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Alternatif Avrupa Birliği Üyelik Modelleri ve Bu Modellerin Birleşik Krallık ile Türkiye için Uygunluğu

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Özet

İkinci Dünya Savaşı'ndan sonra Avrupa kıtası üzerinde bir barış projesi olarak başlatılan Avrupa Birliği, en başarılı ekonomik ve politik uluslararası örgütlerden biridir. Altı kurucu üyeyle başlayan bu örgüt, ilerleyen yıllarda birçok ülkeyi daha cazbetmiş ve bugün 28 üye sayısına ulaşmıştır.. Ancak son dönemlerde Avrupa Birliği'nin karşılaştığı iç ve dış kaynaklı sorunlar bazı üye devletlerin Avrupa Birliği'nin uyguladığı göç politikası ya da son dönemde uyguladığı katı ekonomik politikalar gibi bazı politikaları eleştirmeye başlamalarına sebep olmuştur. Sonunda da, Birleşik Krallık Avrupa Birliği'nden ayrılmak için birçok farklı sebep öne sürmüştür ve Brexit referandumu ile ayrılık yoluna girmiştir. Daha önce eşi benzeri olmayan bu ayrılık durumu Avrupa Birliği ile Birleşik Krallık'ın gelecekteki muhtemel ilişkisi gibi yeni soruları gündeme getirmiştir. Bu makalede, Avrupa Birliği-Birleşik Krallık arasında gelecekte kurulacak muhtemel ilişki modelleri, örneğin şuan da var olan İsviçre modeli veya Norveç modeli, ya da yarı-üyelik gibi tamamen yeni bir model, incelenmiş ve bu yeni modelin Türkiye için uygunluğu tartışılmıştır.

Anahtar Kelimeler

Brexit
Alternatif Modeller
Uygunluk

Alternative EU Membership Models and Their Suitability for the United Kingdom and for Turkey

Abstract

The European Union (EU), which was started as a peace project on the European continent after WWII, has been one of the most successful economic as well as political international organizations. Starting with six founding member states, it has attracted several other countries and currently it has 28 member states. However, current internal and external crises that the EU has suffered from have caused some member states to complain about some of the applications in the EU such as the migration policy or the strict economic policies followed recently. Finally, the UK decided to break up with the EU mentioning several distinct reasons to leave the EU and with the Brexit referendum, the UK citizens decided to exit the EU. This unprecedented event has

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brought forward new questions such as the future relationship between the EU and the UK. In this article, the possible forms of the EU-UK relationship already existing Swiss Model, Norwegian Model or a totally new relationship will develop with the UK such as half membership are discussed. The suitability of this new relationship for Turkey will be examined as well.

INTRODUCTION

Representing a population of more than 500 million citizens at present, the European Union (EU) is an organization established by six founding states -namely France, West Germany, Italy and Benelux countries- "to prevent further conflict between nations on European soil after the Second World War" (Axford, 504). Since its establishment in 1952 under the name of the European Coal and Steel Community, 22 more states participated in the union as new member states at seven different periods. The United Kingdom (UK), together with Denmark and Ireland, was accepted as a member state in the first enlargement process in 1973 that were followed by six more enlargement process at various times (Andersen & Sitter, 2006).

However, the EU has lost one of its leading members recently: the UK, after the Brexit event. The word Brexit was coined by merging the words Britain and exit, "the nickname for a British exit of the European Union after the June 23 referendum asking voters: 'Should the United Kingdom remain a member of the European Union or leave the European Union?'" (Taub, 2016). The proponents of the Brexit, mostly composed of Eurosceptics, advocate that Britain will be able to "protect, or perhaps restore, the country's identity: its culture, independence and place in the world" after the Brexit process (Taub, 2016). Taub (2016) states that 71.8 per cent of the British population, representing more than 30 million people, voted in the referendum, which resulted in the victory of the Brexit supporters "by 52 per cent to 48 per cent."

This article aims at identifying alternative relationships for the UK and the EU, which can be a role model for Turkey as well. Secondary data analysis will be the primary method used in the article. The review of literature part of the study provides the reader with the hotly debated alternative relationships for the possible future EU-UK relationship. In the final discussion section of the study, the suitability of the identified alternative memberships for the UK and Turkey will be analyzed and discussed to prove the hypothesis of this article. The question that will be investigated and answered in this article is that: "How can any alternative options rather than full membership be more suitable for the UK or for Turkey?" This article will contribute to current discussions about alternative options for the UK instead of the EU membership and will move one step further by discussing the suitability of these alternatives for Turkey as well.

An Evaluation of Existing Models

As an unprecedented process in the history of the EU, Brexit has initiated various debates about the future of the UK and the EU relationship. Some alternative relationships that have advantages and disadvantages for the UK such as half membership, Norwegian model, Swiss model, and alternatives like that have been identified by the experts. It is obvious that the attitude that the EU will adopt towards the UK will open a door for the other members and candidates of the EU, including Turkey, to review their membership status and evaluate the suitability and the advantages of the new model of relationship for

their own relationships with the EU. In that respect, a great deal of articles discussing these alternatives and their suitability for the UK has been published for a long time.

As a matter of the fact, the EU has already had the system of differentiated integration, “the process whereby European states, or sub-state units, opt to move at different speeds and/or towards different objectives with regard to common policies” (Dyson & Sepos, 2010). Dyson and Sepos (2010) state that in this system, distinct formal and informal arrangements are provided that lead to differentiation in membership and accession to the EU as well as in “economic, trade and security relations.” According to Schimmelfennig (2014), differentiation has become an inevitable part of the deepening and widening processes and its prominence has increased in parallel to the increase in “the EU’s tasks, competencies, and membership.” There are two types of differentiation: vertical differentiation, in which integration in many policy areas takes place at distinct speeds and is achieved at distinct levels of centralization in the process of time, while horizontal differentiation focuses on “the territorial dimension and refers to the fact that many integrated policies are neither uniformly nor exclusively valid in the EU’s member states” Schimmelfennig (2014). It is known that some EU member states prefer to be excluded from certain “rules and policies of the EU,” which is called internal horizontal differentiation, such as from the EMU or Schengen, while some non-EU members adopt certain rules, called external horizontal differentiation, such as single market rules even though they are not EU members (Holzinger & Schimmelfennig, 2012).

According to Holzinger and Schimmelfennig (2012), the positive impact of the differentiated integration on the internal and external relations of the EU has made it obvious that the differentiated integration will be a “permanent feature of European integration.” After the Brexit, the UK will definitely try to benefit from this system while the other non-EU countries such as Turkey will be following the results with keen interest as the new relationship established with the UK will be a reference point for them. Thanks to the differentiated integration system adopted by the EU, the UK will have the chance to examine all the alternatives and choose the most suitable and beneficial one. To begin with the most popular alternatives, the most foreground ones which are half membership, Norwegian model, Swiss model or “total exit from the EU and the single market,” which would mean to trade with World Trade Organization (WTO) rules should be examined by stating the general features of these alternatives briefly and explain the advantages and disadvantages of them for the UK or for the EU (Slaughter and May, 2016).

Piris (2016) puts forward that for the UK most beneficial alternative seems to be *half-membership*, “a special status [...] whereby the UK would remain a full, voting member of the single market, but ditch most other EU policies.” Some politicians such as the Conservative Boris Johnson claim that it is a possible and reasonable relationship that can be established between the UK and the EU. Half membership would give the UK the right to trade in the internal single market as freely as it used to do with all the rights bestowed upon only to the members of the EU. In addition to that, the UK would still have the privilege to participate “in the corresponding EU decision-making process, while obtaining the right to opt out of most of the rest of what the Union does” (Piris, 2016). Such a relationship model seems neither beneficial for the EU -but so for the UK- nor applicable in a short run as the present EU Treaties do not have any rules that would allow such an option so they need to be revised to establish such a relationship with the UK. It is well known that treaty making and ratification of the treaty are long processes and requiring consensus among all EU member states. According to Piris (2016), it is obvious that even if the UK seems quiet eager for it, the

EU member states and the EU institutions have valid reasons to reject granting such a special status to the UK such as the inequality in its essence against the other member states that have to obey all the rules of the EU, or the possible requests that can be made to get a similar status by the other member states or non-EU member states such as Turkey, Switzerland and others.

The second most popular relationship model applicable to the UK is the Norwegian model which has been intensely discussed during the Brexit process. Norway together with Iceland and Liechtenstein have been the non-EU members of “the European Economic Area (EEA) [...] established in 1994 to give European countries that are not part of the EU a way to become members of the Single Market” (Dhingra, 2016a). If the UK applies for the membership of the EEA, it will have the same rights and meet the same obligations that Norway, Iceland and Liechtenstein do at present. In other words, to be part of the EEA, the UK has to admit and “implement EU rules concerning the Single Market, including legislation regarding employment, consumer protection, environmental and competition policy” (Dhingra, 2016a). However, the UK does not have to implement other rules not related to the Single Market. To illustrate, it does not have to join the monetary union, does not have to be part of the Customs Union, or no need to follow “the EU’s common foreign and security policy or the EU’s justice and home affairs policies” (Dhingra, 2016a). However, Dhingra (2016a) comes out with the fact that the EEA members have to contribute to the EU budget as Norway does, which is actually one of the reasons of Brexit: The proponents of the Brexit have claimed that the UK has been losing more money by contributing to the EU budget than it has been gaining by being a member of the EU. In fact, Norway’s contribution to the EU budget is only % 17 lower than the UK’s net contribution to the budget; in other words, adopting the Norwegian model would not satisfy the UK government in terms of making “substantial fiscal savings” (Dhingra, 2016a). Economist Sam Bowman reminds us another fact that EEA members have to accept and provide “‘four freedoms’ of the single market: the free movement of goods, capital, services and people,” which also would cause dissatisfaction for Brexit supporters because the migration problem was also a Brexit argument that is supposed to be solved through Brexit (Stanford, 2016a). Nonetheless, two big issues leading to Brexit event would not be solved if the Norwegian model is adopted. If this model is admitted as the new relationship model, the worst part would be the fact that the UK will have lost its advantageous position as one of the leading powers of decision making process within the EU together with Germany and France, and will not be able to enjoy the veto power of member states. In other words, the new situation will have highly negative impacts on the UK’s national interests.

The next model, Swiss model, has many similarities with Norwegian model in terms of obligations to be met but it is actually more complicated. As it is based on bilateral agreements that would be made individually with the EU for each policy area, it will be weary for the UK. Switzerland, which is a member of the European Free Trade Association (EFTA), the organization of which the UK was one of the founding member states but left it to join the EEC in 1973, does not have a membership for the EEA; therefore, the access of the Switzerland to the Single Market is more limited than Norway. However, Switzerland also has to obey the rules of the single market and implement the laws regarding the EU Single Market, so will do the UK if it adopts the Swiss model. However, the UK will not be among the decision making actors again. Dhingra (2016b) reminds that Switzerland also makes contribution to the EU budget even though it contributes less than Norway, so the UK will still have to contribute to the EU budget. Another similarity between the Norwegian and

Swiss models is that four freedoms of the single market which are “freedom of goods, capital, services and people” has to be ensured, which is against the Brexit argument against migration problem (Dhingra, 2016a). The biggest difference between two models is that Swiss model needs bilateral agreements sector-by-sector, which would take a long time, while the EEA provides the UK with 25 different agreements already made with the EU. According to Dhingra (2016a), as a single country, the UK has also lost most of its bargaining power, so some bilateral agreements would disappoint the UK in terms of their high costs and low benefits.

The last but not least popular alternative relationship between the UK and the EU is “[t]otal exit from the EU and the single market” (Slaughter, 2016). This model offers three options for the UK: It can prefer either to participate only in the Customs Union, which is called Turkish model as Turkey joined only to the Customs Union in 1995, or to have “access the EU market under the World Trade Organization (WTO) rules” (Slaughter, 2016), called the World Trade Organization model, which is regarded by Watt (2016) as a “‘fall back’ [...] in which trade with the EU would be governed by WTO rules.” Slaughter (2016) expresses that non-discrimination against any members of the WTO, of which number is 161 currently, is the main principle of the WTO “unless covered by a separate free trade agreement.” This means that the EU has to treat the UK in the same way as it treats any other third party. The UK will not have to implement any EU laws or contribute to the EU budget in these models, but it will lose various benefits such as fixed tariffs for their products, free movement of service and capital and things like that the other models would offer.

An Analysis of the Future the EU – the UK Relationship

Each alternative model proposed for the UK has costs and benefits, which the UK should analyze in detail and try to choose the most advantageous in terms of its national interests. As for the analysis made by the Centre for the Economic Performance (CEP) before the Brexit referendum, “neither the government nor the campaign to leave the EU has put forward clear and concrete proposals for what comes after Brexit” (Dhingra, 2016a). Nobody knows what will come after Brexit in terms of its economic, social, or political impacts both on the UK and the EU. Yet, what was common about the predictions of Brexit’s impact was that it would have economic costs rather than benefits. The option that was suggested as the best in most of the articles was to stay in the EU. However, the UK made its decision on June 23 referendum: To (Br)exit.

The Brexit case is an unprecedented one so it is a complicated enigma for everyone. Yet, it is obvious that the EU has to handle the problem as an expert; otherwise, a wrong decision can lead to the dissolution of the EU. If the UK gets its best during the negotiations with the EU, -for instance, half membership would bestows many rights to the UK without many obligations to meet- the other member states would apply for such a special status; in other words, “what new relationship the EU could negotiate with Britain [would] start a domino effect leading to similar referendums elsewhere” (Oliver, 2016). Tim Oliver (2016) emphasizes that the new form of the EU after Brexit shaped not only by the Brexit but also “by a series of pressures connected to the Eurozone, Schengen, Russia, transatlantic relations and global economics.” According to Aydın-Düzgıt (2016), “[t]he major challenge that will be faced by EU policy makers after Brexit is to strike the right balance between keeping Britain engaged with Europe to the maximum benefit of both sides while making the exit option an unattractive precedent for other member states to follow.” As far as the general

views are concerned, the EU should not establish an attractive relationship with the country that preferred to leave it. In other words, the UK should be deprived of the several advantages that it enjoyed as an EU member country and it should be punished for this decision and implicitly forced to regret for its decision for (Br)exit.

According to Yabancı (2016), the EU and Turkey, which applied for official candidacy for the EU in 1987 and was offered an official candidate status only years later at Helsinki Summit in 1999, have been sharing the same opinion "that the prospect of full membership has become more distant and less desirable for both sides" nowadays. However, most of the alternatives discussed above would not be suitable as Norwegian, Swiss and WTO models have already existed for many years, but they are not regarded as satisfying alternatives for full membership. The only remaining alternative, half membership, would be the only beneficial alternative for Turkey instead of full membership due to three reasons: First, more and more EU member countries and the EU citizens are declaring that they are against Turkey's full membership. With the rise of Islamophobia as well as the rise of the populist and right wing parties all around the Western world, anti-Turkish attitudes have been increasing in the EU member states as well, so it is obvious that the EU will not accept Turkey as a full member, which has been able to close only one chapter out of 35 chapters of the EU's *acquis*, in a short while. Even some EU member countries have claimed that Turkey will not be able to become a full member of the EU until the year 3000s. Second, Brexit resulted in the loss of one of the proponents of Turkey's EU membership. According to Üründül (2016), "Without a support from the UK, Turkey's membership to the EU may get more difficult since the UK had supported Turkey's membership for a very long time." With regard to the other supporter of Turkey's membership, the USA, Turkey's relationship has started to get worse since the 2001 Iraq war. The last but not least reason to give up from full membership and to seek for half membership would be the fact that one of the leading member states of the EU, the United Kingdom, decided to leave the EU, which means that the EU membership is not something that is irreplaceable. If the UK could give up from its full membership, it may not be something as rewarding, as attractive as it has been thought by the non-EU member countries. However, to make a more realistic analysis of the Brexit and its alternatives, we need a longer period of time to observe its real effects that have not come to the surface yet.

CONCLUSION

Brexit has changed the history of the European integration. As it is an unprecedented event, nobody has known its possible impacts on the UK or the EU or what kind of relationship they should establish with each other. There are several alternatives for the new type of relationship among which four of them dominate the current debates: Half membership, Norwegian model, Swiss model or total exit and trade under WTO rules. For instance, "[most] of the alternative relationships to full EU membership [do not] offer full access to the Single Market," or some other basic opportunities that the EU full membership offers (HM Government, 2016). Each of them except half membership has costs in addition to their benefits, which are against the Brexit spirit. However, it is not possible that half membership, which is the most suitable and advantageous model in terms of the rights it gives to the UK, would be accepted by the EU as it would lead to a domino effect and finally to the dissolution of the EU.

As for Turkey, which has been waiting at the door of the EU as a hopeless candidate for years, full membership option can be replaced only by half membership. However, it does not seem probable even for the UK to be granted such a special status, so half membership does not seem a realistic option for Turkey, either. In the globalized international relations, it is impossible for Turkey to ignore the importance of a good beneficial relationship with the EU. If the membership tool does not work, Turkey and the EU have to develop a new alternative relationship with each other. The relationship the EU and the UK will develop in two years can create a good opportunity to be part of a newly designed relationship in which both the EU and the UK, hopefully Turkey will benefit from.

On the other hand, current geopolitical stance and foreign policy of Turkey show that Turkey has options other than any kind of EU membership as well. Developing relationship with Russia and worsening relationship with the EU makes it obvious that Turkey, in fact, has more options than the EU supposes. It is not certain whether Russian partnership would replace the EU membership, but the EU's increasing reluctance against Turkey's membership and speeches made against it would naturally force Turkey to seek for other alternatives instead of the EU membership or any other alternative relationship that will not satisfy Turkey's expectations.

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