Criticisms and Conspiracies: Critical Views of Regional Integration in Europe and North America

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Introduction

Analysis of developments within the European Union over the past twenty years make it readily apparent that criticism of the European Union is now an increasingly prevalent feature of political life in virtually every member state. Many states now contain political parties that have Euroscepticism as one of their defining features, if not their sole political objective, while many mainstream political parties have adopted critical policy stances with respect to the European Union. Indeed, opinion poll projections in advance of the May 2014 European Parliament elections indicate that Eurosceptic parties may come at, or near, the top of the election results in many countries and will thus become an even more significant force in the parliament (Cunningham and Hix 2014). At the same time as Euroscepticism has entered mainstream public and political life, so too has it become a more prominent feature of academic analysis of the European Union (see, for example, Harmsen and Spiering 2004; Hix 2008; Taylor, 2008; van Kessel, 2013). These scholars seek to account for the existence of Euroscepticism, the strength of support for scepticism, and the consequences of scepticism within the European Union and domestic political systems.

Criticisms of integration are less prevalent in the North American context but are nonetheless evident at different times in the three North American countries. They form an undercurrent that is capable of bubbling to the surface and entering mainstream political debate (Capling and Nossal 2009; Pastor 2011). This was evident, for example, in the 2008 presidential primary elections in the United States when both the main Democratic candidates (Barack Obama and Hillary Clinton) spoke critically of NAFTA. In January 2007 the U.S. House of Representatives passed a resolution, with the Senate concurring, asserting that the United States should not enter into a purported NAFTA Superhighway system or a North American Union.

This paper compares critical perspectives of regional integration in Europe and North America, with a particular focus on the platform and political activities of the United Kingdom Independence Party (UKIP) as compared to the rejectionist criticisms of integration found in Canada and the United States. The paper compares the content of the sceptics' policies and

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rhetoric; the strength and nature of their support base; and the extent of their impact on political decision-making and public life. The conclusion reached is that there are clear differences in the cases examined. The sceptical opinions are shaped by distinctive features (relating to both structure and agency) in each context. It is also the case, however, that the sceptics have a number of common elements, including the rhetoric used, the focus of the critical rhetoric, and the nature of the support base. In both cases also the sceptics play to a fear of the unknown and exaggerate the extent and nature of the integration that it criticizes.

The final point made is that while it has long been tempting for commentators and mainstream political parties to ignore or dismiss sceptics as 'fruitcakes' or 'loonies,' this approach is problematic.² The UKIP example demonstrates that sceptical rhetoric may be exaggerated and manipulated for political gain, but it cannot be ignored. It has the potential to impact European decision-making and indeed has already done so. The mainstream response should not therefore be to ignore scepticism in the hope that it is marginalized. It is instead necessary to address scepticism and provide a considered defence of the benefits of integration projects in both settings.

What is Scepticism?

There is a growing literature on scepticism within the European Union (Black 2008; Buhr 2012; Hooghe, 2007; Szczerbiak and Taggart 2008; Taylor, 2008; Usherwood, 2008). What this literature identifies is that there is considerable diversity regarding the content of Euroscepticism as well as its possible causes, supporters and consequences. At one level, for example, scepticism is evident from a variety of different groups and individuals who wish to see the European Union, or certain elements of it, reformed but not fundamentally transformed. Taggart and Szczerbiak refer to this as 'Soft Euroscepticism' (2008). On the other hand are groups that perceive the European Union as detrimental to their own and their country's interests and that therefore express opposition to the entire project of European integration. This type of opposition is referred to as 'Hard Euroscepticism' (Taggart and Szczerbiak 2008: 7) and is the focus of this paper; that is, those critics of the European Union that seek its dissolution or at least the end of their country's participation in it.

² David Cameron, the UK Prime Minister, famously referred to members of UKIP in this way (Castle and Cowell 2013; Daniel 2005).

Hard Euroscepticism is, not surprisingly, linked to the development of the European Union itself. In the absence of the European Union, Euroscepticism could not exist. It is, moreover, the case that the development of the European Union and its increasing relevance to everyday public life (as for example through the introduction of the euro) has resulted in greater popular debate and ended the 'permissive consensus' whereby EU decisions were largely left in the hands of political elites based on passive, underlying public support (Hix 2008; Taggart 1998). The increased relevance of the European Union to everyday life has brought with it the development of Hard Eurosceptic voices and political parties in multiple member states. The exact form of this type of Euroscepticism is, however, conditioned by national-specific events, institutions, opportunity-structures (including, for example, the positions adopted by mainstream political parties) as well as characteristics of the Eurosceptics (see, for example, Daddow 2006; Medrano 2003; van Kessel 2013).

In some member states, political parties have been formed specifically around the goal of reversing European integration or removing their country from the European Union. The Alternative for Germany provides one recent example of this type of political party. The UK Independence Party (UKIP) is perhaps the most notable example of such a political organization (Lynch et al 2012; Usherwood 2008; Whitaker and Lynch 2011). The more common situation, on the other hand, is that Hard Euroscepticism has been adopted by far right or populist political parties as a new element of their policy platform; one that they see as likely to improve their electoral performance (Buhr 2012; Gómez-Reino and Llamazares 2013; Mudde 2007). The French National Front for example, particularly under its current leader Marine Le Pen, has sought to distance itself from its early connections to the anti-Semitism and racist rhetoric of the far-right (Engelhart 2014; 'This monster called Europe' 2014) and currently places considerable emphasis on hostility to the European Union. The Dutch Party of Freedom (PVV) led by Geert Wilders has also increasingly emphasized opposition to European integration as a central part of its platform alongside hostility to Islam (van Kessel 2013; 'Turning right' 2014). Indeed, in November 2013 Geert Wilders and Marine Le Pen announced that their political parties would cooperate in advance of the May 2014 European Parliament elections in order to "fight this monster called Europe" (quoted in 'This monster called Europe' 2014).

Given the diversity of Euroscepticism it is not surprising that disagreements exist concerning the reasons why scepticism is supported, who supports it, and the potential limits of

its influence. These questions are addressed first by examining the UK Independence Party. The paper then turns to examine this example of Euroscepticism in comparison with scepticism evident in North America with respect to NAFTA and more recent developments in cross-border integration.

The UK Independence Party

Opposition to European integration is not a new phenomenon in the United Kingdom and it has been expressed to differing degrees by mainstream political parties throughout the history of the UK's relationship with European integration (Forster 2002; George 1998; Wall 2008; Young 1998). This opposition has become more prominent in the years since the entry into effect of the Maastricht Treaty and it is certainly a major issue in contemporary political debate (Bale 2006; Baker et al 2008). The Conservative Party has experienced increasingly bitter internal divisions over the issue of European integration since the 1980s, culminating in the Conservative-led government promising an in-out referendum on European Union membership in 2017. The UK Independence Party has played a role in these internal Conservative Party debates and is a central part of the current sceptical climate within the UK.³

UKIP emerged in the 1990s as the most prominent of several Eurosceptical movements that developed out of the campaign to prevent the ratification of the Maastricht Treaty in the UK (Abedi and Lundberg 2009). This significance was not immediately apparent, however, as the party experienced both internal upheaval and, with the partial exception of the 1999 European Parliament election, insignificant electoral results (see Table 1). The internal upheaval was most evident at the leadership level. The party's founder and original leader, Alan Sked, resigned in 1997 as a result of a disagreement on party strategy with respect to participation in the European Parliament (Abedi and Lundberg 2009). He was followed as party leader by Michael Holmes, Jeffrey Titford and Roger Knapman, the latter of whom faced a short-lived but highly public battle for the leadership from former television personality Robert Kilroy-Silk in 2004 ("UKIP votes leaders out" 2000; Usherwood 2008). In this period, the party was a largely irrelevant factor in general elections (in part as a result of the plurality electoral system), securing only 0.3 per cent of the vote in 1997 and 1.5 per cent in 2001. The party did marginally better in the 1999

³ One example of this are the televised debates between Liberal-Democrat leader, and deputy prime minister, Nick Clegg and the UKIP leader Nigel Farage, which took place in March 2014 (Wintour, Watt and Mason 2014).

European Parliament election when it gained 3 seats with just under seven per cent of the vote but it remained far behind the three major parties within the United Kingdom.

The party's first major electoral success came in the 2004 EP election, when it received over 16 per cent of the vote and claimed 12 seats in the European Parliament, coming third ahead of the Liberal-Democratic Party. The party improved on this performance at the 2009 EP election when its share of the vote improved marginally and it secured one extra seat. Even more notably, the party finished ahead of the governing Labour Party in the 2009 election. UKIP has not, however, replicated this success at UK general elections (where it has failed to return a member of parliament) in large part as a result of the plurality system in use at these elections as compared to the system of proportional representation used for EP elections. Nevertheless, UKIP did increase its absolute number of votes as well as its share of the vote at the 2005 and 2010 general elections. There are, in addition, other indications of UKIP's electoral vibrancy. In 2013 local elections in England, the party secured the election of almost 150 councillors and received approximately 25 per cent of the vote where it ran candidates (Castle and Cowell 2013; "UKIP gets serious" 2014). The party has also performed well in several parliamentary by-elections in the past two years. In two 2013 by-elections, for example, the UKIP candidates secured 24 and 28 per cent of the vote and came second on both occasions (Hope 2013). Finally, UKIP is expected to perform well at the 2014 EP election with opinion polls in early 2014 showing projected support for UKIP at around 20 per cent (Clark 2014).

Support for UKIP is evidently connected to its opposition to the European Union. Although the party has added issues to its policy platform, its core message – that a "vote for UKIP is a vote to leave the European Union" – has remained constant in the twenty years of the party's existence (Lynch et al 2012). Prior to the 2009 EP election, the party asserted that the UK's membership of the EU "should be replaced with a genuine free trade agreement similar to those enjoyed by other non-EU nations such as Switzerland, Norway and Mexico. We want friendship and free trade with our European neighbours – not political union" (UKIP 2009a). This remains central to the party's policy platform in advance of the 2014 EP elections. The party's website for example states that "[o]nly outside the EU can we start to solve the problems our country faces." It continues by stating that "UKIP is a patriotic party that believes in putting Britain first. Only UKIP will return self-government to the British people" (UKIP 2014).

It is also the case, however, that the party has long sought to broaden its policy agenda in order to make the case that it is more than a single issue party. Over the past decade, therefore, it has advanced policies such as the introduction of a flat rate tax, the construction of new grammar schools, and controls on immigration and the access of immigrants to health and welfare benefits (Lynch et al 2012). Many of these policies are linked to the central goal of leaving the European Union. The party, for example, aims at limiting immigration into the United Kingdom but claims that this cannot happen while the UK remains a member of the EU. Nevertheless, UKIP, particularly at local and national elections, increasingly seeks to emphasize that it is not limited to only one policy and that it offers a range of policies that stand in contrast to the establishment parties (see "How UKIP became a British political force" 2013).

UKIP, therefore, now presents a wide ranging policy platform that at times generates conflict within its membership (see Lynch et al 2012). There are, however, several key themes that are prevalent within the party's policies and particularly the rhetoric of its current leader, Nigel Farage. At their core, these themes revolve around the argument that the current political establishment acts in ways that fundamentally challenge the interests of the 'ordinary' population. It argues that there is a community of ordinary people whose interests should be at the forefront of political leaders but which are ignored by the mainstream political elite (see van Kessel 2013; Taggart 1998). This claim that the current political establishment are acting in ways that are inimical to the interests of ordinary Britons is found frequently in the public pronouncements of Nigel Farage, who became UKIP's leader in 2006 and again in 2010 after having briefly stepped down in his unsuccessful attempt to win a parliamentary seat at the 2010 general election. In one recent newspaper column, for example, Farage argued that, "[m]ost reasonably minded people are sick to death of an established elite that has done our country so much damage. Ukip is a choice for us to change direction, and that is what the Establishment really fears" (Farage 2014a). At his 2014 party conference speech, Farage repeated these claims in stating that the party was speaking up for the "silent majority" and aimed to "deliver a blow to the political class from which they will never recover" (quoted in Hope 2014).

There are many other examples of this rhetoric both directly from Farage and from others within the party. The party's website, for example, asserts that a "gulf has opened between the ruling elite and the public. Because they must all follow Brussels diktats, each of the establishment main parties is now so similar voters have no real choice" (UKIP 2014). Neil

Hamilton, who was appointed UKIP's campaign manager for the 2014 election, colourfully refers to "the deracinated political elite of parasites, the bureaucrats, the Eurocrats, the quangocrats, the expenses-fiddlers, the assorted chancers, living it up at taxpayers' expense." He continued by stating that it is UKIP's role "to sweep them all away" (quoted in Sparrow 2014). Farage has frequently commented that he does not care which of the major parties is in government and that he has no intention of reaching an accommodation with Eurosceptics within the Conservative Party (Mason 2013).

In sum, UKIP is seeking to advance the view, found in many European states, that the governing parties represent an establishment unconcerned with the interests of ordinary citizens. A number of arguments follow from this anti-establishment core. The first is that the European Union represents an existential threat to British sovereignty. According to UKIP, "the EU agenda is complete political union, with all the main functions of national government taken over by the bureaucratic institutions of Brussels" (UKIP 2009b). Similarly, Farage states that, "[t]he rights and freedoms of the British people should be protected by the British people, not granted and judged by power-hungry centralising fanatics in Brussels" (quoted in Brown 2013). The party further claims that the governing elite have been complicit in this creation of a European superstate and have deliberately kept its development from the British public. Former UKIP leader, Lord Pearson, argued that it is necessary to see 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 that, "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).

A second, and related, theme in UKIP's policy statements is the preservation of British identity. This has frequently been linked to the party's calls for restrictions on immigration to the United Kingdom as well as its demands for the greater assimilation of new immigrants to the UK and a restriction on new immigrants receiving government benefits. In 2007, for example, UKIP demanded a five year freeze on immigration, a demand that Nigel Farage repeated in 2014 in the context of what he claimed would be a projected "wave of uncontrolled immigration" from Romania and Bulgaria (Wintour 2014). Not surprisingly UKIP and Farage assert that the UK will only be able to control this immigration if it leaves the European Union.

The third theme evident in UKIP's policy agenda is one that has been emphasized more in recent years. According to UKIP, the working and unemployed poor have suffered from the development of the European Union, the immigration that the party links to the European Union and the inattention of a political establishment, which UKIP claims has no interest in such voters (see Hutton 2014). Farage repeatedly made this point in his 2014 televised debates with Liberal Democratic leader Nick Clegg. In these debates he claimed that the working class had effectively become an under-class. He made a similar point in a 2014 newspaper column when stating that the Labour Party "are so out of touch that they just do not know how to speak for working-class people anymore." In the same article he noted that he was acutely aware of situations of "wages falling ever further behind the cost of living for year after year; people being undercut by migrant workers; grown-up children unable to find work at all let alone move out and afford a place of their own; energy and food bills out of control; hardworking people being dragged into hardship" (Farage 2014b). Again, far right and populist parties across the European Union replicate this perspective (Goodwin and Ford 2014).

Overall, then, UKIP's policy platform emphasizes a rejection of the European Union within the context of a more general rejection of establishment policies and a return to a vision of national control over the economy and those who may enter the country and under what terms. In making these claims, UKIP comes close to identifying a conspiracy perpetrated by a European elite, supported by the British political establishment, which threatens the future of the United Kingdom.

Support for UKIP

Support for UKIP, as was identified above, has increased in the more than 20 years of the party's existence (see Table 1). As this support has developed, so too has research into the question of who joins and who supports the party (see Ford et al 2012; Margetts et al 2004; Lynch et al 2012). The first point of note here is that in spite of the general increase, support for the party depends upon the election being contested and is markedly higher in European Parliament elections than in general elections. One explanation for this is the plurality electoral system still used in UK general elections (as compared to the proportional system used for European Parliament elections). The plurality system penalizes smaller political parties, such as UKIP, and may lead voters who primarily identify with UKIP to decide to vote tactically for one of the

major parties (Aspinwall 2000; Usherwood 2008). It is also the case that many voters treat European Parliament elections as second-order elections and therefore decide to cast their vote differently than they do at national elections (Reif 1997). In this view, then, it is possible that UKIP enjoys more support in European Parliament elections mainly because many British voters do not consider them to be significant elections and are using UKIP as a mechanism for registering a protest vote. In either case, the election results and voters surveys find that UKIP draws support from the major parties in European Parliament elections. An analysis by Peter Kellner, for example, finds that close to 20 per cent of voters who supported the Conservatives in the 2010 general election say that they will support UKIP in the May 2014 EP election but then vote Conservative again in the next general election (Kellner 2014).

UKIP draws support from voters who identify themselves as being on the right of the political spectrum and thus traditional Conservative supporters or coming from families whose parents voted Conservative (Ford et al 2012: 213). At this level, then, it is the case that UKIP is in part comprised of dissatisfied Conservative voters; particularly those who feel that the Conservative Party is insufficiently critical of the European Union (Margetts et al 2004; Usherwood 2008; Lynch et al 2012). It is certainly the case the Conservative Party is worried that they will lose potential support to UKIP and that a potential split within the right of centre vote will allow Labour to win the next general election (Bale 2006; "UKIP gets serious" 2014; Pickard 2014). It is also evident that a significant number of UKIP's elected officials and membership are former Conservative Party members. This is true, for example, of both the former and current leaders (Lord Pearson and Nigel Farage respectively). Lord Pearson was a Conservative member of the House of Lords who was expelled from the party in 2004 after he urged support for UKIP in the EP election. Farage left the Conservative Party in 1992 in protest at the leadership's signature of the Maastricht Treaty (Baker and Sherrington 2005).

UKIP's support base is not, however, restricted to dissatisfied Conservatives; voters who tend to be older and more conservative in their views (Kellner 2014). Recent surveys indicate that UKIP voters, or those who indicate in polls that they are likely to support UKIP, include voters with low incomes and minimal education attainment and who may traditionally be considered natural Labour Party supporters (see Kellner 2014; Goodwin and Ford 2014; also Farage 2014b). In short, as Farage identifies and increasingly promotes, UKIP appeals not just to voters who dislike the European Union, but also to voters who feel economically disadvantaged

and threatened by changes in their economic and social lives as a result of global forces including immigration. These voters also feel disconnected from the political establishment. In the words of Goodwin and Ford, "Farage is winning over working-class, white male voters because they feel left behind by Britain's rapid economic and social transformation and left out of our political conversation; struggling people who feel like strangers in a society whose ruling elites do not talk like them or value the things which matter to them" (2014).

This group may not necessarily see concern about the European Union as the central reason for their support of UKIP. Indeed, opinion polls indicate that this group frequently place concern about the state of the economy and immigration ahead of the European Union when asked to identify the most important issues facing themselves or the country (see Kellner 2014). There are, however, connections to Euroscepticism, even if these are not immediately identified by the voters themselves. First, rules relating to immigration and asylum are affected by EU membership, although not to the extent asserted by UKIP. With UKIP one of the main parties in the UK to identify legal and illegal immigration with the European Union, it is not surprising that voters who are critical of immigration in most of its forms turn to that party. Second, in the UK and across the European Union, richer, multilingual citizens take advantage of economic and social opportunities provided by the European Union and are more likely to be supportive of the European Union (Fligstein et al 2012). On the other hand, those with limited opportunities to benefit from European integration are more likely to feel that their identity and economic position are threatened by the European Union and therefore to be sceptical of the EU (Cantle 2012; Jones 2012).

Overall, then, the UK Independence Party fits into a broad category of populist and generally right-leaning political parties, such as the True Finns, the National Front in France, and the PVV in the Netherlands, that are highly critical of the European Union. They attract the support of voters who see the European Union as a threat to their economic well-being and their country's identity. In addition, they attract the support of groups that are more broadly critical of the existing political establishment because they are disillusioned by their economic prospects, feel threatened by societal changes, including immigration, and who are looking for someone to blame. On the basis of support from these groups, UKIP is now significant electoral force in European and local elections and demonstrates a growing core of supporters as measured in tracking polls. The potential impact of the party on British politics and policies is, however, open

to question, and is examined later in the paper. First, however, the paper turns to North America, specifically Canada and the United States, and examines the existence of scepticism in that context and compares it to the situation in Europe.

Scepticism in North America

Even a casual observer of integration in the European Union and North America will be aware that significant differences exist between the two situations. While Canada and the United States are economically interdependent, there is relatively little formal institutional integration between the two countries, and certainly much less than exists in the European Union (Pastor 2011; Bow 2009). The U.S.-Canada trade relationship constitutes the world's largest bilateral trading partnership and integrated supply chains and inventory management link entire industries and economic sectors, as in the case of the auto industry (Sands 2009). This trading relationship was consolidated and augmented first by the Canada-U.S. Free Trade Agreement and subsequently by the North American Free Trade Agreement (NAFTA). The relationship is one of asymmetrical interdependence with Canada being much more dependent on the United States than vice versa (Bow 2009). It is nevertheless of great significance to both partners.

As its name indicates, NAFTA was, and is, primarily concerned with the elimination of all tariff barriers to trade among the three participating countries as well as a reduction in non-tariff barriers. NAFTA has not created supranational or intergovernmental institutional structures that are such important features of the European Union's operation and which are also a frequent target of Eurosceptics (Clarkson 2008; McKinney 2000). Instead, intergovernmental negotiations and decision-making in the context of NAFTA occur both at leaders' summit meetings and in formal and informal negotiations involving government officials (Bow 2009).

As with the institutional infrastructure, NAFTA's official policy agenda is much more limited than that of the European Union (Sutcliffe 2010). NAFTA does have implications for the liberalization of government services procurement (though excluding provinces/states), for labour and the environment, and for the resolution of disputes among or between governments and between governments and business (Cameron and Tomlin 2000; Haufbauer and Schott 2005). Issues pertaining to NAFTA also appear on national government agendas. At times, different national leaders have talked about reforming NAFTA; in March 2014, for example, Canadian Prime Minister Stephen Harper raised the possibility of reopening NAFTA in order to

have it deal more clearly with issues such as labour mobility and government procurement policies (Moore 2014). It is also the case that the Canadian and U.S. governments have engaged in on-going discussions about their trade relationship and the operation of the Canada-U.S. border in the years since September 11th 2001 (Pastor 2011). The 2011 Beyond the Border action plan, along with the related Canada-United States Regulatory Cooperation Council joint action plan, represent yet another effort to facilitate legitimate cross-border trade and travel while at the same time strengthening North American security (von Hlatky 2012). The list of proposed measures and pilot projects in these two action plans is both lengthy and potentially controversial. These measures are, however, limited when compared to the range of decisions across the variety of policy sectors that are debated in the European Union. There is, for example, nothing comparable in the North American context to the debates in the European Union over a banking union, the EU budget, the common agricultural policy, and regional development funds.

Scepticism of interdependence and integration in North America is likewise less visible than the scepticism that is evident within the European Union. In neither the United States nor Canada does a political party exist that in any way equates to UKIP. Nor have political parties adopted opposition to integration with neighbouring countries as a central plank of their policy agenda as is the case in many European countries. The closest approximation to this is the prominence of the Tea Party movement both as an independent force and as an influence within the Republican Party (Skocpol and Williamson 2012; Parker and Barreto 2013). The Tea Party is a movement comprised of a loose association of individuals and groups. As such, a diversity of views are evident within the Tea Party. It is the case, however, that opposition to North American integration is expressed by individuals associated with the Tea Party, linked frequently to opposition to illegal immigration (largely from Mexico) and fears of an overarching government. Rand Paul, Republican Senator from Kentucky, and possible presidential candidate in 2016 as well as a spokesperson for the Tea Party has, for example, made a number of speeches earlier in his career opposing a purported North American Union (Frum 2010; see below). It is similarly the case that many associated with the Tea Party have expressed opposition to NAFTA.

Overall, scepticism of integration in North America is much less prevalent than is the case in Europe largely because the level of integration is much lower. It is nevertheless the case that criticisms of interdependence and integration in North America do exist at different times in

both Canada and the United States. It is, for example, frequently the case that there are concerns about different elements of the working of the NAFTA partnership and calls for reform of elements of the treaty or associated features of the relationship between Canada and the United States. These concerns are particularly prominent during economic recessions when groups and individuals on both sides of the border may be more willing to advocate protectionist measures or to see NAFTA as more advantageous for their trading partners rather than themselves. As noted above, both Barack Obama and Hillary Clinton expressed dissatisfaction with the terms of NAFTA and threatened to reopen the treaty if they secured election to the presidency in 2008 (Ibbitson 2008). The start of the 'great recession' provided the backdrop for these campaign promises. Alternatively, parties, politicians and interest groups express particular concerns about the implications of intergovernmental proposals and agreements. The Beyond the Border negotiations have generated criticisms about specific aspects of the action plans. Canadian actors have for example pressed for specific measures to protect Canadians' privacy in the context of the proposed greater information sharing between Canadian and U.S. authorities (von Hlatky 2012; Ignatieff 2011).

In most cases, criticisms of NAFTA and North American integration are the equivalent of 'Soft Euroscepticism', with the critics seeking to revise and improve elements of existing or proposed measures rather than to scrap them entirely. Indeed, opinion polls indicate that there is underlying support for NAFTA in both Canada and the United States (Pastor 2011; Graves et al 2013). There is, however, also evidence of the equivalent of 'Hard Euroscepticism' in political debate in Canada and the United States. In these cases, critics of North American integration oppose both the current free trade agreement and also proposals, both real and hypothetical, to move integration beyond the terms of NAFTA. In the Canadian case, for example, this type of scepticism has long been linked to the fear that integration with the United States will ultimately threaten Canadian sovereignty and the very future of Canada as an independent state. As early as 1891, the historian Goldwin Smith argued that Canada was likely to be subsumed by the United States as a result of its potential economic and demographic power (Smith 1891). More recently the New Democratic Party (NDP) campaigned vigorously against the NAFTA treaty at the time of its negotiation. In the NAFTA debate, the NDP leader at the time, Ed Broadbent, publicly warned that, "within a quarter century, we could be absorbed totally, lock, stock and barrel if this is not stopped" (quoted in Crosbie 1997). This fundamental criticism of NAFTA remains evident within some sections of the NDP and its supporters through to the present day. It is also expressed by groups, particularly those on the left of the political spectrum. The citizens' advocacy group, the Council of Canadians, for example, was founded in 1985 in opposition to the Canada-US Free Trade Agreement and remains an active opponent of measures that it argues will result in the loss of Canadian sovereignty as a result of deeper integration with the United States. The Council of Canadians ties its opposition to North America integration to a broader critique of globalization and international trade measures that it argues threaten existing Canadian social policies.

Complete opposition to NAFTA is also evident in the United States. The treaty faced criticism from both the right and left in the 1992 presidential election. Within the Democratic Party and the trade union movement, many opponents of NAFTA claimed that the agreement would result in lower wages and environmental standards, and would result in a loss of U.S. jobs (Ginaris 1998). The President, George H. Bush, faced opposition in the 1992 Republican primaries in part as a result of his role in negotiating NAFTA. H. Ross Perot, who ran in the election as a third candidate, also opposed NAFTA on the grounds that the U.S. would lose jobs to Mexico. Bill Clinton, the eventual winner of the presidential election, supported NAFTA but promised to renegotiate key elements of the treaty (Hufbauer and Schott 2005). Opposition to NAFTA has continued to be prevalent in the United States over the 20 years of the treaty's existence. Various presidential candidates, for example, have called for the U.S. to withdraw from NAFTA.

Support for Scepticism

One common strand of hard scepticism in North America is the proposition that the interdependence and integration of Canada, the United States (and Mexico) is inexorably leading to the creation of a North American Union linked by a superhighway and a single currency. A cursory evaluation reveals over six million websites devoted to the subject of a North American Union as well as many magazine commentaries and books. The common themes that emerge from these sources are that the governments of the United States, Canada and Mexico are secretly negotiating away their countries' sovereignty in a process that will result in a new superstate (Corsi 2007; Malkin 2002; Robertson 1991). Jerome Corsi is perhaps one of the best known proponents of this view, although only one of many. Corsi argues that "policy makers in

the three nations and multinational corporations have placed the United States, Mexico, and Canada on a fast track to merge together economically and politically" and that a North American Union is being created "through a stealthy, incremental process in which our public policy makers are intentionally less than candid about their true intentions" (2007: xii).

There exist different versions of this fear that a North American Union is being established. The critics of a North American Union differ in terms of who they see as being responsible for such a project. In some cases, global interests such as financial elites or the Jews, are held to be behind the project. Others identify interest groups such as the U.S.-based Council on Foreign Relations or the Canadian Council of Chief Executives as key promoters of North American integration. Robert Pastor, a former U.S. national security advisor, is also frequently identified as a prominent activist who is helping to drive forward a North American Union. Jerome Corsi is not alone in asserting that, "If Pastor has his way, the economic, legal, and executive capacities of Mexico, the United States and Canada will fuse in such a way that a North American community develops. Such a community depends upon the diminishing of national identities..." (Corsi 2007: 44).

In each case, it is claimed that a new superstate is developing that will control policy areas that were previously the responsibility of the existing states. The website "USA Survival", for example, claims that there is a plan to develop a common legal system for the three North American states that will include a "North American Court of Justice (with the authority to overrule a decision of the U.S. Supreme Court), a North American Trade Tribunal, and a Charter of Fundamental Human Rights for North America, also dubbed the North American Social Charter" (America's Survival nd). Other commentators assert that a North American superhighway and transportation structure is in the process of being created (see Capling and Nossal 2009). Finally many observers make the claim that a single currency – the amero – is being developed to replace the three existing national currencies with the result that the national states will lose their capacity to operate independent monetary policies. One of the founders of the millenarian movement Christian Exodus, for example, asserts that the amero is part of a larger project to introduce one world government "with one fiat currency created and controlled by the world's power brokers for their own benefit" (Cory Burnell quoted in Sweet and Lee 2010: 9; see also, for example, The New American).

These perspectives share the view that the development of a North American Union is occurring in secret in a manner that is not recognised by affected citizens and which is beyond their power to control unless they are alerted to the possible danger. One representative website, for example, states that, "Most Americans have absolutely no idea how far plans to integrate the United States, Canada and Mexico have advanced...But this is exactly what the globalists want. They don't want people to become alarmed by these moves toward North American integration" (Snyder 2012). Similarly, a Canadian website, *Global Research*, states that Canadians "are completely unaware of [the] looming North American Union" (Parkinson 2007). This is echoed by the Vancouver Council of Canadians, which argued that, "Unless we can get the government to change course, it is just a matter of time until Canada is dissolved into a 'North American Union.'" The organisation further states that, "One of the most frightening aspects of these 'trade' agreements is the degree to which the public has been excluded from the process even as the corporate elite has been given privileged access" (Vancouver Council of Canadians nd).

The presence of hard scepticism in North America should not be overstated (Pastor 2011). The majority of Canadians and Americans express general support for trade and other agreements with their neighbouring state. The overwhelming majority vote for political parties that also advocate measures that will further the interdependence of the two countries as in the case of the Beyond the Border action plans. Nevertheless, as we have seen, hard scepticism exists and indeed is more prevalent than might be expected given the more limited nature of formal integration between the two countries. This is particularly the case with respect to the United States. To the extent that fears about the consequences of integration are tied to a loss of sovereignty and the perception that integration will result in decisions being taken over which the state has relatively little control, it might be expected that they will be less evident in the United States than in Canada. As the term asymmetric interdependence indicates, by almost any measure the United States is the dominant force on the continent and its interests are therefore at the forefront of relationships with its neighbours. In spite of this, hard scepticism of North American integration has become increasingly evident at the margins of debate in the United States, and has also extended into the mainstream. It is difficult to determine how widely such views are held and who holds them. Unlike the situation that exists with respect to Euroscepticism, comparatively little research exists that tracks the supporters of these views. As we have seen, however, the views are present. In 2007, for example, the US Congress passed a joint resolution, "Expressing the sense of Congress that the United States should not engage in the construction of a North American Free Trade Agreement (NAFTA) Superhighway System or enter into a North American Union with Mexico and Canada" (House of Representatives 2007). Similar resolutions have been passed by state legislatures across the United States and expressed by political candidates and the media, including, for example, media commentators Lou Dobbs and Glenn Beck as well as supporters of the Tea Party (Frum 2010; "Highway to Hell" 2007).

With respect to the question of who supports this type of scepticism in North America, there are similarities with the situation in the EU in that advocates tend (although not exclusively) to be of two types. The first group are older, white, male and on the right of the political spectrum; the group that are most likely to express support for the Tea Party movement (Arceneaux and Nicholson 2012). Although it is difficult to get a precise measure of the percentage of Americans in this group, opinion poll data indicates that between 12 and 18 per cent identify themselves as Tea Party supporters with a slightly higher number indicating that they have a favourable view of the movement (see Zernike and Thee-Brenan 2010; PewResearchCenter 2013).⁵

The second group of hard sceptics are those who perceive themselves to be the losers of the global forces including trade agreements such as NAFTA. The Canadian New Democratic Party has, for example, traditionally drawn support from organized labour and lower socioeconomic status groups. As Parker and Stephenson note, this helps to explain the party's opposition to NAFTA in its 1993 and 1997 election manifestos (2008: 5). In recent years, the party has taken steps to broaden its electoral support base and has subsequently downplayed its opposition to NAFTA and free trade (Wherry 2012). The labour movement in the U.S. has similarly expressed opposition to NAFTA and, as was the case in 2008, Democratic presidential candidates have sometimes sought to appeal to this constituency by promising to reform NAFTA. In this case, opposition to regional integration is connected to the fear that it results in

⁴ This is the focus of ongoing research, particularly the connection between the Tea Party and views on the North American Union.

⁵ The percentage of Tea Party sympathisers is similar to the level of support for UKIP in European Parliament elections. It must be noted, however, that not all Tea Party sympathisers hold hard sceptical views of North American integration.

economic and societal changes, such as the loss of employment opportunities, which are detrimental to the sceptics' interests.

The Significance of Scepticism in Europe and North America

Scepticism towards integration is evident in Europe and North America. It takes different forms within and between the two settings but in both there are those who reject the real, and imagined, consequences of integration and aim to see it abandoned. A key question, then, concerns the significance of this scepticism and whether it has the potential to affect policy debates and outcomes.

There is a tendency for mainstream political parties, government leaders and commentators to ignore the sceptics and to treat them as marginal and largely irrelevant. This is particularly the case in North America, largely because the claims that a North American Union is being created have only the most tenuous link to the reality of intergovernmental discussions and decision-making. As Pastor indicates, the idea of a North American Union is "not just false" it is "preposterous" (Pastor 2011: 76; see also Capling and Nossal 2009). The tendency to ignore the sceptics is also evident in Europe where integration is developed to a much higher degree (Gifford 2010; Smith 2005; "Turning right" 2014). In the case of UKIP, for example, the major British political parties have frequently sought to dismiss the party as a "lunatic fringe", "fruitcakes", "loonies" and "closet racists" (Castle and Cowell 2013; Daniel 2005; Ford et al 2012). It is indeed important not to overstate the significance of UKIP within the British political system. Its success has so far been limited to 'second order' elections and has not been replicated at the national level. The electoral system makes it difficult for any minor party to breakthrough and this is again likely to be the case in the 2015 general election. In addition, UKIP experiences difficulties, often associated with minor and niche parties, which may limit its long-term success (Usherwood 2008). As with many such parties, it has faced controversies relating to its membership and candidates; in this case, UKIP has frequently experienced problems resulting from its actual and alleged links to the far-right British National Party (Usherwood 2002; Margetts et al 2004; Sked 2001; "UKIP bans candidate..." 2014). It has also experienced controversies relating to its leadership. In its early years, this pertained to in-fighting and frequent leadership change (Abedi and Lundberg 2009). Although the current leader, Nigel Farage, has provided more stability at the leadership level, controversy remains evident. In this case, the controversy relates to Farage's leadership style which is considered too domineering by some party members and has led some to leave the party.⁶ One former UKIP MEP, Marta Andreasen, defected to the Conservatives in 2013 calling Farage a 'Stalinist'.

In spite of this, UKIP's development and electoral success, albeit outside of national elections, indicates that hard scepticism should not be ignored and is not irrelevant. In some European states, including the Netherlands and Denmark, Eurosceptic parties have either entered government or provided governments with the parliamentary support necessary for them to stay in office and have thus had the opportunity to influence government policy directly (van Kessel 2013; Phull and Sutcliffe 2013). In other cases, governing parties have felt the need to shift their policies in order to capture, or recapture, the support being cultivated by Eurosceptic parties. In this way, Eurosceptic parties have been able to exert an indirect influence on the policy agenda. There is distinct evidence of this effect in the case of UKIP and its impact on the current Conservative-led coalition government. The Conservative Party has always contained a significant number of Eurosceptics (Sowemimo 1996; Bale 2006) but this group has expanded and is now more influential (Lynch and Whitaker 2013). In October 2011, a Conservative backbench MP brought forward a parliamentary motion calling for a referendum on EU membership. The vote in the House of Commons was defeated but it did secure the support of 81 Conservative MPs, in spite of the opposition of the Prime Minister, David Cameron ("While Rome burns" 2011).

There is evidence to indicate that the Conservative Party has adopted more Eurosceptical policy positions in order to appease the sceptics within the party and to limit the possible loss of support and votes to UKIP ("More is less" 2013; Petrou 2012). In July 2011, for example, the government put in place a 'referendum lock' whereby the government promised to call a referendum on any treaty that transfers more powers to the EU ("One man, many votes" 2011) and in January 2014 David Cameron made a commitment to renegotiate the UK's place in the European Union before holding an in/out referendum on the UK's membership in the European Union following the 2015 general election. This commitment was reaffirmed in the party's 2014 European Parliament election manifesto (Conservative Party 2014). The party also now uses more critical rhetoric with respect to immigration from other EU countries in a manner that

⁶ In this respect a comparison can be drawn between Nigel Farage and Geert Wilders, leader of the PVV in the Netherlands.

echoes UKIP and has pledged to introduce measures that will limit some of this immigration. In a 2013 newspaper column, David Cameron claimed that the previous government's decision not to introduce transitional controls on freedom of movement from the states that joined the EU in 2004 was a "monumental mistake." He continued by arguing that "[i]t is time for a new settlement which recognises that free movement is a central principle of the EU, but it cannot be a completely unqualified one" (Cameron 2013).

There are undoubtedly problems for the mainstream politicians that support continued EU membership in developing a response to the Hard Euroscepticism advanced by UKIP. This agenda has resonance in the United Kingdom where its roots are deeper than in many other European countries. Ignoring and attempting to marginalise UKIP has so far failed. On the other hand, some critics will not be satisfied by anything less than their country's departure from the EU. These critics reject any arguments advanced in favour of continued EU membership and are willing to misrepresent or exaggerate in order to criticize the EU (Sutcliffe 2013). Co-opting parts of the sceptical agenda is therefore unlikely to satisfy these critics. As a result, sceptical views need to be addressed and challenged. Mainstream political parties and governments, in this case the British government, should be willing to promote the advantages that European integration brings to their country (Menon 2008). This does not mean advancing an uncritical acceptance of the European Union or European integration in all its forms. Debate, discussion and criticism are not in themselves problematic and indeed are crucial to a healthy political system as well as public acceptance of policy decisions. One element of this is an effort to increase public knowledge of the European Union and how it works. As indicated in Eurobarometer studies, a majority of British citizens (51%) report that they do not understand how the European Union works (Eurobarometer 2013: 114). The same study indicates that 68% of UK respondents do not trust the European Union, with the percentage being highest for those with the lowest levels of educational attainment (Eurobarometer 2013: 97-100). Conversely, those who claim to have higher level of knowledge of the European Union are marginally more likely to report that they trust the institution.

In sum, the mainstream political parties must distinguish between Soft Euroscepticism and hard scepticism and work to persuade the soft sceptics that membership in the EU is advantageous and that EU policies can be reformed and indeed are constantly being reformed. Similar conclusions can be reached with respect to the situation in North America. While it may

be easy, and in many cases appropriate, to dismiss sceptical voices, such as those expressing fears of a North American Union, it is important that governments engage with critics. Likewise it is important that, as much as possible, the public be included in discussions about the development of North American integration, as in the case of the Beyond the Border action plans. Without this engagement and debate it is possible that scepticism will increase in strength as and when integration progresses beyond the existing scope of NAFTA as a result of the ongoing discussions and projects relating to the work of the Beyond the Border Action Plan on Perimeter Security and Economic Competitiveness and the Regulatory Cooperation Council (Government of Canada/Government of the United States 2011) or if the U.S. and Canadian governments seek to adopt the proposals of those advocating closer integration (such as Pastor 2008; 2011). It is also the case that discussion and debate can allay fears as policy proposals develop. In the case of the Beyond the Border action plan, for example, initial public and political comments emphasized the fear that closer cooperation between Canadian and U.S. authorities in the context of this plan would threaten the privacy of Canadian citizens and Canadian sovereignty. The final version of the plan sought to emphasize that each country's sovereignty will be secure as the elements of the plan are discussed and evolve (see Von Hlatky 2012). In general, one of the themes that is evident in scepticism of integration in North America (and indeed in the EU) is fear of the unknown future development of this integration. There are critics of the current state of North American integration based around NAFTA but it is also often the case that this extends to a scepticism of how this integration might evolve and that this may occur in bureaucratic discussions that exclude the public. Perhaps the only way to limit this scepticism is through extensive public consultation and discussion combined with a demonstrated willingness on the part of governments to respond to the public debate.

Conclusion

Criticism of integration is evident in both the cases examined here. Although sceptical voices are particularly prominent in the European Union, they are also found in different forms within North America. It is also the case that the scepticism in both settings shares certain characteristics. In both there is evidence that sceptics fear a loss of sovereignty as a result of integration and consequently a loss of national identity. In addition, the sceptics proclaim that integration is a process occurring in secret at the behest of forces (the political establishment and

frequently global elites) that exclude ordinary voters and particularly the working classes. In sum, an anti-establishment rhetoric is common in the sceptical voices in Europe and North America.

This said, it is very important to identify that scepticism takes different forms both between the two settings and also within them. Not all sceptics hold the same views for the same reasons. It is, for example, important to distinguish between hard and soft scepticism in both settings, with the former calling for a complete reversal of integration while the latter promotes varying degrees of reform to either European integration or NAFTA. One of the difficulties in analyzing scepticism in either setting is distinguishing between these two broad categories of scepticism. Another difficulty concerns how to respond. There is a distinct and understandable tendency to ignore scepticism, particularly hard scepticism, as being marginal to political debate. This is understandable, particularly in North America, where the claims of a North American Union are far removed from political reality. As the UKIP case suggests, however, ignoring hard sceptical views does not inevitably lead to them being marginalized. In some respects it feeds the claims made by the sceptics that the mainstream political parties are intent on carrying forward an integration project in secret. This fear is also fed when governments either deliberately or by omission limit public engagement in debates over integration and have been prepared to ignore popular criticisms of the results of intergovernmental discussions. Instead, it is important to keep the discussion of integration at the forefront of political debate, to seek to engage the public in these debates, and at the same time improve public understanding of what is being proposed and the advantages of those proposals. Governments should be willing to defend the benefits of integration but also to reform and improve integration on the basis of public consultation. While an emphasis on public engagement and education will likely not appease the hard sceptics it is the best response to accusations that integration represents an elite conspiracy.

⁷ European leaders were, for example, quick to dismiss the 2005 French and Dutch referendum results.

Table 1: UKIP's Electoral Performance

Election	% of Vote (# Votes)	# of Seats
1997 General Election	0.3 (105, 722)	0
1999 EP Election	6.9 (696, 057)	3
2001 General Election	1.5 (390, 563)	0
2004 EP Election	16.1 (2, 660, 768)	12
2005 General Election	2.2 (603, 298)	0
2009 EP Election	16.5 (2, 498, 226)	13
2010 General Election	3.1 (919, 546)	0

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