

European Union: In Varietate Concordia - United in Diversity. Differentiated Integration as the Key to the Future of the European Union?

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The project of European integration was born on the post-war ruins of Europe, where two world wars broke out in the course of thirty years. The idea of unifying European states arose from the practical consideration that societies that cooperate in the economic sphere, which even link some sectors, will not go to war with each other. It was clear that the memories of the war were too fresh, so political unification was not on the agenda. Robert Schuman, the French foreign minister, coming from the historically disputed region of Alsace-Lorraine, which the French and Germans repeatedly argued over, therefore knew the nature of mutual disputes. So he came up with the idea of an economic level of integration, which seems logical because it is effective. And it was needed precisely in the time of post-war reconstruction. Above all, however, the technical and economic interconnection of states that had been at war with each other for centuries should have made any consideration of war impracticable. (Schuman, 1950). That is why today's European Union began with integration in the energy and metallurgy sector (ECSC). Its success then had a spill-over effect on other areas (Haas, 1958). The Member States of the European Union are independent sovereign actors under international law. There is no single economic base characteristic of all the states of the Union. Even in the six founding countries, after seven decades of integration, no common features can be found in identical combinations that would form the same economic and political model. This is despite the original ideas of harmonizing economic characteristics. A unified approach to integration, the vision of which was to lead to the real unification of Europe, is not currently considered a suitable goal, as the motto of the European Union adopted in 2000, In varietate Concordia – United in diversity, is supposed to guarantee the specifics of each member. However, the heterogeneity of the Union is often too high, including in views on the further development of integration. If the founding fathers started from the thesis of full unity, the empty chair crisis in the mid-1960s was already a warning for them. Even then, in just six member states, different views emerged on the method of voting on matters of the common agricultural policy, which, moreover, was not yet fully operational, different views on the competences of the nascent European Commission. Here too, one can identify a willingness to go further and faster in the integration process, as opposed to interests in preserving given practices and retaining the right of veto in the event of an important national interest. It seems that the pace of integration in the 1960s was so rapid that by the end of the decade a certain degree of restraint was evident, which we now refer to as integration fatigue, but originally, in line with Haas's spill-over effects (Haas, 1958), this approach to integration was called the spill-back effect (Lindberg – Scheinglod, 1970: 137). In order to ensure the functionality and flexibility of the Community, later it was necessary to accept different positions of states on

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deepening integration, or rather a potential reluctance to go further. Nevertheless, the process of economic integration has slowly but surely transformed into a model of multilateralism and supranationalism for today's 27 member states (Cohen-Dootalieva, 2022) Related to this are disputes over the method of voting, where the idea of unanimity (i. e. the original idea of a uniform procedure for veto rights for each member on issues of national interest) is being replaced by a qualified majority for practical reasons. However, to this day, key sensitive areas such as foreign policy, taxes, enlargement, etc., maintain unanimity in the sense of national sovereignty. Since 2009 a double qualified majority system has been in place, requiring 55% of member states with 65% of the EU population to vote for approval. To ensure the interests of small states, a third condition applies, namely that the so-called blocking minority of small states must include at least four small states with a population below 35% of the entire EU population. This should guarantee democratic conditions for EU governance (Lisbon Treaty, Art. 238). These provisions of the Union's ordinary legislative process (Lisbon Treaty, Art. 294) thus responded reflect their differentiated approach to integration challenges.

The Idea of a Unified Procedure in Integration vs. Reality

The differentiated approach to the integration project, to its fundamental ideas, has been observable practically from the beginning of the integration process. And it is noticeable both in the economic, political and security levels. It is true that Europe has gradually been unifying over the course of seventy years, but rather in the sense of convergence in goals and procedures. On the other hand, a relatively wide range of possibilities for preserving individual interests is still left, without this disrupting the essence of integration. The European dream about unity leading to stability of many ideological fathers was based on the principle of unification and interconnection in such a way that no one would even think, not so that it would be practically possible, to wage war among themselves. From the originally initiated functional integration in the economic dimension, later this process has also moved into the institutional, political and security areas.

The original idea of integration was based on the premise of unity of goals and procedures. Reality showed the unattainability of the initial guidelines. Grey is the theory; green is the tree of life.... So over time, different integration speeds became a stable feature (EP, 17. 1. 2019: E) and it had to be faced in a constructive manner.

On a declaratory level, different integration speeds were discussed as early as 1973, i.e. in the year of the first enlargement, where in his speech in the European Parliament, German Chancellor Willi Brandt advocated a flexible approach by institutions and not relying on formal details. The following year 1974, he first used the term gradual integration to indicate the possibility of choosing the speed of involvement in the integration process according to the capabilities and needs of the states. Another year later, Belgian Prime Minister Leo Tindenmans urged his colleagues at the European Council that it was pointless to demand the same tasks by the same deadline for the then nine states. However, these considerations and political speeches were not translated into practice.

A fundamental milestone in the admittedly different pace and depth of integration was the Maastricht Treaty adopted in February 1992, bringing a fundamental

reformulation of the original treaties from the Paris (ECSC) to the Rome (EURATOM, EEC). The Maastricht Treaty established the European Union, systematized integration goals and instruments. Above all, however, it expanded the scope of integration from the originally economic area to internal security and jurisdiction and foreign-security cooperation. Maastricht but also not only demonstrated the differentiated dynamics of integration, but also directly disintegration, in connection with the large number of opt-out clauses, i.e. exceptions in specific areas of integration for specific member states. Primarily it is about of Britain opting-out regime from the objectives the economic and monetary union, on the basis of which it never had to adopt the euro. But that was not the only exception. Another opting-out regime concerned the incorporation of the European Social Charter of Workers' Rights from December 1989 into primary Community law, which Britain completely rejected. The result was a special protocol stating that the Charter would be binding on the then eleven countries, but on Britain as the only one not. Another agreed exception was Britain's non-participation in the Schengen system, on the grounds that it is an island state that has no land borders with any other. Thanks to Maastricht, other states also did not participate in all integration steps. Denmark, like Britain, additionally obtained an opting clause from the monetary union, and also obtained an opting regime in the case of EU citizenship, security cooperation, etc. Although there were quite a few exceptions, the Community legislation at the time did not yet allow this *de iure*. Although the Maastricht Treaty was supposed to lead to even closer integration, and although it allowed some member states to opt out of selected integration projects, its excessive regulatory nature nevertheless became the trigger for an existential crisis (Cohen-Dootalieva, 2022).

Relatively soon, further steps leading to deeper integration and preparations for enlargement to include other states followed. The legal change came with the subsequent Amsterdam Treaty of 1997, which codifies the possibility of differentiated or gradual integration as a flexible system. Originally, it was considered more in the context of different paces of fulfilling the conditions of the next integration stage, and there was no question of any country being completely left out - gradual integration assumes *a priori* that all countries will participate in the given project, only at a different pace according to their capabilities. This is somewhat in contrast to the practice of Maastricht. Officially, the Amsterdam Treaty speaks of a flexible system of closer cooperation (Article 5a TEU), which will allow for the deepening of cooperation between some states, but without disrupting the integrity of the Union. In everyday language, this phenomenon is referred to as closer cooperation or multi-speed Europe.

The possibility of differentiated integration is undoubtedly a pragmatic solution, but there is a significant risk of fragmentation of the Union, both economically and institutionally, which is why it is necessary not to question the fundamental building blocks of the European project, which are the respect and protection of the fundamental values of the EU (EP, 17. 1. 2019: F, M15). The essential values and rights of the EU are: respect for human dignity, freedom, democracy, equality, the rule of law and respect for human rights, including the rights of persons belonging to minorities (Article 2 TEU).

For many, the possibility of differentiated integration is a manifestation of democracy, when differences of opinion on development, on the level of standardization and implementation of standards are then interpreted as a manifestation of legal

pluralism. However, this then leads to some countries voluntarily excluding themselves from decision-making processes (Tosiek, 2023). One of the examples - the Czech Republic does not voluntarily participate in the monetary union, it even refused to sign the Fiscal Pact in January 2012, through the person of the then Czech Prime Minister Petr Nečas, despite being authorized by Parliament - and then we are surprised when we are not members of selected negotiating teams... In contrast to the Czech Republic, Poland is trying to take as large a share as possible in the mechanism of integration decision-making processes and is essentially trying to speak for Central Europe. There is now no doubt about its aspirations to the role of a Central European regional power. Slovakia is a country that, for most of its independence, has been striving for emancipation in the international system, for its voice not to be lost in community bodies. The Baltic republics, i. e. Estonia, Latvia and Lithuania, perceive the possibility of being a member of the Western structure as a certain degree of protection against Russian expansionism, which is why they act as active players. For them, differentiated integration means not slowing down, but rather accelerating and being part of a progressive part of the European Union (Jacobs, 2024).

On the other hand, we cannot ignore the facts leading to different dynamics of accepting integration commitments. The different pace of integration is also supported by the strong internal differentiation of the Member States' economies in terms of economic performance, macroeconomic stability and willingness/ability to meet the obligations arising from EU membership. For example, the current economic parameters of the south-eastern countries of the Union do not provide driving forces for economic and social convergence, which can be perceived as a risk of centrifugal forces in the EU (Celi et al., 2022; Ágh, 2016b). Then differentiated integration can be a solution not only for different approaches and opinions, but also for the possibilities of individual actors (Bellamy & Kröger, 2017).

Conceptualization of Differentiated Integration – Considerations on Different Models of Integration Process

Theorizing about flexible integration is quite broad and was one of the leading topics at the turn of the millennium. The conceptualization of multiple type of integration offers a fairly wide, but mainly colourful palette of models, each of which should correspond to a specific way of engaging in integration projects.

One of the first to reflect on different forms of differentiated approach to integration commitments was already in 1996, i.e. before the Amsterdam Treaty, Alexander Stubb. He distinguishes three manifestations of differentiated integration according to the intention and approach to integration (Stubb, 1996).

The first form is multi-speed integration, which is based on common goals but different paces of implementation, which corresponds to the designation of gradual integration. The assumption is that all Community states will participate in the given activity, but some can implement the relevant legal steps more quickly and achieve the goal faster, with the assumption that the rest of the states will reach the given goal later. But they will. We can see an example here in the Benelux, where these

states achieved the goals of the customs union even before the start of the EEC. Stubb cites the monetary union and the possibility of an individual deadline for fulfilling the Maastricht criteria as an iconic example. Multi-speed integration in this case reflects the abilities and willingness of individual countries to join the Eurozone, but the vanguard is made up of some countries. Hence the designation as enhanced integration.

The terminological ambiguity of multi-speed integration is somewhat reminiscent of the Babylonian confusion of languages: alongside enhanced cooperation, the term closer cooperation is also codified (Treaty of Amsterdam, 1997), while following Treaty of Nice 2001 uses the term extended cooperation. And for simplicity, this mechanism is also called flexible approach, flexibility mechanism... these are often used as synonyms.

While the integration euphoria of the 1990s meant that many states, including the largest ones, did not meet all the conditions (France, Spain, Italy, Belgium, Portugal), they nevertheless started with those that did meet all the criteria (Austria, Germany, the Netherlands, Luxembourg, Ireland, Finland). The different speed in achieving the final stage of economic integration – monetary union – is also evident in those that are essentially hesitant. Sweden met and still meets all the economic criteria, but due to divided public opinion regarding the euro, it does not meet the formal condition of fixing its currency to the euro. And no one blames Sweden for this. This confirms one of the fundamental features of European integration, which is a compromise approach and tolerance.

In the case of multi-speed integration and the example of monetary integration, I would just like to remind you that today, according to the legislation that is still in force, only Denmark has the right to stay outside the Eurozone. All other states that are not yet members have an obligation to move towards the Eurozone. They committed to this in the accession treaties. Of the current 27 EU members, a full 20 countries have introduced the euro, so 7 states are outside. Denmark is the only state with a permanent exception, Sweden essentially does not want to join the Eurozone, but it meets all the criteria, and then only the Eastern enlargement countries remain, of which Croatia joined the Eurozone in January 2023 and Bulgaria is already on its way in and is in ERMII. This means that from January 2026, the EMU would expand to 21 out of 27 states. It seems that only the Czech Republic rejects the euro in essence, because for the others it is more a question of implementation problems on an economic level, not political.

Stubb also assigned other terms to this first category of differentiated approach to integration, which ultimately did not catch on in the so-called Euro speak (the jargon used by civil servants and politicians of European institutions): two-speed integration, flying goose, or step-by-step (Stubb, 1996), which would probably correlate most with the essence of the gradual process of achieving the goal. He puts this in context with the common practice of “Brussels”, which is granting transitional periods for achieving the goal. There is no state that would not sometimes use a transitional period to implement some legal steps.

The entire Eastern enlargement was conceived as a multi-speed model, referring to the agreed principle of accepting new countries into the Union. At the Luxembourg summit in December 1997, the launch of the overall process of enlargement of the

Union was discussed and the principle of enlargement in so-called waves was adopted. The first wave included six countries that had so far demonstrated the greatest degree of convergence. These were the Czech Republic, Estonia, Cyprus, Hungary, Poland and Slovenia, with which bilateral negotiations were initiated. A dynamic approach should be maintained when assessing the progress made by candidate countries in the regular reports (Luxembourg European Council, 12. 1997, d 30). Finally, two years later, in 1999, in Helsinki, the enlargement procedure was changed to the regatta principle: the member states as a group of ships heading to the same port, which is the EU. Whoever arrives first, that is, meets the entry criteria, will be accepted first. This metaphor fully captures the essence of multi-speed integration. And it does not matter whether it would be within the Luxembourg group or the Helsinki group, because both methods took into account different dynamics of convergence of the candidate states.

The accession criteria, the so-called Copenhagen criteria, were formulated in 1993 in three basic levels - political, economic and legal. In the area of political requirements, emphasis was placed on institutional stability guaranteeing democracy, the rule of law, and the protection of human rights. The Copenhagen Criteria were based on general EU standards.

In the economic sphere, a functioning market economy and macroeconomic stability guaranteeing the ability to withstand the competitive pressure of the EU internal market. The third group of conditions related to the enforceability of law, the functionality of the courts, and the validity of EU legislation - the *acquis communautaire*.

The vast majority of candidate countries from Central and Eastern Europe faced problems in achieving all the criteria, both in the political sphere, the related legal and administrative requirements, and in the economic sphere. It is necessary to recall that these countries were undergoing a socio-economic transformation from the former directive management of the state and economy to a democratic organization of public affairs with the implementation of market elements. These candidate countries were thus solving several tasks at once. not only the transformation as a holistic concept of the transition from dictatorship to democracy, but also had to implement measures within the framework of the *acquis communautaire*. Therefore, during their convergence process, different dynamics of harmonization of legislation and real implementation of requirements were manifested. For example, the Czech Republic has long shown decent economic growth with low unemployment and lower inflation rates, unlike Poland, Hungary or Slovakia. But in the mid-nineties, Czech society was struggling with ineffective jurisdiction and poor enforcement of rights. Therefore, during their convergence process, different dynamics of harmonization of legislation and real implementation of requirements were manifested. In 1998, the Czech economy faced macroeconomic depression, similar to Slovakia, Hungary and Bulgaria. Bulgaria, Romania and Slovakia had confronted criticism for insufficient levels of corruption and political violence. These issues were ultimately included in the European Commission's opinions on individual candidate countries, the so-called *avis*, which assessed progress in convergence with EU standards. In general, it appears, and statistical data confirms this (Seidlová & Hána, 2021), that it is easier to achieve a higher degree of convergence in economic issues than in the area of civic integration (Konig & Ohr, 2023). These different problems of the candidate

countries also reflect the different dynamics of their convergence, which also means a manifestation of differentiated integration *ex ante* of their full involvement in the integration project.

The interconnectedness of the phenomenon of European integration in its multi-speed connection with the centre-periphery model offers the concept of multi-floor integration according to the affiliation of a given member according to geographical allocation, all framed by geopolitical contexts (Ágh, 2016b). Similar to Tim Marshall's geographical determination of world politics (Marshall, 2015). The Ágh's concept of multi-floor diversified integration is elaborated on the basis of the binary relationship of core-periphery in a total of four levels (floors). The first floor is formed by core no. 1, which is the category of Western European states and is a full-fledged active membership in the Union. The second floor is then occupied by core no. 2, which is represented by the Nordic centre with a certain laxity in the integration dynamics (!?). The third floor was then occupied by the countries of the South as partial peripheries of membership and the fourth floor belongs to the real periphery, namely the East (Ágh, 2016a).

I will allow myself to make my own comment – yes, in principle I agree with the division of integration dynamics related to individual subjects. Moreover, my categories of comparative groups of states (Kučerová, 2014; 2025) can be inserted into this Ágh structuring.

Floor (level) No. 1 truly forms the integration core of the six founding countries with Britain and Denmark. However, in this case we would probably not use the term active membership, under which I personally imagine a pro-European approach, initiating activity – let's not look for that in Denmark and certainly not in Britain. But on the other hand, these two states have long fulfilled their integration obligations on time and without unnecessary delays. Unless they have forced an opting regime from specific goals. And that is also a manifestation of a differentiated approach to integration.

In the second floor/level, the North of the Union can of course be recognized as another integration core, but what if it were only partially active? Sweden is outside the Eurozone, but it is among the agenda-setters in several integration directions. From social standardization to environmental. And it is always a constructive member of the EU. Finland is a full-fledged part of the most solid core of integration. Austria is not very proactive in the issue of deepening integration, but it actually participates in all projects.

The third level/floor consists of the southern states as a partially peripheral group of the EU. These are economies that are not EU agenda-setters, as is the fourth group of integration dynamics. But even here there are significant differences - the Baltic republics, Slovakia belong more to the third floor of proactive actors.

To my mind, the Ágh's multi-floor model is similar to the multi-layered European Onion model, in which its author De Neve used a metaphor to highlight the different layers of the decision-making process (De Neve, 2007). The analogy of an onion, protected by a layer of separate layers of skin, helps to understand the multi-layeredness of the decision-making sphere.

The second way of engaging in integration is the variable geometry model, based on the assumption of a hard integration core as countries promoting deeper

integration (Schauble-Lamers, 1994). However, this mechanism of cooperation within the integration dynamics was based on the assumption that its flexibility leads to the permanent disconnection of some states in some integration goals. The assumption is not unity, but differentiation both in the integration dynamics and in different areas of integration and differentiation according to goals (Lansdaal, 2002). This approach clearly leads to the creation of a hard core and more or less involved countries, which, however, voluntarily move to the periphery of integration cooperation. Between the core and the hesitant ones, ad hoc cooperating entities arise, which is why we speak of the variability of integration relations (Kadlecová, 2006). This cooperation can also take place outside the *acquis communautaire*, thereby disrupting the unified structure of economic policies at the community level. However, the result is supposed to be a permanent internal differentiation of the participating actors, considered irreversible. This, of course, reduces the effectiveness of integration steps.

Just a note to add to the codification of closer cooperation by the Treaty of Amsterdam – it was in no way intended to concern the second pillar of the European Union, i.e. the common foreign and security policy. On the contrary, it talks about the possibility of constructive absence for states that did not want to participate in selected operations (Article 23/ex-Article J.13 TEU). I am just pointing out the time when the Treaty of Amsterdam was formulated and approved – the second half of the 1990s, the period of the waning war in the Balkans, the period after the first Gulf War and the period when the first post-socialist states were waiting to be admitted to NATO. It was a period of heightened emotions and sympathy of individual member states towards various actors in international security.

Back to the considerations on the effects of different paces of integration – in my opinion, there are examples of multi-speed integration that not only do not disrupt the integration structure, but can even strengthen it. In this case, we are talking about sub-regional integration that goes beyond the *acquis*, but does not disrupt the unity of the internal market and integration in general. The previously mentioned examples of sub-regionalism, such as Benelux (customs union between Belgium, the Netherlands and Luxembourg, built since 1948), the Baltic Council (a joint consultative assembly of the three Baltic republics established before their secession from the Soviet Union) or even the Visegrad Four (cooperative platform of Central European countries - the Czech Republic, Slovakia, Poland and Hungary, referring to the historical alliance from the 14th century), are platforms where common positions were coordinated before the EU-wide discussion in order to accelerate the negotiations. However, this example of mine contradicts the idea that variable geometry amplifies the gaps between the core and the periphery (Warleigh, 2002). This concept of differentiated integration is also associated with geographical determination explaining differences in other levels of coexistence within the EU.

However, I would like to argue with the belief that the results of variable geometry are irreversible. First, I proceed from the thesis that nothing is eternal, including political decisions. Second, circumstances can lead to a reassessment of the original resolution. Third, the role of the individual in history teaches us that history is personified, i.e. all it takes is a change of political outfit and change is easy.

I offer the following examples: firstly, politicians are also people and change their opinions, so during their term of office they can lean towards the opposite option and try to push through the change. See Francois Mitterrand and state intervention in the French economy in connection with etatisation/nationalisation or privatization. Or directly from the integration sphere – Austria relied on its neutrality not only in the military field, but also partly in the economic one, throughout the entire post-war period. As a result of ever closer integration, and above all the growing number of members, Austria reassessed its principles and applied to join the EU. Secondly, the change in the international security situation as a result of Putin's invasion of Ukraine led to a reassessment of the neutrality status of Finland and Sweden, and they immediately began steps to join NATO structures. A third example, and a general one, can be a change of government, when the relationship to integration, to the European Union, changes fundamentally. This happened, for example, in Malta, when in the nineties, after submitting an application to the EU (1992), through its withdrawal by the next government (1996) and reactivation of the application (1998), it finally became an EU candidate country (2000). Another specific example of the personification of the approach to integration is Poland, with the alternation of conservative governments and pro-European ones. The same applies to the Czech Republic, where after four terms of office of Eurosceptic and pro-Russian presidents, a rational and constructive representative with international experience from the highest positions in NATO became the head of state. Or the example of Britain - in 1992, the conservative government, then led by John Major, refused to accept the European Social Charter as binding under the influence of Margaret Thatcher. Immediately after the New Labour Party and Tony Blair came to power, it ratified the treaty and the Charter, which did not mean a fundamental deflection from the traditional splendid isolationist attitude of the British public.

It seems that the variable geometry approach may also be temporary as a transitional way of engaging in integration.

After the presentation of the variable geometry model by German MPs Wolfgang Schäuble and Karl Lamers, this approach to integration became quite popular, especially on the French and German political scene. This speaks to the shared tradition of the Franco-German tandem as the engine of European integration, which practically all top politicians of both countries tried to keep in motion. Presidents have usually acted proactively on behalf of France, but there is an exception – Édouard Balladur, the French Prime Minister, who in the same year, 1994, presented his vision of the variable geometry of integration dynamics. His vision was associated with Europe as three concentric circles, which expressed the varying degrees of integration involvement of individual states.

The first concentric circle included all the integrated states and actually covered the scope of the Union's internal market. The second circle was intended to be an example of closer cooperation between more cooperating groups of states in certain areas, with the idea that these cooperating groups of states would change, thus creating variable groupings. In this second circle, Balladur included the Franco-German tandem as a shining example of the engine of European integration. According to him, the third circle should actually be the whole of Europe, moving towards interconnection in various cooperative ties. His vision of Europe was that

of an integrated pan-region as a guarantee of stability and prosperity. Later, he spoke not of concentric circles, but of eccentric ones, i.e. in the sense of mutual overlapping of individual integration sets, which should accelerate the interconnection of the whole of Europe.

Although Balladour's thinking works with the term concentric integration circles, the essence of the model is to be a variable geometry model as integration deepens and expands to the next circle of incorporated states.

Even after several waves of Eastern enlargement, which deepened diversity in the European Union, despite this, or precisely because of this, the popularisers of variable geometry Schäuble and Lamers, twenty years after the presentation of their model, insisted on their belief that the strategic goal for the future of Europe had not changed, and that is more and more integration (Schäuble & Lamers, 2014).

The third possible form of involvement in integration projects according to Stubb is *à la carte* integration, where states choose from the integration menu only what they want. It means disengagement and is essentially just egoistically choosing only what fits from the integration cake. The so-called cherry picking actually contradicts the ideas of the European dream of solidarity and common goals. The *à la carte* style clearly pursues national interests at the expense of anyone else. This is what Britain tried to do in the Brexit negotiations, especially in the era of Boris Johnson as Prime Minister, when the even moderate and accommodating Angela Merkel pointed out that Brexit cannot be led by the British government in the direction and manner of picking the raisins from the cake. An example of a country using these options is certainly Britain and Denmark. These are manifestations of an uncooperative approach. However, from an objective point of view, their high contributions to the common EU budget cannot be ignored.

The vision of European integration *à la carte* originated with Ralf Dahrendorf in 1979, but in a somewhat different sense than we understand it now. In his conception, it was to be a register of policies that could intertwine and thus reach the same goal by different paths. It was not to be a multi-speed integration (Dahrendorf, 1979). The *à la carte* model was to overcome a certain stagnation in negotiations at the community level in the turbulent 1970s. His model was later modified not only by practice but also by theorizing about the right degree of involvement in ever-progressing integration. Whether it was Margaret Thatcher after her political career or her successor John Major, who advocated greater flexibility in choosing which integration activities to participate in and which not to participate in. A classic example of cherry-picking. And to maintain objectivity, it should be noted that subsequent British prime ministers also defended the principle of integration involvement *à la carte*.

Differentiated integration is not only a reality, because the high integration pace promoted by France or Germany is not achievable for everyone, nor is it acceptable for all member states. It is also a discourse about the further development of the Union. Although flexibility in the approach to integration goals was taboo for a long time, Maastricht made it possible and Amsterdam officially authorized the codification of closer cooperation. And that was before the Big Bank arrived in connection with the waiting states of Central and Eastern Europe, which brought a considerable degree of diversity to the European Union - economic, institutional, political. It seems

that perhaps such a high-level area of national sovereignty as security was the only one where there was the greatest agreement on the direction of the new member states.

In general, it seems that the willingness of member states to further intervene in national policies by European institutions is beginning to wane. This can be explained in two ways. Either the pro-integration is so great that, in the opinion of some countries, there is little left for their own autonomy. That basically everything that was supposed to be integrated has been integrated, and the rest should remain within national competences. The second argument relates to countries that belong to the more integration-neutral group and would a priori like to see a generally lower share of integration. It is possible to work with about three groups of states according to their opinion on differentiated integration (Chopin & Lequesne, 2016).

The first category of rather Eurorealist countries includes the group of Anglo-Scandinavian members, led by Britain (it led), Denmark and followed by Sweden, and Austria can also be included here. Hungary, which since 2010, under the leadership of Viktor Orbán, has been showing increasingly pronounced signs of loosening its integration commitments, is certainly included in this group of states emphasizing their own specificities in economic policy and their unwillingness to submit to wider communitarian trends. These are states that carefully assess each new proposal to strengthen integration. Their motivation for membership resulted from an assessment of the development of foreign economic relations, when they rationally concluded that a state outside the Community was disadvantageous.

The second group, on the other hand, consists of the countries of the core of integration, i.e. the founding six plus the countries of the Southern enlargement. These are states that almost fully identify with the goals and principles of the European project, practically do not use the opting regime and try to be full-fledged members of the integration core.

The third set of states, rendering to this analysis, consists of the new member states, which, according to Chopin and Lequesne, are aware of their delay in participating in the integration process, but on the other hand, the fragility of their actually acquired sovereignty leads to considering integration requirements to see if this does not threaten their national interests. It is then paradoxical that they are the most vocal opponents of differentiated integration, because they perceive it as a risk of relegating them to the second category of membership. They fear the division of Europe into a privileged and a second-rate Europe, degrading EU membership.

Personally, I think that the authors are working with a relatively high degree of generalization, because even the Eastern Enlargement group is not compact, and I find the Baltic states, which I would classify in the second category, missing from this selection. In certain periods, so did Poland. And Finland? This is a country that is strongly pro-integration, meets all the criteria for advancing to higher levels of integration and is a confident European player. And not only under the presidency of Alexander Stubb. Since the fall of the Iron Curtain, Finland has perceived its involvement in European structures as a chance to get out of Moscow's sphere of influence. For this reason, I would place Finland in the second group.

Evaluation of Differentiated Integration

A relatively brief answer is enough to assess the phenomenon of differentiated integration: differences in approach to integration plans have clearly been, are and will be there. It is logical. The empty chair crisis of 1962 already showed that it is impossible to find absolute agreement between the six actors, which led, among other things, to shifts in the conceptual basis of European integration, when the original ideas of unity and federalization had to partially give way to the intergovernmental level of negotiations (Faure & Lequesne, 2023). The Luxembourg compromise that resolved this crisis actually paved the way for qualified majority voting, which is precisely the mechanism for a compromise solution. Unless, of course, the issue at hand undermines the national interests of any country.

Then came the year 1973 with the Atlantic enlargement, where three basic features became apparent. First, the enlargement from six to nine actors meant a more demanding search for an acceptable optimum for all. Second, this enlargement involved the two biggest rebels against the original ideas of Robert Schuman and Jean Monnet. Britain and Denmark brought not only diversity in thinking about the goals of integration, but also loud criticism of the excessive scope of integration and its subsequent bureaucratization. Nevertheless, they participated in all activities except the goal of monetary union. And thirdly, the European Communities accepted Ireland, which was at that time the poorest, least efficient economy of the Community and which thus solved completely different problems than the other member states. Willy Brandt commented on the reaction to the enlargement of the Community and the resulting greater problems in the decision-making sphere with the proposal of gradual integration.

In the following decade of the 1980s, the Community grew by three countries of the southern wing, all of which showed significantly lower performance, an inadequate structure of economies and which perceived entry into the EC as an accelerator of their development. The diversity of the Community shifted again wider.

It is interesting that the Northern enlargement did not bring significant differentiation, on the contrary, in this case states willing to participate in most projects joined. Except for monetary integration in the case of Sweden, and nuclear energy in the case of Austria. Then came the Eastern enlargement, which we can immediately describe as essential in spreading diversity in many respects. It was for them that flexibility in fulfilling integration goals was actually offered. But the political elites of these countries interpreted the offer of multi-speed integration as an effort by the more advanced countries of the West not to wait for those from the East, which could lead to the creation of a multi-category Europe. And there the new member states would play in the second or third league. Paradoxically, the representatives of these countries block very often the adoption of community legislation, implement the necessary regulations late and reluctantly, but this does not prevent them from insisting on a unified approach and possibly accusing the original member states of superiority.

The concrete example - since the beginning of its membership in the EU, the Czech Republic has been one of the least disciplined members in terms of the so-called transposition deficit, which reflects the delay in implementing directives into

national legislation. Due to the long-term ignorance of Czech governments regarding the obligations of their membership in the Union and the need to complete the internal market, the EU used a pressure tool, namely the suspension of the possibility of drawing on structural funds in 2012. Of course, the Czech Republic is not the only country not fulfilling its obligations, but at that time it had the highest transposition deficit, together with Malta. While Malta caught up within a year, the Czech Republic showed a relatively lax approach. Therefore, sanctions were imposed and suddenly the implementation of European directives miraculously accelerated (Single Market Scoreboard). Slovakia, Poland and Spain found themselves in the same situation at the time, but Hungary, the Czech Republic and France felt the strongest sanctions. The approach to integration commitments across the membership base speaks of an ambiguous policy. And often prioritizing one's own interests over common ones. Integration's Jekyll and Hyde or cherry-picking?

The year 2017 was marked in the European Union by the celebration of the sixtieth anniversary of the signing of the Treaties of Rome establishing in 1957 Euratom and the EEC, which were the starting point of macroeconomic integration, later then spilled over into the political and security dimension. The then President of the European Commission Jean-Claude Juncker spoke out in favour of the idea of a differentiated integration process as a guarantee of further development (Juncker, 2017). Flexibility was to be the methodological starting point for further development, without limiting the access of countries that could not move at the same pace (Gotev, 2017). However, the new countries, it means states of Eastern enlargement, did not believe this and sharply opposed the "new iron curtain" between the EU₁₅ and the EU₁₃, or between the 15 original EU member states and the 13 new ones. And it cannot be overlooked that the disagreements were not only between these groups of states, but also between the so-called hard integration core. In France, there was a change in the post of president, when the indifferent Francois Hollande was replaced in 2017 by the active Emmanuel Macron, who advocated stronger integration of willing countries. Above all, he raised again the issue of the missing fiscal union, the absence of which was a key problem of the Eurozone crisis. Germany has nothing against the fiscal union, against the joint supervision of the fiscal policy of the eurozone members, but Germany has traditionally, and especially under Angela Merkel 2005-2021, played the role of a mediator in the EU defending the interests of the majority. And the majority of the countries of the monetary union are against shared responsibility within the fiscal union and banking union. So, at this point, Germany defended the interests of flexible multi-speed integration. But the Franco-German integration engine has stalled. And this despite the meeting of statesmen in Aachen in 2019, when a treaty confirming close mutual cooperation was signed. Compared to the Élysée Treaty of 1963, which confirmed a fundamental change in the mutual relations between Germany and France, it was a mere political gesture.

Along with other integration steps, often triggered by external influences, such as the global financial crisis, migration crisis, Brexit or COVID pandemic and subsequently Russian aggression against Ukraine and provoking war, all this has been reflected in a deeper diversification of member states and their positions on the given crises. On the other hand, some of these crisis manifestations have revealed the heterogeneity of the member base, but they have also united the states with a

common solution (Kučerová, 2024). This is certainly a pandemic and the evocation of strategic autonomy, joint purchases of necessary but missing commodities and their distribution on the principle of solidarity. Russia and its actions, after a short period of hesitation, brought the Union states together to take a common approach towards Russia, to support not only the attacked Ukraine, but also the buffer states. Another challenge for a common approach is the assumption of office of Donald Trump as US President in January 2025 and his offensive in the economic and security spheres. His threat to annex Greenland left no one indifferent in Europe. Not to mention the introduction of tariffs. In this case, I do not see manifestations of differentiated integration, but rather agreement, consensus. Although we cannot ignore the efforts of some national politicians to have individual relations with D. Trump regardless of the consensus of the EU community level. While Italian Prime Minister Georgia Melloni rather used the possibility of bilateral dialogue for pan-European interests, Hungarian Prime Minister Viktor Orbán defended particular interests. But this is also evident in the attitude of some member state governments towards Vladimir Putin. The Hungarian government in the first place, the Slovak, the Bulgarian... Although not only practice and experience have long stated that the unification of Europe will occur under the influence of crises and will then be the sum of the solutions adopted to overcome them (Monnet, 1976 in Lehne, 2022), the crises of the last two decades have, on the contrary, deepened internal differentiation (El Mamoune, 2022). The European Union has been confronted with a series of crises, mostly external shocks, which have fundamentally shaken both the macroeconomic stability, the institutional structure of the Union, and the trust of citizens and politicians in the sense of integration. The first shock was the global financial crisis of 2008-2010, which spilled over into the Eurozone crisis of 2009-2013. This was followed by the migration crisis culminating in 2014-2016, Brexit as an internal crisis of the entire integration project and Britain as such. The Covid pandemic with the lockdowns of the economies showed the weaknesses, and ultimately the strengths, of the integration structure, similarly to the subsequent security crisis associated with the Russian aggression in Ukraine and the outbreak of war on the European continent (Kučerová, 2023). The European Union is therefore not united even in moments of major crises, which does not correspond to the EU motto mentioned above - *In varietate concordia*. On the other hand, it confirms that the Member States remain sovereign actors in foreign policy.

An interesting point in the analysis of differentiated integration is the growing Euroscepticism, which was originally a marginal phenomenon, but in connection with the politicization of the public negative reactions from citizens, politicians and academics are becoming increasingly frequent (Faure & Lequesne, 2023). On the other hand, in contrast to the increasing politicization of the masses, there is an opposite tendency, namely the growing political disengagement of voters and the perceived alienation of politicians from the electorate (Emanuele et al., 2025). Other factors are undoubtedly the deepening and expansion of integration activities and actors, which also affects the growing diversity of the membership base. Another real fact is the lack of cooperation between European institutions and member states, which reduces the EU's real influence in the international system and its potential to be a world power (El Mamuele, 2022).

Disintegration – Brexit

A clear manifestation of the inconsistency of integration strategies with the national vision of further development without an integration umbrella is Brexit, i.e. the withdrawal of Great Britain from the European Union. This is a unique procedure, the ultimate manifestation of disagreement with the principles of European integration. And in the foreseeable future, it is also an irreversible solution.

In retrospect, it seems, at least from a British perspective, that Britain should not have joined the European project at all. On the contrary, from a European perspective, the positive aspects of British membership cannot be overlooked, especially in terms of rationality in the strategic thinking of European institutions.

A brief retrospective of British participation in the European integration process: While W. Churchill considered the post-war unification of Europe under the leadership of the United States of Europe, but without British involvement, after the successful launch of the ECSC, the British government was offered participation in negotiations in Messina on other projects in 1955. The British government evaluated this offer as pointless, which the British later assessed as a fundamental mistake and a waste of the opportunity to be at the heart of the EEC, i.e. the opportunity to influence the creation of the Community's institutional structure (Grieco, 1995). However, soon after the launch of the EEC, the next British government realized the risk of economic ostracism from the EEC and initiated the establishment of a competing integration bloc, EFTA, from 1960.

The original idea that a free trade zone was sufficient soon gained ground, and Britain applied to join the EEC in 1962, and again in 1967. The strength of the emerging economic bloc on the European continent convinced the traditionally isolationist-oriented British that it was disadvantageous to remain outside this trend of international cooperation. An interesting point is the political affiliation of the governments that officially applied for membership - they were representatives of both basic British political forces - both the Conservatives and the Labour Party. This indicates a growing consensus on the desirability of British membership of the EEC. Their efforts were crowned with Britain's entry into the Community in 1973.

Britain was faced with the choice of “take it or leave it”. It could not let the offer go after years of rejection, it had to adapt to the already established European institutions. But this did not contribute to the warmth of membership on the part of Britain (Adam, 2020).

However, immediately after accession, Britain began to promote its visions of further development and strongly influenced the development of integration structures and strategies. At the same time, the first referendum on British participation in the European integration project was held in Britain in 1975. At that time, voters voted in favor of participation. However, the timing of the referendum, the second year after joining the EC, confirms the British reluctance to integrate.

Already during the 1970s, the British footprint in the integration process was visible - among other things, with the establishment of the European Structural Fund for Regional Development in 1975. The most famous act was the promotion of the possibility of a discount on the contribution obligations of the member states to the common budget, which went down in history as the so-called British rebate.

Despite the willingness to integrate and at the same time the traditional British distance from continental Europe, Britain has repeatedly made it clear that staying outside the European project is ineffective. As European integration deepened not only economically, but also expanded to the defense level, police and judicial cooperation, and even the communitarian elites pushed identity aspects and considerations about the European demos into the wording of the Maastricht Treaty, the warning lights of unification, which they have rejected for generations, began to flicker for the British.

The historical memory of the British as members of a former great empire, a hegemonic power, blocked their understanding of why the Community was moving towards a supranational governance structure (Cohen-Dootalieva, 2022). And why they should be part of it. It seems that the roots of British Euroscepticism grow from their great-power past, especially in the era of Pax Britannica 1805-1914, when Britain became the global political and military hegemon of the world at that time. The victory at Trafalgar in 1805 allowed Britain to dominate the world's seas and become the number one naval power, which was reflected in unprecedented territorial expansion. The British Empire thus acquired a global dimension on which "the sun never set". Then it is not surprising that the policy of "splendid isolation", i.e. focusing on its own interests and not participating in the system of coalitions of other powers since the time of Prime Minister Benjamin Disraeli (1895-1905). The British simply did not need to cooperate with anyone, they can do it on their own (Porter, 2006).

Fears of the disruption of national identity in the melting pot of European integration were felt very strongly for generations (Kučerová, 2018). The European trend of federalization was the imaginary red line beyond which the mainstream British did not want to go. At the same time, it was clear that the willingness of other EU members to further opting regimes for Britain was approaching zero, which the rationalist British were fully aware of. This is actually the institutional level of British Euroscepticism.

The economic side of the EU integration trajectory essentially suited Britain, because the scale of the internal market with almost half a billion consumers was a huge boost for British companies. And where they did not want to participate, they obtained an exception. But they never fully identified with the European project (Georghean, 2016).

The confluence of several external shocks weakened the British economy to the point that it fell into a deep depression, which, in contrast to the obligations to contribute to the common EU budget, made the British question whether they would not be better off without the Union. The economic and social crisis has become the main topic not only of populists, but also of serious political debates. From the global financial crisis of 2008-2010, which was fundamentally reflected in the decline of the City of London as one of the world's financial centers, through the migration crisis of 2014-2016 towards the internal political crisis. The announcement of a referendum on Britain's participation in the EU for June 2016 by David Cameron, just to prevent the outflow of his voters, was nothing more than an ill-considered step. Ill-considered because his government did not try to convince voters of the advantages of remaining in the EU. And the British electorate was divided between Leave and Remain, and quite equally. The 52:48% vote clearly demonstrates two facts. Firstly, society was almost split in half, but secondly, the result in favour of Leave was unquestionable.

Brexit is an example of how even differentiated integration, the possibility of using the opting-in regime, is not a guarantee of further development of integration. Brexit is an extreme, and so far, the only, way of resolving disagreement with the methods or goals of integration, but it speaks to the long-term disharmony between federalist trends and national sovereignty.

Conclusion

The European discourse in general as reflections on the meaning of the integration project, its principles and values, discourse on the necessary flexibility in the decision-making sphere returns in waves according to specific developmental manifestations, often external shocks. Perhaps too much attention is focused on the manifestations, or rather forms, of possible differentiated integration, although the question of a different pace of participation in specific goals is more essential. And there is no agreement at all on whether all integration plans must be for all states. Of the manifestations of differentiated integration, the multi-speed Europe, the variable geometry model including the concentric circles model, and perhaps the rather profane Europe à la carte approach has become the most established in the discourse. These types of diversified integration are not contradictory; they can coexist side by side and be used in specific cases. With only one condition, which is that they must not disrupt the essence of integration project.

The broad membership base, comprising 27 states at various levels of economic performance, with different historical memories, and with different partnership relationships, prevents the achievement of full autonomy and unity. It seems that the main proponents of the European institutions have reached a consensus on the need for a flexible approach to integration strategies. The question is therefore no longer whether the goal of unification is desirable, since it is unrealistic, but to what extent integration should increase efficiency without violating the sovereignty of the member states. Hence the principle of flexibility in engaging in the integration process so that the original goals - stability, prosperity, peace - are preserved. In *Varietate Concordia* - United in diversity should not be a mere motto of the European Union, but a mechanism of differentiated integration that will enable the further development of the Union with the desired diversity.

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