DANISH AND BRITISH
POPULAR EUROSCEPTICISM COMPARED:
A SCEPTICAL ASSESSMENT OF THE CONCEPT

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Abstract

The aim of the working paper is to examine similarities and differences between Danish and British sceptical or negative public attitudes towards the European Union. It looks at problems involved with defining and measuring the phenomenon of popular euroscepticism, before turning to characteristics specific for the case countries. The conclusion drawn from the comparison is that the phenomenon differs significantly even between two countries often associated for a discernible euroscepticism. In conclusion, the contemporary relevance of the study of popular euroscepticism is discussed with reference to the increasing use of referenda as a means to settle political questions in today's EU.

1. Introduction

This paper discusses the characteristics of Danish and British sceptical or negative public attitudes towards the European Union – referred to as *popular euroscepticism* – at a time where referenda on the Constitutional Treaty are looming in the not so distant future.[1] Public opinion surveys reveal euroscepticism to be rather widespread in both countries, and Denmark and Britain have often been regarded, by the press and by politicians, as "the eurosceptic pair" in the EU. What is thought to distinguish Denmark and Britain from other EU member states is that their populations consistently appear among the least favourable towards many of the initiatives that "stem from Brussels".

But are Danish and British attitudes towards the EU at all similar? The main hypothesis of the paper is that while Denmark and Britain may indeed both be characterised by a eurosceptic public opinion, considerable differences between the two countries call for great prudence when comparing the phenomena. The simple, but critical, argument of the paper is thus that euroscepticism is a relatively complex phenomenon. We should, in other words, be rather "sceptical" of the sweeping statements that are often heard in the political debate on euroscepticism. At a time when EU questions are increasingly put to the people, a better academic and political understanding of the phenomena is required.

The final part of the paper offers a discussion of the potential consequences of the recent, prominent role allocated to public opinion in the "new Europe".

2. What is popular euroscepticism?

Prior to discussing particularities within the Danish and British variants of popular euroscepticism, some reflection on what it means to be eurosceptic is necessary.

One starting point could be the Danish Foreign Minister, Per Stig Møller, to whom scepticism is of great philosophical importance: he borrowed from distinguished European philosophers

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1 The paper deals with aggregate national-level attitudes towards the EU, leaving the study of individual-level (socio-demographic and attitudinal) determinants the topic of a future study.

when stating: *I doubt, therefore I am a European.*[2] Doubt, in other words, is something truly European to the Foreign Minister. A perhaps less philosophical starting point is that of British Prime Minister Tony Blair, who was cited for calling euroscepticism plainly "dumb" (Watt & Black).

Nevertheless, when trying to pinpoint public scepticism towards the EU and European integration,[3] an initial problem is that euroscepticism as such has not been rigorously defined by the academic community. The public media routinely misemploy the term to express a derogatory value judgement or as a term of abuse, though most often the term figures as a generic label defining a *critical attitude towards the EU* (Forster 2002: 1-2). This simplified definition is potentially misleading for two reasons. First, it would imply that no one, or very few, citizens would be classified not-eurosceptic, as unconditional, uncritical acceptance of all EU developments is rare. Second, critical public attitudes may be directed against the (perceived) impact of *particular* developments within the European integration process rather than against the EU and European cooperation as such.

While the Danish and French referenda on the Maastricht Treaty initiated political realisation of popular euroscepticism, it would not be correct to exclusively assign the phenomenon to the 1992 transformation of the EC into the EU. Popular euroscepticism in Denmark and Britain clearly predated the establishment of the *Union*: The "People's Movement against the EC", for instance, was established as a response to Danish membership of the European Communities in 1972, and it enjoyed popular support throughout the 1970s and 1980s (see for instance Søren Hein Rasmussen). Early popular euroscepticism in the United Kingdom was likewise conducive to the 1975 referendum on the continuation of membership.

Anthony Forster has argued that an "anatomy of Euroscepticism" involves a thought-action spectrum that distinguishes between varying degrees of scepticism (Forster 2000): From a mild, latent sense that the majority of voters share – as mentioned above, unconditional support is rare – to an active scepticism demanding outright withdrawal from the Union. Forster moreover argues that it is possible to identify two different strands of euroscepticism and drafts a "sovereignty axis" and an "ideological axis" of the phenomenon (Forster 2000:

2 Statement included in several speeches by the Foreign Minister; see, for instance, speech to an EP-election conference on April 30, 2004.

3 I mention both "the EU" and "European integration", as public attitudes towards the EU strictly speaking would concern the question of membership, while attitudes to European integration would include ongoing developments of the Union.

100-101). The sovereignty axis represents those voters, for whom the centrality of the nation-state is a main reason for scepticism, and the ideological axis represents voters sceptical of the type of Europe on offer – but these two axes are sometimes interwoven.

Another influential classification of euroscepticism is the distinction between hard and soft scepticism introduced by Paul Taggart and Aleks Szcerbiak in their study of party-based euroscepticism (2002, 2003). Hard, or principled, euroscepticism is opposition to membership itself, while soft euroscepticism is based on a case-to-case evaluation of EU developments.

Academic interest in public attitudes towards the EU is recent. Classical European integration theory paid only scant attention to public opinion. Put crudely, neo-functionalists considered public attitudes irrelevant; intergovernmentalists disregarded European-level attitudes because of the exclusive significance of the national level; and federalists took for granted the a priori existence, or uncomplicated development, of mass support for the "European project" (for an overview of European integration theory, see Rosamond; Wiener & Diez. Niedermayer & Sinnott and Hewstone provide chapters on the role of public opinion in early integration theory). Only transactionalists (notably Karl W. Deutsch) accorded a prominent role to the study of the "sentimental relations among peoples" and the need for a "sense of community" for continued integration (for instance Deutsch et al. 1967).

By developing the underlying assumptions of classical integration theory for not considering public opinion, as well as the emphasis of newer integration theory on issues pertaining to the democratic legitimacy of the EU, the paper defines popular euroscepticism through the identification of six broad types of public attitude towards the EU: They concern the integrity of the nation-state (*national sovereignty*); the values of the EU (*ideology*); the transfer of new competencies to the EU in order to enhance efficiency (*political performance*); the economic rationale of integration (*economic utility*); and the (lack of) emotional attachment to the European level (*affective pull*). A final potent type of public attitude consists in the hard, "pure" opposition to the very principle of cooperation in the European Union (*principled opposition)*. It is the assumption of the paper that these six types present a coherent and in combination exhaustive account of public attitudes towards the EU.[4] Importantly, there is no direct

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4 The pertinence of the six types of attitude presented in the explanatory framework has been tested by the scrutiny of a vast variety of writings on public opinion towards the EU (for instance: Andersen; Andersen & Kaltenthaler; Archer; Arnaud; Borre; Bréchon; Buch & Hansen; Eichenberg & Dalton; Forster; Franklin & Marsh; Gabel; Gill, Atkinson & Mortimore; Harmsen; Hewstone; Inglehart; Janssen; Kritzinger; Lawler; Lindberg & Scheingold; Mayer; Milner; Siune, Svensson & Tonsgaard; Szcerbiak & Taggart.

measure of popular euroscepticism. Instead proxies, such as Eurobarometer poll questions, and the referenda results (as discussed below), must be applied to "operationalise" the examination of the phenomenon. Thus, when the paper includes a poll question surveying attitudes towards the European Parliament (EP), the interest is less with concluding something about the Parliament's image than with what attitudes towards the EP may tell us about the Danish and British types of euroscepticism.

Eurosceptics, accordingly, may differ in their motivations and arguments to oppose the EU or the European integration process, but, importantly, in times of for instance referenda they nevertheless constitute a clearly identifiable group with several common characteristics. I shall return to this in more detail below with regard to the discussion of the Danish referendum on the Euro.

Elite reactions

In Denmark, a marked split traditionally divides the "elite" from the "mass" on issues related to the EU. In the four most recent Danish EU-referenda – covering a time span of eight years – close to half of the Danish population have voted contrary to the recommendation of more than two-thirds of the national Parliament; the official line of all major daily newspapers and virtually the entire business sector. Most Danish political parties, it seems, are "out of touch" with large proportions of their voters on the EU-issue, and at referenda, the yes-campaign has consistently seen its insistence on the economic benefits from integration dismissed as being of secondary importance (see also the discussion of the Danish euro-referendum below). The persistence of the elite-mass gap could point to an inadequate political understanding of popular euroscepticism.

Though popular euroscepticism predates the advent of the Maastricht Treaty, it was during ratification of this Treaty, and more precisely following its rejection by the Danes in June 1992, that political realisation of its extent and salience became apparent throughout Europe. The margin between yes-voters and no-voters in Denmark had been small – about one percentage point, or 46.000 more no-votes than yes-votes (Siune et al. 1994: 112) – however, images from the small, celebrating Scandinavian country that had dared to "say no to Brussels" made headlines from Italy to Ireland and beyond. From one day to the other, or so it seemed, the "permissive consensus" (Lindberg and Scheingold 1970) amongst Europe's publics in favour of integration had "collapsed" (Hix 2005, Ch. 5: 22).[5] Whereas European

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5 The Danish referendum is often cited as the event marking the end of the permissive consensus (e.g. Hix 1998, 2005; Medrano 2003; Weiler 1999).

leaders in the 1960s, 1970s and 1980s were able to rely either on positive prevailing attitudes towards integration or simply on a lack of interest allowing integration to take place without opposition, these options were no longer available to their colleagues in the 1990s.

Elite reactions (academics, politicians) to popular euroscepticism have predominantly taken one of two forms. On the one hand, the conclusion has been drawn that if people are not supportive of the EU it is because of a lack of information about the virtues of the EU. This view is also present in Ronald Inglehart's Cognitive Mobilisation theory (1970), which contends that a high level of cognitive skill—political awareness, familiarity with the EU, skills often associated with higher levels of education—is necessary for understanding, and thereby appreciating, European integration. The theory goes on to assume a positive relationship between (all) information about integration and support for the EU (see also Reif & Inglehart). Debate-meetings, EU info-points, information campaigns and their likes were therefore not to be lacking, with the result that, today, it is almost easier to find information about the *EU's* policies, structures and institutions than about their national counterparts.

Few will question that information forms a central and cherished part of a democratic political system. There is, however, reason to doubt that information about the EU in itself is able to make people less eurosceptic, as seems to be the persuasion of many strategies aiming to enhance positive attitudes.[6] In other words, notwithstanding that decision-making procedures and treaties should aim to be as transparent as possible, it seems unrealistic to assume that information about these alone will fulfil the strategies' goal of awakening popular enthusiasm. Importantly, this is not an inherent problem that the EU faces as a result of its unique position in the European political architecture: it is a fact that is also characteristic of national democracies. It is, for instance, not a detailed knowledge of the Danish political system that appears to form the foundation of Danish national sentiments. A TV-survey in connection with a recent Day of the Constitution (Grundlovsdag) in Denmark revealed that a large majority of Danes did not know whether or not equality between men and women was mentioned in the Danish Constitution – an otherwise very cherished principle in Denmark.

6 The European Commission, for instance, insists on communicating the EU to its citizens as one of its main priorities and has recently designated a Commissioner to this task. In Denmark, the "information strategy" appears close to the hearts of pro-EU politicians and NGOs – despite indications that information campaigns prior to previous referenda have had limited success and sometimes even been counter productive (see Andersen).

On the other hand, popular euroscepticism has encouraged politicians and academics to adopt an increased focus on the democratic legitimacy of the EU. In the years following the Danish "no" to the Maastricht Treaty, interest in pinpointing and solving the EU's so-called "democratic deficit" received tremendous attention. In particular, euroscepticism was interpreted as a concrete criticism of the European Parliament's insufficient influence on EU-legislation. Resultant efforts to enhance the Parliament's powers, however, appeared without resonance in the population. Surveys, moreover, revealed that the European Parliament did in fact not enjoy vast popular support amongst the most sceptic populations (see section 3 below). Consequently, more attention has been drawn to the *multi-dimensional* character of the concept of "democratic legitimacy": The EU, most would agree, largely fulfils the criteria for *legality* – i.e. cooperation is taking place on legal grounds – while instead it is likely to be the definition of the EU's common goals, as well as the speed and scope of integration, that in particular evokes scepticism.

The lack of definitional clarity has not hindered the flourishing of many conclusions with regard to public attitudes towards the EU. One frequent conclusion, as indicated above, has been that Denmark and Britain are eurosceptic countries. A statement like this is misleading for the simple reason that there can never be one and only one public attitude. It is not possible to label 50 percent of a population "sceptical" – the situation, of course, is highly nuanced. The simple, though critical conclusion is that not only will public attitudes towards the EU be somewhere in between scepticism and pro-integration attitudes (degree); they are also likely to be directed against different aspects of integration (type).

Key questions, thus, become the *degree to which* a population is eurosceptic as well as *the type of* euroscepticism which is characteristic for a country. It is to this discussion that the paper now turns, with the focus on Danish and British popular euroscepticism. We begin with degree.

3. Proxies for popular euroscepticism

One way to gain an impression about the degree of Danish and British scepticism is by looking at a number of poll questions from the European Commission's Eurobarometer surveys. Existing since 1973, these biannual surveys of public opinion offer good opportunities for longitudinal research as well as for comparative insights among the member states of the EU.

A first question to examine concerns *attitudes towards membership* (Table 1). Danish support for membership has risen steadily, from 42 percent who thought membership was a "good thing" in 1973 to 57 percent who shared this opinion in 2003. Since 1994, Denmark and Spain are actually the only two countries to have witnessed an increased support for EU membership. In 2003 Denmark thus scored higher in positive attitudes than traditionally pro-EU countries such as Belgium. Figures for the United Kingdom reveal markedly less support, and are in fact distinguished in the EU15 by showing least respondents who think membership is a "good thing" and second-most respondents who think it is a "bad thing" (only surpassed in the latter category by Sweden). British support around the time of accession was at 40 percent, and reached an all-time high of 67 percent at the referendum on continued membership in 1975. Lowest British support has been at 21 percent (1981) (Eurobarometer trends; Eurobarometer 60).

Table 1: "Attitudes towards membership of the EC/EU" (EU15)

(percent)	1973 Good thing/ Bad thing	1994 Good thing/ Bad thing	2003 Good thing/ Bad thing	1994 - 2003 Dev. good thing*	RANKING 2003	
					most good thing**	most bad thing**
Austria	N/A	N/A	35 / 20	N/A	14	5
Belgium	57 / 5	61 / 7	56 / 12	↓	8	7-
Denmark	42 / 30	53 / 22	57 / 22	↑	7	3-
Finland	N/A	N/A	39 / 22	N/A	13	3-
France	61 / 5	58 / 12	44 / 17	↓↓	11	6
Germany	73 / 5	50 / 12	46 / 10	↓	10	10-
Greece	N/A	65 / 8	62 / 7	↓	3-	12-
Ireland	56 / 15	82 / 5	73 / 6	↓	2	14-
Italy	69 / 2	70 / 5	58 / 10	↓↓	6	10-
Luxembourg	67 / 3	80 / 5	77 / 6	↓	1	14-
Netherlands	63 / 4	77 / 4	62 / 12	↓↓	3-	7-
Portugal	N/A	56 / 11	55 / 11	↔	9	9
Spain	N/A	48 / 18	62 / 7	↑↑	3-	12-
Sweden	N/A	N/A	40 / 32	N/A	12	1
U. Kingdom	40 / 21	43 / 22	28 / 29	↓↓	15	2

(Adapted by the author from Eurobarometer trends & Eurobarometer 60)

*: The column shows the development in the percentage of citizens' seeing membership as a "good thing". Two arrows (up or down) symbolise a change of more than ten percentage points.
**: The indicator "-" after a rank indicates that more than one country holds the same value.

Other poll questions of relevance to the present paper concern public attitudes towards the European Parliament. These statistics are interesting because the European Parliament is one of the supranational elements in the EU, contributing to distinguishing the Union from other international organisations and possessing the power to go against the decisions of national leaders. Recalling the definition of popular euroscepticism presented above, a population's aggregate attitude towards the Parliament may therefore reflect whether euroscepticism in that country is sovereignty-based or whether it is based on an ideological rejection of, for instance, the lack of democracy in the EU. Academics and politicians alike have tended to assume the latter and seen the European Parliament as the clue to counterbalancing popular euroscepticism. A dominant ideological interpretation of scepticism has been the "democratic deficit thesis", where euroscepticism is interpreted as public dissatisfaction with the level of democracy in the EU. Since the European Parliament performs a number of democratic functions, the conclusion of this line of thought has been to strengthen the voice and influence of the Parliament.

The two lines of thought thus point in opposite directions: according to the former, countries with large proportions of eurosceptic citizens should be the most critical of the Parliament—because it involves strengthening the supranational element of the Union—while according to the latter line of thought, the reverse situation is expected: eurosceptics should thus be the strongest supporters of increasing the powers of the European Parliament.

Danish attitudes towards the European Parliament around the time of the Maastricht referendum offer support to the "sovereignty thesis": In 1992, Denmark was distinguished within the EU12 by having the least number of respondents with a "good" impression of the Parliament (Table 2a & 2b). Denmark was also distinguished by having the most respondents who believed that the role of the European Parliament should be less important, and, conversely, by having the least respondents who believed that its role should become more important. Attitudes in the United Kingdom reveal a largely similar picture. In the early 1990s, British citizens had the worst impression of the European Parliament among the EU12, as well as the second-most respondents (after Denmark) who desired a less important role for the Parliament.

Table 2a)
"Impression of the European Parliament as a result of what has been read or heard"

Table 2b)
"Desired future role for the European Parliament"

(percent)	1992 Good / Bad	Ranking 1992		1992 Stronger / Less strong	Ranking 1992	
		Most bad	Most good		Most stronger	Most less strong
Belgium	43 / 12	8-	6	40 / 30	9	3-
Denmark	30 / 34	3	12	29 / 38	12	1
France	41 / 17	6	7	52 / 21	3-	9
Germany	37 / 24	4	8-	44 / 24	8	6
Greece	59 / 9	10-	4	65 / 13	1	12
Ireland	67 / 13	7	1	39 / 33	10	2
Italy	63 / 9	10-	2	60 / 15	2	11
Luxembourg	37 / 23	5	8-	52 / 30	3-	3-
Netherlands	34 / 35	2	10	52 / 20	3-	10
Portugal	62 / 6	12	3	45 / 22	7	7-
Spain	51 / 12	8-	5	47 / 25	6	5
U. Kingdom	33 / 41	1	11	38 / 29	11	7-

(Adapted by the author from Eurobarometer trends)

A preliminary conclusion on the basis of these two statistics would suggest that strengthening the powers of the European Parliament is not a straightforward way of counterbalancing popular euroscepticism. The inadequacy of the democratic deficit thesis is confirmed by the poll question surveying levels of *satisfaction with democracy in the EU* (Table 3a). At least Danes do not appear dissatisfied compared to other European citizens, and are in fact much more satisfied with democracy in the EU than Italians, Dutch and Germans, though these three countries are often portrayed as pro-integrationist countries. British citizens, however, are distinguished by being the least satisfied with EU democracy (Eurobarometer 60).

Attitudes towards political union (Table 3b) is another poll question that seems to underline the relevance of the sovereignty axis over the ideology axis in understanding popular euroscepticism in both Denmark and Britain. Before the end of the Cold War, the question of the political unification of Europe was a recurrent theme in Eurobarometer polls, in which Denmark was distinguished by being the least in favour – and the most against – closely followed by Britain as second-least in favour and second-most against (Eurobarometer trends).

**Table 3a)**
"Satisfaction with democracy in the EU"

Table 3b)
"Attitudes towards the unification of Western Europe" (Political union)

(percent)	2003 Satisfied / Not satisfied	Ranking 2003		1994 Very & to some extent supportive /Very & to some extent against	Ranking 1994	
		Most satisfied	Most not satisfied		Most supportive	Most against
Austria	44 / 42	8	4-	N/A	N/A	N/A
Belgium	49 / 40	6	8-	78 / 16	3	6-
Denmark	54 / 39	4-	10	58 / 39	12	1
Finland	37 / 56	13	1	N/A	N/A	N/A
France	39 / 40	11-	8-	72 / 19	9	4
Germany	39 / 42	11-	4-	70 / 22	10	3
Greece	54 / 35	4-	12	81 / 11	2	9-
Ireland	65 / 14	1	15	77 / 10	4-	11
Italy	45 / 38	7	11	85 / 6	1	12
Luxembourg	59 / 31	2	13	77 / 16	4-	6-
Netherlands	40 / 48	10	2-	76 / 17	7-	5
Portugal	41 / 42	9	4-	76 / 11	7-	9-
Spain	56 / 23	3	14	77 / 14	4-	8
Sweden	36 / 48	14	2-	N/A	N/A	N/A
U. Kingdom	30 / 42	15	4-	60 / 29	11	2

(Adapted by the author from Eurobarometer 60 (3a) and Eurobarometer trends (3b))

Finally, attitudes towards the Constitutional Treaty are of course of acute relevance considering the forthcoming wave of referenda. Both Denmark and Britain are set to hold a plebiscite in 2006, following national elections and in the British case the end of their presidency of the European Council. Hostility or scepticism towards the EU does not necessarily imply opposition to the idea of a constitution for Europe, especially as a constitution may also serve to restrict cooperation. However, the present Constitutional Treaty does not appear to enthuse. In Britain in July, 31 percent of the British population was supportive of the Constitution (of which 8 percent were strongly in favour), while 50 percent were against (of which 27 percent were strongly against) (Gill, Atkinson & Mortimore). The British referendum has already been thrust aside by many as unwinnable. While the above figures are discouraging for the yes-campaign; it is important to bear in mind, as a MORI-poll points out, that nearly half the British public are "waverers", meaning that they might change their minds on the issue if they could be persuaded that the arguments pointed the other way. In theory, at least, the referendum result is still open (Gill, Atkinson & Mortimore: 7).

Figure 1. Danish and British attitudes towards the Constitution, June/July 2004
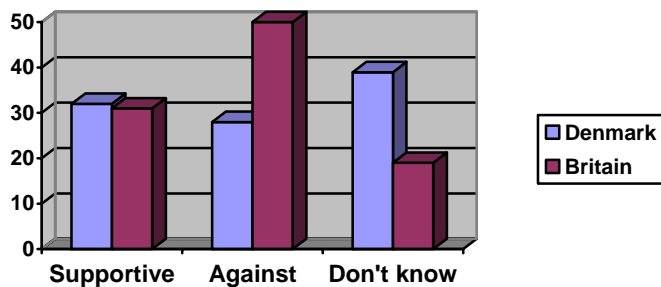
Denmark [1]: Rambøll Management for Jyllands-Posten (June)

Britain[2] : Gill, Atkinson & Mortimore (MORI-survey) (July)

[1] Formulation of question: "The member states of the EU are close to closing the negotiations on a European Constitutional Treaty. If there was a referendum on this Constitutional Treaty today, what would you vote?" (Yes; No; Don't know). My translation.

[2] Formulation of question: "Which of the following best describes your own view of Britain adopting the new European Constitution" (I strongly support; I am generally in favour; I am generally opposed; I strongly oppose; Don't know).

Danish public attitudes towards the Constitutional Treaty do not appear much more supportive than the British—a June-poll suggested that 32 percent would vote "yes". Sceptical attitudes, however, are at 28 percent far less widespread than in Britain. Waverers are also likely to render the Danish result unpredictable: 39 percent claimed in June to be uncertain about their vote (Rambøll for Jyllands-Posten). The percentage of yes- and no-voters has different significantly from poll to poll. A poll from late October (Megafon for TV2) thus revealed a marked increase in yes-voters, a slight increase in no-voters and a large decrease in waverers.

4. Types of scepticism: a comparison of Denmark and Britain

Below, main characteristics of Danish and British popular euroscepticism are discussed in order to pinpoint and analyse points of similarity and points of difference. First, a short overview of main events in the history of Danish and British membership of the EC/EU is presented. This is followed by the investigation of a particular event (in the Danish case) and aspect (in the British case) that is useful for drawing out and elaborating the Danish and British types of popular euroscepticism. In Denmark, the euro-referendum of September 2000 appears to sum up Danish scepticism. It represented a situation where a comfortable majority of citizens went against a large majority of the Danish elite; where political arguments overshadowed economic arguments; and pointed to several common denominators within the no-campaign, most notably the desire to protect the Danish "way of welfare". In the lack of a similar recent event in the United Kingdom, the paper will focus on a predominant aspect of British scepticism – its strong insistence on independence – which appears to reflect particularities of the British case well. Indeed, Britain's geographical size and position, as well as divisions among its elite as to whether or not the EU represents a critical choice between the Continent and the Atlantic, are both aspects reflected by the overall focus on independence.

4.1. DANISH EUROSCEPTICISM

A short history

Arguments in favour of Danish accession to the European Communities in 1972 centred on the economic advantages of membership. Denmark wanted to safeguard its agricultural exports to Britain, so when Britain applied for membership, Denmark also applied for

membership. It was pragmatic considerations, rather than political visions about an ever closer union, that were the main concern for Danes in October 1972.

The 1970s – Denmark's first years as an EC-member – were generally challenging for the EC. It was not Danish entry that triggered the hardship, but external events such as the oil crisis. In Denmark, the EC slowly but steadily became an accepted, if not even appreciated, acquaintance. The single market was developing with many advantages for the Danish economy, and in 1986, at a referendum on the Single European Act, plans to consolidate market integration received a rather overwhelming support from the Danes. Interestingly, this result overturned a prior vote in the Danish parliament, which had actually rejected the Act.

However, the 1986 referendum was in many ways an event that marked a change in Danish attitudes towards the EC: in short, while Parliament became more positively inclined and increasingly wanted to turn the EC into more than just a pragmatic acquaintance, public opinion increasingly felt that a line had to be drawn somewhere. The neo-functionalist claim of a spill-over effect from economic to political integration was not in line with the direction in which most Danes wanted the EC to develop. Opponents and supporters started a heated debate in Denmark about what exactly the EC was and was not. The pro-EC debate insisted on economic arguments. The EC was, as it name testified, an *economic* community – an interpretation that was confirmed at the highest level by then Prime Minister Poul Schlüter's famous proclamation that the union was "stone dead".[3]

That argument soon became hard to defend. While the almost "existentialist" debate was raging in Denmark, discussions on how to establish a European *Union* were materialising among the remaining member states of the EC; plans which materialised with the Maastricht Treaty in 1992.

In marked contrast to today, where a considerable number of member states decided to hold a referendum on the Constitutional Treaty already before it was finally agreed upon, it is important to note that Denmark and Ireland were the only countries to have made that decision with regard to the Maastricht Treaty in 1992. This reflects the large general increase in the attention allocated by politicians to public opinion: 14 years ago not much energy was used on this issue. To a majority of politicians as well as academics, public support was regarded as something that was simply just there or otherwise something that would come

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3 The proclamation has been subject to considerable debate in Denmark. Poul Schlüter himself has subsequently argued that he was using the vocabulary to describe a fully fledged federal union.

almost automatically once people got used to new developments. The confidence in this belief contributed to making the Danish "no" to the Maastricht Treaty a spectacular event in the history of European integration. Importantly, the "no" posed a new, ominous question about the future of the integration process: What to do if the people say "no"?

The euro-referendum

A closer look at the last EU-referendum in Denmark, the euro-referendum of September 2000, may contribute to a more adequate understanding of Danish scepticism. In early 2000, when the seven-month long referendum campaign was initiated by then Prime Minister Poul Nyrup Rasmussen, the single currency was about to become a physical reality for millions of EU citizens and, initially, there was a comfortable majority in Denmark in favour of participation. In early spring, yes-voters were leading with up to ten percentage points, but by May they were trailing the no-side. The summer showed a continuous no-majority, a gap which widened to 11 percentage points in the weeks prior to the referendum.

At a first glance, euro-opponents in Denmark were not a homogenous constellation. From right to left of the political spectrum, they were found in the Danish People's Party, the centre Christian Democrats, the Socialist People's Party, the Unity List (formerly the Communist Party), and two single-issue movements: the June Movement and the People's Movement against the EU – a constellation that normally would not receive more than 25 percent of the total vote in general elections. Despite their differences, the above parties all advocated a "no" to the euro.

As could be expected from their divergent positions on the left-right scale of politics, the parties within this inhomogeneous group initially appear to differ considerably in reasons to oppose the euro/the EU. To the right, the Danish People's Party argues that European integration is saturated with planned economics and centralism and resembles a situation that the former communist countries are struggling to get rid of. The Party has moreover been keen to add a national touch to its campaigns, and has focused strongly on the allegedly negative implications of the EU on Danish national identity and sovereignty. On the other side of the political spectrum, the Socialist People's Party has criticised the free market and military aspects of the EU, while arguing that the European project lacks in environmental and social regulation.

The Danish referenda have seen the birth of two single issue movements that only campaign in "referenda times" and at elections to the European Parliament. One, the People's Movement against the EU, emerged, as mentioned above, as the direct response to Danish

membership in the EC in 1972; while the other, the June Movement, emerged twenty years later in connection with the referendum on the Maastricht Treaty.

Despite the immediate differences between the "no-parties" in reasons to oppose the euro/the EU, it has not always been easy to distinguish their campaigns from one another. According to *The Economist* (2000), the no-campaign prior to the euro-referendum could be said to have had three headings: Nationalists, who feared a further loss of sovereignty; democrats, who believed the EU was ruining Danish democracy; and socialists, who thought the welfare-state would be undermined. However, despite different stresses, these three standpoints importantly all share the belief that Denmark has little to gain from integration.

Prior to the Danish referendum on the Amsterdam Treaty in 1998, the June Movement had launched a now infamous campaign slogan, whose wording seemed to supplement that of the Danish People's Party at the other end of the political spectrum. The rhetorical question posed by the slogan read: "*Welcome to forty million Poles in Denmark?"* While it *was* intended to encourage Danes to vote "no", the June Movement felt obliged to withdraw the slogan following accusations of xenophobic undertones.

Xenophobic undertones or not, the purpose of the slogan was arguably to spell out to the Danes that only by voting "no" would they be able to preserve the Danish "way of welfare" and keep the two traditional enemies of the left, the US and the EU, out of Denmark. If nothing else, the slogan contributed to blur the boundaries between the various no-groups and underline their common concern about the Danish model of democracy and an uncertain economic and social future – a privilege pertaining to the no-side as it could identify itself with what the voters knew and trusted, effectively pointed to by a slogan from the Danish People's Party: "*You know what you've got. You don't know what you get*" (Qvortrup: 192, 195).

Overall, economic arguments were hardly visible in the debate: Although the yes-campaign did stress the economic benefits from joining the single currency, these arguments failed to reach the core of the debate and were rarely visible. Despite convincing some people of the necessity to "vote with their heads," a post-referendum survey showed that economic arguments only had a significant impact on 16 percent of the electorate (Andersen: 7). On the contrary, it was the cultural and political side of the euro-coin that received most attention. Although most issues do have economic implications, concerns over the impact on the public budget were probably of minor importance compared with the concern of losing national sovereignty.

The high sensitivity of the issue of a single currency forced the yes-campaign to tread carefully, and the fact that the debate succeeded in causing such heated reactions in Denmark was in itself remarkable, since Danish political culture is traditionally connected with earthbound attitudes and a certain pride in being a "small" and "satisfied" nation (Østergaard). It was not macroeconomics that "heated the Danes." On the contrary, it seems to have been an underlying general perception in Denmark that further integration in the EU would be a threat to Danish integrity; a scenario, which most yes-voters as well as no-voters would oppose.

Danish popular euroscepticism, to sum up, seems largely to have been based on concerns about the EU's impact on national identity and integrity – thus corresponding to the sovereignty-based type of scepticism. Danes are not sceptic towards membership of the EU as such; instead scepticism seems based on a case-to-case evaluation of the sovereignty implications (factual or formal) of new developments.[4]

4.2. BRITISH EUROSCEPTICISM

A short history

Like Denmark, Britain joined the European Communities in 1972. Its membership had long been hotly debated nationally and, contrary to the Danish case, contested also at the European level. Britain had in 1957 declined to form part of the group of the countries founding the EC on the grounds that it could not accept the fundamental supranational elements of the Rome Treaty (Rasmussen & Sørensen, Urwin). But only four years later, in 1961 (i.e. only two years after its own pet project EFTA had begun to operate), the Macmillan government announced its intention of applying for admission. The change of attitude had to do with a number of factors, including the fact that France, Germany, Italy and the Benelux had in fact succeeded in establishing the EC; that the EC on top of that was actually growing in importance; and a beginning British reassessment of its role and influence in world politics, in particular with regard to the United States and the Commonwealth (see Rasmussen & Sørensen, Urwin).

However, there were doubts in the EC6 about Britain's real position with regard to the desirability of European unity – doubts which in France became coupled with concern for the future centrality of the Franco-German axis following British accession. The tone of

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4 The four Danish opt-outs from the Maastricht Treaty are tellingly directed at aspects of cooperation closely connected to the state: currency, foreign policy, policy and citizenship.

Britain's application, which included several calls for safeguards to protect its "special national interests", did little to appease concern. Though negotiations by the end of 1962 had brought considerable progress, then French President Charles de Gaulle, referring to Britain as "insular, maritime" and profoundly differing from the other states of the Continent (speech of 01/1963, quoted in Urwin: 212), twice vetoed entry. It was only following de Gaulle's resignation in 1969 that membership negotiations were resumed. Subsequent British reassurances about its seriousness, and growing French acknowledgement of the need to counter the growing weight of West Germany (Urwin), finally led to British accession in 1972.

Unlike the Danish case there was no prior referendum on membership in the United Kingdom. A referendum, however, was called three years later, in 1975, when it had become clear that many Britons, hereunder the Labour Party, were not overly fond of their new European connection. On election day the Britons were not in doubt. A rather overwhelming two-to-one majority decided on June 5 that Britain was to stay in "the European Community (the Common Market)", as the referendum question called it (Gill, Atkinson & Mortimore: 1).

Despite the large 1975 majority in favour of continued membership, it seems fair to say that the EC, and later the EU, has rarely been perceived as something Britain was a natural part of. Most Britons, on the contrary, appear to lack the feeling of an emotional pull from the EU. Professor Kenneth Minogue, writes:

> "We have become so accustomed to it [the European Union] as to forget how
> remarkable, indeed, how unnatural, it is to be able to induce established states to
> hand over their power to an institution largely composed of foreigners"
> (in Holmes (ed.): 261).

British rationale for membership has been and is, not surprisingly, largely economic. Treaty changes and other developments are critically evaluated for their added economic benefit contra their increased political implications. The result has been that Britain has often been a rather reluctant member. British "red lines", or issues of allegedly sensitive national interest, have been fought for with such ardour and skill that Britain has succeeded in obtaining both its infamous economic rebate, opt-outs from the single currency and social policy, and moreover often succeeds in weakening the supranational elements of new treaty proposals at Intergovernmental Conferences – as most recently was the case under the negotiations of the Constitutional Treaty.

The British public remains divided on most issues concerning European integration, including the issue of membership itself. Unlike populations in other member states, it is not uncommon for a majority of Britons to oppose membership in public opinion polls. Deep-running divisions with regard to the European issue are also a characteristic of the British media and the political parties. Originally opposed to membership in 1972, today's Labour Party under Tony Blair is at its most EU-friendly level. It is, nevertheless, the centre Liberal Democrats who run with the title of the most EU-friendly party in Britain. The Conservative Party (with the exception of prominent individuals) and the UK Independence Party are ardently eurosceptic.

Indifference? Superiority feeling? Reviewing British eurosceptic arguments

The argument is sometimes put forward that British euroscepticism has its roots in the fact that Britain geographically is on the European periphery. Living on an island, it is thought, leads to feelings of remoteness with the mainland – and it does seem possible to identify in Britain a considerable degree of indifference to being part of Europe; thus the famous newspaper headline "Fog in Channel: Continent Cut-off". The belief that Britain is distinct from Europe may give leeway to generally negative attitudes about the EU. Most Britons do not think of themselves as European – according to a Eurobarometer survey (2003) 62 percent consider themselves "British, not European" rather than partly or totally European. This is easily the highest level among the EU15 average of 40 percent (see also Gill, Atkinson & Mortimore: 4-5).

Inability on the part of the British population to answer correctly on rather general questions about the EU is sometimes mentioned as another indicator of British indifference towards the Union. Thus, only 41 percent of the British public appear to have even heard of the EU Council of Ministers; 55 percent say positively that they have not (Gill, Atkinson & Mortimore: 16-17). However, on most indicators of knowledge about the EU, Britons do not appear to score markedly poorer than populations in other EU member states – and, at least, the British appear honest about their lack of actual knowledge about the EU: according to a MORI poll just one in four of people claim to know a fair amount or a great deal about the EU (ibid). On the other hand, one might also say that actual knowledge about EU institutions is, perhaps, not so essential if, for instance, joining a European federation to many Britons, as to their former prime minister Sir Anthony Eden, is "*something which we know in our bones that we cannot do*" (quoted in Holmes (ed.): 307).

Indifference alone, however, would fail to account for British attitudes towards the EU. Instead, feelings of indifference may be coupled with a strong sense of independence

stemming in part from close ties to the world outside of Europe. Britain's history as the centre of the "pink empire", covering two-fifth of the globe, has surely not been forgotten; on the contrary, it is a historical background that leaves Britons to muse that *there surely must be something distinctive – and superior – about Britain*" (Holmes (ed.): 309), and Winston Churchill to declare that "*Each time we must choose between Europe and the open sea, we shall always choose the open sea*".[5] Churchill also epically summed up his view of the British position at his famous Zurich speech in 1946, where he underlined the importance of European unity with reference to the creation of a United States of Europe, but was very careful not to leave any doubts as to the British position: *"we have our own dream and our own task. We are with Europe but not of it. We are linked, but not comprised. We are interested and associated, but not absorbed."*

Deeper integration in the EU is often portrayed in Britain as a critical choice between the Atlantic and the Continent. Indeed, there is the added attraction to the British of the rest of the world because it contains cultures directly derived from the United Kingdom. Moreover, the EC's (read: the French) treatment of Britain over entry did little to endear it to Britons, while instead contributing to feelings of the EC/EU as being fundamentally anti-British. The structure of the Common Agricultural Policy has added to such sentiments. According to political scientist L.J. Sharpe "*it is impossible to conceive a system more unsuited to Britain's traditional trading policies*" (quoted in Holmes (ed.): 312-313). Such impressions have led many eurosceptics to claim that there has never been an obvious and indisputable gain for Britain in joining the Community.

British independence and "superiority feeling" rests largely on political grounds. Britons are proud of their political traditions and, above all, of the stability of their political system in times when political turbulence has reigned on the Continent. Indeed, the Continent is sometimes perceived by British eyes as a source of great threat to the British polity, a perception supported by the fact that most of Britain's wars have originated on the Continent. Also, Britain was never occupied. As the experience of being occupied under the Second World War was a major impetus for many Continental states to integrate, it is an impetus that is thus largely lacking in Britain.

5 The famous quote continues: …"Each time I must choose between you and Roosevelt, I shall always choose Roosevelt". Comments to Charles de Gaulle before the Normandy Landing on June 6, 1944. This wording taken from Euro-Quotes: [http://www.liebreich.com/LDC/HTML/Europe/01-Britain.html]. The quote is often slightly misquoted, but the sentiment is fairly clear.

Political power in Britain has traditionally been considered indivisible, belonging to the government of the day and not something to be shared. This stands in contrast to most Continental countries that have a more consensual system based on political alliances and compromises. As political scientist Susan Milner points out, the Continental system corresponds more to the concepts of power-sharing and consensual politics that characterise the EU (Milner: 21). This lack of familiarity with the EU's political system may thus be adding to British feelings of remoteness from the Union. Political scientist Nevil Johnson writes:

> "There are grounds for believing that Britain remains strongly attached to self-government, more so than most or even all of its Community partners with the exception of Denmark. And this is basically why it finds itself at odds with them" (Holmes (ed.): 376).

However, even between Denmark and Britain, different perceptions of the role of parliamentary sovereignty and the people in the policy process, and the basic connotations of the state, constitute other important frameworks for difference in their European attitudes. No institution is more revered in Britain than Parliament and the key concept of parliamentary sovereignty – a concept profoundly hostile to any notion of power-sharing (Holmes (ed.): 307). Similarly, no concept is more revered in Denmark than the participation of the people in politics.[6]

To sum up, British popular euroscepticism seems closely tied to its perceived role as an independent actor on the world stage as well as to the impression of not forming part of the Continent of Europe. Scepticism, thus, appears directed both towards the wording "European" and "Union" in the European Union. With reference to the theoretical framework for understanding public attitudes mentioned in the introduction, British scepticism can thus be said to represent a combination of the principled and the sovereignty-based type of popular euroscepticism.

6 The role of the people in Denmark arguably reaches an extent that is unparalleled in other European countries (see also Østergaard). The argument is supported by the fact that there have been as many as six referenda on European issues in Denmark, while the majority of member states in EU15 have held none. Interestingly, the word for referendum in Danish is folkeafstemning, meaning "people's vote". The frequent use of the word folk (people) in the Danish language is, in fact remarkable, and illustrates the degree to which sovereignty is placed with the people in Denmark: Apart from folkeafstemning, Danes name their parliament folketing, although the word parlament is part of the Danish vocabulary, and refer to their political system as folkestyre (people's rule) and members of parliament as folkevalgte (elected by the people).

4.3. ARE THEY SIMILAR, AFTER ALL?

A first similarity between Denmark and Britain is that both countries from an early stage witnessed vehement political debates about the EC/EU. It is in fact unlikely that a "permissive consensus" has ever existed in either of these countries. Both Denmark and Britain are furthermore marked by a strong perception that there is a lot to lose from deeper integration in the EU. State identity, it is believed, cannot, as in the German case, be enhanced by the European project, which may satisfy economic demands but fill no psychological need for identity (Milner). Because of this we see a backlash of public opinion precisely in those countries where the nation-state has provided the main reference point for political action and public identities (Milner: 7).

Further factors contribute to similarities between Danish and British EU-attitudes. According to *The Economist* (1999), Denmark and Britain are to a large extent free of historical baggage, suspicious of bureaucracy and generally loath to get involved in the high diplomacy of Berlin, Paris or Brussels. They resent putting more into the EU budget than they take out. They are largely indifferent to the Mediterranean countries: the Iberian pair and Greece are perceived to have different values, nurtured by the strong memory of life under a dictatorship. These factors pose a difficult task for pro-Union camps in Denmark and Britain, who all to a greater or lesser extent have attempted to deny the federalist nature of the EU, thus the White Paper by Mr. Heath in 1971, which stated that EC membership would involve "*no question of any erosion of essential national sovereignty; what is proposed is a sharing and enlargement of individual national sovereignty in the general interest*" (quoted in Holmes (ed.): 318).

One possible explanation to differences between British and Danish European policy lines is that these to a large extent are shaped by different understandings of the state and the nation, which has influenced the content and procedures of policy. As political scientist Henrik Larsen writes, British policy has been dominated by a neo-liberal understanding of the state and Danish policy by more welfare thinking (Larsen: 451). Moreover, Denmark has never had a eurosceptic government or press. Indeed, the EU is supported by a vast majority of the Danish elite, including the business sector, which stands in contrast to the experience of other member states with strong popular euroscepticism (including Sweden and Britain).[1]

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1 Scholars have suggested that the British press now influences political elites rather than the reverse, thus to some extent limiting the government's room for manoeuvre. See Milner: 9.

It can moreover be argued that while Danish popular euroscepticism seems to focus on negative or sceptical feelings towards the *EU*, a great part of British scepticism may importantly be seen to include Europe as a whole. This difference would reflect Denmark's geographical connection to the Continent and Britain's status as an island.[2]

So far, the aim of the paper has been to show that despite frequent casual comparisons of Danish and British public attitudes towards the EU, popular euroscepticism is not a uniform phenomenon that can be instantly compared among member states. This realisation ought to have important implications for the looming referendum campaigns in the mushrooming number of member states that are making use of this institution. A referendum may constitute a blunt manifestation of the prevalence of popular euroscepticism in a member state, and testifies to the importance of public opinion in shaping and constraining the integration process. Its recent popularity deserves closer scrutiny; indeed it arguably represents a seismic shift in EU politics (Keohane). After next year's wave of referenda, Europe's heads of state and government will experience difficulty in not resorting to a popular vote on future EU issues. In other words: referenda are here to stay. Some may find that this element of direct democracy alleviates accusations of a democratic deficit in the EU, but there are other potential implications, some of which are discussed below.

5. Referenda and the role of public opinion in the EU

The EU's two ambitious projects of the early 2000s, Eastern Enlargement and the drafting of a Constitutional Treaty, were formally finalised, in Copenhagen in December 2002 and in Brussels in June 2004, alongside the traditional celebratory speeches. It had been commonplace to stress that the two projects represented the yin and yang of the integration process; the reform of the institutions constituting the almost obligatory effort to reinforce – or deepen – the unity that was challenged by the diversity brought about by ten new members. But there were, of course, also significant similarities between the two contemporary projects (even apart from the word historical!*), which those heads of state and government, who were

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2 The argument appears to be supported by Eurobarometer polls surveying attachment to one's nationality as well as attachment to the EU and Europe respectively.

fortunate enough to both figure in the first family photograph of the reunited European family and to stand as draftees of the first European Constitution, had been keen to underline.

One such similarity is often overlooked. It has to do not with the potential impact or symbolism of a constitution or of enlargement, but with an arguably novel point of concern for EU leaders. Rhetoric surrounding both projects, indeed, seemed to reflect the increased attention awarded by politicians to public opinion in the continuation of the integration process.

As discussed above, political awareness of popular euroscepticism was cemented in 1992 by the laborious ratification process of the Maastricht Treaty. Rejected by the Danes and only narrowly approved by the French, the permissive consensus of the integration process was suddenly hard to defend. Whether or not EC/EU legitimacy had been seen as gradually developing from a functionalist logic – the utility of integration within a policy area over time producing its own legitimacy in the eyes of the public – or as indirectly "just being there" as the result of national governments' sovereign and voluntary decisions to cooperate, the challenge revealing itself following Maastricht was new and alarming. It presented at least three dilemmas to European leaders:

First, popular euroscepticism was becoming accepted and legitimate. The rejection or almost rejection of the Treaty by half the population in both two countries presented with a vote was a battle call for eurosceptic movements, and a reminder to supporters to clarify, present and defend the virtues of the integration process. The EU was being questioned by the public and scrutinised by the politicians and the academics to a greater extent than before.

Second, the Danish and French referenda made it difficult for other EU-leaders to explain to their publics why they were not to be asked on a topic of such apparent contention. Today we are witnessing how calls for referenda have been heard or are likely to be heard by at least nine of the 15 old member states of the Union – many of which have no tradition of subjecting EU matters to popular approval – and how heads of state or government in the remaining states have been subject to accusations of undemocratic and elitist rule. The popularity of the referendum institution arguably has its roots in the post-1992 setting, which had presented European leaders with a "new strategic environment", where citizen's attitudes were "increasingly important" and in which European leaders had to compete for public support for the integration process (Hix 2005, Ch.5: 2, 22). However, as mentioned, increased use of referenda constitutes a potentially very significant development in the history of EU integration, the consequences of which may be far-reaching. The decision to invite Turkey to

join the EU, to mention but one pertinent example, may be seen as representing as much of a constitutional issue for the EU as the Constitutional Treaty. Why, then, would people not be asked to vote on Turkish accession? Indeed, the French has recently been promised a referendum on Turkish membership, a decision likely to be followed by other member states.

One consequence of calling for referenda on major EU issues brings us to the third dilemma arising from the phenomenon of popular euroscepticism: What to do if people say "no"? Surely a "no", "nej", "nie" or an "οχι" is sooner or later going to be the outcome of one or several referenda. It has been pointed out that popular rejection of the Constitutional Treaty would leave the EU in an unprecedented legal limbo as the relevant provisions to dealing with such a situation – quite tellingly – are missing in the Union's existing treaty framework. Political commentators have suggested a number of potential solutions (see for instance Keohane; Rossi), but even viable solutions to accommodating failed ratification of the Constitutional Treaty will not solve the fundamental problem presented to EU leaders by themselves: If "the people" are to be involved in shaping the future of the Union through such an influential institution as the referendum – something which politicians and theorists alike have called for, and something which today's increased attraction of referenda witnesses the development of – then all of a sudden "Europe" may come to have many more defined and legitimated limits than today. At least it does seem problematical to, on the one hand, call for public involvement in, and "control" of, the EU, while, on the other hand, turning a deaf ear to, say, vast majorities of citizens rejecting the idea of Turkish membership. Politicians will have to ask themselves whether popular rejection of this issue would constitute a legitimate reason to declining the Turkish application. If it is *not*, then the beautiful words about openness and democracy that surrounded many of the declarations to hold a referendum on the Constitutional Treaty will arguably loose some of their sincerity: indeed, keeping referenda for those issues where a "no" is unlikely or where internal political concerns are overshadowing other reasons (and refraining from calling them on those issues where a rejection would be truly unpalatable), is unlikely to arouse feelings of a "citizen's Europe" or of "ownership" of the Union.

6. Concluding remarks

The question, therefore, is whether Europe's heads of state and government really are ready to live up to their celebratory speeches of December 2002 and May 2004. In light of the discussion of Danish and British popular euroscepticism, this paper suggested that the increased popularity of referenda constitutes a critical and challenging development in the

history of European integration, with potentially unravelling consequences for the EU's constitutional project, for coming enlargements, but also, in fact, for the future of the very project of European Union. Through the focus on Denmark and Britain – two countries that are frequently compared with regard to their euroscepticism – the paper has put forward the argument that popular euroscepticism is not a uniform phenomenon but instead differs among countries both with regard to degree and type. This finding has implications for the success of European-level strategies in "communicating the EU to its citizens" – a solemnly declared priority of the new European Commission. Indeed, addressing citizens sceptical of the sovereignty-implications of new developments is different from addressing citizens indifferent to the European Continent as a whole. Increased use of referenda makes the need for understanding national differences in opinion even more acute: Communicating the EU to its citizens and communicating citizens' opinions to the EU go hand in hand. What kind of European Union that will emerge from these developments is difficult to predict. What is certain, however, as Steven Everts and Daniel Keohane put it, is that "the era of European integration by stealth is over" (Everts & Keohane).

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