlights the policy environment, western concepts of property rights, new forms of corporate governance and improved transports and communication (Jones, 2005, p. 25), but not religion. Nevertheless, religion can help to explain a difference between Ireland and the UK. The authoritarian catholic tradition in Ireland may have impacted the topics of the discourse. This is briefly explained in the next paragraph, and further examined in chapter 4.4 on political corruption and media traditions.

If we concentrate on the 'protestant ethic' and 'rational capitalist' it is noteworthy that Ireland had its first reform of corruption laws since Victorian times in 2012 (Minihan, 2012). Further, ahead of the proposed referendum on the Lisbon Treaty, Prime Minister Bertie Ahern stepped down due to corruption claims. In contrast, the reformed Bribery Act of 2010 in the UK has been called the "toughest anti-corruption law in the world" (Breslin, Ezickson, & Kocoras, 2010, p. 362). We find little evidence of the protestant ascetism of Weber when the CCCTB is debated, but the religious divide may play a part in shaping the public discourse, based on the political traditions that Protestantism and Catholicism have created in the UK and in Ireland. As mentioned, correlation between corruption and catholic countries have been demonstrated (Della Porta & Mény, 1997).

⁹² Based on Max Weber's 1905 manuscript.

⁹³ See for instance (Cantoni, 2014) and (S. O. Becker & Woessmann, 2007).

⁹⁴ For such a controversial text as Weber's protestant hypothesis, there have been many critiques. See for instance (Acemoglu & Robinson, 2012, pp. 57,60-61).

4.3 Economic complexity – MNEs and indigenous companies

Economic complexity is a factor that captures the differences of the national economies of Ireland and the UK. As mentioned, globalization and the trans-national poses a challenge to the nation states. How do they cope with it? The major changes in the world economy after 1945 have promoted multinational companies to the basic unit of the economy, and diminished the control nation states have over the economy (Hobsbawm, 2012, p. 181).

Let us now clarify the similarities between the Irish and the British national economies, and then compare the differences in the next paragraph. First, both are liberal market economies. Second, since the 1970s, their economical paths in confrontation with the effects of globalization have been similar. Both countries had a highly conflictual wage management during the 1970s, and both tried to apply strong fiscal consolidation after the 1980s (Dellepiane-Avellaneda & Hardiman, 2015, p. 13).

The Irish and the British national economies obviously differ in size. In addition, they also contrast in the role played by indigenous industrialization. The divergent paths taken by Irish and British governments have increased the difference in their economic complexity. Academics at MIT have developed the Economic Complexity Index (ECI) to measure how advanced an economic system is (Hidalgo & Hausmann, 2009). More diversified products of import and export, and higher diversification of trade partners, result in a higher ranking. The index uses trade data made available by UN comtrade.⁹⁵ In 2012, Japan scored first in this ranking. Japan's high export in the competitive trade of automotives, is one of the reasons for their high ranking. Unsurprisingly, The UK ranks higher than Ireland in such an index.⁹⁶ This can in part be explained by the larger size of their economy.

However, the interesting discovery is related to their individual change in rank over time, and not which is ranked higher. In 2001, both Ireland and the UK were on the global top ten list, 9th and 5th place respectively. The UK has maintained their spot on the top ten list, registering an 8th in 2012. Ireland however, has struggled in this ranking the last ten years. When the first article was written about the CCCTB in 2006, Ireland was ranked 14th and their ranking continued to fall until 2008, and has now stabilized on 17th. A lower ECI ranking is not

⁹⁵ UN comtrade is the International Trade Statistics Database of the United Nations, and collect trade statistics on countries and commodities.

⁹⁶ <https://atlas.media.mit.edu/en/profile/country/irl/> and <https://atlas.media.mit.edu/en/profile/country/gbr/>

necessarily bad per se. For instance, Norway ranks very high on GDP/capita and the Human Development Index, but is ranked 30th on the ECI.

Nonetheless, Ireland's drop on the ECI gives us a hint about the current economic situation. According to Hidalgo and Hausmann, the higher ranked countries are most likely to experience GDP growth. Thus, Ireland's lower ranking on the ECI can be an indicator showing that Irish products have a harder time on the global market. Thus, keeping the income that Ireland-based headquarters for Multinationals generate, is a salient issue for Irish politicians and the public discourse.⁹⁷ In addition, the large influx of MNEs has led to a faster introduction of new technology in Ireland, the host country (Figini & Görg, 1999, pp. 594-595). In fact, attracting foreign export oriented companies has been the Irish industrial strategy since the 1960s. Ireland attracts foreign companies by "offering the lowest corporation tax in the EU" (Truetzschler, 2004, p. 115). The UK in contrast, has experienced smaller changes in their global trade position, and a debate about a European tax regime is therefore not as prevalent in the public discourse. Though, we should keep in mind that the sample is very limited (two countries), and a similar study including other EU member states that have and have not experienced changes in their ECI ranking should be undertaken before drawing any final conclusions. Nevertheless, we should also note that MNEs may have a positive impact on indigenous companies by creating business links (Görg & Strobl, 2002). Next, we focus on the political impact of MNEs.

A prevailing democratic problem is that MNEs have more political power than ever (Rothkopf, 2012). In the UK, The Guardian has written articles from 18.06.2015 (*UK to reject EU plans to combat multinational tax avoidance*) and 28.06.2015 (*UK tax policy dictated by companies not ministers says leading treasury expert*) which proves this point. One might claim that there is an important difference, many of the UK companies that dictate tax policy are indigenous.⁹⁸ However, that is only relevant from a politico-economical perspective. From a normative perspective on democracy, it is utterly irrelevant. Next, we look at corruption in Ireland, and how it may have affected the public discourse.

⁹⁷ . For a discussion on how Multinationals use tax planning strategies, see *Money Moves: Tax Planning in Multinational Companies* (Anggraeni, 2015).

⁹⁸ See Appendix I in (Jones, 2005) for a list of where the largest MNEs reside.

4.4 Political corruption and media traditions

The risk of corruption is one hazard for countries that engage in tax competition and aspire to be MNE host countries, such as Ireland (Killian, 2006, p. 17). Since 2012, the political corruption has been growing significantly in Ireland (GRECO, 2014, p. 4). However, corruption can be reduced through public scrutiny. When the circumstances allow it, one example of public scrutiny is the reporting by daily newspapers. Some factors exacerbate and other factors counter the risk of political corruption due to tax competition. Below we discuss how mutual interest exacerbates the risk in both countries, three exacerbating factors that are particular to Ireland, and at last one factor in each country that might counter the risk of corruption.

First, we look at the mutual relationship between governments and newspapers using an example from each country. In 1997, the newspaper Irish Independent used their front page to promote the political party Fianna Fáil on the Election Day. The newspaper's arguments were based on economics and taxation. They argued that taxpayers had suffered enough under the 'Rainbow Coalition' of Fine Gael, Labour and progressive left parties (Horgan, 2001, p. 170). Consequently, this promotion of a political party led to an uproar within Ireland. However, such an emphasis on tax issues by the Irish Independent is limited to domestic affairs. As seen in chapter 3.1 and figure 2, from 2007, The Irish Times has published more articles about the CCCTB than the Irish independent, every year. In the UK, our example is a bit more subtle, but there can be no doubt about the mutual interests between politicians and the media. One example is the close relationship between Tony Blair and Rupert Murdoch. By virtue of being the British opposition leader, Tony Blair visited the News International conference in Australia in 1995 (Begg, 1997, p. 64). This conference is an annual event in the Murdoch media empire. The year after, Blair dropped the 80-year-old pledge by the Labour party to abolish the City of London Corporation. The City of London Corporation is the municipal government body for the City of London district. The difference from most other local elections around the world is that both residents and businesses can vote.⁹⁹ In 2001, the residents held around 6000 votes, while the businesses held about 23 000. After Blair had won the election, Labour proposed a reform in 2002 of the voting rights within the City district. They suggested that the residents should still keep their 6000 votes, while the business votes should be increased to 32 000 (Hencke & Evans, 2002; Shaxson, 2011, p. 265).¹⁰⁰ It is unclear whether a link between the

⁹⁹ KPMG which was highlighted in chapters 2.2 and 3.1 for their role in the tax discourses, has a vote in these elections (Shaxson, 2011, p. 265).

¹⁰⁰ Shaxson writes 9000 residents votes, but the actual number was around 6000 in 2002. In 2011 it is 7 400 (City of London, 2012).

three dots between Rupert Murdoch's media empire, Tony Blair's travels and reform suggestions and The City of London. However, there is a suspicious inconsistency between the Labour politician Gordon Brown's promise in 1992 to 'end tax abuses',¹⁰¹ and then suggesting to increase the political power of businesses within the City of London in 2002. Another example of the close ties between political and media powers in the UK is from 2012, when Tony Blair became the godfather of Rupert Murdoch's daughter (BBC, 2012).

Second, three other aspects apply to Ireland that may exacerbate the risk of corruption. First, The Irish Republic has very prescriptive libel laws, which may discourage the newspapers to write about corruption. One example is the Denis O'Brien¹⁰² defamation case from 2007.¹⁰³ He was awarded €750 000 in damages (Byrne, 2012, p. 235). Second, few ruling parties have investigated corruption within the government. Third, due to the Irish constitution, it is difficult to obtain government data and proceedings, and consequently to perform investigative journalism (Byrne, 2012). There have been few examples of the media revealing political corruption in Ireland. However, this has not been due to a lack of corruption. Furthermore, this can be the reason why there are no mentions of 'corruption' linked with the CCCTB in Irish newspapers, while examples exist in The Guardian and European Voice.

Thirdly, the risk of political corruption has been mitigated by events in both Ireland and the UK. In Ireland, we find the most bizarre example. The Irish government tapped the phones of journalists without proper authorization for a very long period. The relationship between journalists and Irish governments therefore chilled in the second half of the 1990s, when it became apparent that the tapping had been going on as far back as the 1970s. The tapping scandal included journalists working at both Irish Independent and The Irish Times (Horgan, 2001, pp. 165-166). This may have led to an increased scrutiny by Irish journalists later, and thus help to explain the higher number of articles on the CCCTB in Ireland compared with the UK. In the UK, the danger of too close relationships between governments and the media is mitigated by the fact that newspapers have changed which political party they endorse.¹⁰⁴ In the next chapter, we look closer at the different types of media ownership.

¹⁰¹ As cited in (Shaxson, 2011, p. 264).

¹⁰² Also the owner of Irish Independent since May 2012.

¹⁰³ The Irish supreme court awarded Denis O'Brien damages, against the Irish Daily Mirror, due to false claims that the newspaper made in 1998 (Byrne, 2012, p. 235). In 2013, Denis O'Brien was again awarded damages, this time €150 000, due to claims by the Irish Daily Mirror (RTÉ, 2013).

¹⁰⁴ <http://www.supanet.com/business--money/which-political-parties-do-the-newspapers-support--25923p1.html>

4.5 Media ownership

The media ownership has changed for the European Voice (2014) and the Irish Independent (2012) during the time unit (2001-2015) researched. The British publisher The Economist Group set up European Voice in 1995, with a focus on EU affairs and a neutral political alignment. In December 2014, US-based Politico and Berlin-based Axel Springer jointly acquired European Voice.¹⁰⁵ European Voice was rebranded as Politico Europe in April 2015, and has not reported on the CCCTB since. This may be a coincidence, but it is remarkable that The Guardian published the majority of their CCCTB articles in 2015, and that Politico Europe has been silent. Next, we will look at the two categories of ownership for the British and Irish newspapers.

Their form of ownership separates the four newspapers surveyed from the British Isles. First, The Irish Times and The Guardian are owned by trusts. Both are owned by non-charitable trusts, however, they are both barred from paying dividends. Second, Irish Independent and The Times are privately owned with profit goals for shareholders. As we can observe by the last column (total articles) in table 4, there is a correlation for each national discourse between number of articles and ownership category. The non-dividend-paying newspapers The Irish Times and The Guardian have written far more about the CCCTB than their dividend-paying (and privately owned) counterparts Irish Independent and The Times. However, our data is too limited with two newspapers in each category, and similar patterns should be researched in a greater European context including French and German newspapers of both categories. The important lesson is that the type of media ownership may have an impact on the Europeanization of a subject, and on whether a European Public Sphere can exist.

Ownership in Irish media was thoroughly debated in the 1990s (Rapple, 1997, p. 72). Nevertheless, as we have shown in chapter 4.3 on economic complexity and 4.4 on political corruption, diversity in ownership is far from the sole issue in the media landscape of Ireland.

4.6 The shadow economies

Considering the number of articles written about a European tax regime in Ireland and the UK, we find a significant divergence. There have been 152 articles published in Ireland, in contrast to seven articles in the UK. If you acknowledge that the CCCTB would improve taxation

¹⁰⁵ <http://www.politico.com/blogs/media/2014/12/politico-europe-acquires-european-voice-199775>

transparency across Europe, it seems intuitive that the size of the shadow economies in the separate countries could explain the British indifference and the vehement Irish opposition to the subject of a European tax regime. However, this is a flawed assumption. To understand why, we need to take a closer look at what a shadow economy is. The common definition of a shadow economy is “[a] market based production of goods and services, whether legal or illegal, that escapes detection in the official estimates of GDP” (Schneider & Williams, 2013, p. 23). A normal range for Anglo-Saxon countries¹⁰⁶ is 9-12 percent, and 20-30% for southern European countries, while the OECD-average in 2005 was 16.4% (Schneider & Williams, 2013, p. 20). Ireland’s shadow economy has decreased relatively¹⁰⁷ from 16% in 2003 to 12.7% in 2012. The UK’s shadow economy has also decreased from 12.5% in 2005 to 10.3% in 2012. These numbers are quite similar, and the trends are moving in the same direction. Ireland is far from being considered a ‘southern European’ country by the size of its shadow economy and Friedrich Schneider’s standards. For reference, Finland’s shadow economy was 17.7% in 2005, and declined to 13.3% in 2012 (Schneider & Williams, 2013, pp. 54-55).

The correlation between the sizes of the shadow economies in Ireland and the UK makes it an insignificant variable. Consequently, the shadow economy cannot explain the difference in the public discourses.

Nevertheless, comparing data on the shadow economies may prove useful in a broader analysis of tax discourse. In this thesis, we have delimited the tax discourses, and focused on the debates around the CCCTB, which attempts to deal with tax avoidance. The shadow economies are more relevant for tax evasion. The major difference between tax avoidance and tax evasion is judicial. Tax avoidance is legal loopholes that corporations use to minimize their tax expenses, while tax evasion concerns hiding profits from the tax authorities, and this is undisputedly illegal.

¹⁰⁶ Schneider & Williams include Australia, Canada, Ireland, New Zealand, USA and the UK when they speak of Anglo-Saxon countries. The term Anglosphere is usually used interchangeably.

¹⁰⁷ Relatively because the official GDP grew faster than the shadow economy declined in absolute terms.

Chapter 5 Conclusion

The major contribution of this thesis to the literature on European Studies consists in showing the path from Euroscepticism to debates on tax avoidance and the CCCTB. In addition, interesting correlations between the tax discourses and religion and media ownership have been highlighted. In the literature review, we defined Europeanization as ‘raising an issue to the European level’. In this case, the issue is how to deal with tax competition, and whether the CCCTB is a preferred solution. In chapter 2.3.3, we set up three criteria for Europeanization. First, there had to be a correlation in the issue cycles. Second, the same topics had to be highlighted. Third, the CCCTB had to be discussed with the same intensity in Ireland and the UK as in *European Voice*. The short answer is that we find a weak link in the correlation of issue cycles. The same topics have not been discussed with regard to the national effects of the CCCTB. Neither has it been discussed with the same intensity. Nor did we find any responses to the open letter by Moscovici and Vestager, dated 17.01.15, which used the CCCTB acronym. However, we need to crystallize these simplistic answers.

For Ireland, the issue has been discussed in European terms, and we can claim that Europeanization of the tax discourse is present. The CCCTB was actually discussed far more often in Irish newspapers, than in *European Voice*. In contrast, in the case of the UK, the issue has only been raised to a European level a few times, but *The Guardian* has referred to views in Ireland, and thus an existence of a weak horizontal Europeanization seem plausible.

Perhaps the most interesting revelation in this thesis is a supportive argument for Kellermann, Rixen and Uhl.¹⁰⁸ They claim that the only way nation states can regain tax sovereignty is through cooperation. When we look at our discussion in chapter 4.3 on economic complexity and chapter 4.4 on political corruption, the continuation of a tax competition doctrine for Ireland does not seem feasible.

Below is a summary of the thesis, a review of the main findings, and future research suggestions. First, we will summarize the debates on the CCCTB. Second, we contextualize our analysis, both commenting on the types of discourse influences, and estimating their impacts. Third and last, we give some suggestions to future research on Europeanization and tax discourses.

¹⁰⁸ See chapter 1.4 Literature review, page 8.

5.1 Brief summary

In total there were 152 articles published in Ireland about the CCCTB, 40 in the Irish Independent and 112 in The Irish Times. In contrast, there were 7 articles published in the UK, 6 in the Guardian and 1 in The Times.¹⁰⁹ European Voice wrote a total of 15 articles about the CCCTB. We found three peaks of interest in the daily newspapers. The first one started in 2006, coinciding with the Austrian presidency's impetus to forge a European tax regime. The interest petered off, until it was renewed in 2011. French and German attempts of a European tax reform put the CCCTB back in the spotlight, but again there was no common ground to be found and the media interest dwindled once more. The LuxLeaks case, which The Irish Times and The Guardian participated in, put the CCCTB on the agenda again in late 2014. This time, the EU Commissioners made their intentions clear and said in January 2015, "*This is the year for Europe to get its tax house in order*". At the EU summit in June this year, the member states agreed on a common corporate tax base, and it will be introduced during the next 18 months.¹¹⁰

European Public Spheres has been a key concept in this thesis. To determine whether it exists or not we have looked at the convergence of news frames. To identify a convergence, the aforementioned peaks of media interest must be synchronized. Using three points in time (2008, 2011 and 2015), we found a convergence of news frames, though the evidence was not overwhelming. In 2008, we found a convergence between Irish newspapers and the European Voice, but not the British newspapers. In 2011, we found a convergence among the Irish newspapers, European Voice and The Guardian. Moreover, in 2015 we found a convergence between the Irish newspapers and the Guardian, but not the European Voice/Politico.

Based on the convergence of news frames, we suggest, somewhat surprisingly, that there has been a shift from vertical Europeanization between Dublin and Brussels in 2008, to horizontal Europeanization between Dublin and London in 2015. Thus, we see a small shift from vertical to horizontal Europeanization of the public sphere in the period 2006-2015. It is important to note that the horizontal Europeanization is apparent but weak in the UK. Adding to this fragile Europeanization, we found in chapter 3.4 that there is a divergent use of the concept of 'other'

¹⁰⁹ There are likely others articles about the CCCTB, but we use Ireland for Irish Independent and The Irish Times, and the UK for The Guardian and The Times combined.

¹¹⁰ Any harmonization of tax rates are very unlikely, as Article 99 in the Treaty of Rome explicitly demands unanimity. (Baldwin & Wyplosz, 2012, p. 51) There has however been some harmonization on excise duties in the EC since the Maastricht Treaty in 1992 (Baldwin & Wyplosz, 2012, p. 97).

in Ireland and the UK. The British newspapers far more often refer to the EU as “they” than the Irish newspapers do.¹¹¹

When we looked at the topics discussed in the newspapers, a weak pattern emerged¹¹². First, no newspaper mentioned ‘religion’, ‘catholic’ or ‘protestant’ in any article. Second, the only newspaper to couple the CCCTB and ‘solidarity’ is the Irish Times, which did so five times. It is a predictable finding, when you consider that The Irish Times is a non-dividend paying newspaper located in a nation state with soft instead of hard Euroscepticism. Third, European Voice and The Guardian were the only newspapers who mentioned ‘corruption’. In The Guardian article from 21.07.2011, ‘corruption’ was linked to corruption in Eastern Europe. However, in the EV article from 16.04.2008, “Ireland’s rocky road to Lisbon”, a direct link between the CCCTB and Irish corruption was made. Fourth, Irish newspapers were more concerned with ‘export’ than the British newspapers, both in numbers and relative shares. European Voice linked the CCCTB and export two times, which is 13.3% of their articles. The two Irish newspapers hover around this percentage. The Irish Independent makes the link between export and the CCCTB in six articles (15%), and The Irish Times also makes the link in six of their articles (5.36%).

5.2 Main findings

In chapter 4.1, Euroscepticism was established as the key variable that determine whether a Europeanized tax discourse can exist. The division between soft Euroscepticism in Ireland and hard Euroscepticism in the UK is the main separator between lively debates in Ireland and absence of discourse in the UK. Our findings support the claim by Thomas Risse that the UK is semi-detached from the EU, and in chapter 3.4 we found that Europe and the EU is still UK’s ‘other’ (Risse, 2010, pp. 160-161).

In chapter 4.2, we found that the protestant hypothesis by Max Weber could not explain the differences in the discourses. Most certainly, Protestantism was not the primary factor that contributed to the emergence of more indigenous MNEs in the UK than in Ireland. As mentioned, technological, legal and political reasons can better explain the growth of MNEs (Jones, 2005, p. 25).

¹¹¹ See table 2, 66.7% in the Guardian, compared to 37.5% in the Irish Independent and 22.3% in The Irish Times.

¹¹² See table 4.

In chapter 4.3, the different economic complexities we highlighted, may be explained by religion indirectly. The variable economic complexity developed at the MIT tells us that Ireland is more exposed in the trans-national economy than the UK. Therefore, they have less room for maneuver (and taxation). This in turn has made Ireland more dependent on foreign direct investments, and consequently turned them into a hostage in a global tax competition race. There are many historical factors at play, but religion instead of Weber's protestant hypothesis, may be relevant in explaining the lower economic complexity in Ireland than the UK. Consequently, the CCCTB is a more salient topic in Ireland than in the UK. In addition, due to different levels of economic complexity, we can observe a higher focus on the impact of trade and export in Ireland than in the UK.

In chapter 4.4, we discussed that the difference in political corruption and media traditions have possibly led to a diminished focus on corruption in Ireland. This is also connected to the previous point about the primacy of trade and export in the Irish debate.

In chapter 4.5, the media ownership was discussed. In the UK, the daily newspapers does not focus at all on the CCCTB. With just seven articles between two daily newspapers over 14 years, any claims to direction of the debate would be very weak. However, there is a fragile correlation between articles published and type of ownership. The Irish Times and The Guardian are owned by non-dividend paying trusts, and have published more than their national counterparts Irish Independent and The Times about the CCCTB. Even European Voice have altogether stopped writing articles about the CCCTB after The Economist Group sold the newspaper in December 2014.

In chapter 4.6, the size of the shadow economy was applied as a variable to determine the tax discourse. As mentioned, the shadow economy is defined as the market-based production of goods and services that escape the national GDP. However, there is no significant disparity between the Irish and the British shadow economies. Both are among the smallest in the world as a proportion of the GDP, mainly due to their low taxation. If other countries were compared, the results may have been different.

5.3 Future research

The three key components determining Europeanization of tax discourses are Euroscepticism, religion and saliency. These three components can forecast Europeanization of tax discourses in other countries, as long as one use updated data. For instance, a model combining the data on ‘divergent trends of Euroscepticism’ (Lubbers & Scheepers, 2010) with the national data on economic complexity (Hidalgo & Hausmann, 2009) could be useful. This model has its flaws as well, as it will not apply in a reliable manner to countries that have diverse data points on these variables, and a high religious heterogeneity.

Liberal intergovernmentalism is another research avenue that can help us understand the process of making the CCCTB. This theory highlights the relationship between international relations and domestic politics (Moravcsik & Katzenstein, 1998). Regarding tax avoidance, this link can prove interesting for both social scientists and policymakers. If we understand better the changes that enabled a unanimity on a European tax regime in June 2015,¹¹³ these findings might be useful in the work against tax avoidance. This study has focused on the tax discourse with a constructivist perspective, but the rational institutionalist perspective of liberal intergovernmentalism may help us explain why the member states agreed to introduce the CCCTB directive within 18 months in June 2015.

¹¹³ The unanimity is on ‘introduction within 18 months’, not the actual technicalities of the directive. The CCCTB directive is in a status of ‘public consultation’ until January 8th, 2016 (EU Commission, 2015b).

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Annex I

Published in The Irish Times, The Guardian and various other European newspapers.

“This is the year for Europe to put its tax house in order” (17.01.2015).

By Margrethe Vestager and Pierre Moscovici.

We commissioners have vowed to clamp down on evasion and fraud to make sure all companies pay their fair share

2014 was the year the world discovered there is no whisky in a double Irish and no cheese in a Dutch sandwich. Discussions about fair taxation and tax avoidance featured prominently on last year’s menu. What we have seen is a welcome shift in public perception and political positions in favour of taking steps to battle tax fraud and tax evasion, to ensure that all companies pay their fair share of tax.

This shift has also enabled us to take action: 2015 will be a crucial year to use this momentum to achieve concrete results.

We have a situation today where some companies are engaging in aggressive tax planning, made possible by a lack of fiscal harmonisation in the EU and loopholes in national taxation systems. They do this with the help of consultancies – and sometimes even of national tax authorities.

If this is done to favour only selected companies, it damages our single market and hurts European citizens directly. Especially in challenging economic times, with many EU citizens having to tighten their belts, it is even more important that large companies pay their fair share of tax.

Jean-Claude Juncker made very clear in his political guidelines, presented in front of the European parliament last July, that he is dedicated to stepping up efforts to combat tax evasion and tax fraud.

It is also only a few weeks ago that we and our fellow commissioners were on our way to take an oath of office before the European court of justice in Luxembourg. (The legend on the coach rented from the Belgian football team Club Brugge for the occasion read “No sweat, no glory”, which was fitting for the occasion.)

The European commission as a whole has already proved that it is getting down to work, having put forward in record time a €315bn investment plan that will help kickstart growth in Europe.

And we, the commissioners for competition and taxation, are committed to pushing forward the battle against unfair tax competition and tax evasion, each within our own area of responsibility but working together towards one common goal.

Since June last year, the commission has been investigating so-called tax rulings in several EU countries. Our services are working on these continuing cases as a matter of urgency, and we are committed to presenting the first results of these investigations by the second quarter of this year.

For the record, tax rulings are not a distorting instrument as such. Almost all EU countries use this fiscal instrument to provide companies with legal certainty for their tax matters. However, there are allegations that the tax ruling instrument may have been misused to the benefit of big corporations.

There is a difference between a tax incentive for all and preferential treatment for some. The latter may well amount to unwarranted state aid. This is of concern both to European citizens and to the commission, which is looking carefully into the matter. The information made available by the impressive journalistic work behind Luxleaks has provided some additional insights, and will be carefully processed. But we need to have the full picture of what is going on. We need to take a structured approach.

Therefore, in addition to our own investigations, in December we asked all EU countries to detail their tax ruling practices. This will help to establish a coherent approach, and get a better picture of the extent of the respective practices and possible problems.

In the worst-case scenario, unfair tax competition could create a race to the bottom, in which countries feel compelled to give handouts to multinationals in the form of tax breaks.

The losers are the taxpayers, who foot the bill, the small businesses that cannot compete, and national governments, which lose tax revenue needed to maintain roads, power grids and schools. The winners are the big businesses that play European countries off against each other.

This is not an issue limited to a small number of EU countries – it is a European problem needing a European solution. That's why the commission is planning to present new legislation in the area of taxation. In spring this year we will table a proposal on the automatic exchange of information on cross-border tax rulings. We believe tax authorities should know which

companies enjoy favourable treatments in another country. Most EU members are already in favour. And we are convinced we can win over those that are still hesitating.

Only recently, member states gave the green light to two commission proposals to prevent companies from abusing rules on the taxation of parent companies and their subsidiaries, and on the automatic exchange of information between national tax authorities. This was a direct response to new transparency and cooperation rules agreed by the G20 finance ministers.

At last November's G20 summit in Brisbane, it was on President Juncker's initiative that world leaders committed to transparency on tax rulings. We will continue to drive forward this agenda internationally within the OECD, where we are working on modernising international tax rules. This will be finalised by the end of this year.

But we need to go even further. The fight against tax avoidance is not about taking on companies that create jobs and help Europe to grow. It is about providing transparent and business-friendly solutions. It is in that context that the commission is committed to reviving its proposal for a common consolidated corporate tax base. This would mean that a group active in more than one EU country would have to worry about only one common set of rules for its tax declaration; the states hosting the group's subsidiaries would share the tax among them. While allowing for fruitful competition on tax rates, this proposal would eradicate a lot of current possibilities for aggressive tax planning.

We now have a great opportunity to make tax competition within the EU's single market fairer and more transparent. Of course, on tax policy EU member states decide unanimously. Despite this constraint, we strongly believe we should make use of the current momentum.

These initiatives are only the start of the establishment of a fairer tax system in Europe, on the basis of which profits are taxed where value is created. At the same time, we will continue enforce our state aid rules where we believe that selective tax advantages distort fair competition. Our political pledge is simple: all companies have to contribute their fair share. In 2015 we will make good on this pledge.

Annex II

Published letter in The Guardian, London (04.11.2015).

“A year after LuxLeaks, it is high time for EU action on corporate tax-dodging”.

See end of Annex II for letter signatories.

One year ago, the LuxLeaks scandal revealed publicly the content of tax rulings issued by Luxembourg to more than 340 multinationals between 2002 and 2010. These secret deals from Luxembourg allowed many of these companies to slash their global tax bills. Some firms enjoyed effective tax rates of less than 1%.

This was further proof that European countries are competing with each other by offering a variety of creative tax measures, thus depriving other countries of important parts of their due tax revenues – and lowering total tax revenues across the whole of Europe. This is money that countries could have used for public services, healthcare or schools.

One year has passed and still no ambitious measures at European level have been agreed upon. Across Europe, governments are failing their citizens, who suffer from weaker public services and higher taxes on labour, consumption and income, and their SMEs, which cannot, like many multinationals, hire expensive tax firms and artificially design their businesses in order to lower their tax rates and, as a consequence, face unfair competition.

Strong and effective action is urgently needed; business as usual is not an option. The European Union should ensure that multinationals pay their taxes where they make their profits. We strongly advocate for ambitious reforms to clamp down on tax fraud, close legal loopholes, effectively sanction tax havens, fight corruption and money-laundering, and improve transparency and cross-border cooperation.

Specifically, we call on EU member states and the European commission to support the obligation for public country-by-country reporting. This measure would oblige listed companies to make public their activities and the taxes they pay in each country in which they operate, in order to allow tax authorities, investors and all stakeholders to properly assess their activities and tax strategies and to take action in case of inappropriate or illicit corporate behaviour. Such transparency requirements would not entail any negative consequence for companies' competitiveness, as highlighted in the results of the European commission's impact assessment of public country-by-country reporting for large financial institutions.

A year after the scandal of LuxLeaks, European citizens and responsible businesses cannot wait any longer for meaningful action. It is high time for member states to learn the lessons of LuxLeaks, finally put an end to multinationals' tax-dodging, and start working towards a fair system of company taxation. This is an essential precondition for finally reigniting economic growth in the EU for the benefit of both citizens and companies. The stakes could not be higher.

Letter signed by:

John McDonnell MP Shadow chancellor

Thomas Piketty Paris School of Economics

Richard Murphy City University

Glenis Willmott MEP Labour, East Midlands

Anneliese Dodds MEP Labour, South East England

Neena Gill MEP Labour, West Midlands

Seema Malhotra MP Shadow chief secretary to the Treasury

Paula Sherriff MP Labour, Dewsbury

Paul Kenny General secretary, GMB trade union

Winnie Byanyima Executive director, Oxfam International

Christine Allen Director of policy and public affairs, Christian Aid

Sorley McCaughey Head of advocacy and policy, Christian Aid Ireland

Luca Visentini General secretary, European Trade Union Congress

Jan Willem Goudriaan General secretary, European Federation of Public Service Unions

Ronen Palan City University

Ann Pettifor City University

Anastasia Nesvetailova City University

Prem Sikka Essex University

Gianni Pittella MEP President of the European parliament Socialists & Democrats group

Romano Prodi Former president of the European commission and former Italian prime minister

Josep Borrell Former president of the European parliament

Elio Di Rupo President of the Belgian Socialist party and former Belgian prime minister

Vincenzo Visco Former Italian finance minister

Jutta Urpilainen Former Finnish finance minister

Paul Magnette Minister-president of Wallonia, Belgium

Pierre-Alain Muet Member, French national assembly

Yann Galut Member, French national assembly

Jean-Paul Fitoussi Co-chair, Progressive Economy scientific board

Professor Jill Rubery Member, Progressive Economy scientific board

Professor Kate Pickett Member, Progressive Economy scientific board

Dr Irene Ring Member, Progressive Economy scientific board

Professor András Inotai Member, Progressive Economy scientific board

Professor Ilene Grabel Member, Progressive Economy scientific board

Professor Heikki Patomäki Member, Progressive Economy scientific board

Appendix I – List of newspaper articles

European Voice

- 22.02.2006 – Austria seeks tax allies, Anna McLauchlin.
- 12.12.2007 – Barroso caved in to Irish threat on tax, claim MEPs, Lorraine Mallinder.
- 23.01.2008 – Kovacs keeps faith in common tax-base plan, Lorraine Mallinder.
- 20.02.2008 – CCCTB: the right treatment for cross-border business? Emrah Arbak.
- 18.03.2008 – Danger lurks in common corporate tax base, op-ed by Turlough O’Sullivan.
- 16.04.2008 – Messing up the Irish referendum won’t do the French much good, op-ed by Alan Dukes.
- 16.04.2008 – Ireland’s rocky road to Lisbon, Uncredited.
- 18.06.2008 – France pledges helping hand to Europe’s SMEs, Daniel Igra.
- 19.06.2008 – Corporate tax proposals still on Commission agenda, Zoe Casey.
- 10.03.2010 – Commission considers ‘enhanced co-operation’, Jim Brundsen.
- 09.03.2011 – Semeta seeks tax co-ordination, Ian Wishart.
- 11.05.2011 – Concern over corporate tax plans, uncredited.
- 25.05.2011 – Eight countries object to common corporate tax plan, Ian Wishart.
- 27.07.2011 – Facts and figures: EU/IMF loans, uncredited.
- 12.04.2012 – MEPs to back ambitious common corporate tax plan, Ian Wishart.

Irish Independent

- 18.04.2006 – EU tax plans could be catastrophe for Ireland, op-ed by Mike Hayes
- 22.04.2006 – Common EU tax a threat, op-ed by Dublin MEP Eoin Ryan.
- 27.07.2006 – EU tax cooks spoiling recipe for member states, op-ed by Mark Redmond.
- 25.04.2007 – EU plan on company tax base raises Irish fears, Bernard Purcell.
- 03.05.2007 – McCreevy digs in over EU tax row, Bernard Purcell.
- 03.05.2007 – I am quite certain that it will make the EU less competitive, op-ed by Charlie McCreevy.
- 12.05.2007 – McCreevy slams EC ‘hidden’ tax plan, Bernard Purcell.
- 24.05.2007 – Ireland Inc. fears hidden agenda in Kovacs’ corporate tax plan, Enda Faughnan.
- 04.10.2007 – New twist in business tax reforms has sting, uncredited.

04.11.2007 – Proposal that could send the Celtic Tiger into meltdown, op-ed by Antoin Murphy.

08.12.2007 – Experts not up to speed on new EU rules, Laura Noonan.

08.02.2011 – Country will not benefit from new corporate tax system, Emmet Oliver.

15.03.2011 – Common tax base could lead to flight of investment, Peter Flanagan.

17.03.2011 – EC denies plan is ‘tax harmony’ by back door, Fionnan Sheahan.

17.03.2011 – Multinationals face higher EU bill, Carmel O’Connor.

17.03.2011 – Kenny flies flag for business and common sense at the EU, uncredited.

20.03.2011 – Brendan Keenan: Two certainties and EU tax plans, uncredited.

27.03.2011 – EU reform will deliver a fatal blow to economy, uncredited.

27.03.2011 – Changing our corporate rate would be economic suicide, op-ed by Anna Scally.

10.04.2011 – Nobody woke the economic watchdog, op-ed by Michael McDowell.

10.04.2011 – Tax battle – Are we losing to Germany? Jody Corcoran and Daniel McConnell.

24.04.2011 – Revenue to target tax of global giants, Louise McBride.

09.05.2011 – Government warned not to cave in to pressure on corporation tax, Michael Brennan.

13.05.2011 – Oireachtas findings put State on collision course with EU over tax, Emmet Oliver.

24.06.2011 – Stalemate broken in talks on bailout cuts, Fionnan Sheahan.

24.06.2011 – Progress on 1pc interest rate cut in Brussels – Enda Kenny, uncredited.

07.08.2011 – Look out, Sarkozy – Enda’s in charge! Op-ed by Willie O’Dea.

10.01.2012 – Slowdown in export growth rate puts economic recovery in doubt, Peter Flanagan.

10.10.2012 – 11 Eurozone countries agree to press on with disputed ‘Tobin tax’, Peter Flanagan.

07.11.2012 – Corporate tax rate under fire from countries angry at loss in revenue, Peter Flanagan.

18.11.2012 – EU big boys make our tax rate irrelevant, Dan White.

11.01.2013 – Property tax is ‘growth friendly’, Colm Kelpie.

18.02.2013 – Tom Bergin: In the corporation tax race, it’s the base, not the rate, that counts, Reuters.

19.03.2015 – EU and UK reforms pose challenge to our corporate tax regime, Gareth Morgan and Colm Kelpie.

26.05.2015 – Report that Europe is considering a minimum corporate tax rate across Europe

incorrect, Colm Kelpie.

27.05.2015 – No threat to Irish tax rate, says Moscovici, Colm Kelpie.

01.06.2015 – Newsmaker: Pierre Moscovici, Uncredited.

17.06.2015 – Ireland in focus as EU proposes common tax base for multinationals – again, uncredited.

18.06.2015 – Mandatory corporate tax rules to be launched within 18 months, Colm Kelpie.

The Guardian

10.05.2011 – Ireland’s financial crisis: Look who gets burned in Kelly’s ‘big bang’, op-ed by Stephen Kinsella

21.07.2011 – European debt crisis meeting – Thursday 22 July 2011, Graeme Wearden

16.05.2015 – Brussels to announce measures against corporations’ ‘sweetheart’ tax deals, Simon Bowers

17.05.2015 – Tax haven blacklist omits Luxembourg as Brussels announces reform plans, Simon Bowers and Arthur Neslen

18.06.2015 – UK to reject EU plans to combat multinational tax avoidance, Simon Bowers

28.06.2015 – UK tax policy dictated by companies not ministers says leading treasury expert, Simon Bowers

The Irish Times

11.11.2006 – McCreevy warns of bid for EU tax deal by backdoor, Uncredited.

23.04.2007 – Labour, FF clash over corporate tax move, Deaglan De Breadun.

23.04.2007 – Concern at EU corporate tax plan, Marc Coleman.

25.04.2007 – State’s corporation tax under threat after proposals by EU, Olivia Kelly.

02.05.2007 – Bank body opposes EU tax plans, uncredited.

03.05.2007 – Commission tones down EU tax proposals, Jamie Smyth.

09.05.2007 – FF says it will veto tax harmonization, uncredited.

10.05.2007 – Labour accused of ‘undermining’ corporate tax rate, Marc Coleman.

26.09.2007 – EU corporate tax formula may hit Ireland, uncredited.

26.09.2007 – Harmonised tax system favoured, Jamie Smyth.

02.02.2008 – Relief as study delivers blow to tax plan, Stephen Collins.

29.02.2008 – Debate on the Lisbon Treaty , op-ed by Declan Ganley.

10.03.2008 – Debate on the Lisbon Treaty (answer to 29.02), op-ed by Micheál Martin.

09.04.2008 – France’s corporate tax plan sparks strong reply, Mary Fitzgerald.

09.04.2008 – Unanimity needed for EU tax change – Ahern, Marie O’Halloran.

17.04.2008 – Barroso says Lisbon Treaty’s ‘good for Ireland’, uncredited.

23.04.2008 – Germany hopes to see progress on EU corporate tax strategy, Jamie Smyth.

19.05.2008 – Is Ireland’s tax regime threatened? Uncredited.

03.06.2008 – Concern at confusion over tax policy, uncredited.

06.06.2008 – Is the Lisbon Treaty good for business? (Positive) Op-ed by Maurice Pratt.

06.06.2008 – Irish veto not affected, says tax institute, Mark Hennessy.

16.06.2008 – EU tax: The knowledge gap, Fiona Reddan.

17.06.2008 – Vote will not delay plan – EU tax chief, uncredited.

18.06.2008 – Treaty rejection ‘won’t affect’ plan for calculating corporate tax across EU, Mary Fitzgerald.

19.01.2009 – EU shelves tax plan for fear of unsettling Irish voters, Jamie Smyth.

24.09.2009 – Treaty does not threaten Ireland’s corporate tax rate, uncredited.

09.09.2010 – Fresh EU move to harmonise tax rules, Arthur Beesley.

10.09.2010 – Coalition to oppose EU tax-base reforms, Arthur Beesley.

11.09.2010 – Competitive edge and EU tax plans, uncredited.

12.01.2011 – Government warns EU tax reforms will damage recovery, Arthur Beesley.

12.01.2011 – Coalition aims to block EU tax reforms, Arthur Beesley.

13.01.2011 – Push to introduce pan-EU business profit tax, Arthur Beesley.

28.01.2011 – Ireland must focus on Greek debt despite political meltdown, uncredited.

28.01.2011 – Ireland needs to cultivate home-grown industries, Michael Casey.

07.02.2011 – Common corporate tax would ‘push up costs’, uncredited.

07.02.2011 – Keep minimum wage cut – IBEC, Laura Slattery.

01.03.2011 – Merkel’s plan for EU corporate tax harmony falters, Derek Scally.

09.03.2011 – EU nearing ‘competitiveness pact’ agreement but divided over tax plans, Arthur Beesley.

11.03.2011 – A taxing issue that looks set to expose EU’s fault lines, Derek Scally.

12.03.2011 – Kenny defends corporate tax, Arthur Beesley.

12.03.2011 – Fears modification to tax would hurt Ireland, Arthur Beesley.

14.03.2011 – EU corporate tax base, uncredited.

16.03.2011 – EC proposes common tax regime, Charlie Taylor.

16.03.2011 – What is the CCCTB? Uncredited.

16.03.2011 – Tax burden on Irish firms inside EU norm, report finds, Colm Keena.

16.03.2011 – Noonan tackles France over tax rate, Arthur Beesley.

17.03.2011 – EU rejects fears on corporate tax plans, Arthur Beesley.

17.03.2011 – Proposal adds to pressure on Kenny, Arthur Beesley.

17.03.2011 – Negative reaction CCCTB draft laws, Charlie Taylor.

18.03.2011 – Kenny is right to dig in his heels on corporation tax, op-ed by Feargal O'Rourke

21.03.2011 – Ministers to hold firm on tax at EU meeting, Harry McGee.

22.03.2011 – Noonan pledges 'reality' on tax issue, uncredited.

22.03.2011 – Government insists it will not yield on corporate tax rate, Arthur Beesley.

25.03.2011 – Kenny to wait for bank stress tests before bailout talks, Stephen Collins.

14.04.2011 – Barroso seeks stronger single market to curb rise of 'economical nationalism', Arthur Beesley.

19.04.2011 – State's credibility rests on delivery of bailout targets, Arthur Beesley.

04.05.2011 – Meeting to consider EU proposal on corporate tax, Deaglan de Breadun.

05.05.2011 – Cantillon, uncredited.

09.05.2011 – Honohan defends decision to retain bank guarantee, Suzanne Lynch.

09.05.2011 – Honohan defends bailout decision, Suzanne Lynch.

14.05.2011 – France hardens stance on rate cut for Irish bailout, Arthur Beesley.

14.05.2011 – Creighton praises Germany's approach to tax dispute, Derek Scally.

16.05.2011 – Ireland 'not seeking debt restructure', uncredited.

16.05.2011 – 'Small number of states oppose Irish rate cut' Gilmore, Paul Cullen.

18.05.2011 – We would suffer under EU common tax proposal, says Flanagan, Michael O'Regan.

20.05.2011 – American Idol, Suzanne Lynch.

20.05.2011 – Corporate tax regime 'a role model', Suzanne Lynch.

10.06.2011 – Paris signals willingness to end stand-off over corporate tax rate, Ruadhan MacCormaic.

20.06.2011 – Euro zone ministers agree rescue fund amendments, uncredited.

25.06.2011 – France still seeking major concessions on tax from Ireland, Arthur Beesley.

21.07.2011 – Full text of new euro-area rescue deal, uncredited.

21.07.2011 – Row over corporation tax 'over', uncredited.

22.07.2011 – New terms could save Ireland up to €800m a year, Arthur Beesley.

22.07.2011 – Statement by the heads of state of government of the euro area and EU

institutions, uncredited.

23.07.2011 – Q&A: Common Consolidated Corporate Tax Base, Laura Slattery.

19.08.2011 – State should protect corporate tax rate to retain US firms, says envoy, Fiona Reddan.

27.09.2011 – Common tax talks unlikely to meet deadline, says Creighton, Suzanne Lynch.

19.01.2012 – Common corporate tax rate back to haunt Kenny, Arthur Beesley.

19.01.2012 – Pressure mounts on Ireland over corporation tax rate, Arthur Beesley.

21.01.2012 – EU to speed up plan for common tax base, Arthur Beesley.

01.03.2012 – German ambassador disputes tax study, Ronan McGreevy.

02.03.2012 – German envoy at odds with TD over tax, Ronan McGreevy.

06.04.2012 – Ireland ‘can vote again on treaty’, Pamela Duncan.

19.04.2012 – MEPs approve tax base plan, Charlie Taylor.

20.04.2012 – MEPs back plan for common consolidated corporate tax base, Charlie Taylor.

16.05.2012 – Being yes men of Europe has got Ireland nowhere, op-ed by Morten Messerschmidt.

10.10.2012 – Noonan rejects EU financial tax plan due to fears over job losses, Arthur Beesley.

10.10.2012 – New swathe of difficulties as Dublin abstains from tax plan, Arthur Beesley.

12.10.2012 – IFSC in eye of gathering storm, Fiona Reddan.

11.01.2013 – Call for Ireland to push ahead issue of common corporate tax base, Suzanne Lynch.

11.01.2013 – Semeta urges EU tax reform, Pamela Newenham.

19.03.2013 – EU common tax base still on agenda, says senior commission official, Mark Hennessy.

24.05.2013 – Foreign investors easy access to policymakers, Colm Keena.

20.06.2013 – Cantillon: The intricacies of the CCCTB proposal is a subject people don’t usually enjoy, uncredited.

13.12.2013 – Dealings with troika developed a give-and-take quality, Arthur Beesley.

16.07.2014 – Juncker calls for €300bn investment, Suzanne Lynch.

08.11.2014 – Noonan expects Apple tax inquiry to be dropped, Suzanne Lynch.

21.11.2014 – Inquiry into Irish tax deal with Apple is ‘high priority’, Suzanne Lynch.

24.11.2014 – Juncker defends handling of Luxembourg tax regime while PM, Suzanne Lynch.

01.12.2014 – Germany, France and Italy urge EU to write common corporate tax laws,

uncredited.

02.12.2014 – EU directive on exchange of information on tax ‘letters of comfort’ due early in 2015, Suzanne Lynch.

10.12.2014 – EU pledges to intensify fight against tax avoidance, Suzanne Lynch.

19.03.2015 – Enda Kenny says Ireland opposes European corporate tax plan, Suzanne Lynch.

19.03.2015 – European Commission’s tax rulings proposal may prove ambitious, Suzanne Lynch.

19.03.2015 – Europe bringing forward proposal to harmonise tax rates, Suzanne Lynch.

20.03.2015 – Ireland still opposed to corporate tax base consolidation, says Kenny, Suzanne Lynch.

27.05.2015 – Common tax base proposed for EU by Brussels, Suzanne Lynch.

29.05.2015 – R&D tax credits and 12.5% tax rate red-line issues – Noonan, Colm Keena.

02.06.2015 – Luxembourg key to EU debate on multinational tax systems, Colm Keena.

17.06.2015 – EU Commissioner calls on Ireland to engage with tax harmonization, Suzanne Lynch.

The Times

2008.06.19 – A taxing problem that refuses to go away, Martin Waller