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## External Differentiated Integration in a post-Brexit era

A comparative study of why cooperation in security and defense has not become an expression of external differentiated integration with the EU, as opposed to economics and trade

Bacheloroppgave i Europastudier med engelsk

Veileder: Tobias Schumacher

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Norges teknisk-naturvitenskapelige universitet  
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# Abstract

Despite British exceptionalism and Eurosceptic attitudes, the coordination of policy areas in the post-Brexit era has illustrated how beneficial cooperation between the EU and UK can be when conducted rightly. The parties have negotiated agreements which predominantly entails matters concerning economics and trade. However, as both parties share much of the same security concerns, and with the rise of geopolitical instability, it would be reasonable to assume that much of the same ambitions would emerge in the policy area of security and defense as well. But contrary to initial expectations, this policy area has remained relatively untouched by the principles of external differentiated integration. The paper therefore attempts to identify the key-drivers behind this divergence. Accordingly, six hypotheses have been developed, which are believed to be the most central explanatory factors behind this contrasting outcome.

With the help of two eminent authors central to the topic, the analysis indicates that a British shift towards bilateralization, a growing informality in security cooperation and United Kingdom's reliance to NATO has mitigated the necessity for them to seek direct integration with the EU in security and defense. The paper also discusses to what extent the EU has contributed to undermining cooperation in this policy area. Equally importantly, the analysis indicates that the British business interest, economic interdependence, and the direct impact the economy has on people's everyday lives has contributed to prioritize an economic agreement instead. At last, the paper will also touch upon core-Brexit issues, such as sovereignty and immigration, and discuss to what extent these issues still affect the contemporary dynamics between the parties and their willingness to cooperate.

# Sammendrag

Til tross for Britisk eksepsjonalisme og euroskeptiske holdninger har koordinering av politikkområder i perioden etter Brexit tydeliggjort hvor gunstig samarbeid mellom EU og Storbritannia kan være. Partene har i hovedsak inngått avtaler som har vært rettet mot det økonomiske og handelsmessige forholdet. Men ettersom både EU og Storbritannia deler mange av de samme bekymringene rundt sikkerhetspolitikk, og med en økende grad av geopolitisk ustabilitet, ville det være rimelig å anta at partene også ville inngått samarbeidsavtaler på dette området. Men overaskende nok har samarbeid innenfor dette feltet forblitt relativt upåvirket av «ekstern differensiert integrasjon». I lys av dette forsøker oppgaven å identifisere hva som er hoved drivkreftene bak denne utviklingen. Seks hypoteser er derfor utviklet, som anses å utgjøre de mest sentrale forklaringsmekanismene bak dette kontrasterende utfallet.

Ved hjelp av to sentrale forfattere innenfor fagfeltet, indikerer analysen at et Britisk skifte mot bilateralisering, en økende grad av uformelt samarbeid og Storbritannias avhengighet til NATO som de største forklaringsmekanismene for mindre behov for integrasjon med EU innenfor sikkerhetspolitikken. Oppgaven vil også diskutere til hvilken grad EU har bidratt til å nedprioritere sikkerhetspolitisk samarbeid. Like viktig indikerer analysen at Britiske forretningsaktører, økonomisk gjensidig avhengighet og den direkte påvirkningen økonomi har på folk flest har bidratt til å prioritere en økonomisk samarbeidsavtale isteden for. Til slutt vil oppgaven også diskutere de mest sentrale motivene fra Brexit, som suverenitet og innvandring, og vil deretter gjøre en vurdering av hvorvidt disse temaene fortsatt påvirker den nåværende dynamikken mellom partene og deres villighet til å samarbeide.

# Preface

I would like to express my deepest appreciation to my supervisor, Professor Schumacher whose assistance has been vital for carrying out this paper. Thank you for guiding me throughout this process.

I also extend my sincere thanks to Dr. Benjamin Martill and Dr. Stefan Telle who accepted to participate in a semi-structured interview and granted their valuable time to answer several of my questions inherent to the research question. It was a pleasure to discuss topics of mutual interest.





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# List of Abbreviations

DI	Differentiated integration
EDI	External differentiated integration
EU	European Union
UK	United Kingdom
NATO	North Atlantic Treaty Association
CSDP	Common Security and Defense Policy
TCA	Trade and Cooperation Agreement
BRINO	Brexit in name only

# 1 Introduction

## 1.1 Introduction

Serving as the first of its kind, the tactical gambit from David Cameron to renegotiate the EU-UK relationship ultimately resulted in invoking article 50 of the Treaty of the European Union on the 29<sup>th</sup> of March 2017 (Kalaitzake, 2021, p. 482; Szucko, 2020, p. 621). Being an unwilling martyr for the cause, the UK thereby triggered a two-year period to negotiate the terms for how Brexit would take place instead (Szucko, 2020, p. 621). The government of May, which succeeded Cameron's premiership, did not only express desire for continued security cooperation with the EU, but after "heightened geopolitical tension", also signaled for renewed interest (Martill & Sus, 2023, p. 1294).

Accordingly, the political declaration was designed to establish the framework for the future relationship between the EU and UK, where shared aspirations and a mutual interest to continue close cooperation on a number of policies, including the policy area of security and defense was expressed (EUR-Lex, 2019, p. 178). But as this paper will showcase, their desire for cooperation in this field fell short of its initial idealization.

Despite early efforts to continue close cooperation, the rushed process to "get Brexit done" created a period of high turnover of prime ministers in the UK which contributed to undermining security concerns (Owen et al., 2020, p. 1; Martill & Sus, 2023, p. 1296). To not solely lay the responsibility of limited advancement of cooperation in this policy area at the feet of the British, the paper will also examine to what extent the EU, and perhaps rightfully so, contributed to mitigating advancement in security cooperation.

Owing to the lack of consensus of desired integration, Brexit has pushed the concept of external differentiated integration, hereafter referred to as EDI, to the forefront of policy discussions. This paper will show that, in stark contrast to economic integration, and contrary to expectations of strengthened cooperation, the policy area of security and defense has remained relatively untouched by the principles of EDI.

This comparative study will therefore, in an explanatory manner, explore the complexities behind this divergence and attempt to provide an explanation for why the two subcases at hand has experienced such a stark difference in political realization. The main research question of this paper is therefore:

*How can it be explained that security and defense has not become an expression of external differentiated integration, as opposed to economics and trade in a post Brexit era?*

## 1.2 Status quo on formal documents

Some documents have addressed the process of withdrawal, and others have expressed desire for further cooperation between the parties. The withdrawal agreement, however, was the first legally binding treaty negotiated between the UK and EU (European Commission, 2020). This laid the groundwork for separation, whereas the aforementioned political declaration, attempted to lay the foundation for future cooperation (HM Government, 2019, p. 5).

### 1.2.1 The Withdrawal Agreement

In the withdrawal agreement, the only expression of cooperation on security and defense was under article 156, which stated that it would continue to contribute to “the European Defense Agency, the European Institute for Security Studies, the European Union Satellite Centre”, and the cost of the Common Security and Defense Policy operations until the end of the transition period (European Commission, 2020). Nonetheless, these contributions predominantly reflect obligatory provisions inherent to the withdrawal agreement, not distinctively British desire for future cooperation. This, however, was not unique for the policy area of security and defense, as much of the similar obligations applied to many other issues, including the one of trade and economics. The focus of the agreement was, perhaps tellingly, withdrawal and disentanglement. Their future relationship was instead to be addressed in its accompanied document.

### 1.2.2 The Political Declaration

Subsequently, the political declaration did indeed express great ambition to continue further cooperation in “law enforcement and criminal justice, foreign policy, security and defense and wider areas of cooperation” (European Commission, 2020). It is further stated that the UK did intend to participate in Union programs, and that external actions, defense capabilities and civil protections are “areas of shared interest” (HM Government, 2019, p. 5). Unfortunately, these ambitions were never carried out. The policy area which ultimately was carried out however was trade and economics.

### 1.2.3 The Trade and Cooperation Agreement

Those ambitions resulted in the Trade and Cooperation Agreement, hereafter referred to as the TCA (European Commission, 2021). The TCA entailed a free trade agreement with focus on cooperation on economic, social, environmental and fisheries issues (European Commission, 2021). To no surprise did the TCA exclude “foreign policy, external security and defense cooperation” as the European Commission stated forthrightly that the UK “did not want to negotiate this matter” (European Commission, 2021).

This brief status quo on the established agreements highlights that on a formal level, there has been little to no expression of EDI on security and defense as opposed to the major efforts and joint endeavor to facilitate economic cooperation through the TCA.

## 2 Lit review

The literature surrounding differentiated integration has, as Dr. Benjamin Martill states, “burgeoned” since 2016, and brought about a renewed scholarly attention to European integration (Martill, 2021, p. 976; Martill & Sus, 2018, p. 847). The following review of the established literature will therefore attempt to uncover the most central arguments, debates, key findings, and other significant contributions to the topic.

Benjamin Martill and Monika Sus will actively be used and repeated a number of times throughout the paper, as they are considered eminent authors in the field of security and defense between the EU and UK. In one of their papers, “With or Without the EU”, conventional wisdom regarding integration indicates that even though EU-UK cooperation in security would in all likelihood be beneficial for both parties, it has instead become “subject to the broader politics of the Brexit negotiations” (Martill & Sus, 2023, p. 1288).

The “broader politics of Brexit negotiations”, however, encapsulates a multitude of complex issues, such as the interplay of domestic and foreign politics, security concerns, and the interest of the UK, the EU, and even the US. As such, here are the most central arguments and themes in the literature concerning both subcases.

### 2.1 Security and Defense

First and foremost, it is commonly understood that Theresa May’s failure of negotiating a withdrawal agreement brought about a political shift towards the right, introducing the Johnson administration (Martill & Sus, 2023, p. 1292). With the new administration already facing time constraints once installed in office, the timeframe could not be extended to ambitions and commitments established in the political declaration, such as the policy area of security and defense (Martill & Sus, 2023, p. 1292).

Secondly, a recurring element has been UKs role as a historic and fundamental reluctant country towards European integration in security and defense (Ricketts, 2017, p. 30). Despite Anglo-French efforts from Tony Blair and Jacques Chirac, in the lead at the St. Malo summit in 1998, the UK “veered off” and they have never since considered the EU to be a relevant actor in the field of security and defense (Ricketts, 2017, p. 30). A recurring argument is that the UK has always relied on “national, bilateral and NATO cooperation” instead (Martill & Sus, 2022, p. 1297). As Jolyon Howorth (2017, p. 192) claims, the UK has for a long time prioritized the special relationship with the US over the troublesome connection to the EU.

Another central argument is that the British did not consider the consequences of Brexit to be disastrous in terms of security (Martill & Sus, 2022, p. 406). The status quo would

not, as stated by Martill & Sus, be left in a “blank slate” overnight (2022, p. 406). The existing framework of cooperation would understandably eventually be reduced, but the process would unfold gradually, thereby mitigating immediate concerns (Martill & Sus, 2022, p. 406). Despite much of the literature laying the responsibility of little EDI at the feet of the UK, the EU has also played its part in halting the process of integration between the parties.

With the UK serving as the first member state to ever leave the Union, the EU had to carefully consider how a disintegration process would take place. The EU had no choice but to illustrate how remaining a member state would always be more beneficiary and a better solution than not being part of the EU (Martill & Sus, 2023, p. 1288). The risk of contagion from Brexit to other member states with the same preferences as the British introduced a sensitivity in Brussels for the question of precedents (Martill & Sus, 2022, p. 1292). Instead of prioritizing “beneficial distributional outcomes”, the focus of discouraging other potential departures was paramount and can be used as a major explanatory factor for why there has been little expressions of EDI in security and defense (Martill & Sus, 2022, p. 1292).

## 2.2 Economics and Trade

Having addressed some of the central complications concerning security and defense, the review will now explore the other subcase of this study. The policy area of economics and trade remained uncertain for a long time but did, at the end of 2021, result in the Trade and Cooperation Agreement, which agreed on tariff- and quota free movement for goods (Wachowiak & Zuleeg, 2021, p. 7). Despite the TCA neither serving the UK nor the EU economically better than what it originally could have done with a full membership, it is still considered an important step to facilitate healthy and beneficial cooperation and must therefore be seen as a major expression of EDI.

Drawing back on the referendum, the issues regarding security and defense was not in particular a politicized topic (Martill & Sus, 2022, p. 406). Instead, the core issues predominantly revolved around sovereignty, immigration, identity, and the economy (Martill & Sus, 2022, p. 406). Martill & Sus claims that as opposed to a reversion of integration on security and defense, a “reversion to WTO rules would prove economically disastrous”, hereby suggesting that the economic cooperation stands of much bigger importance to the British than the security issues (2022, p. 406). Security and defense had taken a “back-seat” in the referendum campaign and instead prioritized other matters (Martill & Sus, 2023, p. 1294).

Furthermore, historical arguments in the literature revolves around the underlying motivations for British membership in the first place. The economic concerns and access to an international market were the main drivers for membership (Keating et al., 2022, p. 4). Accordingly, this has throughout EU membership remained their sole focus, and “British exceptionalism” and their tendency of opting out from those political and social policy implementations serves as examples of those motivations (Keating et al., 2022, p.

4). With economic and trade being the motivation to join the EEC in 1973, Bennet & Vines (2022, p. 70) argues that it was only a matter of time before the parties would fall into conflict given the significant European progress in the social and political dimension.

Despite limitations in the literature concerning the British business interest, these drivers have also played a significant role in shaping the outcome of the TCA. Manolis Kalaitzake (2021, p. 986) underscores the important role of the financial sector in shaping the outcome of Brexit. He argues that, and as this paper will discuss later on, economic interdependence and British lobbying also played an important role in persuading British and EU policymakers to prioritize an economic agreement (Kalaitzake, 2021, p. 986).

Having presented the most central themes, arguments, and discussion in the literature, it becomes clear that the issues under scrutiny are complex and multifaceted. Regardless of the significance of the scholarly contributions, it appears that some questions still remain somewhat ambiguous and uncertain. An attempt will therefore be made in the later stages of this paper to provide further answers for these conundrums.



# 3 Research Design

## 3.1 Conceptual Framework

The conceptual framework in this paper is predicated on external differentiated integration as an offspring of differentiated integration. The paper will therefore firstly expound on the foundational principles of differentiated integration. Subsequently, the derivative offspring of external differentiated integration will be addressed to illustrate how it provides insights into the current situation between the EU and UK.

### 3.1.1 Differentiated Integration

The concept of differentiated integration encapsulates the notion that not all policy areas, especially those which emphasizes integration and cooperation, are applicable to every member state (Schimmelfennig et al., 2015, p. 766). The complexity of the European nature does not always allow for one policy to be implemented in all the member states. We can therefore, as Thomas Winzen and Frank Schimmelfennig brilliantly puts it, understand differentiation as a "legal exemption from the validity of the rules that govern a policy area" (2016, p. 624).

Justification for such preservation, which is often achieved through political bargaining may be rooted in political, economic, cultural, or social concerns. Regardless of the motivation for differentiated solutions, DI has proved to be a recurring element in European policy implementation (Schimmelfennig et al., 2015, p. 766). Eminent scholars claims that DI is not only a temporary feature or side effect of negotiations but has instead become an essential and enduring characteristic of the EU (Schimmelfennig et al., 2015, p. 765). Furthermore, Schimmelfennig, amongst others, refer to the European Union as a "system of differentiated integration", which implies that the concept has become incredibly persistent in the EU landscape (Schimmelfennig et al., 2015, p. 765).

Accordingly, a central element in differentiation is the act of opting out from European policy implementation. Prior to Brexit, the UK was significantly characterized by several notable exceptions and opt-outs from European legislation and policy implementation (Keating et al., 2022, p. 4). These includes exceptions from the Euro, Schengen and parts of justice and home affairs (Keating et al., 2022, p. 4). Retrieved from the European Council, it is stated forthrightly in the protocols to the treaty of Lisbon that the British rights for a differentiated position in the EU is:

*"a. not to adopt the Euro, maintaining its national currency, the Pound sterling (Protocol No. 15);*

*b. to exercise control of borders and, therefore, not to participate in the Schengen area (Protocols No. 19 and 20);*

*c. to choose whether or not to participate in Community measures in the Area of Freedom, Security and Justice (Protocol No. 21);*

*d. not to be bound by the jurisdictional capacity of the Charter of Fundamental Rights of the European Union (Protocol No.30)"*

(EUR-Lex, 2021).

Additionally, Denmark has also been active in opting out. They have inter alia preserved themselves from the economic monetary union, the area of freedom, security, and justice, and just up until recently, defense (EUR-Lex, 2021). Ireland is neither part of the Schengen agreement nor part of the area of freedom, security, and justice (EUR-Lex, 2021). Albeit the UK is notably reluctant, it is not alone in negotiating and seeking for opt-outs.

### 3.1.2 External Differentiated Integration

As opposed to DI, EDI refers to the formal agreements and arrangements the Union has with its external neighboring countries (Keating et al., 2022, p. 1). Gstöhl and Phinnemore described these relationship as "privileged partnerships", which often encompass adoption of the *Acquis Communautaire*, reciprocal rights, binding agreements, policy cooperation and institutional arrangements and other formal measures (Keating et al., 2022, p. 1). Countries outside of the EU which cooperates on a formal level can therefore be said to have a deeper level of engagement and cooperation than the standard-third country relation.

Scholar and professor Sandra Lavenex states that "a third country's inclusion in a specific regulatory body is not a goal in itself but is an instrument in a foreign policy that is based on the extension of the EU's *Acquis Communautaire*" (2015, p. 837). She further claims that "functional considerations" and "foreign policy prerogatives" are significant drivers to involve third countries into EU policy (Lavenex, 2015, p. 837). Therefore, EDI must not only be seen as the external counterpart of differentiation, but in strict sense, also in relation to Europeanization and subsequently European external governance.

Expressions of EDI can therefore occur if the EU and a third country both finds it beneficial to align their political agenda. The same way third countries may enjoy and benefit from integrating into the *Acquis Communautaire*, the EU can also enjoy this form of exporting its policies and principles (Niemann et al., 2019, p. 60). By letting third countries partly integrate into EU policies, the EU benefits through its promotion of European standards and values beyond its borders (Niemann et al., 2019, p. 60). Therefore, one can also argue that EDI partly extends into neofunctionalism as it often entails an "external spillover effect" (Niemann et al., 2019, p. 60).

Given the complex nature of the EU, and its various relationship with its neighbors, EDI may occur in many different shapes. For some countries, EDI may encompass a place in the European Neighborhood Policy, where ENP member countries are not considered potential future EU member states given its geographical remoteness (Zuleeg & Wachiwiak, 2021, p. 14). For others, EDI may emerge as a "temporary waiting room on the way to membership", inter alia, as is the case of Albania and North Macedonia (Zuleeg & Wachiwiak, 2021, p. 13). Then, there are the EFTA countries, which are qualified to become member states but have chosen not to fully integrate for various reasons (Zuleeg & Wachiwiak, 2021, p. 14). The case of UK, however, is unique, as it has introduced a new mode of EDI into the literature (Zuleeg & Wachiwiak, 2021, p. 15). The UK does not only serve as the first major example of "disintegration". It has also externally integrated back into the Acquis afterwards, which thereby has redefined the concept of EDI and changed EUs approach to EDI as a whole.

Zuleeg & Wachiwiak (2021, p. 13) describes external differentiation as a process which allows for deep economic integration at a political price. The case of UK, and the Trade and Cooperation Agreement serves as a great example of precisely that. The British has earned its right to economic cooperation through the TCA by adopting and integrating into other policy areas like social security coordination, energy and sustainability, air and road transport and fisheries (Ioannides, 2023, p. 1).

## 3.2 Methodology

### 3.2.1 Single case and within case comparison

The paper employs a qualitative methodological framework to explore the expression of external differentiated integration between the EU and UK in a post Brexit era. First and foremost, the single case study design will be used to get an in-depth and detailed examination of these particular political developments (Willis, 2014). Single case studies are, perhaps tellingly, particularly applicable to "sui generis" (2014). Brexit and its accompanying political conundrums can be considered the first of its kind and thereby confirms the fitting applicability of this methodological approach.

More specifically, the paper will make use of a within-case comparison design. In similarity to the Willis' latter claim of the single case study serving as particularly applicable for "sui generis" cases, scholar-activist Albert Mills further considers the within-case analysis especially fitting for "standalone entities" (2010, p. 2). The within case comparison has therefore been chosen as the most effective approach as it offers a detailed comparison of two specific policy areas that are crucial to understand the dimensions of this integration; one focusing on security and defense and the other on trade and economics (Mills et al., 2010, p. 971). The entire case of Brexit is complex and includes numerous policy areas which upon first glance may seem very complex, which it definitely is, but by narrowing the scope of the study down to two subcases, one can go more in-depth and thereby gain further clarity to the question at hand (Mills et al., 2010, p. 972).

### 3.2.2 Triangulation

The use of triangulation will actively be used as the methodological approach to enrich the analysis and strengthen the findings. The rationale behind triangulation rests on the assumption that no single method is singlehandedly sufficient enough to fully explain the challenges of competing explanations (Patton, 1999, p. 1192). Instead, multiple methods of data collection can provide a more comprehensive understanding of an event or phenomena (Carter et al., 2014, p. 545). Given the explanatory purpose of this paper, triangulating in this regard is considered crucial. To undertake this specific method, the paper has found it necessary to supplement the qualitative findings from the literature with direct expertise for this specific topic through semi-structured interviews.

### 3.2.3 Semi-structured interviews

Semi-structured interview is chosen as the most applicable interview approach given its flexible nature. As opposed to many other approaches, semi-structured interview does not strictly follow an interview guide, which lets the participants probe into the subject with little constraints (Barriball & While, 1994, p. 331). The dynamic nature of semi-structured interviews allows for a natural conversation which can uncover unexpected information which one could potentially miss by employing stricter forms of interview methods (Barriball & While, 1994, p. 332). Moreover, the participants invited to the interview brings their own distinct expertise to the table, and the flexible dynamic allows them to provide insights from their particular field of competences.

## 3.3 Hypotheses

As the concluding remarks of the literature review pointed out, some questions, for different reasons remains somewhat ambiguous. The hypotheses below have been crafted on the basis of the established literature, and they are specifically designed to facilitate room for further investigation in the subsequent analysis.

**H1:** *EDI has not occurred in security and defense because the British government has never considered the EU to be a relevant actor in this field, and has instead relied on the NATO, the US, and other bilateral arrangements for security concerns.*

**H2:** *EDI has not occurred in the field of security and defense because the cooperation already established between the parties would partly continue on an informal level.*

**H3:** *EDI has not occurred in the field of security and defense because the EU could not risk contagion to other European member states and had to set precedent with the UK.*

**H4:** *The broader politics of Brexit negotiations, the political expediency and concerted time-pressure undermined the parties' ability to establish a viable EDI solution on security and defense, and instead prioritized an economic agreement.*

**H5:** *EDI has not occurred in the field of security and defense because the public pressures, the high visibility of economic, as well as the persistent policy issues of sovereignty and immigration prioritized negotiating a trading agreement.*

**H6:** *As opposed to security and defense, economics and trade has become an expression of EDI, because of the role of business interest on the British and EU side.*

## 4 Analysis

As the literature review stated, the scholarly contributions and the literature as a whole has been very sufficient and robust in providing answers and guidance for the research-question at hand. The paper has, however, found the need to investigate deeper into some of the aspect on this particular issue. This rationale stems from two concerns. The first one is predicated on the assumption that certain, and often very specific issues lacks robust investigation, which is the case of this particular research question and its accompanying puzzles. Or secondly, the issue may have been addressed in previous studies, but needs further confirmation or expertise given either recent political developments or concerns of outdated research. Which as for both has created a gap in the literature. The paper will therefore in the subsequent section of the paper attempt to answer the hypotheses presented above.

### 4.1 Falling back on NATO and the US?

The literature review mentioned that the UK has been historically reluctant towards European development on security and defense, which can be further explained by their commitment and reliance to "national, bilateral and NATO cooperation" (Martill & Sus, 2022, p. 1297). As of recently, however, Donald Trump stated that he would "not protect" NATO member states which did not spend at least 2% of their gross domestic product on defense, and further stated that he "would encourage them (Russia) do whatever the hell they want" (Gray & Siebold, 2024). The central role of the US in NATO, and the increasing American dissatisfaction with NATO member states has therefore introduced a new uncertainty on to what extent any NATO member state, including the UK, can rely on NATO and the US in times of crisis. Accordingly, it is reasonable to assume that formal integration between the EU and UK would therefore emerge in this field, but as this paper has pointed out, it has not. The aforementioned argument presented in the literature review is therefore challenged by these recent developments.

One of the participants from the interview, Dr. Telle, states that albeit such statements can be deeply concerning, they are not necessarily considered immediate threats and therefore does not function as a direct push for integration (2024). Instead, public dissatisfaction from figures like Trump are used as a mean of action and can be understood as "a strategy to get what he wants" (Telle, 2024). Additionally, political reactions from those statements can be "sold at home" as an achievement (Telle, 2024). In fact, recent years has showed a significant incline in budget spending towards defense in many NATO member states (Vergun, 2024). This new wave of increased defense spending can obviously primarily find its explanation from the Russo-Ukrainian war, but simultaneously, it is reasonable to assume that Trumps "name and shame" strategy concerning burden sharing has also likely contributed to this development.

This further begs the question of whether the increased defense spending, and the ostensibly renewed interest in NATO can be used to explain why British desire to integrate with EU on defense has been undermined. In the other interview, Dr. Benjamin Martill argued that Trump's rhetoric regarding the uncertainty of US has not fostered new commitment to NATO, but rather undermined the credibility of deterrence (Martill, 2024). The level of polarization in the US and the presence of Trump, whether he be in power or not, makes the EU and UK more predisposed to hedging (Martill, 2024). As such was the case during the government of Theresa May, where the rise of Trump, the Salisbury poisoning and the tensions in the Donbass region resulted in security concerns, hereby explaining her desire for a security agreement with the EU (Martill, 2024). In spite of this, British security still finds heavy reliance in NATO and the US, and it definitely must be seen as an important factor to explain why security and defense was undermined during the negotiation of the TCA, which thereby verifies the first hypothesis.

## 4.2 Shift towards bilateralization and informal cooperation

Being predisposed to hedging, one could at first assume that the UK should seek for formal security cooperation with the EU instead, but as this paper has highlighted, this has not been the case. According to Dr. Telle, there have been a massive increase towards their bilateral relationships instead (2024). Their direct cooperation with the more "serious" partners, like Germany, France, Poland, and the frontline states in the current conflict, such as the Baltics have all directly developed deeper forms of cooperation with the UK (Telle, 2024).

In the immediate years after Brexit, the EU and its member states were united against the UK and predominantly reluctant to talk with the British in this policy area (Martill, 2024). But since the geopolitical escalations in Ukraine, bilateralization has "gradually ramped up" and they now speak on a daily basis (Martill, 2024). This has also introduced new complications for the EU, where they have to accept that big member states are going to seek direct cooperation with the UK (Martill, 2024). The EU therefore often monitor these dynamics, to make sure that the EU position is not sold out, and equally, EU member states have to occasionally check in with Brussels (Martill, 2024). Therefore, the British strategy-shift towards bilateralization can be seen as a major explanatory reason for why security and defense has indeed not become an expression of external differentiated integration with the EU as opposed to trade and economics.

It should also be mentioned that the informal contacts and cooperation have, contrary to the initial expectations, also experienced substantial growth. According to Dr. Martill, the British have provided the curriculum for EU's training missions, has taken part in the military mobility of PESCO and British officials are in Brussels assisting in coordinating where weapons supplies go (2024). The EU-UK situation can therefore be said to have improved year on year, and month on month (Martill, 2024). Therefore, informal cooperation which continues to thrive should be seen as a contributing explanation for why the UK nor EU has not sought for formal agreements in this policy area. The second hypothesis is therefore not only verified based on the informal contacts, but it has also identified how bilateral cooperation have likely mitigated the necessity of the EU.

### 4.3 Contagion and setting precedents

When discussing Brexit, it is very common, as mentioned earlier, to assign responsibility for complications regarding cooperation at the feet of the UK. Even though most Europeans, and almost half of the British population wished to avoid the unwanted outcome of withdrawal, the EU has consequently played its rightful role to slow down the process of cooperation and integration in several policy areas.

Theresa May attempted to establish a bespoke deal, which included cooperation in security and defense, sector-specific participation in single market and other customized form of partnership (Martill, 2021, p. 983). She failed not only domestically but also in Brussels (Martill, 2021, p. 983). The EU opposed Mays proposal as they feared it would divide the four freedoms, reduce EU autonomy in decision making, and felt that the UK attempted to cherry pick from the Acquis Communautaire (Martill & Sus, 2021, p. 983). This is what the literature refers to as "Brussels red lines", meaning policies and issues which Brussels considers non-negotiable, and areas where the EU are unwilling to reach compromise. Every model in the EU structure represents a certain balance of rights and obligations, and these models cannot be adjusted specifically for the UK (Martill, 2024). Brigid Laffan further states that the EU had three strategic goals regarding Brexit:

*"One: to show that membership must matter. Two: to demonstrate the centrality of the EU to governing trans-national relations in Europe and three: to safeguard the EU as a rule-based system built on treaties, laws, and institutions".*

*(Laffan, 2019, p. 24).*

Through Brexit, the EU could essentially make an example of how Britain's role of being an unwilling martyr for the cause comes at a cost (Martill, 2024). In the semi-structured interview, Dr. Telle states that for their book, "EUs response to Brexit", he and Brigid Laffan interviewed people which contributed to the negotiations on the EU side (2024). The participants stated that "the EU would not move", and that the UK ultimately had to "focus on what they could get and leave out parts they could not get", which helps to explain why economics and trade was prioritized (Telle, 2024). Furthermore, Dr. Telle stated that the UK initially aspired for a separate agreement regarding other issues, such as "energy, fisheries and potentially security cooperation", but since the EU with more bargaining power could dictate the terms of the negotiations, EUs preferred outcome of one overarching agreement was the final result, which thereby deprioritized the policy area of security and defense and prioritized trade and economic (Telle, 2024).

Additionally, President of the European Commission, Ursula Von der Leyen stated back in 2020, that:

*“No new partnership will bring back the benefit of being part of the same union, but we have the duty to seek the best for the British and for the European people in a post-Brexit world.”*

(European Commission, 2020).

This statement is important in this analysis, because it conceptualizes EUs overarching strategy for how it planned on handling the case of UK in the following years; on one side it had to continue beneficial cooperation, but simultaneously make sure it never served as a better solution than membership. As mentioned in the earlier stages of this paper, the literature surrounding the crucial necessity for EU to avoid contagion is well established. Years after Brexit however, it becomes interesting to explore to what extent this still is the case. According to Dr. Martill, EUs approach to the UK today comes down to two things: what the UK could add in a certain policy area, and perhaps more importantly, what the EU wants to achieve (2024).

Drawing this to the dimensions of security, the EU has always felt that the UK can bring significant value to the table, which explains, as stated above, why the EU has informally cooperated with the UK in recent years. This hereby implies that functional needs can occasionally overrule fundamental discords if it is considered paramount. Still, it is likely that this particular issue will remain a puzzle for the uncertain future, because regardless of the significant value the UK could bring, allowing decision-making power to the UK in this policy area would mean that EU oversteps their own red lines.

The political dynamics which have unfolded as a result of Brexit, and the somewhat inevitable reaction from the EU first seemed to have created an unsolvable deadlock, but despite this, contagion has become less important. EUs approach to the question of contagion is still present, but functional needs may occasionally overrule those political bargaining processes if it is important enough. The hypothesis concerning contagion still remains complex and multifaceted, but it has definitely contributed to reducing EUs willingness to ingrate. The hypothesis is therefore verified for the first stages of Brexit, but as time has passed, it becomes more unclear of to what extent this still affects the dynamics.

#### 4.4 The broader politics of Brexit

It is clear that the shift towards a harder Brexit and the time constraints on the new government truly undermined the potential for integration. Theresa May, and her government initially proposed the “Framework for the EU-UK Security Partnership” during May 2018, but the expressions of continued interest and ambitions were taken advantage of by pro-Brexit lobbies and right-wing medias (Martill & Sus, 2023, p. 1295).

Mays government was portrayed as “Brexit in name only” (BRINO), and the hard/soft Brexit debate resulted in a hardline government with Boris Johnson in the lead, where the sole focus was to “get Brexit done” (Martill & Sus, 2023, p. 1296). Finding



themselves in the midst of covid further exacerbated this process, and it became “an easy win” for Johnson (Martill, 2024) as his government did not feel that security cooperation with the EU is something the UK desperately need for their national security at the time.

As if the political shift towards the right did not worsen the hope for cooperation in security and defense, the time constraints certainly did (Martill & Sus, 2023, p. 1297). With Johnson ultimately gaining an 80-seat majority in the general election at the end of 2019, and the deadline for the negotiations of the future relationship already set at the end of December 2020, there were little room to discuss “less” important matters (Quinn et al., 2022, p. 236; Martill & Sus, 2023, p. 1297). Simon Usherwood stated that reaching an agreement under “such extreme time constraints” and with “much remote interaction” was an impressive achievement in itself (2021, p. 4). And despite high ambition in the early stages of negotiation, the TCA must be seen as a better outcome than a “no deal” scenario (Minenna, 2021, p. 17).

Years after Brexit, it becomes interesting to see to what extent the politics of Brexit still affects EU and UK willingness to cooperate on security and defense. Dr. Martill states that he first and foremost does not believe the EU and UK have completely figured out how they would square the circle in that regard (2024). Despite persistent discord however, and as addressed in the earlier stages of this analysis, the “broader politics of Brexit” has to some extent fallen by the wayside, as both parties have realized it is unwise to be divided when they’re both facing a common external aggressor with a very different worldview (Martill, 2024). 8 years after the referendum however, the core issues of sovereignty and immigrations still continues to play a role regarding the question of security and defense. The conservative and the labors are still both reluctant to the EU, although it should be mentioned that latter party is slightly more sympathetic towards cooperation with the EU than the former (Martill, 2024).

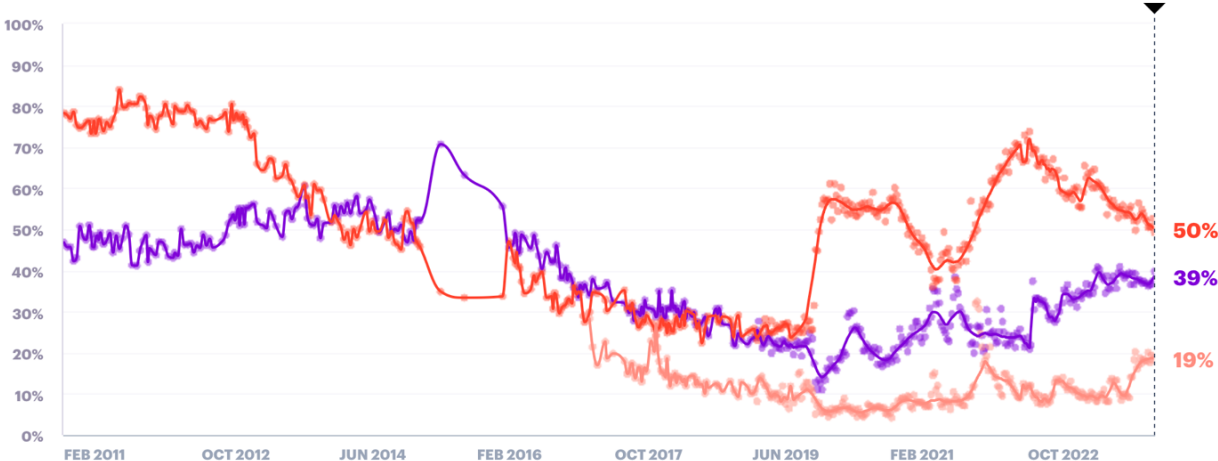
Sovereignty meant taking back control, “whatever that means” (Martill, 2024), and has ironically enough resulted in a situation which seems to be somewhat paradoxical. Despite having “taken back control”, the UK has still ended up adopting almost all the same policies and agendas as the EU does (Martill, 2024). This is what Lee McGowan has called “orbiting Europeanization”, or as Dr. Martill stated: “we're orbiting Europe, we're adopting everything” (2024). To no surprise, having addressed the main drivers from the Brexit negotiations, the fourth hypothesis is therefore verified, and despite seeing that the water has somewhat calmed, the Brexit complications continues to play an important role in undermining UK willingness to integrate in this field.

## 4.5 The role of public pressures

To get a deeper understanding for what drove the UK to specifically land a trade and economic agreement, as opposed to security and defense, one can employ the concept of “political responsiveness” (Krichewsky, 2020). In simple terms, the modern political system first and foremost defines and formulates problems, thereafter, interpret the

problems within a broader context, followed by a deliberation on policymaking before it ultimately crafts a solution to be carried out (Krichewsky, 2020, p. 121). The problem, however, is that this process may often be highly selective. Dr. Damien Krichewsky states that there often is only a handful of potential political problems which ultimately is identified, examined, and thoroughly carried out (2020, p. 121).

Accordingly, a delve into what policy areas which has been paramount over the last years can be helpful. Retrieved from YouGov, a sample which is representative for British adults, the global public opinion- and data company asked the following question to British citizens: "Which of the following do you think are the most important issues facing the country at this time?" (YouGov, 2024). In a selected comparison, only focusing on "the economy", "security and defense" and "immigration" as the three political issues, it becomes easy to see how these issues have differed and continue to differ in importance amongst British citizens. 50% stated that the economy is the most important issue as opposed to only 19% on the issue of security and defense (YouGov, 2024). It also illustrates how immigration and sovereignty still remains a persistent and important issue for the British population, with a staggering 39%, and shows how these issues still play a central role in shaping British politics (YouGov, 2024).



(YouGov, 2024).

An argument which this paper has found necessary to present is the direct impact trade and economics have on people. It is a policy area which is highly visible when not fulfilled. Prices of goods and the availability of products are directly affected by the economic arrangements and trading agreements between the parties (Kalaitzake, 2021, p. 486). Manolis Kalaitzake who has studied the finance of Brexit argues that despite many policy areas being important in their own right, few stands of more "systemic importance" than the interdependency and the operation of the individual economies (2024, p. 486). As the 2007-08 financial crisis vividly illustrated, if the "primary sources of capital" are disrupted, entire economic may come to a halt (Kalaitzake, 2021, p. 486). Therefore, the direct impact of the economy, the theory of political responsiveness, and the attached illustration serves as explanations for why certain policy areas are prioritized and why others may go under the radar, and thereby verifies the fifth hypothesis of the analysis.

## 4.6 The role of British business interest

Even though the UK is indeed a trading partner which stands of significant importance for the EU, they are not considered as vital for "survival" as the EU is for the UK. The EU ranks as their biggest and most important trading partner, which underscores the importance for the British to reach an agreement in this field (Minenna, 2021, p. 3). This meant that British business interests were extremely exposed and vulnerable to imposition of trading barriers and therefore had to put in great efforts to attempt to shape the political development in that regard (Martill & Mesarovich, 2024, p. 6). British business interest therefore played an important role in lobbying against harder versions of Brexit (Martill & Mesarovich, 2024 p. 6).

With London competing with New York as the number one finance center globally, securing an attractive agreement with the EU was a high priority for UK authorities (Long Finance, 2019). Despite having stated that an agreement was more vital for the British, the EU also highly values trading with the UK as well. The size of the British respective economy, their market depth and the liquidity of London serves as a financial hub for many European actors. High efforts were therefore put into making sure EU actors completely understood their dependency on "the city" (Kalaitzake, 2021, p. 489). So, not only does the financial sector and the British business interest play a crucial role for British growth, but it also serves as a provider for essential services to EU cooperation's as well (Kalaitzake, 2021, p. 499).

Many analysts, scholars and journalistic commentators have discussed the "limitations" of the financial sector of London in a post-Brexit era and suggest that despite the financial clout of British finance, this sector struggled in shaping the Brexit process (Kalaitzake, 2021, p. 480). Dr. Kalaitzake however argues that the strength of the Business interest, particularly on the British side becomes evident from how European policymakers also sought for financial agreement (2021, p. 498). One of the arguments Kalaitzake and Martill makes is that business has a lot of structural power (2021, p. 483; 2024). Both EU and UK policymakers are structurally dependent on the financial sector and the vital role it has in contributing to economic growth, which therefore underscores the parties dependency upon each other (Kalaitzake, 2021, p. 486). One of Brexit's most central negotiators, David Davis stated that avoiding financial fragmentation should be a priority and responsibility not only for the UK, but for the EU as well (Kalaitzake, 2021, p. 491). As such, the role of business interest in shaping the negotiations must be seen as both EU and British motivations.

The sixth and last hypothesis is therefore verified on the basis of the importance of British business interest, and the role those actors had in lobbying during the referendum and the TCA negotiations. The structural power, as addressed by Dr. Kalaitzake further highlights how the interdependence also included EU actors to push for an attractive outcome. It was not a policy area in which Boris Johnson could ignore and undermine as opposed the security and defense (Martill, 2024).

## 5 Conclusion

This paper posited the following research question: *How can it be explained that security and defense has not become an expression of external differentiated integration, as opposed to economics and trade in a post Brexit era?* The literature review presented some of the most central arguments, themes, and debates inherent to the question at hand. Thereafter, six hypotheses were created, tailored to facilitate further investigation for the most elucidated aspects of this topic. Ultimately, those hypotheses were examined in the analysis, in which qualitative data was triangulated with direct expertise from two central profiles from this domain.

The first and second hypotheses discussed to what extent the British reliance on NATO, the US and other bilateral relations has mitigated the necessity for formal agreement with the EU in security issues. Despite the growing uncertainty regarding American dissatisfaction of financial contributions to NATO, the alliance is, and is likely remain the most robust solution in terms of security for the UK, and thereby plays an important role in explaining why the UK has not sought for further formal agreements (Telle, 2024). Contrary to initial expectations however, the UK has not only maintained their informal contacts, but as Dr. Martill stated (2024), increased their informal practices and rosters with the EU as a whole, which should be seen as a contributing explanation for why formal agreements between the parties has remained untouched by EDI. At last, and perhaps most importantly, the UK has over the last years instead experienced a significant shift towards bilateralization (Telle, 2024). It has advanced in security cooperation with the actors the UK finds most serious and important, which thereby served as verification for the first and second hypotheses.

The paper also raised the question of what role the EU played in undermining security agreements and instead prioritized economic cooperation. It found that the EU has attempted to balance beneficial distributional outcomes while simultaneously ensuring that any new arrangements does not serve as a better solution than what membership can do (Martill & Sus, 2022, p. 1292). With the EU dictating the terms of the negotiations, there was little room for British cherry picking from the Acquis Communautaire and bespoke agreements was ruled out. In spite of this, the UK have a lot to bring to the table in terms of security and defense, and with both parties facing a common external aggressor, the EU has advanced in some informal forms of cooperation with the UK (Martill, 2024). The paper has therefore found that if the matter is important enough, the EU may occasionally choose to overstep their own "red lines" and contagion can occasionally be deprioritized. Despite leaning towards verification, the third hypothesis is neither completely verified nor dismissed, as it occupies a nuanced position between the extremes.

The broader politics of Brexit, which encapsulates both a shift towards the right and time constraints are considered one of the main drivers in forming a hardline government, and definitely contributed to prioritize a trading agreement over a security agreement. Data from the analysis shows how sovereignty and immigration still are important issues for the British citizens and the challenges inherent to Brexit are still present (YouGov, 2024). Recent times however have illustrated how a “hardline” approach has gradually become softer and been somewhat replaced with a pragmatic leadership instead (Martill, 2024). Despite this, both the conservatives and the labors are still reluctant towards formal cooperation with the EU as a bloc, and the fourth hypothesis was therefore verified. At last, the paper has also examined what role the public pressures, the direct impact of economics and role of British business interest has played to shape the outcome of the TCA. The paper found that the structural power and systematic importance of trade, the visibility of the economics, and the lobbying of businesses have contributed to preservation of economic integration, and thereby undermined the room to include security and defense in the TCA (Kalaitzake, 2021, p. 486). The last two hypotheses are therefore also considered verified.

Even though the paper has illuminated certain dimensions and presented noteworthy findings, its limitations are also recognized. Both Dr. Martill and Dr. Telle has provided incredibly valuable insights and contributions from their specific expertise. There are, however, a number of factors which has further contributed to the divergent outcome for the two subcases at hand which cannot be covered in this paper alone. The six hypotheses only cover certain policy areas inherent to the research question, and future studies may therefore want to delve deeper into the shortcomings of those hypotheses. Brexit serving as the first of its kind implies that there is a lot of room for new thinking. Furthermore, differentiation, and external differentiated integration has been and continues to be an evolving concept in the EU literature. Potential further research may therefore consider conducting a longitudinal study to explore the long terms effect of bilateralization in the UK and how EDI has evolved. Another interesting approach could also be to explore how other subcases and different policy areas compares with security and defense and economics and trade.

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## Attachment 1: Participants for the interviews

<b>Participants</b>	<b>Description</b>	<b>Platform and date for interview</b>
<b>Dr. Benjamin Martill</b>	<p>Senior lecturer in Politics and International Relations at the University of Edinburgh.</p> <p>Dr. Martill has written 30+ articles on topic revolving EU-UK relations, Brexit, Security and Defense and much more, and is therefore considered extremely eminent for this particular paper.</p>	<p>Semi-structured interview over teams.</p> <p>02.05.2024</p>
<b>Dr. Stefan Telle</b>	<p>Assistant Professor in European Governance and Politics at the University of Twente.</p> <p>Prior to this, Dr. Telle was a Research Associate at the Robert Schuman Centre for Advanced Studies with a focus on differentiated integration.</p> <p>Dr. Telle has also published the book "The EU's response to Brexit" with Brigid Laffan.</p>	<p>Semi-structured interview over teams.</p> <p>30.04.2024</p>

## Attachment 2: Guide for the semi-structured interview.

**Note:** Both Dr. Martill and Dr. Telle possess distinct expertise, and the interview guide has therefore been specifically adjusted accordingly to their competences. The following guide should therefore be read as a compilation of the interview, instead of a strict template.

- Transcription and further details from the interview can be provided upon request.

Warp up:

- Informal conversation.
- Informing the participants of what the focus and purpose of the paper is.
- Clarifying privacy and ethical concerns for audio taping, transcribing and potential citation in the paper.

Question 1:

- To what extent have the "broader politics of Brexit" undermined EU and UKs ability to negotiate a viable agreement for security and defense?
- To what extent is this still the case?

Question 2:

- To what extent has the EU undermined integration with the UK on security and defense in order to avoid contagion to other member states?
- To what extent does the EU still undermine integration with UK to avoid contagion?

Question 3:

- To what extent has British reliance on NATO, the US and other bilateral relationships undermined the necessity for the UK to seek cooperation with the EU in security and defense?
- Given the ongoing conflicts, geopolitical tensions and American dissatisfaction with NATO member states not providing enough financial contributions to the alliance, what are the reason we still have not seen a push for further integration in security and defense?

- Accordingly, to what extent have the ostensibly renewed interest in NATO mitigated the necessity for EU-UK integration in security and defense?

Question 4:

- To what extent has the informal contacts undermined the necessity for both the EU and UK to seek formal agreements in this policy area?
- To what extent have the British strategy for cooperation and coordination changed to a bilateralization?
- To what extent has this undermined the need to seek security cooperation with the EU?

Question 5:

- What role has public pressure, the political elite and British business interest played in shaping the outcome of the TCA?

Question 6:

- What role has the highly discussed issues of sovereignty and immigration shaped British reluctance to integrate.
- To what degree are these issues still persistent?

Concluding:

- Asking if the participant has any additional questions or insights.
- Thanking the participant for taking their time.



