"Critical Discourses on Integration in North America and Europe: The Roots of Criticism"

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Introduction

Regional integration is a prominent feature of politics and economics in both North America and Europe. As these integrative projects have developed in the post-war years, and particularly in recent decades, critical perspectives have also become more prominent. In the case of the European Union (EU), for example, this criticism was evident in the 2005 referendums in France and the Netherlands that saw the rejection of the Constitutional Treaty, the 2008 Irish referendum rejection of the Lisbon Treaty, and it is also present in the 2010 euro crisis. It has also been evident in the rise of political parties and existing, often populist, parties adopting positions that reject integration. In many EU member states, these political parties enjoyed significant electoral success in both the 2004 and 2009 European Parliamentary elections. In the case of the North American Free Trade Agreement (NAFTA) and associated agreements such as the Security and Prosperity Pact (SPP), critical organizations and individuals exist in all three participating states and critical perspectives were particularly prominent during the 2008 United States presidential primary elections.

This paper examines the critical perspectives in both settings with the specific focus on those critics who seek the reversal of the entire integration project or at least their country's withdrawal from the project. In the context of the European Union, this form of criticism is frequently labelled 'Hard Euroscepticism' (see Taggart and Szczerbiak 2008).[1] The paper examines and compares the content of the sceptical opinions in both settings. The themes within the critical discourses are examined as are the different ideological backgrounds of the critics. On the basis of this examination, the

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[1] 'Soft Euroscepticism' on the other hand refers to critics that want to modify elements of the European Union's institutional structure or policies and not its fundamental reform or abandonment.

paper addresses the factors that account for the critical perspectives. In particular, the paper analyzes the relative importance of the factors which drive the critical discourses. These factors include the nature of the integration projects, the critics themselves as well as the domestic context within which they are located.

Integration and its Critics in Europe and North America

Integration in Europe and North America, in the shape of the EU and NAFTA respectively, are extensively studied and contested subjects. One element of these studies is the question of whether the integration projects are comparable and whether the study of NAFTA can learn from the experiences of the older European Union (see Laursen, 2010). Disagreement exists with respect to this question. There are marked differences between the state of integration within the European Union and North America that are evident with respect to policy and institutional development. Unlike the European Union, for example, NAFTA does not contain a single currency, a common agricultural policy or regional development fund and does not have an extensive institutional structure that contains an elected parliament (see Clarkson, 2008; McKinney, 2005; Cimon and Rebolledo, 2004; and MacMillan, 1995). In his studies of North American integration, Robert Pastor argues that NAFTA as currently established is very different from the European Union (see Pastor, 2001). He argues, however, that closer North American integration should be modeled on, or at least partially modeled on developments in Europe (Pastor, 2001; 2008).

Stephen Clarkson also argues that the integration projects in North America and Europe are quite different. In Clarkson's view, where the EU developed as a political project with the primary goal of averting future wars on the continent, NAFTA is largely an economic project dominated by business elites (2008). As a consequence of this difference, the EU displays more of the characteristics of a strong state as well as a community. "Compared to the European Union, NAFTA's members are not attached to a

social contract as community, having never known what a social contract is" (Clarkson, 2008: 44; see also Cavanagh and Anderson, 2002). The result, according to Clarkson, is that "NAFTA has brought North America no nearer to a public consciousness of itself as a community in any way approaching Europeans' consciousness of themselves as citizens in an entity transcending their own nation-states" (Clarkson, 2008: 459). Clarkson argues that at most, North America should be seen as an economic market with a community of interests evident at the corporate level (2008: 460). For this reason, Clarkson argues that North America is not like the EU and nor should it be assumed that NAFTA is an "embryonic version" of the European Union (2008: 16).

The debate about the utility of a comparison of integration in Europe and North American can be extended to a debate about criticisms of integration. As noted above, criticism of integration is evident in both settings. As Mair (2007) argues, critical perspectives develop in part as a result of the progression of integration. While criticism of European integration has always existed to varying extents in different states, the two decades since the debates surrounding the ratification of the Maastricht Treaty have witnessed a more widespread and vocal scepticism about the benefits of the European Union (see Hix, 2008; Milner, 2000; Taggart, 1998). As integration has progressed and become more visible in the daily economic and political lives of citizens, a growing number of citizens and organizations express opposition to these developments. This opposition is, for example, evident in the number of political parties that have adopted a Eurosceptical position and demanded the fundamental reform of the European Union (Taggart, 1998; Szczerbiak and Taggart, 2008).

Criticism of NAFTA and North American integration has also been evident throughout its history but is not as prominent as Euroscepticism and the critics are not as widely studied. At the time of its negotiation, for example, the North American Free Trade Agreement generated outright opposition from both inside and outside the major political parties in Canada and the United States. In 1992 Bill Clinton was forced to run

on a presidential campaign that promised a renegotiation of parts of the NAFTA agreement, and even then was forced to rely on Republican votes to have the revised treaty ratified (see Hufbauer and Schott, 2005). Since this time, the most visible form of opposition to NAFTA has primarily been calls to reopen and reform the treaty rather than scrap it completely. The Canadian Liberal Party, for example, expressed outright opposition to NAFTA while in opposition but reversed this position after coming to power in 1993. Similarly, during the 2008 U.S presidential election Democratic primaries, both main candidates (Hillary Clinton and now president Barack Obama) claimed that they would investigate reopening NAFTA in order to protect American jobs (Ibbitson, 2008). Once in office, however, President Obama did not pursue this campaign promise. The most visible NAFTA criticism therefore appears to be akin to what has been labelled 'Soft Euroscepticism' (see Taggart and Szczerbiak 2008); that is criticism that seeks reform of the treaty rather than its abolition.

The lower visibility of critical attitudes towards integration in North America as compared to the European Union is in part related to the more limited development of integration in North America and therefore its more limited visible impact on the daily lives of North Americans as compared to the impact of the EU on its citizens. One example of this is the absence of the equivalent of European Parliament (EP) elections in North America. At the most recent EP elections, 2004 and 2009, political parties with 'Hard Eurosceptical' platforms secured notable performances in many countries. In both the 2004 and 2009 EP elections, for example, the UK Independence Party secured approximately 2.5 million votes, and in 2009 it secured more votes and seats than the Labour government (Usherwood, 2008). It is generally the case, however, that parties with a Hard Eurosceptic platform are considerably more prominent in EP elections than they are in national elections when European issues tend not to be the focus of campaigns (see Reif, 1997; Reif and Schmitt, 1980). This has been the case with the UK Independence Party, for example, which could not replicate its EP election results at

either the 2005 or 2010 UK general elections. The absence of continent wide elections in North America therefore reduces the potential for critical organizations to focus popular attention on NAFTA.

A second potential difference between critical perspectives in North America and the European Union concerns the content of the criticism. To the extent that NAFTA and the European Union are different, it may be expected that the focus of the critical perspectives differ in both settings. This argument is implicit within Stephen Clarkson's interpretation of North America integration as compared to European integration (Clarkson, 2008). As noted above, Clarkson contends that North American and European integration are quite different in that European integration has developed with strong social-solidarity programs (2008: 16), as compared to NAFTA, which created "no viable framework for North American governance" (2008: 70). Clarkson further argues that NAFTA strengthened transborder corporate powers without balancing them with institutions subject to democratic controls (2008: 70). To the extent that this is the case, it would be expected that critics of the EU will be found on the right of the political spectrum specifically opposed to the regulation of the market at the EU level, whereas critics of NAFTA are more likely to be found on the left. More generally, it may be expected that opposition is generated among those who perceive the integration project to be antithetical to their interests.

In the context of his study of the European Union, Simon Hix (2008) makes the argument that citizens are relatively well-informed about the EU and base their opinions of the EU on this information. Hix asserts that, since the 1990s in particular, information about the EU is widely accessible and that "public understanding of the EU has grown as a result" (2008: 54; Forster 2002: 8). He therefore argues that it is wrong to dismiss popular opposition to the European Union as based on ignorance of the European Union (2008: 50). Citizens are aware of decisions made in the European Union and base their opinion of the EU on its impact on their own economic and political preferences (Hix,

2008: 62). Hix uses this analysis to explain why some opponents of the EU are found on the right and some on the left of the political spectrum. In the United Kingdom, for example, EU social measures tend to be more interventionist than pre-existing policies and therefore generate opposition from the right. In France, however, these same measures are less interventionist than national norms and thus generate opposition from the left (Hix, 2008: 63).

Similarity and Diversity in the Critical Perspectives

It is plausible to hypothesize that if critics base their position on integration's impact on their belief structure, criticism of integration in North America and Europe will differ because the integration projects differ. While there is an element of truth in this, the situation is in fact more complex. There is great diversity within the criticism within each setting (see Harmsen and Spiering, 2004; Mair, 2007; Spiering, 2004). This diversity is evident in that the focus of criticism can vary depending upon the country within which the critics are based. Diversity is also evident in so far as opposition to European and North American integration can come from political forces from both the right and the left, even within the same country.

Opposition to the European Union is particularly evident in the United Kingdom. This opposition manifests itself in public opinion polls indicating a widespread public belief that the country's membership of the EU is not a good thing (see Hix, 2008). It is also present within the policies adopted by both the major political parties as well as by other more marginal political forces (see Bale, 2006; Baker et al, 2008). Former Prime Minister Margaret Thatcher, while always reticent about the progress of European integration, became a prominent critics after leaving office in 1990. In her 2002 book, for example, Thatcher argued that in the absence of fundamental reform, the United Kingdom would be better placed leaving the European Union and applying for membership of the North American Free Trade Agreement (Thatcher, 2002: 403).

The overall place of the United Kingdom within the European Union is extensively studied (see, for example, Booker and North, 2003; George, 1998; Wall, 2008; Young, 1998). These studies highlight that hostility toward European integration is not a new phenomenon within the United Kingdom and that it has found expression within both Conservative and Labour governments throughout the EU's existence. Division on the issue of the European Union has been particularly prevalent within the Conservative Party over the last two decades and has even appeared to dominate that party's internal politics at several key moments (Baker et al, 2008; Baker and Seawright, 1998; Sowemimo, 1996). These moments include the controversial parliamentary debates over the ratification of the Maastricht Treaty (Baker, Gamble and Ludlam, 1993; Berrington and Hague, 1998) and the series of recent leadership contests (see Bale, 2006). Opposition to the European Union has also been evident within the Labour Party. Labour opponents of the European Union have frequently drawn attention to the perceived dominance of big business within the development of the European market place along with a general opposition to the loss of sovereign decision-making authority (see Baker at al, 2008; Forster, 2002; Fella, 2006). There are also political parties to the left of the Labour Party that advocate withdrawal from the European Union. In his analysis, Andrew Mullen concludes that,

> In the future, the British left may unite against further European integration, demand alternative economic and political formations in Europe and renew its support for a national-progressive-socialist strategy. Whatever happens, it seems highly likely that the British left's 'great debate' on Europe will continue (2007: 227).

Alongside the existence of Eurosceptical opinions and policies within the major political parties, the last two decades have witnessed the emergence of political parties and groups advancing positions seek either the fundamental reform of the European Union or the United Kingdom's withdrawal from the EU. Sir James Goldsmith, for example, formed the Referendum Party to contest seats in the 1997 UK general election

and which secured votes on the basis of its demand for a referendum on Britain's place within the EU (see McAllister and Studlar, 2000). One of the Referendum Party's successor organizations is the non-party Democracy Movement, which believes that liberal democracy in the UK is "fundamentally undermined by the single currency, the EU Constitution/Lisbon Treaty and the drive to create a Brussels-based system of government, which will result in all major decisions being taken at the European Union centre by undemocratic institutions" (Democracy Movement, 2005). The United Kingdom Independence Party (UKIP) is arguably the most prominent of these Eurosceptical organizations.

The United Kingdom Independence Party was formed by Alan Sked in 1993 and emerged out of his campaign against the ratification of the Maastricht Treaty (see Abedi and Lundberg, 2009). Since that time the party has faced a number of controversies including, for example, disputes over its leadership as well as its purported links to the populist far-right British National Party (BNP). In spite of these controversies the party has enjoyed some notable electoral successes which have made it a significant minor party within the British political system. Indeed, UKIP's electoral success is one factor that led Webb to question the accuracy of referring to the UK as a two party system (Webb, 2005). The major breakthrough for UKIP came in the 2004 European Parliamentary election when the party placed third by securing over 16 per cent of the vote and 12 Members of the European Parliament (MEPs) (see Baker and Sherrington, 2005). The party improved on this performance in the 2009 European Parliament election when it increased its vote share to 16.5 per cent and secured one extra seat (from a smaller UK total). Most remarkably, UKIP's share of the vote meant that it placed second to the Conservative Party and pushed the governing Labour Party into third place in terms of vote share.

Within the United Kingdom, therefore, fundamental criticism of the European Union exists on both the right and left of the political spectrum. A similar phenomenon is

evident among integration's critics in other European countries and in North America. Several shorter examples can be used to make this point. In France, for example, a number of far left parties and groups portray the European Union as a neo-liberal project that threatens both French jobs and the French social welfare policies (see Milner, 2004). These attitudes were at least part of the explanation for the 2005 French popular rejection of the Constitutional Treaty (Taggart, 2006). At the same time, fundamental opposition to European integration has been evident on the political right in France since the presidency of Charles de Gaulle, and is currently a prominent part of the political platform of the National Front (see Evans, 2000).

Critical perspectives on integration in North America point to a similar ideological diversity. In Canada, many critics of NAFTA can be found on the left of the political spectrum. The New Democratic Party (NDP), for example, has consistently been hostile to NAFTA and its implications for the Canadian economy. In its 2008 election platform the NDP called for the renegotiation of central elements of NAFTA (New Democratic Party, 2008). Other commentators and analysts on the Canadian left are highly critical of NAFTA and warn of the dangers it poses for the future of the Canadian economy, health care, resources and society (see Foster, 2004; McQuaig, 2001). The Council of Canadians, for example, is an interest group established in 1985 to oppose the original Canadian-United States Free Trade Agreement. This group campaigns actively against what it calls 'deep integration' between Canada and the United States and argues that NAFTA is dominated by the interests of business groups and has done little to improve the economic situation for the majority of Canadians (or Mexicans or Americans). Instead they argue that integration leads to increased inequality and other problems (see Campbell, 2007; Foster, 2004; Scott et al, 2006).

In spite of the generally left-leaning direction of Canadian critics of NAFTA, it is also possible to find Canadian conservatives who advocate the abolition of NAFTA. David Orchard, for example, twice came a close second in campaigns for the leadership

of the former Progressive Conservative Party of Canada (in 1998 and 2003) and remains a prominent opponent of North American integration (see Orchard, 1999). Opposition (and support) for NAFTA thus crosses ideological grounds (see Rankin, 2004). A diversity of views is also a feature of U.S. opposition to North American integration. NAFTA has attracted criticism from the left within the United States. At the time of its signature there were many in the Democratic Party and within the trade union movement who felt that the agreement would result in the loss of American jobs, particularly to Mexico with its lower wage and environmental standards (see Gianaris, 1998:18). In 2004, Dennis Kuchinich ran as a candidate in the Democratic presidential primaries on a platform that called for American withdrawal from NAFTA. Criticism of NAFTA, and integration more generally, is not however confined to the political left within the United States. The creation of NAFTA was opposed in the 1992 presidential elections by not only the labour unions, but also by Patrick Buchanan (who challenged the sitting president George H. Bush in the Republican primaries) and businessman H. Ross Perot who ran as a third candidate in the presidential election. In the intervening years a large number of American activists, commentators (including, for example, CNN's Lou Dobbs) and politicians from the political right have continued to argue that integration will result in the United States' disappearance, with the state no longer able to defend its borders. A dazzling array of web-sites is devoted to defending the United States against this prospect. One of many commentaries, for example, asks, "Why doesn't President Bush just tell the truth? His secret agenda is to dissolve the United States of America into the North American Union. The administration has no intent to secure the border, or to enforce rigorously existing immigration laws?" (Corsi, 2006).

Opponents of integration in both Europe and North America thus come from different ideological positions. In spite of this diversity, similar interrelated themes are evident in the rhetoric used by those parties and individuals opposed to integration. The first of these themes is the fear that integration poses a significant threat to state

sovereignty. These claims are very much evident within critical perspectives within the United Kingdom. Margaret Thatcher, particularly in her post-prime ministerial career, has gone so far as to argue that, "It seems very likely that the drive for a United States of Europe, a European superstate, is now unstoppable" (Thatcher, 2002: 359). Similarly, the United Kingdom Independence Party asserts UKIP, for example, asserts that "the EU agenda is complete political union with all the main functions of national government taken over by the bureaucratic institutions of Brussels." UKIP continues by suggesting that the EU is "an alien system of government that will ultimately prove to be totally unacceptable" (UKIP, 2009). UKIP MEP Marta Andreasen expressed these sentiments when she referred to the European Commission as a "political elite who wants to acquire more and more power." She further argued that: "The EU wants to have one government, one superstate, one law and one justice" (quoted in Sloan, 2009). Similar ideas are present in other European states. As Hainsworth, O'Brien and Mitchell identify, the threat to national sovereignty and independence have been at the heart of opposition to the European Union from the French right (2004). The French left have also identified the threat to sovereignty as a problem generated by EU membership. As noted above, in this case the argument often made is that EU policies threaten existing French social policies (Milner, 2004).

The loss of sovereignty as a result of integration is very much in evidence within Canadian criticisms of NAFTA. The Council of Canadians, for example, asserts that Canadian autonomy and decision-making capacity is under direct threat from a process of 'deep integration' (See Dobbin, 2002). Deep integration, they argue, is "the harmonization of policies and regulations that govern the foods we eat, the items we buy, and how we live. It calls for the formation of a new North America that effectively erases the border between Canada and the United States in the interest of trade north of the border and security south of the border" (Council of Canadians, 2008). James Laxer makes the argument vociferously that Canada needs to defend its border. In Laxer's view

"the quality of life of the average Canadian is superior to that enjoyed south of the border and that while deep integration could bring huge rewards for a few, it would condemn most Canadians to a deteriorating quality of life" (Laxer, 2004). Laxer's views are shared by Maude Barlow, who helped create the Council of Canadians, and by Linda McQuaig (2001). The common theme running through these works is that Canada is under threat, either explicitly or indirectly as a result of trade agreements, corporate decisions and globalization (Bolt, 1999). These authors argue that the depth of the relationship with the United States threatens Canada's capacity to take independent policy decisions. While these critics indicate that limitations on Canadian sovereignty already exist, they are particularly concerned about the potential for further integration.

The second theme that is common within the critical perspectives is the argument that the loss of sovereignty poses a threat to democracy. The UK Independence Party, for example, claims that an increasing number of issues are being determined at the EU level rather than within the British political system and that consequently British voters are losing control over those decisions. In advance of the 2005 general election, for example, the then party leader Roger Knapman appealed for votes by arguing that: "This is the opportunity for you to back UKIP and get our country back" (BBC 2005). The party also claims that the governing political parties have deliberately kept the development of European integration a secret from the British public and have concealed the extent to which sovereignty has been delegated (see Booker and North, 2003). The current UKIP leader, Lord Pearson (who was elected in November 2009) made this point when he argued that his party was "for people who now for many years have seen through the lies of our political class and our main political parties, particularly in regard to our relationship with the European Union." In the same speech he stated: "If you want to go on being deceived by the main parties, then stay in them and vote for them - if you don't, the only way forward now is UKIP" (quoted in Norman, 2009).

Similar claims are made by critics of North American integration and are evident from competing ideological perspectives. In Canada, for example, the Council of Canadians contends that the Security and Prosperity Partnership is "anti-democratic;" that it is a top-down process controlled by the major business interests. In making this claim, the Council of Canadians draws particular attention to the existence and work of the North American Council on Competitiveness – an advisory body of CEOs (see VanNijnatten, 2007). In a 2006 U.S. Congressional testimony the policy director of the AFL-CIO questioned the openness and democracy of the SPP when she stated that, "It appears that important decisions relating to deepening economic integration among our three nations, and the well-being of our citizens, are being made by government and business elites, while civil society and Congress are sidelined" (Lee, 2006). A report for the Center for International Policy similarly stated that the SPP "set in motion an underground process that spawned its own working groups, rules, recommendations, and agreements—all below the radar of the legislatures and the public in the three nations" (Carlsen, 2007). On the right, Pat Buchanan has also made the argument that free trade in general, and NAFTA in particular, threatens American sovereignty and thus democracy (Buchanan, 2003). Jerome Corsi also argues that a process is underway that is leading to the unification of the United States, Canada and Mexico and that it is occurring with only limited awareness on the part of U.S. policy-makers and public (Corsi, 2007).

The third theme evident in the critics' rhetoric is the argument that the process of integration threatens the identity of the participating states. Many Canadian criticisms of NAFTA and the SPP stem from the fear that there is a danger of Canadian identity disappearing in the shadow of the United States and policies dictated by business interests located in the United States (Bolt, 1999; Orchard, 1998). Similarly, there are individuals and organizations within Europe that feel that integration threatens national identity. These views are prominent in non-member states such as Switzerland and Norway as well in the United Kingdom, which has long been considered an 'awkward

partner' (George, 1998). As Spiering has identified, Euroscepticism in the United Kingdom is linked to the belief that the United Kingdom is different and separate from the continent of Europe and that Britons are thus distinct from Europeans (see Spiering, 2004). In turn Daddow (2006) argues that this is linked to history education in Britain, which emphasizes Britain's great power past. Daddow suggests that history education and public history "remains hooked on images of Europe as a source of national rivalry and, by extension, the EU as a serious threat to British sovereignty, identity and nationhood" (2006: 77).

Within Euroceptical opinion the fear about the loss of identity is linked to concern about the loss of control of the state's borders and specifically the possibility of demographic change within the state as a result of both legal and illegal immigration. This fear that the national government is losing control over who can enter and stay in the state's territory is evident within the rhetoric of the Austrian Freedom Party (see Fallend, 2008) and many other political parties across Europe, including the List Pim Fortuyn and the United Kingdom Independence Party among others (see Szczerbiak and Taggart, 2008; Williams, 2006). In 2007, for example, UKIP called for a five year freeze on immigration into Britain. The party made the link between this policy and identity explicit when it recommended that, "No one should be admitted unless they are fluent in English, have the required educational qualifications, demonstrate loyalty to the UK, its laws and values, and can support themselves financially, with no recourse to public funds – and this to apply equally to their dependents" (UKIP, 2007). The party also advocates a slate of policies that it claims are aimed at 'restoring Britishness.' These policies include the recent call to limit the wearing of the burka in the United Kingdom. Lord Pearson, the current party leader, claims that the burka is "incompatible with Britain's values of freedom and democracy" (quoted in "UKIP to call…", 2010). Ex-leader, Nigel Farage introduced the proposed ban by arguing that the burka is a symbol of an "increasingly divided Britain" and of the fact that a different culture is "being forced on Britain"

(quoted in "UKIP chief…", 2010). The predominant theme of all of these policies is that British identity is under threat and needs to be preserved.

The claim that a flood of immigration as a result of integration will result in a loss of national identity is also evident in North America, especially within the United States within groups and organizations on the right in particular. These claims have been made, for example by Bill O'Reilly and Pat Buchanan, and are also evident on a large number of web-sites that claim that a potential North American Union will lead to a large influx of immigrants into the United States and a subsequent identity loss. In the words of one such commentator, "There is no society that can indefinitely allow a relentless flood of illegal aliens to contravene its laws, violate its sovereign borders…the massiveness of the illegal invasion constantly degrades America's way of life, culture and language (Peterson, 2006).

Explaining the Critical Perspectives

There are then both differences and similarities among the critical perspectives of integration in North America and European Union. Several factors help to account for this.

The differences stem in part from the fact that the critics target different elements of the integration project. Critics on both the left and right oppose the loss of autonomous decision-making capacity but focus on the impact of this in different policy sectors. Right-wing critics, for example, in both North America and Europe frequently focus on the loss of sovereignty with respect to border control and the subsequent fear of uncontrolled immigration and its impact on national identity. On the other hand, left-wing critics frequently focus on the loss of sovereign control over the setting of social regulations and a subsequent potential increase in the autonomy of big business. In part, then, the diversity within the critical perspectives is linked to the wide-ranging nature of the integration projects in both settings.

This does not, however, fully account for the content of the critical discourses. It is frequently the case that critics provide different interpretations of the same element of the same integration project. Right-wing critics of the European Union in the United Kingdom, for example, criticize the European Union's single market project on the grounds that it increases red tape and interference in the functioning of the free market as a result of Brussels' regulations. At the same time, left-wing parties criticize the same project on the grounds that it privileges business interests at the expense of the working classes. The Socialist Labour Party, for example, supports complete withdrawal from the European Union in part on the grounds that: "The European Union is a capitalist club that makes it easy for multi-national companies to exploit workers throughout its member states, while the sovereignty of those states is increasingly meaningless, and we are all at the mercy of a vast, faceless bureaucracy" (Socialist Labour Party, 2010).

It may well be the case that the integration projects are rejected by those who see integration clashing fundamentally with their interests and or values (Bennett, 2004; Hix, 2008). More is needed, however, to explain the critical discourses. One key additional element is that the critics focus on both the nature of the integration projects as they currently are and on the fact that there is a lack of clarity about what exactly is occurring, how it might develop, and what the end point might be. In both Europe and North America, there is disagreement about what integration actually is and where it might lead (see Taylor, 2008). This vagueness has been evident within the European Union since the original call to create "an ever closer union" and it has been manifest in disagreements over the Constitutional Treaty and the Lisbon Treaty. Some of those engaged with the project, such as Jean Monnet, have attempted to push integration in a federal direction, whereas others, such as Charles de Gaulle, have sought to limit integration to intergovernmental cooperation.

A lack of absolute clarity about the endpoint of integration is also evident in North America. It is at least possible that the NAFTA agreement is not the limit of

integration in North America. In the period since the terrorist attacks of September 11th there have been a number of cooperative developments relating to border security, including the December 2001 Smart Border Declaration and the NEXUS and Free and Safe Trade (FAST) programs (see Morales, 2008: 147). In addition, the governments of Mexico, Canada and the United States negotiated and eventually agreed on a Security and Prosperity Partnership of North America (SPP). This March 2005 agreement was intended to develop rather than replace NAFTA by calling on the three countries to cooperate to increase security and to enhance economic prosperity (see VanNijatten, 2007). The agreement also led to a series of trilateral summit meetings and the establishment of a series of working groups including the North American Competitive Council (NACC), and while the future of these initiatives is now in doubt, there are calls to develop further the agreements reached under the SPP.

In addition to these developments, academics and members of the business community have called for the creation of a customs union between the United States and Canada, a common currency and a smart border that will require common intelligence and security policies (see Pastor, 2008; Dobson, 2002). Support for these kinds of developments has been particularly evident in the private sector. Canadian business executives, for example, have been particularly worried that increased border security measures introduced by the United States in the wake of September 11th 2001 have been damaging to Canada's trading relationship with the United States and therefore Canadian prosperity (see Rao, 2004). The status of integration in North America is not fixed and to this extent is similar to the European Union. There is no universally agreed upon definition of where integration is headed in either Europe or North America.

As the integration projects have developed, this lack of clarity as to what might happen has helped generate criticism. In the critics' perspectives, it matters that the integration projects require member states to pool sovereign decision-making authority. It often seems to matter more, however, that this initial decision is not the end-point. What

has happened is important, but so is what might happen. This is very much evident, for example, in the rhetoric of the UK Independence Party and its claims that European Union is leading to the establishment of a United States of Europe. The party's 2010 general election manifesto makes frequent reference to the idea of a United States of Europe or a European superstate (UKIP, 2010b). In the section on foreign affairs and international trade, for example, UKIP claims to recognize "Britain as a global player with a global destiny and not a regional state within a 'United States of Europe'" (UKIP, 2010b: 6). Similarly, the Canadian Action Party sees NAFTA as part of a transformation "from three sovereign nations Canada, USA, Mexico into one regional corporate power base, the North American Union" (Fogal, 2010). This is also the argument made by Jerome Corsi in his book, *The Late Great USA* (2007).

The lack of clarity about what integration actually means, combined with fear about the future direction of integration, therefore helps to explain why criticisms come from different ideological perspectives. Critics are able to see in the integration projects a variety of different (often contradictory) problems and challenges to their preferred political and economic arrangements. A related factor is the lack of popular understanding or knowledge of the integration in both settings. John O'Brennan highlighted Irish citizens' ignorance of the Lisbon Treaty's contents as being a significant cause of their rejection of the treaty (2009). He argues that "although the Irish remain among the most enthusiastic about EU membership, there remains a significant knowledge vacuum, with a large majority of citizens professing to know little or nothing about how decisions are made at the EU level and how the EU institutions function" (O'Brennan, 2009: 270). Eurobarometer surveys also point to relatively low levels of public knowledge about the European Union. In 2006, for example, 85 per cent of British respondents claimed to know either nothing or only a little about the EU (Eurobarometer, 2006). Studies of NAFTA also indicate that while citizens are aware of NAFTA there is

relatively limited public knowledge about the contents of the treaty (see Schmitt, 1995; Rankin, 2004).[2]

The lack of popular understanding of European or North American integration may allow political space for political groups and parties to attract support by misrepresenting or exaggerating the development of integration. Analysis of the UK Independence Party and its policies demonstrate that its leaders misinterpret the European Union and its implications. At the very least, there can be little question that the party employs radical rhetoric and launches populist appeals in an attempt to secure both media attention and votes. A recent example of this tactic was the personal attack launched by UKIP's former leader, and current MEP leader, Nigel Farage on the President of the European Council, Herman van Rompuy, in the European Parliament. In his widely reported comments, Farage asserted that van Rompuy has "the charisma of a damp rag and the appearance of a low-grade bank clerk" (quoted in Charter, 2010). This speech resulted in Farage being fined by the European Parliament president but it was successful in securing media and public attention. It also provides an example of UKIP basing its appeal on a partial truth but doing so in a radical fashion. When the EU's heads of state and government selected Herman van Rompuy as the first individual to fill the position of European Council president, there was considerable commentary that questioned the decision on the grounds that van Rompuy is relatively unknown outside of Belgium (see Traynor et al, 2009; Kirkup and Waterfield, 2009). This commentary came particularly in the light of the fact that the initial proposal for a permanent European Council president had in part been intended to give the European Union a more visible international face (Crum, 2009).

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[2] Governments in general have not been active in providing information about integration to generally apathetic populations (see O'Brennan, 2009; Mair, 2007). In the case of the European Union, national governments sometimes deliberately provide a misleading interpretation of the EU in order to secure electoral advantage (Menon, 2008).

Misrepresentation is evident in the frequent claims made by critics of European integration that it has already created a European superstate. It is certainly the case that EU membership does entail a pooling of sovereignty and it does mean that some decisions that were previously taken by the national governments and parliaments are now taken collectively within the EU's institutional structure. More measured analyzes of the European Union, however, argue that this pooling of sovereignty has not created a superstate, and arguably will not do so. Certainly this is the argument made by both Andrew Moravcsik (2001) and Anand Menon (2008). Menon, for example, cogently argues that the European Union has been created by the member states because it is in their interests and that power remains at the state level. He states that: "The European Union, for from representing some kind of artificial construct separate from its constituent member states, is, in reality, a tool created and dominated by them" (Menon, 2008: 106). Even scholars who suggest that the European Union has had a significant impact on the participating states are far more likely to refer to it as a multi-level polity, or quasi-federal system, rather than a centralized superstate (Hooghe and Marks, 2001).

In North American, it is also the case that critical perspectives often misrepresent or exaggerate the extent of existing integration. As noted above, many critics in the United States, for example, assert that the 2005 Security and Prosperity Partnership (SPP) is producing a North American "regulatory structure" at an "astonishing speed" and is doing so in a secretive manner outside of popular democratic control (see Corsi, 2007: 85). Academic analyses of the SPP presents a more cautious interpretation of the potential impact of the SPP on North America (see VanNijnatten, 2007) and recent developments suggest that the formal elements of the SPP agreement are no longer actively being pursued by the three governments. Similarly, many of the critical discourses argued that NAFTA would lead to the removal of border controls and be part of the creation of a "borderless 'Superstate' similar to the European Union" (NAU War Room, nd). Contrary to this view, however, the years since September 11th 2001 have in

fact seen a 'thickening' of the border rather than a move towards open borders (see Andreas, 2005; Lennox, 2007; Capling and Nossal, 2009).

It is beyond the scope of this article to examine the relative prominence of the critical perspectives in North America and Europe. It is important to note, nevertheless, that the popular attractiveness and vitality of the critical discourses depends at least in part on the domestic context within which the critics are located. A strategy of misrepresentation is likely to be successful to the extent that there is a lack of popular awareness and lack of understanding about integration in both North America and Europe. This provides fertile soil into which anti-integration rhetoric can sink its roots. This is particularly the case in the United Kingdom with its long-standing popular and media tendency to view continental Europe as the 'other' (see Daddow, 2006; Harmsen and Spiering, 2004: 16), a generally low level of popular enthusiasm for the European Union (Spiering, 2004), and the frequent tendency of British governments to be on the minority side of EU debates (see George, 1998; Wall, 2008; Young, 1998). In this context, a sceptical message is an extreme manifestation of widespread popular and elite critical attitudes with respect to the European Union that are evident in the press (Anderson, 2004) and within the major political parties (Holmes, 1996). In Canada critics of integration are frequently built on criticisms of the United States that are prominent in a large section of Canadian society, politics and academia and which view the border as a defence against the threat posed to Canadian identity by U.S. ideas, policies and practices. In this view, the border is a dividing line between very different societies and governing systems (Adams, 2003). In the United States extreme critics of integration are often linked to conspiracy or super-conspiracy theories; constructions that link multiple theories in a meta-narrative purporting to explain all aspects of political, economic and social life (Barkun, 2003; Knight, 2002; Capling and Nossal, 2009).

Conclusion

A study of the critical discourses on integration in Europe and North America perhaps inevitably points to complexity. Even limiting the study to those parties, organizations and individuals that seek the complete abolition of the integration project, or their country's withdrawal from the project, does not entirely eliminate the complexity. Critics within the same setting can come from quite different ideological perspectives and sometimes reach radically different conclusions about the same feature of integration. It is also the case that there are differences between the critical perspectives in North America and Europe. It is, for example, the case that fundamental criticism of the European Union is a more prominent part of political debate than is fundamental criticism of NAFTA.

In spite of this complexity and these differences, there are also similarities evident in the critical discourses across the two settings. The same themes are evident in the criticisms even if the targets and conclusions differ. One of these central themes is the fear of the loss of sovereignty and the implications that this has for national policies, identity and democracy. These themes emerge in the critics' rhetoric regardless of their ideological perspective in both North America and Europe. It is also the case that the critical discourses display a similar tendency towards populist rhetoric and an exaggeration of the current state of integration and its possible direction. In this respect, the criticisms often build on an underlying popular lack of detailed knowledge of the integration projects as well as the fact that there is a lack of clarity about the eventual destination of both integration projects. In this context, the critical discourses play to the politics of fear.

In sum, then, fundamental criticism of integration in both Europe and North America reflects, and requires attention to, the contemporary state of the integration projects. It is also, however, affected by the absence of clarity about the future direction

of the integration projects as well as the ideologies and interests of the critics and their domestic political settings.

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