



## Brexit as a Driver of European Disintegration: Institutional Reform and Differentiated Integration

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### Abstract

This study investigates the disintegrative impact of Brexit on the European Union's institutional framework. Disintegration may occur in the form of other member states leaving the union. Still, it can also manifest in terms of institutional reform in the direction of increased intergovernmentalism and executive dominance, resulting in a renationalization of the EU's policymaking competences. The article contributes to the literature on European disintegration and differentiated integration by addressing the causal impact of Brexit as a driver of flexible institutional designs to meet the diverging demands of EU member states. The authors' research is grounded in a constructivist approach, which draws from several theoretical accounts of European integration, proposing that Brexit has and will continue to result in increasing institutional differentiation in the EU. The authors test this hypothesis through an embedded single case study that examines how member states reacted to the new European power balance. The authors focus on proposals for institutional reform, particularly in relation to the Common Foreign Security Policy and the European Stability Mechanism.

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## 1. Introduction

This article studies the impact of Brexit on European integration. The UK's departure from the EU has raised several questions about the future of European integration (Leruth et al. 2019b). On the one hand, Brexit represented an ontological threat to the EU, as it highlighted the risk, until then theoretical, that member states could unilaterally withdraw under certain external and internal conditions. At the same time, given how the United Kingdom has been a *sui generis* member over the years, tending to be reluctant to adopt reforms in the direction of greater European integration, Brexit has been seen as an opportunity to accelerate this integration process. Both possibilities, which are not mutually exclusive, could occur gradually at different rates in different member states. This work explores the effects of Brexit on European disintegration, looking at how the UK referendum on EU membership has influenced the member states' agenda in the context of EU policies. The aim of this article is to assess how Brexit has affected the vision of the future of Europe of the other member states by highlighting how European integration is a reversible process. The referendum reinforced the notion, hitherto only theoretical, that a state can leave the EU and has spread awareness among member states that the EU is less stable than previously thought.

As a result, rather than striving for further integration, a more effective strategy for states could be to champion differentiated integration (DI) in the fields of their interest. In essence, Brexit might have redefined the perception of the EU, shifting from an embryonic stage of a supranational entity with state-like ambitions to a mere international organization with exceptionally broad competences. Despite the coexistence of both visions within the various member states and their respective political classes, a similar shift could significantly alter EU integration trajectories. This article does not aim to prove that one vision has replaced the other. Instead, it seeks to gauge the disintegrative impact of Brexit by highlighting the changes that have occurred in the years following the referendum. In pursuing this goal, it looks at two different, albeit not mutually exclusive, hypotheses: first, has Brexit resulted in increased differentiation? Second, did its impact on differentiation, whether positive or negative, lead to more integration or more disintegration? It does so by analyzing the political discourse of the member states on the central themes for European integration, which are the same policy issues at the heart of the British referendum debate and the agreement signed in February 2016 between Prime Minister David Cameron and the European Union. These issues include sovereignty, economic governance, and restrictions on movement and access to national welfare for intra-European migrants.

The article is structured as follows. The first section focuses on the effects of Brexit and the models of disintegration developed by the literature review. The following section discusses the methods used in this study, also outlining the criteria behind the data selection. The third part analyzes the institutional developments of the EU in the fields of monetary and security policy. The fourth section builds on this analysis to explore the role of Brexit as a catalyst of already present disintegrative forces, highlighting the causal links between the referendum and strengthening the Eurosceptic discourse. The fifth section discusses these ties, addressing the article's central hypothesis that Brexit has given momentum to a new type of discourse on EU membership. Finally, the conclusion offers some remarks on how the study of European integration can develop on the subject, taking into account the case of Brexit and the general idea that external events can reshape the ideological fabric of a political system, influencing its future.

## 2. Literature Review

This research looks at the ties between disintegration—a concept which played a foremost role in EU studies in the last decades—and differentiated integration (DI). Differentiated integration centres around the notion that European policies are applied unevenly across member states in terms of centralization, defined as vertical integration and territorial extension, or horizontal integration, which is linked to the number of member states adhering to a given policy (Schimmelfennig et al. 2015). Schimmelfennig (2021) distinguishes between differentiated integration and differentiated disintegration, defining the former as the delegation of national competences to the EU by the member states and the latter as the culmination of a process that originates from the politicization of European integration issues within the sphere of mass politics. The consequence of this process is the strengthening of Eurosceptic parties, which, notably through referenda, seek to achieve differentiated disintegration, ultimately resulting in withdrawal from the EU. Overall, the two terms can be understood as the two ends of the differentiation spectrum—a conceptual category that includes a wide range of phenomena such as opt-outs, cooperation agreements, and the renationalization of specific competences (Leruth et al. 2022). Given this foundation, this study examines the impact of Brexit on DI to assess its disintegrative effects. By analyzing how Brexit has influenced differentiation, it evaluates whether the UK's departure has strengthened Eurosceptic political actors in other member states by demonstrating the feasibility of leaving or, conversely, has discouraged such movements by highlighting the complexities and costs of disentangling from the EU.

### *2.1 Differentiation and Disintegration*

This research draws from the recent literature on EU disintegration, combining it with an empirical assessment of EU policies. The aim is to determine the extent to which Brexit can act as a catalyst for European disintegration, which aligns with intergovernmentalist theorizing. According to this approach, member states will perceive EU membership as disadvantageous to their interests, also due to the pressures exerted by Eurosceptic elements within them (Leruth et al. 2019a). At the same time, it is also conceivable that the actors in this process, i.e. the member states as well as the institutions and interest groups within the EU, proceed with the creation of new institutional arrangements to overcome the challenges posed by the result of the referendum, a scenario comparable to the approach implemented by the EU in the banking and energy fields (Bauer and Trondal 2015).

In the negotiations with the EU before the 2016 vote, Prime Minister David Cameron emphasized the importance of member states being able to determine autonomously the extension of their adherence to the European project. This underscored the relevance of differentiated integration in the context of Brexit. Both in the Bloomberg speech and during the “Remain” campaign, Cameron advocated for institutional “flexibility” to address the new challenges faced by the EU. This position aligns with the approach already preferred by the United Kingdom, a member state generally hesitant to adopt some of the most significant reforms in the EU, notably opting out of the Schengen Agreement and the Eurozone.

Differentiated integration (DI) was also advocated by member states who sought greater EU involvement in specific policy areas. France has been a prominent advocate of this approach, especially under the leadership of French President Emmanuel Macron. The French President has consistently remarked on the importance of fiscal and institutional reforms within the EU, including a common defence strategy based on a Franco-German partnership open to interested member states (Michel 2020; Schmidt 2019). This work draws from the literature that has described differentiated integration as the situation in which some member states choose to pursue further integration, while others seek to be exempted from specific aspects of European legislation, as was the case with the UK until Brexit (Holzinger and Tosun 2019). In this regard,

the unique form of membership developed by the UK in the decades before its departure—characterized by the contradiction of seeking a central role within the single market while opting out of the euro—has been highlighted in the scholarly literature as one of the causal factors behind Brexit (Fossum and Lord 2023).

Accordingly, the development of similar institutional arrangements in other member states could further destabilize the EU in the future, a scenario known as “EU à la carte” (Hoekman 2007). This model could also provide member states with greater autonomy to define their preferences within a larger framework. As a result, increased differentiation could strengthen or hinder EU integration, leading to the four empirical scenarios outlined in Table 1.

**Table 1: Impact of differentiation on integration. Source: Authors**

	<i>More Integration</i>	<i>Less Integration</i>
<i>More Differentiation</i>	Differentiated integration	Differentiated disintegration
<i>Less Differentiation</i>	Conventional integration	Renationalisation in areas where DI is currently practiced

Part of the literature focused on how Brexit might lead to a less differentiated EU, as the withdrawal of the United Kingdom results in a double effect: first, it strengthens political unity between member states and, simultaneously, it discourages the adoption of models similar to the British one, which was based on opt-outs and external differentiation (Martill 2021). Other authors have observed how Brexit has instead highlighted the limits of the EU’s ability to cope with requests for flexibility from its member states, underlining how differentiated integration is an intrinsic characteristic of the EU and shared, in certain areas, by every member state (Kendrick 2023). Considering how differentiated integration affects specific policy areas depending on the state analyzed and the external circumstances, and thus in line with the ambition of studying the effects of Brexit on this phenomenon, this work pays particular attention to the monetary and security fields. The choice of these sectors is motivated by their relevance, as they are areas generally linked to the concept of sovereignty as portrayed in Eurosceptic narratives; it has been widely observed how the issues of security and the economy were at the centre of the “Leave” campaign and is a recurring topic in the Eurosceptic discourse across Europe (Orlando 2022).

Differentiation is a consequence of the heterogeneity of preferences and capabilities among member states, due to the significant demographic, economic, and societal differences between them. According to the supply and demand theory, differentiation arises from the contrast between states resisting deeper integration (demand side) and those promoting it (supply side) (Schimmelfennig and Winzen 2020). States on the demand side will pursue differentiation through opt-outs, while those on the supply side may support this process to advance further integration without being hindered by the constraints posed by the former.

In turn, the dynamics leading from heterogeneity to differentiated integration (DI) have been studied through the lenses of the three main European integration theories: liberal intergovernmentalism, neofunctionalism, and postfunctionalism. Specifically, liberal intergovernmentalism (LI) and, to a minor extent, neofunctionalism (NF) consider the heterogeneity of wealth among member states as one of the causal factors of differentiated integration. Member states with similar economic outputs are more likely to cooperate and

experience greater spillover effects, while those with significant economic differences may opt for more flexible arrangements, leading to varying levels of integration across the EU. This process is facilitated by the significant advantage of wealthier states in realizing their preferences, due to their greater bargaining power. On the other hand, postfunctionalism (PF) focuses more on domestic factors and national identity in researching the driving forces of differentiated integration, thus offering an alternative, albeit complementary, explanation (Schimmelfennig and Winzen 2019). Postfunctionalism, therefore, differs from the other two grand theories in that it turns its attention to the role of identity in individual preferences in shaping the jurisdictional architecture of the EU; this mechanism becomes of primary importance where European integration is politicized, that is, it enters the arsenal of political actors, conditioning their positions and limiting their range of action due to the fear of electoral or referendum defeat (Hooghe and Marks 2009). These dynamics, already hypothesized in the years following the Maastricht and Lisbon treaties, were widely observed in the choice of government led by David Cameron to renegotiate the United Kingdom's position in the EU first and in granting a referendum afterwards (Schimmelfennig 2021). They were also reflected in the post-Brexit negotiations, which have been described as unfolding within a reality of constraining dissensus (Biermann and Jagdhuber 2022).

This article aims to make a unique contribution to the existing scholarship by drawing from both the postfunctionalist approach, liberal intergovernmentalism (LI), and neofunctionalism (NF), as well as by analyzing the institutional developments of the EU in the years following Brexit. To achieve this, it conducts an analysis of the member states' policy decisions in the most significant and politicized areas of European integration, namely economic governance and security policies. In this context, the impact of Brexit on disintegration could manifest in two ways. First, Brexit might demonstrate alternative cooperation mechanisms and the viability of referendums as a tool to implement differentiated integration. Alternatively, the exit of the United Kingdom could accelerate the process of European integration, potentially through the implementation of a series of reforms that lead to the coexistence of a softcore Europe alongside smaller and more integrated policy communities (Schmidt 2019). The purpose of this article is therefore to seek evidence in support of these two possibilities and, based on the findings, draw conclusions about differentiation in post-Brexit Europe.

These two scenarios should not be considered mutually exclusive, as their coexistence is possible and probable. Given the heterogeneity of preferences mentioned before, it appears likely that some member states would seek greater flexibility, motivated both by the desire to reduce the economic costs of further integration as envisaged by LI and NF and the internal political constraints at the centre of postfunctionalist theory. This process, identified by Schimmelfennig and Winzen as the supply and demand model of disintegration, can conceivably push those states interested in expanding the EU's scope of competence to achieve their aims through internal agreements. At the same time, if some member states decide to carry out ambitious reforms characterized by a high level of integration, such as the previously discussed cases of common defence and fiscal policies, it is foreseeable that they would opt for some form of differentiated integration (DI), rather than allowing their efforts to be blocked by the reservations of more reluctant member states.

If this is the case, Brexit has opened the doors to a multi-speed Europe, a phenomenon that predates it and that the referendum could further legitimize. The example of the UK has provided a new weapon to the arsenal of Eurosceptic actors at the domestic politics level, while in the context of EU negotiations, it showed how concessions and opt-outs can be preferable to having a member reluctant to conform to the European integration project. In line with the choice to focus this analysis on the economic and security areas, examining the two crises that

hit the EU after Brexit—the COVID-19 pandemic and the 2022 Russian invasion of Ukraine—is inevitable.

Regarding the community response to the pandemic, the EU coordinated its efforts despite some initial resistance by certain member states; this high degree of coordination applies both to the health aspect, such as the supply of vaccines, and to the response to the economic and fiscal consequences of the crisis (Schilin 2023). Given these findings, Schilin also suggests that the relevance of differentiated integration (DI) decreased after Brexit, as granting the UK opt-outs was not sufficient to prevent its withdrawal from the EU; accordingly, he hypothesizes that the role of DI as a causal factor of European disintegration is conditioned to the existence of specific circumstances capable of strengthening its ideational importance.

Regarding the Common Foreign and Security Policy (CFSP), the 2022 escalation of the Russo-Ukrainian War has called into question the EU's role in security. Although the central pillar of European defence remains, for most states, NATO membership, the EU's response to the war shows the goal of implementing a common response. At the same time, DI is an intrinsic characteristic of the security field—an area in which historical and geopolitical reasons led to various types of cooperation: between individual member states, between member states and non-member states, and through bilateral agreements with non-European countries, both outside and within the NATO framework (Rieker and Giske 2024). This high level of DI in the defence field is not surprising, considering how the military aspect has historically been the most emblematic expression of state sovereignty, with the very survival of the state often depending on it, as reminded by the war in Ukraine.

### **3. Materials and Methods**

The literature discussed so far presents a highly complex picture concerning DI in general and specifically the impact of Brexit. At the same time, on the empirical level, it can be observed how the two major crises faced by the post-Brexit EU resulted in vastly different outcomes. Through an extensive analysis of the literature and policy documents, selected through an in-depth analysis of the relevant material, this work aims to explain and partly reconcile these evident contrasts by analyzing policy decisions and explicit statements toward a higher level of differentiated integration by member states and the EU. The material, meticulously collected via traditional mainstream media, digital media, and official policy documents between 2020 and 2024, provides a comprehensive understanding of the disintegrative effects of Brexit in the context of community policies, particularly in the final stages of the negotiations and the months preceding the official exit of the United Kingdom from the EU.

Through an assessment of government declarations and programs, this comprehensive approach provides the opportunity to focus both on the institutional developments within the EU, measurable through an analysis of the policies implemented by member states, and on the ideological dimension, indicative instead of Brexit's impact on how the notion of belonging to the EU has changed. As a result, this work aims to discuss the disintegrative effect of Brexit from the vantage point of differentiated integration, providing an empirical analysis while being cognizant of the leading European integration theory approaches. The analysis presented here, however, does not take into account programs of political parties and electoral material since, while recognizing their importance for the study of Euroscepticism, it has been observed that the positions of the parties are characterized by a high level of ambivalence (Heinisch et al. 2021). Therefore, they appear poorly suited for studying the institutional developments of relations between the EU and its member states.

The analysis of the material presented in the following section aims to provide empirical support for a theoretical discussion on Brexit's direct and indirect effects on differentiated integration. By examining how Brexit has influenced the evolution of EU institutions and shaped member states' perceptions of the costs and benefits of membership, this discussion contributes to a broader assessment of European disintegration trajectories. Through this institutional perspective, the study seeks to better understand Brexit's disintegrative impact within the framework of differentiated integration.

This last aspect is the basis of the choice to focus on monetary policy and security, already at the centre of the Brexit campaign and widely considered sectors in which it is challenging to carry forward common European policies (Orlando and Conrad 2024). By focusing on these crucial areas, the authors aim to shed light on the most pressing issues surrounding Brexit and its impact on differentiated integration.

#### **4. Institutional Development**

Although on a purely theoretical level, EU membership obliges all member states to comply with the provisions of the treaties, it is evident that, in practice, exceptions in this sense are, in fact, the norm. In the two macro-areas affected by this analysis, a widespread tendency to resort to opt-outs can be observed. Examples of this phenomenon are the Economic and Monetary Union (EMU), based on three stages of progressive economic integration that have not been adopted by all member states, as well as from Schengen membership, temporary in the cases of Romania, Bulgaria, and Cyprus, and permanent in the case of Ireland.<sup>34</sup> The existence of such resistance leads to a reflection on the supranational nature of the EU, as these two areas are not only, as previously noted, cornerstones of the Eurosceptic discourse, but also involve competences generally delegated to the central government in federal states (Schimmelfennig et al. 2023).

##### *4.1 Economic Policy*

The first necessary distinction in the analysis of differentiated integration is between those states partaking in the EMU and those outside it; following the 2010 Eurozone crisis<sup>5</sup> and the ensuing reforms, the gap between the two groups widened significantly. Some examples of this process include: the creation of the European Stability Mechanism (ESM) to assist euro area member states in financial difficulty; the establishment of different monitoring and reporting measures for Eurozone members in the context of the Stability and Growth Pact; the Treaty on Stability, Coordination and Governance in the Economic and Monetary Union (TSCG), which subjects Eurozone countries to particularly stringent budget rules and enhanced supervisory mechanisms; the entry into force of a specific regulation aimed at monitoring macroeconomic asymmetries (Reg. 1176/2011), accompanied by special sanctioning measures for euro area

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<sup>3</sup>For a detailed account of the history of the Economic and Monetary Union, and on which some member states have yet to fulfill the convergence criteria see European Parliament. 2025. "History of the Economic and Monetary Union." Accessed June 17, 2025. <https://www.europarl.europa.eu/factsheets/en/sheet/79/history-of-the-economic-and-monetary-union>.

<sup>4</sup> Although Schengen technically falls under the Area of Freedom, Security and Justice (AFSJ), in the context of Eurosceptic rhetoric and populist discourse the issue of freedom of movement is generally framed as a security one, hence the inclusion above.

<sup>5</sup> The Eurozone crisis, beginning in 2010, was a sovereign debt crisis that exposed structural weaknesses in the euro area. Triggered by the 2008 global financial crisis, it primarily affected Greece, Ireland, Portugal, and Spain, leading to bailouts coordinated by the European Central Bank (ECB), European Commission, and the International Monetary Fund (IMF). Austerity measures and economic stagnation followed, sparking political unrest and raising doubts about the Eurozone's long-term viability.

countries (Reg. 1174/2011). These measures have contributed to increasing the distance between the two groups of states and, at the same time, giving rise to conflicts between the Eurozone states, as they are bound by new and more stringent measures which have exacerbated pre-existing differences in terms of policy preferences (Pilati and De Angelis 2020). The EU's response to the Eurozone recession was a labyrinthine network of measures, signifying a resolute intent to prevent crises of the scale experienced in 2010 from recurring within member states. This was accomplished by amalgamating support tools with novel methods of sanction and supervision (Börzel 2016).

The measures implemented after the COVID-19 pandemic, however, appeared to be aimed at intervening not only in the pathological stage of the member states' finances but also at significantly amplifying the scope of EU investments, thereby acting already in the physiological phase of the functioning of the European economy. The Multiannual Financial Framework (MFF), adopted for the years 2021–2027, witnessed the EU endorsing an ambitious financial project aimed at fortifying its economy post-pandemic; this project, dubbed “Next Generation EU” (NGEU),<sup>6</sup> was distinguished not only by its substantial magnitude but also by the decision to finance it through the issuance of EU debt instruments, henceforth defined as Eurobonds, to be repaid until 2058 (European Commission 2021a). The funds raised from the issuance of these Eurobonds were then allocated to member states through the Recovery and Resilience Facility (RRF), an instrument explicitly created to provide such performance-based financing to member states under conditions that they present a National Resilience and Recovery Plan (NRRP) in which they outline the reforms and investments to be implemented by 2026 (European Commission 2021b).

The negotiations that led to the approval of these measures were significantly influenced by the resistance of a bloc of states labelled as the Frugal Fours (Austria, Denmark, the Netherlands, and Sweden) and Finland (Bisciari et al. 2021). Although eventually overcome, these resistances allow us to spell out some considerations regarding the institutional dynamics of post-Brexit Europe. In contrast to the reaction to the 2010 crisis, in which the economic support of the EU was conditioned and secondary compared to the austerity measures introduced, the strategy to respond to the pandemic shows an approach aimed at promoting the development of member states, almost in a Keynesian fashion. The main objection raised by the Frugal Four was that the issuance of Eurobonds could damage the functioning of the Eurozone, specifically in the absence of a system of conditionality and accountability linked to the disbursement of European funds. After intense negotiations, these concerns were addressed by establishing the RRF and other smaller programs aimed at increasing accountability for member states benefitting from these measures (Vanhercke et al. 2021).

The decision to respond to the crisis through direct EU intervention of unprecedented scope has been interpreted as a post-Brexit development of European economic policy, as it represents an overcoming of the neoliberal logic prevalent in the United Kingdom (Joseph and Juncos 2024). Another possibility is that the need to address the COVID-19 crisis forced Europe to face a dilemma rooted in two arguments at the core of Eurosceptic criticisms. On the one hand, the claim—central in the Brexit campaign and quite common in wealthier member states—that the EU tends to redistribute resources to benefit its poorest members, effectively subsidizing their failing economic policies. On the other hand, there is the opposing view that EU monetary policy and its austerity measures represent a threat to the economy of those states with below-

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<sup>6</sup> Next Generation EU (NGEU), launched in 2020 in response to the COVID-19 pandemic, is a €750 billion recovery instrument aimed at supporting economic resilience and green and digital transitions across the EU. Marking a significant step toward fiscal integration, it allowed the European Commission to issue common debt on behalf of member states—an unprecedented move that redefined the scope of EU-level solidarity.

average economic performance (Orlando and Conrad 2024). The achievement of these agreements demonstrates that, despite internal divisions arising from conflicting economic preferences and ideological differences within domestic politics, the EU has successfully pursued common financial objectives, fostering optimism about its future. This outcome aligns with the conventional understanding of EU integration, corresponding to the “more integration/less differentiation” scenario outlined in Table 1, where deeper cooperation prevails over fragmentation.

#### *4.2 Foreign and Defence Policy*

As regards the second area covered by this article, namely the Common Foreign and Security Policy (CFSP), it would appear that the direct impact of Brexit is lower than what the international relevance of the United Kingdom would suggest. This discrepancy is because the UK took advantage of the high level of flexibility available in these areas in the years preceding Brexit, so its contribution to the administrative field was reduced (Schade 2020). Nonetheless, losing a member state with a military and diplomatic apparatus on the scale of the UK’s had significant consequences for the CFSP. The attempts to reach an agreement through some form of external differentiation by the Theresa May-led government proved fruitless, both due to the lukewarm reception by the EU and the rise of Boris Johnson’s government, characterized by more drastic positions on the topic (Martill and Sus 2023). In parallel with the need to readjust its strategy following Brexit, the EU found itself facing the Russian invasion of Ukraine in 2022. In March 2022, the European Council endorsed the Strategic Compass, a document previously approved by the Foreign Affairs Council, which contained an analysis of the EU’s priorities and objectives in the field of security (Council of the European Union 2022).

The Strategic Compass, hastily revised in the weeks between its promulgation and the onset of hostilities, begins by acknowledging the resurgence of war in Europe and the European Union’s commitment to upholding the European security order. While the document alludes to the concept of the EU’s strategic autonomy as a security actor, it remains somewhat unclear about the implementation of this autonomy, particularly in relation to the EU’s mutual assistance clause and EU-NATO cooperation (Koenig 2022). In essence, the Strategic Compass serves more as a roadmap for the future development of European security than a concrete institutional development. Despite the document’s resolute language and ambitious objectives, undoubtedly influenced by the events in Ukraine, it is yet to be seen how willing member states are to put it into practice, especially regarding the potential for coordinated operations under EU supervision, as outlined in Article 44 of the Treaty on European Union (TEU) (Blockmans et al. 2022).

The extent to which the EU can act autonomously at a regional and global level, implementing its preferences independently from the North Atlantic Treaty Organization (NATO) and individual member states, remains uncertain. For instance, the fact that Sweden and Finland have joined NATO, along with the skepticism of Central and Eastern European countries about the CFSP’s concrete capability to protect their interests, suggests that the EU has a long way to go before it becomes the primary security provider for its member states. This is despite the significant support in the form of financial and strategic aid provided to Ukraine (Helwig 2023).

Returning to the focus of this article, the institutional developments in the field of CFSP offer some relevant insights. Enhanced cooperation in this sector is explicitly referred to in EU legislation, such as the institution of the Permanent Structured Cooperation (PESCO) based on the Treaty on European Union (TEU). Moreover, it is also logically desirable given the differing security needs of member states, such as the above case of the Central and Eastern European bloc, as well as shared interests, for example, among Mediterranean countries concerning the management of migration flows. On these grounds, and given the need to

accommodate divergent interests, differentiated integration (DI) has represented a recurring feature of the CFSP. However, it was present more in its passive meaning, especially in terms of opt-outs, than in the active sense, conceptualized as a higher degree of integration. This significant fragmentation is visible in the case of PESCO, where it was recommended to implement straightforward guidelines and a more stringent monitoring system for member states (Houdé and Wessel 2023). Based on the four-fold typology outlined in the second section, this policy area exemplifies differentiated integration (characterized by both more differentiation and integration), as certain states seeking deeper cooperation are advancing beyond the common EU framework. This trend suggests the emergence of strategic security partnerships among like-minded countries rather than the development of a unified European defence strategy.

This analysis described how post-Brexit Europe has evolved, focusing on institutional developments in the economic and security fields. Although a deep analysis of both events is beyond the scope of this work, it is necessary to address how the pandemic and the Russo-Ukrainian War affected these policies. Therefore, the two crises are considered external causal factors capable of accelerating endogenous dynamics independent from them. The authors have highlighted how the EU has implemented robust economic measures to support its member states, overcoming internal opposition through minor concessions. Although the Strategic Compass represents a step forward in the direction of more incisive EU-level action, within the CFSP, it appears that the national and NATO dimensions continue to be dominant in the areas of diplomacy and security. The following section explores the role of Brexit in the institutional developments discussed so far, aiming to determine whether, and to what extent, the notion that a state could leave the EU has had an integrative, disintegrative, or mixed effect.

## **5. The Role of Brexit**

### *5.1 Main disintegrative factors*

To discuss the impact of Brexit on European integration, it may be helpful to summarize the main profiles under which it can be analyzed. Possibly the most profound consequence of Brexit is a disintegrative impact that could lead other member states to leave the EU. However, this domino effect has yet to be observed, and it does not appear likely to happen in the immediate future. Another possibility is for the post-Brexit EU to experience disintegrative spillovers, differentiated disintegration through the renationalization of specific competences, or a weakening of EU structures at the advantage of member state governments in line with intergovernmental theories (Niemann 2021). At the same time, both during and after the Brexit negotiations, the 27 EU member-state governments and public opinion privileged cohesiveness. It has been observed how even Eurosceptic parties raised the issue of reforming the EU rather than promoting the example set by the UK (Chopin and Lequesne 2022). Such instances of reform might indicate an evolution of the EU in the sense of a more flexible institutional design. Institutional safeguards have been a quintessential feature of the EU constitutional design, aimed at guaranteeing member states the possibility of opting out of specific policy initiatives, a mechanism often used by the United Kingdom (Glencross 2021). Alongside the possibility that Brexit has incentivized member states to seek more flexible designs, it is also necessary to consider the dilemma of future trajectories for European integration: whether to favour deepening (institutional) or widening (geographical) integration. As noted by Hobolt (2016), a process of greater differentiated integration is underway, destined to accentuate the divisions within the EU in the sense of a deeper integration of core Eurozone members. In this context, the DI process would represent an intrinsic characteristic of a more

flexible design, and it would go hand in hand with the deeper integration required by some states.

### *5.2 Imitative effects*

Concerning the contagion effect, on a political level, the most significant threat consists of the potential emulation effect mediated by local Eurosceptic forces and the perception by member state citizens that the UK improved its position by leaving the EU. To offset this risk, the EU maintained a hard stance in the negotiations, emphasizing that the benefits associated with membership must be tied to the related costs—a position that aligns with voter preferences, as demonstrated in a large-scale quantitative study (Walter 2021).

This process can be witnessed in the EU-UK negotiations on the CFSP. Despite Brexit offering Brussels an opportunity to expand its competences in the security and foreign policy domains, the EU also had to confront the claims advanced by Eurosceptic actors that such developments would result in a loss of national sovereignty and the establishment of a superstate. Furthermore, both parties faced significant constraints in their efforts to outline the future profiles of their cooperation in the area. The EU had to avoid an agreement that was too favourable towards the UK, as it would have reinforced the perception of an à la carte integration, with all the benefits of membership and none of the associated costs. Simultaneously, Boris Johnson's cabinet could not settle for a compromise that curtailed the UK's sovereignty, which would have contradicted the hard Brexit stance of his government. Ultimately, this conflict led to the exclusion of the issue from the 2020 EU-UK treaty (Harrois 2023), and such an agreement is still pending at the time of this writing (Posaner et al. 2023).

### *5.3 Executive Dominance and the EU Democratic Deficit*

A further aspect of primary importance in assessing the disintegrative impact of Brexit concerns executive dominance, specifically the tendency of member state governments to bypass the multilevel structure envisioned in the EU design, which includes both national parliaments and EU institutions. The relevance of this phenomenon harks back to the debate on the democratic deficit in the EU, one of the main points of contention in the Eurosceptic discourse. In the context of the Brexit referendum, the term highlighted the distance between the EU and the citizens of member states. In this analysis, a surge in executive dominance is relevant as it indicates a shift towards an understanding of the EU as an institution ultimately managed by member states, rather than a democratic supranational entity.

A recent quantitative study aimed at assessing the impact of EU executive action versus member states' governments in the 2015 refugee crisis and during the pandemic suggests how, in both cases, the executive action of national governments was decisive in shaping the relevant policymaking decision (Bojar and Kriesi 2023). However, in the case of COVID-19 and the fiscal reforms connected to it, the friction represented by minority coalitions of member states had a minor effect, attributable to the symmetric distribution of the crisis and the limited role played by national identities. These findings align with a further quantitative study highlighting the reduced role of national parliaments in influencing government preferences (Tarlea et al. 2024). The reduced role of national parliaments is partly due to the constitutional architecture of member states; however, Brexit might have influenced governments to compromise more. This phenomenon is due to the absence of the UK, which has historically been a reluctant partner and to avoid facing the consequences of hindering the EU decision-making process. Not only was executive dominance present independently of Brexit, but the UK's withdrawal has partly facilitated negotiations between member states, easing the implementation of shared policies.

Thus, Brexit did not increase the democratic deficit of the EU, as neither the other national actors have seen their role diminished due to the referendum, nor can one observe a surge of supranational centralization to the detriment of the member states. The central role of national governments is, instead, the leading cause of European democracy's imperfect nature. Although governments are directly or indirectly accountable to their voters, they decide on EU affairs with significant autonomy; moreover, the collegial nature of the EU decision-making practices allows them to offload their political responsibility significantly.

#### *5.4 Heterogeneity*

A further factor to consider is the high degree of heterogeneity between member states, which results in various institutional convergence clubs, i.e. groups of countries with comparable performances in several macroeconomic and institutional indicators (Glawe and Wagner 2021). This heterogeneity could be fertile ground for differentiated integration, as a flexible institutional design would help overcome conflicts between member states with different preferences; it would also allow for joint projects to be carried out with countries at a comparable level without waiting for the other member states to complete the necessary structural reforms. Given such conditions, a disintegrative event like Brexit could lead to a more flexible institutional design to avoid conflicts between member states. In the context of the CFSP, a sector already characterized by a high level of flexibility and autonomy on the part of the member states, it is not possible to observe any development in this sense (Klose et al. 2023). On the contrary, after the referendum, and in the context of the war in Ukraine, which led Denmark to join the Common Security and Defence Policy, the effect of Brexit appears to be negligible.

In the context of security policies, DI can manifest both in the sense of opt-outs and as enhanced cooperation between member states within the structures provided by European legislation. In the economic and single market fields, the type of DI most relevant for the study of European disintegration is the former; the British government's requests to the EU to avoid the referendum represent a clear example of this disintegrative drive. In the 2015 letter addressed to the President of the European Council, Donald Tusk, PM David Cameron called for exemptions for non-Eurozone states from financing operations supporting the euro, limits to the free circulation of people, and an increase in the power of national parliaments (Cameron 2015). Despite the eventual failure of Cameron's plea, a post-Brexit EU might accommodate similar instances of reform from member states to avoid their withdrawal. If this were the case, one might expect to observe an easing of European constraints, particularly budgetary ones, accompanied by a trend towards renationalizing national competences in critical sectors. This tendency would represent a radical change in the core features of the EU, as highlighted by Tusk's negative response to the British government's requests, a position shared by the member states during the Brexit negotiations (Matthijs et al. 2019).

#### *5.5 The Institutional and the Ideational Profile*

A shift of this magnitude, facilitated and accelerated by the referendum's outcome but not attributable only to it, can be studied from two perspectives. The first, empirical and particularly relevant in the short and medium term, is the assessment of instances of competences renationalization. These processes would occur gradually and concern only specific sectors at any given time. A comprehensive empirical study focused on the dynamics of single market integration across multiple policy areas contradicts this hypothesis, showing instead a situation characterized by the relaunch of initiatives aimed at promoting greater integration and a high degree of resilience towards instances of renationalization (Raudla and Spendzharova 2022).

The second vantage point, theoretical and therefore better suited to address the long-term dynamics of European integration, shifts the focus from what has been done to what has yet to be done. In other words, it evaluates whether Brexit forced institutional actors to delay reforms to avoid being targeted by Eurosceptic forces or exacerbating the conflict between member states (Zeitlin et al. 2019). In such a scenario, differentiated integration could serve a dual purpose. It would offer member states constrained by the dynamics described above greater leeway and allow those actors interested in European integration to pursue a deeper form of it independently. The following section discusses the extent to which this has happened and the role of Brexit in these developments.

## **6. Discussion**

### *6.1 Brexit as a Structural Driver of Disintegrations*

The authors' examination of the current state of the EU has primarily delved into its institutional reforms and the concept of differentiated integration while assessing the profound disintegrative impact of Brexit. In the context of EMU policies, the measures outlined in the Multiannual Financial Framework (MFF), alongside the issuance of Eurobonds, represent a visible sign of development in the sense of greater integration. In the security field, although the Strategic Compass contains several blueprints for development, the situation appears substantially unchanged. This gap between external security and other policy areas, with the latter confined to the decision-making autonomy of member states, is a feature of EU policymaking already observed by Börzel (2005) in a macro analysis of the institutional evolution of the European project. The distinction between level, referring to the issues falling under EU competences, and scope, measured in terms of supranational centralization versus the involvement of national governments in the decision-making process, provides a useful framework for further analysis (Börzel 2005). The extensive distributive policies implemented post-pandemic, along with the establishment of a monitoring system by the Commission, demonstrate a broadening of competences. However, it is important to note that the approval of these measures was a result of consensus among the member states. In the case of the CFSP, the national dimension still holds sway in both aspects; even the calls to enhance defence cooperation by European heads of state primarily pertain to the national dimension, with the EU's role limited to providing an institutional framework for such initiatives (Le Monde 2024).

However, the presence of these structural limits alone cannot be considered a sign of disintegration, much less can it be attributed to Brexit. On the contrary, considering that one of the central factors of divergence between the UK and Brussels was the implementation of redistributive policies, Brexit facilitated the implementation of Next Generation EU. Nonetheless, establishing a permanent macroeconomic stabilization mechanism in the future is desirable and such a mechanism would be even more effective if paired with broader EU competences in the fiscal field (Codogno and Van den Noord 2022). Brexit has facilitated the negotiations, as, based on the positions of the British government during its membership and specifically the Eurozone crisis, it was unlikely that the UK would have accepted a project of economic recovery of this magnitude. Furthermore, the exit of the most prominent non-Eurozone member changed the balance of power within the EU further in favour of the euro area countries. In this sense, Brexit can be considered a driver of European integration in line with the tenets of intergovernmentalism, which focuses on the power relationship between member states.

### *6.2 Brexit as an Ideological Driver of Disintegration*

Some further considerations can be drawn by analyzing these dynamics from a postfunctionalist perspective. Brexit and the experience of the 2010 Eurozone crisis had a positive impact because European leaders approached the pandemic aware that an austerity-driven reaction would have a potentially disintegrative effect, as it would favour a narrative centred on an EU distant from its citizens. The ideological effect of the referendum, combined with the emergence of more interventionist governments in various European states, also contributed to a paradigm shift in EU trade policies in the sense of greater protectionism alongside the redistributive measures already mentioned (Bauerle and Meunier 2024). One cannot underestimate the causal impact of the COVID-19 pandemic and the war in Ukraine in this paradigm shift; however, already at the time of her inauguration, the President of the European Commission, Ursula von der Leyen (2019), had underlined the intent to increase the use of economic tools by the EU for geopolitical purposes. These difficulties in isolating the impact of Brexit derive from the fact that institutional developments can be understood as the result of the interplay between external events and how they are interpreted and metabolized within the political arena.

In the negotiations following the referendum, although the possibility of forming a “European Army” was one of the arguments employed by the “Leave” campaign, the issue of the CFSP was relatively overshadowed compared to other aspects (Howorth 2017). The first developments in this area were the signing of PESCO in 2017 and the reiteration by the Commission of the need to create a single market for defence, optimize economies of scale, and ultimately “move towards a security and defence union” (European Commission 2017). These developments suggest that EU defence integration gained momentum after Brexit, with member states putting into practice the visionary discourse already present in the Treaty of Lisbon but essentially left unrealized in the following decade (Svendson 2019). Five years later, the Strategic Compass reiterated this intention. However, rather than providing a framework for a common defence market, it reaffirmed the need for member states to increase military expenditures. Overall, compared with the economic dimension, developments in the security sector have been more moderate. The reason for this different pace might be that, despite the Russian invasion of Ukraine, member states are not under the same pressure when it comes to security.

If one assumes that the main drivers of institutional development are the need to adapt to crises and the emergence of ideological forces, the main difference between the two fields was NATO’s presence. In the economic field, the pandemic was the structural factor leading to the need for institutional reform. On an ideological level, the experience of the 2010 crisis and the UK’s absence shaped the response of the EU; this resulted in unprecedented measures to support member states, shaping a narrative of the EU as an actor capable of responding effectively to an economic and social crisis. Suppose one transposes this paradigm into the security sphere; in that case, the external event driving institutional adaptations would be the Russo-Ukrainian War, as highlighted by the tones of the Strategic Compass and the declarations of European leaders. However, the NATO-national state dualism is still prevalent on the ideological level. Despite the impact of Brexit, also postulated by the literature, the EU is still a secondary actor. As a result, institutional developments in the sector consisted of “best endeavour” norms that have not been accompanied, until now, by concrete and effective actions.

Thus, the current situation is marked by uncertainty. On the one hand, the EU has managed to avert the disintegrative domino effect predicted by Brexit, despite facing a global pandemic and a military conflict on its borders. On the other hand, the UK’s departure did not accelerate European integration, which continues to follow an intergovernmentalist logic. In this context, Brexit remains a reminder of the potential extreme consequences of community policy failures,

accentuating the domestic constraints faced by member states' governments. This stagnant situation can be attributed to the underdeveloped European identity among the population, despite the prominence of EU issues in national debates. In times of crisis, the EU becomes an easy target for criticism from interested domestic actors, as evidenced by the "Leave" campaign.

### 6.3 Future Trajectories of European Integrations

A further halting factor is linked to the democratic deficit of European institutions, in particular in the context of EU constitutional politics. As observed by Patberg (2017), the EU currently lacks an institution that allows citizens to exercise constituent power independently of the governments of member states. This limit, accompanied by a European identity weaker than the national one, can only discourage any attempt at significant reform, making it politically hazardous. In this context, the EU's democratic deficit can be traced back to two significant causal factors. The first, and perhaps the most crucial, is the member states' need to preserve their autonomy. This need is met by maintaining a consensus-based decision-making system, aligning with the principles of liberal intergovernmentalism. However, this process, while protecting national sovereignty, also hampers integration. As actors bound by domestic electoral constraints, national governments are often reluctant to decrease their sovereignty, thereby impeding the EU's democratic functioning. The second factor contributing to the EU's democratic deficit is the lack of citizens' involvement at the institutional level. This issue is evident in the relatively minor role of the European Parliament and the absence of a strong European identity. Against this background, differentiated integration, understood as opt-outs or controlled disintegration, can potentially prevent or mitigate the dysfunctionalities of European integration, ultimately empowering citizens to shape their policy preferences (Patberg 2020). This interpretation can also be applied, *a posteriori*, to the negotiations conducted by the British government prior to the referendum. While some of the requests made by the British Prime Minister in 2015 show a clear intention to stop or even reverse European integration, they can also be seen as a plea for differentiated integration. Given that the United Kingdom was already an EU member with unique characteristics, it appears that the British government viewed differentiated integration as a potential solution to the issues it faced at the time.

These issues are the same ones that ultimately led to the outcome of the referendum—namely, a domestic context characterized by a plurality of potential disintegrative factors, including weak support for the EU amongst the public, a high level of polarization on European topics, and the existence of solid opposition to the EU both within the Conservative Party and in the electorate (Niemann et al. 2020). It would be bold to claim that an increase in the institutional flexibility granted to member states is in itself a remedy for European disintegration. However, within the framework of the complex dynamics of European integration and the inevitable conflicts that arise from it, one of the lessons of Brexit is that the EU's adoption of overly strict positions can exacerbate the polarization of the debate and reinforce Eurosceptic narratives. This further underscores the need for a flexible approach to European integration, one that accounts for the diverse needs and perspectives of member states and their citizens.

Brexit, therefore, represented a significant turning point, demonstrating the potential consequences of an excessively rigid approach, namely, demonization by national actors of the EU. This process, in turn, has created a space for Eurosceptic forces to shape the domestic debate on European integration. Consequently, mainstream parties found themselves fighting an unequal battle on the national front without being able to rely on policy solutions at a European level (Schmitter and Lefkofridi 2016). As of today, the lessons of Brexit have been at least partially received by the EU. The issuance of Eurobonds and the intention, although

not yet fully realized, to implement a common defence strategy represent significant developments in this sense. The relevance of these institutional developments lies not only in the scope of such measures but in the potential ideological impact on the debate on European integration. However, although Brexit has yet to represent a driver of differentiated integration, it cannot be considered an isolated event. Euroscepticism, understood as a radical opposition to further integration, still has a central role in the EU debate. The critical warning of Brexit is, perhaps, that EU membership is reversible given the right conditions. In terms of institutional development, these conditions can stem from a systemic crisis and the conflicts that could arise following the EU's attempt to deal with such an event.

Under the prevailing circumstances, Brexit has had a notably contained influence on European disintegration. Particularly in the institutional sphere, the progress in economic and security policies observed thus far allows us to dismiss the notion that the referendum halted institutional development or led to increased differentiated integration. However, the referendum's outcome has bolstered the factors that precipitated it, notably the presence of a fertile Eurosceptic narrative that political actors can exploit to impede the EU's institutional progress. This situation has, to some extent, given rise to a scenario described by Rosamond (2016, 868) as an "institutional equilibrium of diminishing returns"—the belief that the costs and risks of integration are too steep to implement the ambitious reforms that have characterized the European project over time.

Conquering this interplay of institutional and ideological constraints, which Brexit has facilitated, poses a significant hurdle to EU development. There are, however, potential strategies that could alter this trajectory. Firstly, the EU's democratic deficit could be reduced by enhancing the role of Parliament. Secondly, deeper integration in key policy sectors could yield positive results, even if it is limited to a core group of states. This process would align with the constructivist understanding that policy boundaries can shift over time (Hoeffler 2019). If this holds true, establishing a more integrated institutional model in the fiscal and security sectors, in addition to the structural benefits envisaged by liberal intergovernmentalism (LI) and, to a minor extent, neofunctionalism (NF), could, on the ideological level, counter the negative politicization of EU issues that led to Brexit. In other words, it could introduce and reinforce among the population the narrative of a Europe close to its citizens and capable of meeting their needs.

## **7. Conclusion**

This article discussed the effect of Brexit on institutional developments in the EU. It delved into the disintegrative impact of the referendum at a systemic level, examining whether and to what extent Brexit contributed to differentiated integration, with a specific focus on economic and security policies. By concentrating on these two areas, which played a pivotal role in shaping the Eurosceptic narrative that led to the referendum, the authors tested the central hypothesis of this work, which was to assess the disintegrative impact of Brexit on the institutional framework of the EU. This was done by looking at the effects of Brexit on differentiation, exploring the two sides of it: differentiated integration and differentiated disintegration. This research was based on an analysis of official policy documents in these sectors, supplemented by a comprehensive review of qualitative and quantitative studies on Euroscepticism and European integration. Additionally, the authors considered the two crises that the EU has faced in the post-Brexit period, the COVID-19 pandemic and the war in Ukraine, aligning with the theoretical assumption that external events significantly impact the institutional developments of the EU.

The analysis reveals that developments in the two sectors were not adversely affected by the referendum. In the economic sphere, the measures adopted after the pandemic, focused on support for member states by the EU, demonstrate significant progress compared to the European response to the 2010 Eurozone crisis. In this context, the effect of Brexit was likely positive for two reasons: the absence of the opposition represented by the UK and the recognition that a response focused on austerity would have been unpopular and would have strengthened Eurosceptic forces. In the sphere of the CFSP, the most relevant causal factor was the Russian invasion of Ukraine, a few weeks after the promulgation of the Strategic Compass. This document, significantly modified after the outbreak of hostilities, reflects member states' ambivalence towards a common security policy. Although the document highlights the intention to implement a common defence framework, these developments are still largely unrealized.

Concerning differentiated integration, the strong stand adopted in the Brexit negotiations, especially in the context of the CFSP, shows how this option was not contemplated in the case of the United Kingdom. As for other member states, a certain level of differentiated integration remains the norm in the security sector, a sector characterized by broad decision-making autonomy by national governments. In the economic sphere, however, despite the Frugal Four's concerns regarding the accountability of member states concerning the funding received in the context of the National Resilience and Recovery Plan, the community response was substantially unitary.

This research indicates that Brexit has not triggered a surge in differentiated disintegration within the EU, nor has it initiated a trend towards institutional reforms that would lead to greater disintegration. However, Brexit has had a dual impact on European disintegration. In line with postfunctionalist theorizing, it has provided interested actors with a roadmap for effectively promoting a Eurosceptic narrative within their member states. Furthermore, it has imposed additional constraints on the governmental policy level by highlighting the risks of politicizing policy issues. This trend could potentially lead to a deceleration of European integration in the long run, by escalating the costs of potentially unpopular reforms.

In addition to providing an overview of the current state of European institutional development, this article has examined how Brexit has fundamentally altered the concept of EU membership. The long-term implications of this transformation are uncertain. While further crises could lead to a negative politicization of the EU in the aftermath of Brexit, there is also potential for positive change. Strategies such as addressing the democratic deficit within the European Union, promoting differentiated integration in specific sectors to overcome any situations of paralysis, and striving to counter the ideological forces that precipitated the referendum could all be effective. Future research will need to explore the feasibility and consequences of such an approach in more detail.

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