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Good Neighbor and Bad Neighbor?
Differentiation in the US and EU
Southern Neighborhood Strategies
2014-2017

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Social Sciences,
Political Science (S 002)

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Geras kaimynas ir blogas kaimynas?

Diferenciacija JAV ir ES pietų

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Abbreviations

AA – Association Agreement
AAP – Annual Action Plan
AMU - Arab Maghreb Union
CAFTA-DR – Central America – Dominican Republic – US Free Trade Agreement
CARSI – Central American Regional Security Initiative
CBERA - Caribbean Basin Recovery Act
CBI – Caribbean Basin Initiative
CEN Strategy – US Strategy for Engagement in Central America
DACA - Deferred Action for Childhood Arrivals Program
DAPA - Deferred Action for Parents of Americans and Lawful Permanent Residents
DCFTA – Deep and Comprehensive Free Trade Agreement
DoD – US Department of Defense
DoS – US Department of State
EAC – Environmental Affairs Council
ECA – Environmental Cooperation Agreement (between the signatories of CAFTA-DR)
ECoA – European Court of Auditors
EFTA – European Free Trade Association
EIB - European Investment Bank
EMP - Euro-Mediterranean Partnership
ENI - European Neighborhood Instrument
ENPI – EU Neighborhood and Partnership Instrument
ERBD - European Bank for Reconstruction and Development
FTA – Free Trade Agreement
HRO – hierarchical regional order
IABD - Inter-American Development Bank
IR – international relations
IMF – International Monetary Fund
MEDA – Mesures d’accompagnement (Economic support for Mediterranean Partnership countries)
OAS – Organization of American States
ODA – Official Development Aid
PAP – Plan of the Alliance for Prosperity
PfG – Partnership for Growth Initiative
PTA – Preferential Trade Agreement
RDCS CAM – USAID’s Regional Development Cooperation Strategy for Central America and Mexico
RSCs – regional security complexes
SEM - Secretariat for Environmental Matters
SICA – Central American Integration System
UfM – Union for the Mediterranean
UNDP - United Nations Development Programme
WB – World Bank

INTRODUCTION

Thucydides' phrase, "the strong do what they can, and the weak suffer what they must",¹ has often been used by realists to emphasize the seemingly inevitable triumph of more powerful (most often, militarily powerful) states over weaker ones. Thus, neighborhoods marked by strong power asymmetry² between one actor and the other countries seem to be places of conflict, often described using concepts of "sphere of influence" or, more often, "backyard".

While the Cambridge Dictionary defines a "backyard" as "an area of interest and activity",³ when applied in international relations (IR), the concept often describes the patterns of state relations in the immediate neighborhood of major powers. These peculiar relationships, usually "quite different from a normal region" (Womack, 2015, p. 149), encapsulate dynamics of domination, subordination and resistance, and the concept itself has quite a strong negative connotation. Such a vision of regional patterns of interaction reflects the realist point of view, according to which every actor "is compelled within the anarchic and competitive conditions of international relations to expand its power and attempt to extend its control over the international system" (Gilpin, 1981, p. 86). The neighboring regions become the first "frontier" for such expansion.

The thesis of the inevitable domination of major powers in neighboring regions has been challenged by several authors, focusing on the strategies of smaller states.⁴ These studies show that smaller parties might use existing interdependence to elaborate strategies and avoid domination, even in cases of significant power asymmetries. Nonetheless, even these studies do not challenge the idea that all strongly predominant actors seek control over their neighboring countries' different, usually political and economic spheres. Consequently, all regions marked by an asymmetrical distribution of power capabilities between one regional power and the other countries (or unipolar

¹ <https://www.mtholyoke.edu/acad/intrel/melian.htm>

² Understood as the strong prevalence of one actor in terms of material – military or economic – capabilities.

³ Cambridge Dictionary, <https://dictionary.cambridge.org/dictionary/english/backyard>

⁴ There is a body of literature in IR dealing with diverse strategies which small states use in order to increase their power vis-à-vis large states: see Archer, Bailes, and Wivel, 2014; Cooper & Shaw, 2009; Kuik, 2016; Lindell & Persson, 1986. For small state strategies in the EU, see Jakobsen, 2009; Panke, 2010a, 2010b; Thorhallsson, 2000, 2015; Thorhallsson & Wivel, 2006. For the focus on asymmetry in IR and strategies of small states, see Arreguin-Toft, 2001; Long 2013, 2017; Womack, 2015.

regions) should be similar. The interstate patterns of interaction emerging from this structural inequality usually lead to regional hierarchies or “hierarchical regional orders” (Garzón Pereira, 2014). These structures are distinguished mostly by the strength/weakness of domination, or, in other words, by how “baleful or benign” they are (Stratfor, 2017).

Nonetheless, different powers claim to approach power and neighborhood relations differently. While they do not shy away from using the word “backyard” to define their neighborhoods, the content they give to the word seems to be quite different. For example, the EU promises to its backyard “everything but institutions”, drawing on its role as a “pole of attraction” for its neighbors (Prodi, 2002) and maintaining that it rejects power politics completely (Della Sala, 2018, p. 1). The US, meanwhile, oscillates between a promise of “equal partnership” and “mutual respect” (White House, 2009) to direct threats to cut aid in the case of an inability to reduce migrant flows (Wagner & Nakamura, 2018). This variation, together with the growing importance and more assertive behavior of different regional powers, indicates that, in the second decade of the 21st century, “there seems to be no more appropriate time than now to ask what backyards mean for modern geopolitics, and what constraints exist to their formation” (Stratfor, 2017).

This thesis approaches the analysis of “backyards” focusing on unipolar regions⁵ and (hierarchical) regional orders which emerge there. By doing that, this research proposes a more complex framework for classification and comparison of different regional orders. Merging regional power studies and the sociological approach in IR, this thesis debates the one-dimensional vision of regional hierarchy and proposes a more nuanced way of understanding it.

The framework does not explain why different neighborhoods are different or similar. Instead, this research proposes a coherent way of capturing and classifying regions according to patterns of interactions, creating a tool suitable for analysis of regional orders which are both *emerging* (real, existing) and *intended* or *desired* (regional visions laid out in strategic documents and implemented by one actor or another). Such an instrument allows comparison of different regional orders or “regional visions” of different regional powers and tracing of their changes over time or the capture of discrepancies between these visions and reality. In this

⁵ Those with only one materially predominant regional power.

manner, the framework will be of use to those wanting to explain the reasons and limits of the formation of different regional orders.

While the thesis aims primarily to demonstrate the utility and potential of the framework, it is applied to the Southern neighborhood strategies of two Western powers – the US and the EU. They are chosen for an empirical analysis due to the recurrent academic debates about differences in their preferred world orders, regionalism models, and different management of power politics in general. The following sub-chapters more thoroughly present the why's and how's of this research.

Research puzzle

The research presented in this thesis is motivated by the attempt to understand the consequences of the emergence of new regional (and potentially, global) powers⁶ for global politics. The puzzle that drives this effort is related to the discrepancy between claims about the uniform impact of unipolarity on actor behavior and the debate about differences in approaches to power politics.

As observed by the “father” of neorealist or structural theory, Kenneth Waltz, the placement of states in the international system accounts for a good deal of their behavior (Waltz, 1993, p. 45). Analyzing the behavior of the US and USSR during the Cold War, the author observes that both countries were similarly powerful and, despite different ideologies, had very similar behavior patterns, as “each sought to make other countries over in its own image” (ibid. p. 49). While placing emphasis on different aspects of the international system, liberals also agree that “the behavior of states, as well as of other actors, is strongly affected by the constraints and incentives provided by the international environment” (Keohane, 1984, p. 26).

The end of the Cold War and of bipolarity intensified debates about the effects of unipolarity. As Ikenberry, Mastanduno and Wohlforth observed, “concerns over how a unipolar world operates - and how the unipolar state itself behaves - are the not-so-hidden subtext of world politics at the turn of the twenty-first century” (2009, p. 2). As demonstrated by the debate about the “American empire” (see Cox, 2004; Ferguson, 2004; Gilderhus, 2005), unipolarity, a system with one prepotent state, is often related to patterns of behavior such as dominance, hegemony, or empire.

⁶ Such as China, Russia or Turkey among others.

Robert Gilpin summarizes the realist view, claiming that a “state is compelled within the anarchic and competitive conditions of international relations to expand its power and attempt to extend its control over the international system. If a state fails to make this attempt, it risks the possibility that other states will increase their relative power positions and will thereby place its existence or vital interests in jeopardy” (Gilpin, 1981, p. 86). From this perspective, the differences in relative power define the behavior of states (see Handel, 1990; Mearsheimer, 2001; Waltz, 1979).

Similar ideas are advanced by the theories which focus on inequality in the international system. For example, peripheral realism, a school of thought that emerged in Latin America, agrees with the main postulates of realism, but considers, however, that the international system is hierarchic, not anarchic. According to this theory, powerful states hold the place of rule makers and leave limited options (to obey or become a “rogue state”) for weak ones (Escude, 2015). The theory of asymmetry, partially following the premises of liberal institutionalism and promising a more nuanced vision of international relations, points out the capacity of small states to change the behavior of stronger (Womack, 2015). However, it still sustains that its premises are applicable only for those cases where the asymmetry is not “overwhelming”.⁷ In such cases, we would be talking about relationships of domination (ibid. p. 54), as the opportunities for the smaller counterpart to negotiate and resist would be extremely limited.

In summary, the unipolar distribution of material capabilities leads to the dominant behavior of the stronger counterpart, which, in turn, leads to the hierarchic, hegemonic, or directly imperialist regional and global orders. The outcome depends more on the weaker counterpart’s resistance (according to the asymmetry theory) or existing interdependencies (according to liberalism) than on the differences in the visions of regional powers.

The emergence of different powers promising if not to challenge the US (or Western hegemony) globally, then at least to craft their alternatives in regional spaces, has motivated the studies of regional powers. Different authors dwell on very varied spheres of regional politics. Peculiarly, attempts to define what types of regional orders might emerge in the new “world of the regions” (Katzenstein, 2005) are rare. If the once unipolar world is becoming bi- or multipolar, what different regions might emerge

⁷ Womack calls a disparity “overwhelming” the larger is ten times the smaller (the smaller is 10 percent of the larger) bearing in mind population and material capabilities. (Womack, 2015, p. 8)

around major powers? These “backyards” present interesting cases of how different, though similarly asymmetrically powerful, actors arrange their neighborhoods. Can we say that similarly powerful actors organize their regions in a similar, hierarchical manner, creating regions distinguishable from one another only in terms of more or less domination? Studying these processes is relevant, as they can also represent the testing ground of different global-level visions and strategies.

So far, regional strategies of regional powers have been conceptualized as hegemonic, imperial, or leading (Destradi, 2010; Mitchell, 2016; or in similar, though slightly different, terms Prys, 2010), the distinction depending on their coerciveness and one-sidedness. Meanwhile, the typologies of regional orders are limited to questions of polarity (uni-, bi-, and multipolar), and the analysis of particular spheres of interactions (special attention is accorded to the analysis of regional security complexes: see Buzan & Waeber, 2003; Stewart-Ingersoll & Frazier, 2012). Some other authors, especially interested in unipolar regions, use the concept of hierarchy and measure the strength of domination (and submission) through the lens of demands for policy convergence and the tradeoffs given for this effort. For example, Garzón Pereira offers a typology of regional orders ranging in a continuum between “neo-imperial regional formation” and “hierarchical regional society” (Garzón Pereira, 2014).

However, these typologies are not sufficient either to capture the specifics of different regional orders or for their comparison. The focus on relations in one sector (even an important sector such as security) limits our understanding of the broader patterns of regional interactions. Furthermore, narrow, security-focused approaches cannot account for the variety of roles, instruments, and patterns of interaction described in the rich literature on regional powers and their engagement. On the other hand, typologies based on the distribution of capabilities, while being the most general (as they are related to structure), are not particularly informative either about different global systems or about regional systems. According to Ikenberry, Mastanduno and Wohlforth, “describing the system as unipolar leaves unanswered the Weberian questions about the logic and character of the global political system that is organized around unipolarity” (2009, p. 4).

Furthermore, Donnelly, criticizing the structural approach of Waltz, observes that the three structural attributes which Waltz considers essential for any system, “ordering principles, functional differentiation, and distribution of capabilities <...> cannot provide an adequate account of political structures.” In his view, anarchy and hierarchy are not ordering principles, and “polarity is not a plausible conception of the distribution of

capabilities” (2009, p. 50). Thus, according to Donnelly and other authors (for example, Buzan & Albert (2010)), the focus on polarity, together with the erroneous consideration that anarchy and hierarchy are dichotomous ordering principles, leads to a simplified and one-dimensional understanding of complex and dynamic structures, composed of different patterns of interaction. These authors, while encouraging a structural approach, advocate a framework which would underline, rather than erase, significant differences and would open systematic, comparative structural analysis to the concerns of other theoretical approaches, not only that of realism (Donnelly, 2009, p. 50-51). In short, they advocate a structural analysis where hierarchy would be only one of several different dimensions.

A different approach to regions and regional orders is also needed because different actors claim to approach power relations differently. The best cases for such an extended debate about similarities and differences of the management of power relations are two Western powers, the US and the EU. Despite some seeing them as part of “the West” or the “Global North”, various comparative works, often echoing conceptual debates about the “American empire” and “Normative/civilian power Europe”, emphasize their differences. The EU is “an incomplete supra-national body, whose competences over foreign policy issues are weak and need to be constantly re-negotiated among <...> member-states with divergent priorities” (Celata & Coletti, 2016, p. 16). Some authors even claim that from the outset the EU has “rejected power politics and the very notion of hierarchy and hegemony in the international system” (Della Sala, 2018, p. 1). Such conceptualizations picture the EU as the antithesis of the “traditional” great power in a realist sense, the US.

The debate about the EU, the US, and their approaches to power became very lively in the early 21st century. It was framed by two global processes: the “War on Terror” on the one hand, and growing EU external actorness on the other. The first event revitalized discussion about the so-called “American empire” (see Cox, 2004; Fergusson, 2004; Gilderhus, 2005), as academics and practitioners debated America’s engagement with the world, and its readiness to act alone and use military force. In this context, Robert Kagan proposed “to stop pretending that Europeans and Americans share a common view of the world, or even that they occupy the same world” (Kagan, 2002, p. 1). Many authors, focusing on instruments used by the US, the reasons behind its actions, and their consequences, tend to conceptualize it as an empire or hegemon.

Meanwhile, the growing EU actorness prompted debate about how such an unorthodox actor might even operate in IR. The concept of “Normative

Power Europe (NPE)”, coined by Ian Manners (Manners, 2002, 2006), signaled an intensification of discussion about the EU’s global role. According to Manners, “not only <was> the EU constructed on a normative basis, but importantly this predisposes it to act in a normative way in world politics” (2002, p. 252). The numerous adjectives used by those conceptualizing the EU as a power reflect efforts to grasp the peculiarities of its actions. The majority of authors emphasize the civilian characteristics of the EU as a power (for example, Damro, 2012; Meunier & Nicolaidis, 2006). However, others point out its preference for norm-based politics (for example, Manners 2002), or call it an “ethical power” (Aggestam, 2008). These two meta-narratives (“American empire” and NPE) are also reflected in comparative studies dedicated to regionalism modes and “world orders” preferred by the US and EU and in studies of their particular neighborhood projects.

Hettne and Ponjaert (2014) observe that the two sides of the Atlantic represent different world orders: unilateralism often decried as imperialism, and multilateralism intertwined with interregionalism. “There is a place for regionalism in either of these models, but one of a very different sort: neo-Westphalian in the US case, post-Westphalian in the EU one. The first is to be understood as state-centric and rooted in hierarchical power relations; the second is rather more functional in nature as it is centered on multilateral governance efforts” (Hettne & Ponjaert, 2014, p. 115). Similarly, various authors observe that the EU is constructing an alternative cooperation model (based on nominal equality, partnership, and in general, “more human”) for Global South countries (Escribano 2007, Grugel 2004).

Hettne and Ponjaert (2014) also claim that, among other things, by the fact that it deals with the external world differently than “an ordinary great power, driven by geopolitical interests” (2014, p. 135). While the EU does not hide its interests, it has “a pattern of governance with its own distinctive characteristics and the potential of contributing to a world order <...> that would be multipolar, plurilateral, regionalized and compatible with established international law; in contrast to the unipolar, unilateral and national interest-based model which remains at the core of US foreign policy” (ibid., 135-136). Thus, according to the regionalist, the EU creates a different type of global order, based on both different values and different ways of engagement than the one proposed by the US.

The regional policies of the US and the EU have not been systematically compared. However, they have both been labeled “imperialist” and hegemonic by various authors who have analyzed their engagement in their corresponding neighborhoods. As Long observed, the studies of US

engagement in its Southern neighborhood often suffer from a non-critical use of the concept of empire: many works about the US in Latin America start with the proclamation of the US as an empire with little attention to the previous usage of the term or attempts to define it⁸ (Long 2013, p. 15). Often, “empire” goes hand in hand with an equally vague concept of “backyard” (see Grandin, 2001; LeoGrande, 1998; Livingstone, 2009; Reyna, 2006), showing in this manner US dominance over the region and its persistent efforts to maintain it.

Labeling of EU policies in its Southern neighborhood is more difficult, as the authors discuss both the EU’s normative and colonial aspirations. While some authors agree that EU policies confirm it as a normative power (see Adler & Crawford, 2004) in its Southern neighborhood, others vehemently reject the normativity of EU action. This rejection comes from observation of the discrepancies between the EU’s norms and real political priorities (see Dandashly, 2018; Pace, 2009; van Hüllen, 2019) or from criticism of the neo-colonialist patterns of interaction and attempts for dominance, calling out the underlying “ideal power Europe metanarrative” (Cebeci, 2017, p. 58).

Del Sarto (2016) proposes combining both the EU’s normative approach and its tendency to subordinate its norms to its interests, conceptualizing the EU as a *normative empire*. Having analyzed EU policies towards its “borderlands”, the author conceives “the EU’s exporting of rules and practices to neighboring states as the modus operandi of empires in pursuit of their interests” (2016, p. 216). Hettne and Söderbaum, meanwhile, claim that the EU’s neighborhood policies are leaning to the end of *soft imperialism*, defined as “asymmetric relationship, and the imposition of norms in order to promote the EU’s self-interest rather than a genuine (interregional) dialogue” (2005, p. 549). Haukkala, focusing on the Eastern neighborhood, advocates the conceptualization of the EU as a *normative hegemon* that “is using its economic and normative clout to build a set of

⁸ For example, Grandin uses the terms “empire” and “hegemony” as synonyms, discussing everything from the US attempts to rearrange the Mexican economy or, in general, the promotion of free trade, to military interventions and use of American soft power from the 19th century to the War on Terror. Colby (2011) connects the business model of United Fruits Company with the so-called “American empire”, nevertheless without going into the details of what empire is and how it works. Joseph (1998) goes even further, claiming that he has no interest in the “attenuated debate” about whether the US constitutes an empire. According to him, “such arguments <...> ignore structures, practices, and discourses of domination and possession that run throughout US history” (Joseph, et al., 1998, p. 6).

highly asymmetrical bilateral relationships that help to facilitate an active transference of its norms and values” (Haukkala, 2008, p. 1602).

Summing up, while both actors intend to shape and model the behavior of other countries (hence, the label “empires”), at the same time they seem to have different preferences for the structures they create. However, existing conceptual instruments such as hegemony or empire do not permit the systematic capture and comparison of these differences. First, these concepts are themselves contested (for a more exhaustive analysis of what each concept means exactly, see Destradi, 2010). For example, while the most common definition sees hegemony as based on soft power, Lake sustains that it is “necessarily coercive and based on the exercise of power” (Lake, 1993, p. 469). An “empire”, meanwhile, can indicate different ways of engagement, ranging from “a greedy system of subordination based on militarism and global dominance” (Destradi, 2010, p. 910) to imposition of “domestic constraints on other actors through various forms of economic and political domination” or even “leading by example” (Zielonka, 2008, p. 471).

Second, both hegemony and empire have a strong normative connotation, often with empire seen as “bad” and normative power as “good”. As a consequence, the EU being an empire is considered as an aberration. While Jose Manuel Barroso labeled the EU as a “non-imperial empire” (Barroso, 2010), Catherine Ashton promised for EU partners a “post-imperial engagement” (Ashton, 2011). Even those longing for the American empire as a sign of stability often need to apply adjectives which show that this empire is not “*really imperialist*” (for example, Kagan (1998) speaks about “benevolent empire”).

This observation leads back to the debate presented earlier on regional power strategies and orders. As discussed above, regional power strategies have often been conceptualized using the same terms of hegemony and empire (with similar consequences). However, as the cases of the US and the EU indicate, we can also compare the orders that regional powers *prefer*, thus employing the vocabulary coming from studies of regional orders and their typologies. Merging this field of inquiry with structural analysis permits the treatment of each regional order (existing or seen as desirable) as a system, having its own particular structure. The focus on structure – which indicates how the parts of the system “stand in relation to one another (how they are arranged or positioned)” (Waltz, 1979, p. 80) – allows one to look at the general features of the system, making it also comparable with others. Applying a structural theory that goes beyond hierarchy to the analysis of regional orders would allow movement beyond dichotomies of weak and

strong (domination) or good and bad (powers). Moreover, such a framework could be applied both to *intended* regional orders (as described in public discourses and political strategies and reflected in the unilateral actions of regional powers) or *established* regional orders and would allow comparison of the differences and similarities between them.

In summary, while the number of powerful and ambitious regional actors seems to be growing and there is a debate about the differences in their regional and global engagement, our analytical tools for describing, analyzing and comparing their regional engagement (strategies, visions) and its consequences (regional orders) are limited. Structural analysis, correcting the errors of the “polarity + anarchy approach”, offers avenues for expanding it.

Events which took place on both shores of the Atlantic in 2014-2015 provide a perfect testing ground for such a framework. The migrant crisis at the Southern US border forced the US to rethink its engagement with its neighbors and to propose the very first regional strategy for engagement in Central America. A year later, similar reasons, together with the growing assertiveness of Russia’s foreign policy, pushed the EU to rethink its neighborhood strategy as well.

Thus, the post-2014 period offers an opportunity to analyze the coherent visions of the regions which both these Western powers attempted to create around them.

Aim and specific objectives

The goal of this thesis is to build an expanded structural typology of regional orders and, through the analysis of US and EU Southern Neighborhood strategies (2014-2017), to demonstrate its ability to capture more diversified features of existing and desired regional orders than is allowed by concepts of hierarchy and unipolarity.

This thesis has the following **specific objectives**:

1. To demonstrate the limitations of current typologies of regional orders and how structural theory might be applied to and expand the analysis and typology of regional orders.
 - a. To discuss the limitations of current typologies of regional orders;
 - b. To present differentiation theory and trace how different elements of it appear in the studies of regional and global hierarchies;

- c. To demonstrate how a more explicit use of differentiation theory might enrich regional order typologies.
2. To elaborate an analytical tool which allows classification of regional orders according to the interplay between stratificatory/vertical and functional/horizontal differentiation.
 - a. To elaborate a regional order typology based on the differentiation theory and hierarchical regional order framework;
 - b. To operationalize the framework for the study of existing and intended regional orders (or regional strategies).
3. To operationalize the framework for the purposes of this empirical research;
4. To apply the framework to US and EU Southern Neighborhood strategies during 2014-2017, in order to map the features and the change in both vertical and horizontal differentiation principles.
 - a. To demonstrate that both sub-regions can be analyzed as hierarchical regional orders;
 - b. To establish the strength of vertical differentiation in US and EU regional strategies;
 - c. To establish the strength of functional differentiation in US and EU regional strategies;
 - d. To formulate conclusions about their similarities and differences.
5. To formulate conclusions on:
 - a. the similarities and differences of US and EU regional visions;
 - b. the suitability of the framework for the analysis of regional orders.

Theoretical approach

Given the focus on the structure of regional orders and desire to understand them better than allowed by the concepts of “unipolarity” and “hierarchy”, this thesis responds to the invitation of Albert, Buzan and Zürn (2013) to “bring sociology to IR”. These authors, while advocating structural analysis as an avenue to explain stability and change in different systems of international politics, criticize neorealism for its wrong assumptions leading to the simplification of complex structures. Observing that the “ordering principle understood as anarchy/equality and distribution of capabilities understood as polarity obscure, even occlude, the nature and significance of ranking in international relations” (Donnelly, 2009, p.58), they abandon these concepts altogether instead of proposing to analyze different structures using the *principles of differentiation*.

In sociology, differentiation, “in the broadest sense, refers to the form and structure of a large-scale social entity” (Albert, et al., 2013, p. 1), or, in other words to “how and based on which structuring principle, are the main units within a social system <...> defined and distinguished from one another” (ibid., p. 1). Thus, instead of looking at the distribution of material capabilities or (absence of) ranking (*anarchy* and *hierarchy*), these authors focus on how different elements in the system (states, civil society organizations, international organizations, etc.) are organized towards and related to each other. One can distinguish at least three basic principles (or forms) of differentiation:

- *Stratificatory* (or *vertical*, both terms are used interchangeably in this text) differentiation which indicates the ranking and subordination of the parts of the system, an example being an empire or chiefdom where the status defines the ranking of all the political units. Hierarchical systems, as discussed by Waltz, would be organized vertically.

- *Egalitarian* (or *segmentary*, both terms are used interchangeably in this text) which prevails in un-ranked systems, where all the units are considered “like kinds”. An example of a system based on such differentiation is the Westphalian system of states, where, despite differences in their size, capabilities or governance forms, all states enjoy the same rights and obligations.

- *Functional* (or *horizontal*, both terms are used interchangeably in this text) differentiation is a complex and contested concept, depending on the meaning of the term “function” (Cerny, 2013, p. 206). On the one hand, functional differentiation might be seen as differentiation of roles and specialization of actors inside the system. This view is consistent with that of early sociologists who focused on the benefits of specialization and individualization for society in the late 19th century (Stichweh, 2013, pp. 51-53). On the other hand, functional differentiation forms the core of Luhmann’s theory of modern society: one that lacks a top and a center and any central control. In such a society, politics, law, economy, science and art form autopoietically operating partial systems of society following their particular codes (Münch, 2013, p. 71).

As argued by Albert, et al., (2013, p. 229) and Donnelly (2013), all three principles or types of differentiation are interrelated, and what matters is their specific interplay. For example, great power systems are composed of formally equal states (*segmentary differentiation*), with one major actor having more power (*stratificatory differentiation*) and, sometimes, fulfilling different functions (*functional differentiation*). The prevalence of each

principle of differentiation might vary: for example, greater dominance or a stronger hierarchy would indicate more robust vertical differentiation.

In summary, this thesis is based on the observation that the existing definitions and typologies of regional orders are limited and unsuitable for the analysis and comparison of orders emerging around different major powers. While classifications based on polarity do not sufficiently capture differences between different uni/bipolar regions, other typologies are often limited to one sector of cooperation, most often, security. They also tend to emphasize the hierarchical nature of unipolar regional orders, often seeing them as merely weaker or stronger hierarchies. Application of differentiation theory allows the creation of a new typology, capable of capturing the main structural features of regional orders, and their variety and change.

From this perspective, regional orders can be analyzed as systems, where both vertical and horizontal differentiation coexists, as different roles and functional divisions match varying levels of control. Therefore, regional hierarchies can be classified not only according to the prevalence of stratificatory/vertical differentiation but also according to the prevalence of functional/horizontal differentiation. Such an approach allows one to avoid a dichotomy between weak and strong hierarchies (or good and bad regional powers), thus expanding understanding of regional interactions as a whole.

Research design

This thesis has a double objective: on the one hand, to elaborate a typology of regional orders based on the interplay of differentiation principles; and on the other, to apply it to the US and EU Southern Neighborhoods, thereby showing the potential of the framework to capture both their similarities and differences. Hence, the first part of this thesis is theoretical, based on reading and debating the academic literature dedicated to global and regional hierarchy and hegemony. The theoretical part of this thesis concludes with an analytical framework, capturing the interplay of vertical and horizontal differentiation in regional settings.

The second part, meanwhile, is designed as a comparative case study, seeking to demonstrate the utility and potential of the analytical instrument. The basic typology of case studies proposed by Levy (2008) lists four potential strategies: idiographic, hypothesis-generating, and hypothesis testing case study, and plausibility probe. The research presented in this thesis adheres to the last of these. Plausibility probes are the case studies that “allow the researcher to sharpen hypothesis and theory, to refine the operationalization <...> or to explore the suitability of a particular case as a

vehicle for testing a theory” (Levy, 2008, p. 6). Such “illustrative” case studies <aim at giving> the reader a “feel” for a theoretical argument by providing a concrete example of its application or by demonstrating the empirical relevance of a theoretical proposition by identifying at least one relevant case (Eckstein, 1975, p. 109).

This approach means that both case studies might be considered as somewhat limited. For example, when discussing demands by stronger powers of policy convergence, this thesis groups different policies together, without discussing their details, thus diminishing the depth of analysis. However, this simplification helps to achieve a broad comparison, making it more limited but still suitable for testing and improving the framework.

Case and time frame selection

The research narrows its focus from the “Southern Neighborhood” of the US and the EU to smaller sub-regions of the Northern Triangle (Honduras, Guatemala, and El Salvador) and the Maghreb (Algeria, Tunisia, and Morocco). The strategic documents of these regional powers indicate that both see these areas as regions: the EU supports the Maghreb Union and trade integration between its members, and the US the development plan of the Northern Triangle countries. Moreover, both sub-regions are marked by the critical characteristic of hierarchical regional orders as envisaged by Garzón Pereira: hub-and-spoke economic integration and different institutionalized frameworks for negotiated management of policy priorities.

There is no standard definition of what a region is. Nevertheless, most authors refer to a set of states and territories bonded to each other through geographic proximity and some level of interdependence, interaction, and commonality (see Fawcett & Hurrell, 1995; Lake & Morgan, 1997; Russett, 1967). Other authors talk about a “geographically delineated subsystem of the global system, which is composed of adjacent states” (Flemes & Nolte, 2010, pp. 2-3). Thus, to consider any geopolitical entity a region, it has to fulfill two sets of criteria: one of geographical proximity and the other of interdependence (be it commercial, political, security, or cultural). This thesis maintains that in both cases, one can speak of the US and the EU being a regional power. They both form part of their corresponding regions and are highly influential in regional affairs. Moreover, they have both articulated a self-conception or pretension to be a leading power in the “geographically, economically, and political-ideationally delimited” region (Nolte, 2010, p. 15). Both the EU and the US see themselves as powers in the Mediterranean (and the Maghreb) and Latin-

Central America respectively – they draft regional strategies, host regional level meetings, and attempt to play a leading role in the solution of (sub)regional crises ranging from migration and security to climate change and trade.

Since the EU is not a state, but an organization where foreign policy is mostly left in the hands of its member states, the question of comparability needs to be addressed. This thesis approaches this question focusing only on EU level strategies and documents and excluding member state policies (their development strategies and projects implemented in the Maghreb countries). Such an approach limits the understanding of the full scope of EU engagement: for example, while discussing official development aid (ODA) or cooperation in terms of migration management, it excludes certain areas supported by EU member states, despite the potential for agenda sharing with the EU. However, limiting the analysis to the EU institutions diminishes challenges of comparability and still allows an understanding of what vision of the neighborhood the EU has as an entity. In other words, this thesis maintains that the EU has enough actorhood⁹ in the field of neighborhood policy to be compared with the US. That does not mean that the EU's power is equal to that of the US'. Quite to the contrary, the EU being a Western supra-national entity and the US being a nation state allows comparison of the preferences and intentions of actors having (seemingly) similar values and being similarly more powerful than their neighbors, but very different in terms of their structures and existing capabilities.

The time frame (2014-2017) has been chosen since, at the end of 2014, responding to new security challenges, both the US and the EU adopted new strategies redefining their engagement with their southern neighbors. While for the EU this was already the second review of its Neighborhood policy, for the US, this was the first time it had elaborated an overarching and holistic strategy for its engagement in its Southern neighborhood (Mexico and Central America).

The four-year period which has passed – 2014-2017 – allows an evaluation of the similarities and differences between the regional orders proposed by the two powers to their dependent, but nevertheless significant

⁹ Sjöstedt (1977) distinguishes two characteristics necessary for an entity to be considered an actor: “it must display a minimal degree of both internal cohesion and separateness from its external environment” (Sjöstedt, 1977, p. 15). The more recent approaches of Bretherton and Vogler (1999, 2006) and Jupille and Caporaso (1998) added the external constraints and opportunities of the EU's structural environment (Klose 2018). The concept of actorhood has been used to compare different EU policies with that of the US (or other actor) by Börzel, et al., 2015; Brattberg & Rinhard, 2012; and Murau & Spandler, 2016, among others.

neighbors. 2017 is chosen as an endpoint for two major reasons. First, for the EU, it was the mid-term period of its strategy, with the first mid-term evaluations published in 2017. Second, the new presidency of the US started drawing up its policies in 2017, leading to significant changes in 2018. Thus, 2017 was the last year when we could speak about the continuation of the initial strategy.

Scope of analysis

This thesis focuses on the *intended* (or *desired* – used interchangeably in this text) regional orders or, in other words, on the regional orders which the regional powers attempted to create during the period of analysis. Consequently, it does not analyze the actual regional orders which were created. The difference is crucial as it narrows down the scope of analysis and affects the operationalization of the framework, as it includes only the documents and actions of the regional powers.

There are several reasons for this choice. First, such a scope is chosen due to an interest in the ways in which different powerful actors prefer to shape their surrounding regions. Hence, there is a focus on their intentions and not on their consequences. Second, various authors claim that the regional powers play a “disproportionately critical role in the creation, maintenance, and possibly breakdown” of regional orders (Stewart-Ingersoll & Frazier, 2012, p. 2). Thus, while studying their visions limits this research, it accounts for the most important element of the potential emerging regional order. Third, by focusing on the intended regional order, this thesis does not address the question of effectiveness and therefore does not enter into a discussion as to whether, for example, the goals were achieved. This limit is also important since, due to the comparative approach, the empirical analysis is already broad, and inclusion of the foreign policies of the smaller states would have expanded it considerably.

In summary, studying *intended* regional orders is not a perfect, yet it is still a sufficient way to demonstrate the utility of the framework and differences between the ways in which the various actors imagine their surrounding regions. Having said that, this thesis still proposes a way of operationalizing the framework by making it suitable for studying *established* regional orders.

Data

The analytical framework proposed in the first part of this thesis structures the empirical research and defines the data used for it. Due to the interest in a snapshot of the regional order preferred by both actors during the period of analysis, the primary source of the data is official documents. Thus, the first step in the empirical research is a careful reading of global and regional level strategies (the US Strategy for Engagement in Central America (CEN Strategy), USAID's Regional Development Cooperation Strategy for Central America and Mexico (RDCS CAM), the Reviewed ENP of 2015, and the EU's A Global Strategy for the European Union's Foreign And Security Policy (Global Strategy)). To gain more insight, sub-regional and bilateral documents for six countries, such as trade agreements, cooperation strategies, and cooperation programming documents, complement these general strategies. Moreover, in order not to limit the research to document analysis, this thesis also looks at bilateral and regional financial assistance, which indicates what policy priorities both regional powers have chosen to finance and what conditionality mechanisms they have used. Similarly, this thesis uses data on trade and trade agreements, migration and remittances.

The data on ODA comes from the OECD data base for the purposes of general comparison, and the USAID and Europe Aid websites for a more detailed look at the projects implemented. In the case of the EU, the thesis omits bilateral ODA between the Maghreb countries and EU member states, focusing only on EU institutional aid managed by the European Commission and European Investment Bank.

Finally, the secondary sources - evaluations, analytical reports (for example, briefs prepared for Congress by the Congressional Research services, a rich source on the US perspective) and academic articles - help to contextualize the strategic documents and to form a broad and comprehensive view of the regional orders preferred by these two Western powers in their Southern neighborhoods from 2014 to 2017.

The documentary sources are analyzed using, in the words of O'Leary (O'Leary, 2017, p. 498), the "interview technique", which indicates a careful reading of documents to answer specific questions predetermined in the phase of elaboration of the conceptual framework. Chapter 3 presents more thoroughly the data and procedures used in the analysis.

Thesis statements

The application of the framework elaborated in this thesis allows the formulation of the following statements:

First, while the literature on regional and global hierarchies tends to see them only in terms of strong/weak domination, different regional powers may have different preferences in terms of both, stratificatory/vertical differentiation and functional/horizontal differentiation.

This research demonstrates that regional orders preferred by the US and the EU during the period of analysis were similar in terms of stratificatory differentiation (moderate) and different in terms of functional differentiation (moderate and strong, respectively). Both powers intended to create regions distinguished by moderate vertical differentiation. They both attempted to reform various domestic policies in neighboring countries. They both established clear mechanisms of sanctions and inducements, mostly giving preference to the latter. Simultaneously, they both attempted to present their strategies as highly legitimate (or inclusive).

At the same time, both powers had different preferences for functional differentiation. The US undertook a limited role in sponsoring the resolution of specific regional challenges and supported the institutionalization of a limited number of regional interactions. Meanwhile, the EU committed itself to the sponsor's role in financing and coordinating the solution of a broad range of regional problems. Moreover, it supported the emergence of a broad range of formal and informal institutions in various spheres.

Second, while the literature on hierarchy suggests that stronger functional differentiation should weaken stratificatory/vertical differentiation, this research shows that this is not always the case.

The research has demonstrated that a regional power may prefer a regional order with weak functional differentiation and strong stratificatory differentiation. However, this is not always the case. Even more, a change in one principle may not lead to changes in the other. While both the EU and the US changed their regional strategies during the period of analysis, these changes were not uniform. While the US strategy changed in terms of both functional and stratificatory differentiation, the EU's preference for strong functional differentiation seems to be stable despite weakening stratificatory differentiation.

Relevance

This thesis goes beyond a one-dimensional vision of hierarchy, based mostly on vertical differentiation. It proposes a new approach to the typologies of regional orders which allows the elaboration of a more complex matrix encompassing the roles undertaken by regional actors and the different institutions active in the regions. In that sense, such a framework is very suitable for the analysis of “backyards” (or hierarchical regional orders), as it captures both the level of domination and the level of engagement and complexity of the regions.

The framework elaborated is suitable not only for the cases of the US and the EU but also for the analysis and comparison of other regional orders or change of regional orders during the relevant period. Moreover, the framework can be operationalized to study both established and desired or intended regional orders. In this way, the analytical tool presented in this thesis might serve not only to create a better understanding of what a “backyard” is but might also be used to provide insights about the causes underlying the change and formation of a certain type of regional order.

The empirical part of the thesis also provides insights into perceived similarities and differences in the US’ and EU’s preferred regional orders. While one cannot automatically transpose the conclusions of the mid-level analysis to the macro level, the similarities in terms of vertical differentiation and differences in terms of functional differentiation might explain the contradictory evaluations of US and EU engagement with other actors. While both of them have clear preferences for how the world (and their neighbors) should be, and seek to change them, the EU more willingly engages in regional affairs, undertakes various roles, and directly or indirectly supports the creation of different institutions.

Furthermore, the empirical part also offers insights into the debate about the management of asymmetrical regional relations. It seems that even such a peculiar actor as the EU still desires to create “vertically organized” regions, this being limited mostly by the extent of its capabilities. A further comparison of regional strategies of other rising powers such as China and Russia (and maybe even Turkey), or a longer-term analysis of desired regional orders of the US and the EU, are needed to obtain a more thorough picture of asymmetrical relation management. However, this limited empirical analysis would seem to indicate that, when “the powerful can”, they tend to accentuate regional hierarchies.

Finally, this thesis expands the application of differentiation theory in IR. This concept, which was created to study macro-level global phenomena,

is adapted to the study of regional orders, thereby bridging studies of regional orders and sociology. So far, various authors have applied differentiation theory to study different global phenomena. For example, Donnelly (2006) uses it to analyze the so-called “American empire” or to propose a new approach to hierarchies in IR (2009, 2012). Kleinschmidt (2018) and Lees (2012) focus on vertical differentiation to study the North-South divide. Meanwhile, in their edited volume, Albert, Buzan and Zürn (Albert, et al., 2013) bring together authors discussing both the applicability of differentiation theory to different aspects of IR and the utility of doing so. The concept of “global society” inspires the majority of these authors, who are not interested in mid-level regional analysis. In that sense, this thesis offers new avenues for the application of differentiation theory in IR.

According to Buzan and Albert, “differentiation could make a major contribution to IR theory, and... by adapting it for this purpose, IR might itself make a more significant contribution to social theory than it has done so far” (Buzan & Albert, 2010, p. 4). The results of this research refute classical social theory, which suggests that one form of differentiation should normally be dominant. This thesis confirms the observations of Buzan, Donnelly and other authors developing differentiation theory, that all three basic types of differentiation are strongly in play and that what matters are the specific mixtures and their interplay (Albert, et al., 2013, p. 229). The proposed typology of regional orders allows one to capture precisely this interplay and its change.

Outline

The goal of *the first chapter of the thesis* is to present the theoretical approach guiding this research. It demonstrates how the concept of differentiation might help to expand and deepen our understanding of the different types of regional orders forming in IR. To do that, first, it discusses different definitions and typologies of regional orders, demonstrating that the majority of them are narrow and security-focused. Second, it demonstrates how the concept of differentiation can help to expand them. The chapter concludes by arguing that any system, even those commonly considered as ‘hierarchical’, could be studied as a system where various differentiation principles overlap. This conclusion becomes a departure point for the analytical framework that is laid out in chapter 2 of the thesis.

The second chapter expands and operationalizes the conceptual framework that guides the analysis of empirical data. It expands on three main criticisms to Garzón’s Pereira’s hierarchical regional order framework:

it is vague and difficult to operationalize; two of the three areas are overlapping; and, most importantly, it sees functional differentiation as weakening vertical differentiation. Based on these observations, the thesis proposes a two-dimensional approach to regional orders, measuring the strength of stratificatory/vertical differentiation and functional/horizontal differentiation. The chapter ends by proposing a framework of nine potential regional orders based on the strength of two differentiation principles.

The third chapter discusses more thoroughly the operationalization of the framework, making it suitable for the study of regional power strategies. The chapter also discusses the data, questions and procedures used for the analysis, and lays out the structure of the empirical chapter.

This modified framework is applied to US and EU neighborhood policies during the period 2014-2017 in *the fourth chapter* of the thesis. First, through the brief presentation of regional cooperation before the period of analysis, the thesis demonstrates that both sub-regions can be analyzed as hierarchical regional orders. Second, the chapter discusses the regional orders which the US and the EU attempted to build during the period of analysis. First, it explores vertical differentiation, observing that, while there are some differences, the strategies are very similar, as both powers have clear preferences for how their neighborhood should look and use different (though mostly positive) instruments to induce the desired change. The chapter goes on to focus on horizontal differentiation, where major differences appear. While the original CEN Strategy seems to envisage a broader US engagement in the region, functional differentiation during the period of analysis weakened, as the US continued to focus, mostly, on security-related issues. The EU, meanwhile, seems to have a continuous and robust preference for functionally differentiated regions, where it would be part of different networks, spreading across different issue areas. Thus, while both are willing to dominate, the US and the EU indeed create different “backyards” in terms of the roles they fulfill and the density of different formal and informal institutions emerging in the process.

The final chapter of the thesis summarizes the thesis and proposes avenues for further research.

1. REGIONAL ORDER AS AN INTERPLAY BETWEEN STRATIFICATORY AND FUNCTIONAL DIFFERENTIATION

This chapter presents the theoretical approach guiding this research and proposes a new analytical typology of regional orders. It starts by presenting a definition and discussion of the typology of regional orders. After elaborating on the working definition of regional order, the chapter presents the “hierarchical regional order” framework proposed by Garzón Pereira (2014) and discusses its limitations. These observations are followed by discussion of how differentiation principles have already been reflected in the debates about hierarchy, hegemony and legitimacy in regional and global politics. The chapter concludes by claiming that regional and global hierarchies can be analyzed by looking at the prevalence of various differentiation principles.

1.1 Typology of regional orders in unipolar regions: what kind of hierarchy?

1.1.1 Regional orders and their typologies

Two key events – the end of the Cold War and the rise of new powers at the beginning of the 21st century – increased academic interest in regions and regional powers. In the new context of unipolarity and the growing importance of regions, various authors analyze the impact of the absence or presence of regional powers on peace and conflict in the region (see Buzan & Waewer, 2003; Stewart-Ingersoll & Frazier, 2012; Lake & Morgan, 1997). Others build ideal regional power typologies (see Prys, 2010; Mitchell, 2016), or analyze their engagement in the region and the roles they assume (see Burges, 2008, 2015; Flandes, 2010; Pedersen, 2002). Finally, some authors (see Destradi, 2010; Destradi & Gundlach, 2014), criticizing the focus on what an actor is, rather than what an actor does, propose analysis and typologies of regional power strategies. Peculiarly, attempts to define what a regional order is, and what types of regional orders might emerge in the new “world of the regions” (Katzenstein, 2005), are rare.

While many of the works cited above mention the concept of regional order, it is often left undefined. For example, Fawcett and Serrano, in their analysis of Latin American regionalism, talk about regional order as a particular “idea of the region” proposed by local thinkers such as Simon Bolivar or Andres Bello (Fawcett & Serrano, 2005, pp. 30-32). Similarly, in the edited volume titled “Regional Leadership in the Global World”, the

authors discuss regional order as some patterned interactions, shaped by regional powers (Flemes, 2010), without actually offering a clear definition. It seems that, similar to “order” in IR, it is often understood as merely (international/regional) reality (Malmvig, Quero & Soler i Lecha, 2016) or management of, most often, conflicts.

For some, “order” is a synonym for peace, stability or predictability (Armstrong 1993, p. 4). For example, Hoffman maintains that order in international relations consists of “formal or informal rules that allow for the moderation of disputes and a measure of security and stability” (Hoffman, 1978, p. 3). Similarly, Parent and Erikson (2009) define order as a pattern of activity that limits the frequency and intensity of violence among the units within an international system, thus limiting the objective of any international order to the security dimension and, more narrowly, to a decrease in levels of hostility.

Not accidentally, “regional order” as a concept is used especially often to analyze security and conflict dynamics in regional settings. Lake and Morgan talk about regional order as “the mode of conflict management within the regional security complex” (1997, p. 11). Similarly, Lake sees regional order as a manifestation of “how states within a regional security complex manage their security relations” (Lake, 2009b, p. 36). In such security-oriented research, regional orders often overlap with regional security orders or regional security complexes (RSCs, see Buzan & Waewer, 2003; Lake & Morgan, 1997; Stewart-Ingersoll & Frazier, 2012), placing emphasis on the conflict or the peacefulness of the region.

However, this is a narrow view of order both in IR and in the regional spheres, as it attends to only one aspect of a very multifaceted concept. In “The Anarchical Society” (1977, p. 8), one of the founding fathers of the English School, Hedney Bull, defines order as “a *pattern of activity* that sustains the elementary or primary goals of the society of states, or international society” (emphasis added). In his view, “international society” is a group of states, conscious of their shared interests and values, which recognize that they are bounded by common norms ruling their relations (Bull, 1977, p. 13). Among other functions, these norms preserve international society by avoiding the “elimination” of any actors, safeguarding states’ external sovereignty, maintaining peace among all the actors within the system, and preserving property (Bull, 1977, pp. 18-21). Thus, while encompassing the topic of security, order is a much broader concept.

Some authors, such as Acharya (2007) and James (1973), observe that the concept of order in IR has two slightly different meanings,

emphasizing different aspects of it. According to Acharya (2007, p. 637), the first sees order *as a characterization of the status quo distribution of power*, with no attention paid specifically to its effectiveness (or lack thereof) in producing peace or security. The second refers to *an increased level of stability and predictability* within the system. The latter is more of an outcome-oriented conceptualization, while the former is descriptive and not focused upon the attainment of any particular objective of order.

Somewhat similarly, James observes that the concept of order has two aspects. The first denotes *the existence of method and regularity and limits* to areas of unpredictability in the affairs of a particular society. The second aspect recognizes that social life is inherently dynamic rather than static and *emphasizes the need for clear procedures* within which change may take place (James, 1973, pp. 61-63, quoted from Armstrong, 1993, pp. 4-5).

Summing up the discussion, “order” might mean an arrangement *for* something (usually peace). However, it might also signify *how* the arrangement is maintained. Thus, while security-focused frameworks usually emphasize the goal (peace, or establishing minimum or maximum conditions for coexistence), “order” can be understood more broadly. In his work on order and revolutions, Armstrong (1993) focuses on the regularity and continuity of a specific web of rules, practices and assumptions. These elements are accepted among the members of society as legitimate and affect how they operationalize changes within that society. Similarly, before dwelling on the analysis of regional security complexes, Stewart-Ingersoll & Frazier define regional order as “the governing arrangements among the units of a system, including their rules, principles, and institutions, which are designed to make interactions predictable and to sustain the goals and values that are collectively salient” (Stewart-Ingersoll & Frazier, 2012, p. 18).

In the broadest sense, one can conclude that “regional orders are made of multiple details and changing contingencies, of security dilemmas and economic interdependence, of relations between democracies and autocracies, war and peace” (Solingen, 1998, p. xi). Interestingly, the studies focusing on regional orders often ignore economic (or other, for example, political) elements. As Flemes observes, “in IR theory there has been a bifurcation between the economic region – the central topic of studies on regionalism and regions – and the security-related region” (Flemes, 2010, p. 3). According to Flemes, economic and security cooperation “could not be separated because economic cooperation presupposes a low level of conflict or at least the management of security-related conflicts in the region. Most regions possess both security-related institutions as well as institutions that

manage economic issues, and there may be reciprocal spillovers – from economic to security interactions and from security to economic interactions” (Flemes, 2010, p. 3).

This thesis defines regional order as “*patterned interactions between the states of the region*”. The sphere of interaction (security, economic, or any other) or goal of interaction (peace, economic integration, conflict management) are regional order’s secondary characteristics. First, such a broad definition of regional order allows the observation of both stability and change (thus “patterns of interaction”). The repeated behaviors and patterns reflect both static (norms, institutions) and dynamic (repeated or changing practices) features of the region, depicting them as continually changing systems and structures. Second, seeing regional orders as patterned interactions allows one to account for a wider variety of regional orders, not limiting the focus of analysis to one particular sphere.

Currently, the majority of explicit typologies dedicated to regional orders can be called one-dimensional as they are evaluated in terms of security management and located in a spectrum ranging from conflict to cooperation. For example, Lake and Morgan (1997) define five types of regional orders: balances of power, regional power concerts, collective security organizations, pluralistic security communities, and integration. These different models of conflict management are directly related to the level of violence in the region, since, according to Lake, “as regional states move ‘up’ this continuum of regional orders, relations generally become more peaceful and interactions less colored by actual or threatened violence” (Lake, 2009b, p. 36). Consequently, this typology is deemed “vital for the analysis of the security arrangements within a regional security complex and comparative analysis of RSCs” (Morgan, 1997, p. 38).

Comparative analysis (or better understanding of RSCs) also motivates Buzan and Waever’s typology. Basing their observations on power distribution (or polarity) and variations in amity and enmity, these authors characterize four different RSCs, distinguishing between standard and centered RSCs, the latter divided into four sub-types according to the ‘power’ on which the RSC is centered. Moreover, they distinguish between great power RSCs and super-complexes, which stand for one or more great powers which bind different RSCs together (Buzan & Waever, 2003, pp. 55-62). Despite matching structural features (ordering principles) and dynamic features (roles and relations) of the region, these typologies are limited to security relations. While in his other work Buzan includes economy, environmental and societal issues in his analysis, he studies them as “new” sectors for security (Buzan, 2003, p. 141). However, as empirical

reality demonstrates, security management, while important, is only one of the issue areas in regional interactions. Thus, security-focused typologies do not capture the whole complexity of the region.

The hierarchical regional order framework elaborated by Garzón Pereira (2014) represents by far the most comprehensive attempt to elaborate a potential typology of regional orders and to take into consideration both a pattern of interactions and unequal power distribution. The following chapter presents the model and its limitations.

1.1.2 Hierarchical regional orders: the framework and its limitations

Elaborating on the concept of “benign unipolarity” conceived by Charles A. Kupchan, Garzón Pereira observes that any regional order emerging in hierarchical regional systems has at least three constitutive elements. First, there is hub-and-spoke social, political, and economic integration. Second, there is a consensual bargain, and third, an exchange of concessions between the regional (great) power and the smaller regional states (Garzón Pereira, 2014, p. 31). The first two elements – the asymmetrical interdependence between the regional power and the smaller states, together with peaceful resolution of bilateral and regional issues – are considered as “important complementary variables to understand order within regions characterized by a marked power asymmetry” (ibid. 31). Meanwhile, the third element – the negotiation around three main issues of contention – policy convergence, the transfer of material resources, and the nature of the regional institutions – allows classification of the regional order.

Garzón Pereira’s framework establishes two ideal types of regional orders: “(neo)-imperial regional formations” and “hierarchical regional societies”. While the former represents an extreme form of hierarchical relationship commonly referred to in the literature as an “empire”, the latter can be conceived as an ideal regional formation in which order is a “contract” which permits both strong and weak states to attain valued foreign policy goals. While Garzón Pereira does not state this explicitly, the main difference between these two ideal types is the perceived benignness of the regional order, understood through the lens of interference in the policy decisions of the smaller states, redistribution, and certain self-restriction through regional level institutional power constraints.

At one extreme, the (neo)-imperial regional formation, the stronger power interferes in the domestic affairs of the weaker ones, does that often, in a broad spectrum of policies, and limits the ability of its counterparts to organize and contest its power. At the other end of the continuum, despite

having more resources and capabilities, the regional power avoids demanding policy convergence, especially in the domestic sphere; and foresees region-wide mechanisms to redistribute resources and political power towards the weaker states through the production of regional public goods, and the creation of regional organizations (ibid., p. 27)

Table 1. Characteristics of two ideal-type regional orders (elaborated by the author, based on the model of Garzón Pereira (2014))

(Neo-) imperial regional formation	Hierarchical regional society
<= Policy convergence: range, domain & intensity =>	
<ul style="list-style-type: none"> - A broad range of policies required for convergence (not only foreign policy but also domestic policy) - Requirement for policy convergence sustained over time (repeated in different strategic documents during the period of analysis) - A requirement of convergence supported by sanctions and/or retribution (clearly defined and used mechanisms) 	<ul style="list-style-type: none"> - Narrow range, mostly foreign policy - Ad hoc demands (related to concrete issues) - Lack of clear sanctioning mechanism (in the strategic documents), lack of sanctioning actions
<= Resource transfers: direction, magnitude & modality =>	
<ul style="list-style-type: none"> - Provision of systems to move resources from the smaller states to the center - Amount of resources distributed is insignificant for the smaller countries - Either: no visible attempt to pass resources from the center to the periphery, or: attempts to extract resources from it - Regional power avoids producing regional public goods unless directly related to its foreign/domestic policy interests - Ad hoc transfers (as part of a stick and carrot policy) 	<ul style="list-style-type: none"> - Setting a clear framework for the transfer of resources from the larger state to the smaller ones (i.e. preferential trade agreements, development aid, technical assistance) - Amount of resources foreseen is significant for the smaller countries - Agrees to produce regional public goods (i.e. funding for regional organizations or different regional security, healthcare, etc. initiatives) - Financial flows are reliable and consistent
<= Institutional power-constraints =>	
<ul style="list-style-type: none"> - Opposition to the creation of regional institutions; or - Promotes institutions that enshrine/strengthen power asymmetries and represent the foreign policy aspirations of the larger state 	<ul style="list-style-type: none"> - Regionalization of the region is encouraged - Efforts are made to reduce existing power asymmetries

Unlike the authors discussed in the previous sub-chapter, Garzón Pereira explicitly aims at building taxonomy of regional orders. Moreover,

his framework allows the inclusion of different sectors of cooperation which might be prevalent in different regions, thereby offering a more holistic vision of a regional order. Finally, while the theoretical framework which guides this effort is neoclassical realism, and not any structural theory, its focus on the “transactional bargain or give-and-take dynamic in which both types of states pursue distinct foreign policy objectives in accordance with their respective power positions within the regional and international system” (Garzón Pereira, 2014, p. 33) reflects the structure of the order.

The focus on patterns of interaction and asymmetry makes the framework of Garzón Pereira’s typology a perfect starting point for the inquiry of this thesis. However, his framework has a few weaknesses. First, the framework’s operationalization is complex as there is an unclear relation between the three dimensions, making it difficult to estimate the “benignness” and “coerciveness” of the specific regional order and to compare it with others. The author himself maintains that “in the real world most hierarchical regional orders will not perfectly fit into either extreme ideal-type in the sense of straightforwardly featuring even negative or even positive values in all three dimensions. An uneven hierarchical regional order (for instance, scoring low in resource transfers and policy convergence but displaying some degree of institutionalization of power-constraints), however, will be clearly less benign than a uniformly ‘hierarchical regional society’ but more benign than a uniformly (neo-)imperial regional formation” (Garzón Pereira, 2014, 38). Such a vague definition creates a universe of potential regional orders. Moreover, the “scores” for resource transfer and regional institutionalization might vary not only in scope but also in type. For example, is the creation of regional public goods, such as security protection, equal to the support of regional-level infrastructure projects?

Second, while Garzón Pereira sees resource transfer and regional institutionalization as separate spheres, they are related and difficult to separate from one another. On the one hand, resource redistribution sustained over time and involving significant amounts requires a certain level of institutionalization. For example, just as preferential trade access requires trading agreements, large scale development aid transfers or production of regional public goods require certain practices and institutions to manage them. On the other hand, support for regional institutionalization, either on a small or more significant scale, actually requires investment or resource transfer.

Third, the model rests on the distinction between coerciveness and benignness, which is difficult to define, especially in cases where power

asymmetry is extreme. For example, looking at hegemony from the Gramscian school perspective, hegemony is discursive and relational, ensured through political and ideological leadership, instead of being based on brute power. Socialization and ideology might make it difficult to distinguish between common goals and those which reflect only foreign policy aspirations of the regional power. Moreover, empirically, many dynamics of power-resistance are difficult to observe. For example, the Organization of American States is widely criticized for being a platform and puppet of US interests. However, studies such as those elaborated by Shaw (2003), or the failure of the US candidate to join the Inter-American Commission on Human Rights in 2017, demonstrate that US influence is more limited. Can one conclude that this regional organization strengthens power asymmetry between its members and the US or on the other hand, gives them a useful tool to solve particular regional challenges?

Finally, and most importantly, this division between coercion and consensus reflects the one-dimensional vision of hierarchy: it is seen only in terms of how much control one actor has and how much they are ready to give in return. Moreover, while the three dimensions of negotiation are theoretically not connected, resource transfer and regional institutionalization are seen as *compensating* for the pressures in the policy convergence sphere. In the words of Garzón Pereira, demands for policy convergence, taking place in spheres “which are essential to the regional (great) power’s Grand strategy are <...> part of the transactional bargain by virtue of which the smaller states are *compensated in other issues* of contention of their concern” (2014, p. 38, emphasis added). Such compensation consists of the “superior resources <...> [which] flow toward the weaker states on a regular and reliable basis, and a set of institutional rules and norms that manage the use of preponderant power can be observed” (ibid). This thesis argues that, while such a view reflects conventional definitions of hierarchy and legitimacy, it is fundamentally flawed, as it places in opposition two complementary principles defining the structure: an actor can BOTH be domineering and willing to control AND redistribute resources, create international organizations and produce regional public goods.

To elaborate more on this argument, one needs to go back to the debate about the structure and structuring principles in IR. The next sub-chapter elaborates this argument, discussing the premises of differentiation theory, an approach explicitly dedicated to the analysis of systems and structures.

1.2 Differentiation theory and regional orders

1.2.1 Differentiation in international politics

The analysis in this thesis is based on the premise of the so-called theory of differentiation, the latter meaning a process to distinguish and analyze the components which make any social whole (Buzan & Albert, 2010, p. 316). This theory, born of inquiries in the field of sociology, seeks to understand the underlying patterns of the arrangement of society. As observed by Albert, et al. (2013), in sociology, the postulates of differentiation theory are reflected in two strands of literature: first, some sociological approaches, like those advocated by Parsons or Luhmann, explicitly engage in discussion about differentiation as labor sharing in society. Second, much of classical sociology has always been about the differentiation of society, without the term being used explicitly: concepts such as “division of labor”, “role differentiation” and “specialization” indicate the existence of specific differentiation patterns in modern society (Albert, et al., 2013, pp. 2-3).

Albert, et al. (2013), Donnelly (2006, 2009, 2012, 2013), Kleinschmidt (2018), Lees (2012) have strongly advocated the utility of the theory for IR. As observed by Albert, et al. (2013), the “approach based on differentiation theory allows the analysis of changes on a macro level by using the coherent and highly durable framing of an interplay between various forms of differentiation” (2013, p. 4). Nonetheless, until recently, differentiation has been “strangely absent from IR” (Donnelly, 2009, p. 50).

Differentiation appears more explicitly in the works of Waltz, who engages in the application of sociology, mostly the works of Durkheim, for his system-level explanation of world politics. In his “Theory of International Relations”, Waltz claims that every structure is composed of three elements: ordering principles (hierarchy and anarchy), functional differentiation, and distribution of capabilities. Given that the international system is anarchic and states compete in a self-help system, functional differentiation in the latter is irrelevant: there is no division of labor when all actors try to be self-sufficient (Waltz, 1979, pp. 79-101).

The “Waltzian” approach, while very influential, has been widely criticized by scholars desiring to analyze the structure of IR and observing what they consider to be errors in the neorealist framework. The main critics of Waltz from that perspective, Buzan & Albert (2010), Albert, et al. (2013), and Donnelly (2008, 2012, 2013), agree with his claims that “a structure is defined by the arrangement of its parts” (1979, p. 80) and that ranking is central to that arrangement. Nonetheless, they observe that neither hierarchy

nor anarchy are ordering principles themselves, as they indicate instead a lot or a little of super-ordination (Donnelly, 2009, p. 52). Moreover, as these authors observe, super-ordination is only one way to arrange the units, and even without hierarchical ranking, there might be other types of arrangements. These critiques of Waltz advocate the use of the concept of “differentiation” instead of the concept of “ordering principle”, claiming that it offers more opportunities for a better understanding of the international system. As Donnelly observes, if we agree with Waltz that the arrangement of its parts defines a structure, then differentiation defines the structure. Furthermore, in his view, differentiation theory is precisely what structural theories (which, in the words of Waltz, provide a “purely positional picture of society” (Waltz, 1979, p. 80)) depict.

Summing up, differentiation theory looks not at the units which compose the structure but at the ways they are organized: how they relate to each other and what roles they undertake to keep the system functioning. Any differentiation is a feature not of the actors but of the system, whose structure is characterized by existing ranks, functions, and their interplay. In that sense, international, regional, global or national societies or systems are similar – they are all composed of interrelated parts, organized in certain ways. The taxonomy of differentiation can vary from author to author, but various authors, e.g. Albert and Buzan (2010), follow Luhmann (1982, pp. 232–8), who approaches the matter in terms of fundamental principles, noting that “only a few forms of differentiation have been developed”: segmentary, stratificatory and functional.

✓ **Segmentary/egalitarian differentiation** establishes non-hierarchical segmentation. In anthropology and sociology, this simplest form of social differentiation points to families, bands, clans and tribes. In IR, it points to anarchic systems of states as “like units” or “like kinds” (Buzan & Albert, 2010, p. 316). In IR, the Westphalian order illustrates segmentary differentiation. In such a system, all states are equal and (at least officially) similar to each other, despite their size, economic, military potential and political system. As stated in Viola (2013, p. 112), it is conventionally accepted that the major development of the modern international system is that the hierarchy of medieval Europe was replaced with a system characterized by segmentary differentiation. Efraim (1999, p. 480) indicates that the principle of sovereign equality is referred to in nearly all international institutions from the UN to other international organizations; thus, “overall the picture is of an international society in which segmentary differentiation is the rule” (Viola, 2013, p. 113).

✓ **Stratificatory/vertical differentiation** establishes hierarchical order, with a clear ranking between parts where some actors raise themselves above others. In society, stratificatory differentiation would be exemplified by class or rank inequalities, in IR – by the superior position of certain actors. In the words of Tucker, “the history of the international system is a history of inequality par excellence. This is so not simply because political collectives vary greatly in those natural endowments that contribute to their power but also because of the basic condition in which they have always existed” (1977, p. 3). As Buzan and Albert claim, “stratification can occur in many dimensions: coercive capability, access to resources, authority, and status. In IR, it points to the many forms of hierarchy: conquest and empire, hegemony, a privileged position for great powers, and a division of the world into core and periphery, or first and third worlds” (Buzan & Albert, 2010, p. 318). Hence, the instruments used for domination (a feature often used to distinguish, for example, different power strategies and types (see Destradi, 2010)) are less important than the mere fact that such domination exists.

✓ **Functional/horizontal differentiation** denotes that sub-systems are defined by the coherence of particular types of activity and their differentiation from other types of activity (Buzan & Albert, 2010, p. 318), in other words, by their functions. Such differentiation creates segmentation that “cut[s] across rank distinctions’ to produce ‘equivalently ranked, though behaviorally differentiated units” (Pertulla, 1993, p. 81 quoted in Donnelly, 2009, p. 71). Functional differentiation is at the root of sociological inquiry into differentiation as it was the main differentiation type that attracted the attention of sociologists, who saw emerging functional divisions in society as a response to modernity and the growing complexity of globalized society and the world. Functional differentiation can be understood in two ways: one narrow and the other more expansive. First, a simple form of functional differentiation is a division of tasks or “role differentiation” *inside* the same system, where actors are differentiated due to the functions or roles they undertake. For example, in IR, some states are serving as leaders or providers of collective goods, others as followers or neutral states (Albert, et al., 2013, p. 6). Second, there is more complex differentiation *between* different function systems. For example, economy, politics and culture are function systems in themselves (Roth & Schütz, 2015, p. 11), and, in the case of IR, these systems cross the boundaries of the nation-state. Moreover, each of these systems has its own logic and structure of governance.

An agreement of different actors to regularly undertake specific roles (*differentiation inside*) and emergence of (partially) independent sub-

systems (*differentiation between*) cannot be considered as the same phenomenon. Nonetheless, this thesis maintains that they both indicate the prevalence of functional differentiation. Emerging division of labor (or having different functions) can be considered as a precondition for the formation of different (partially) functionally independent sub-systems.

One last observation regarding functional differentiation should be made. Systems with strong or prevailing functional differentiation are not egalitarian. In terms of IR, in such systems, we do not speak about “states as units” (all equal, all similar) but rather about states having different roles and obligations. For example, great powers are functionally differentiated from other states; as Waltz puts it, they are “specialists in managing system-wide affairs” (Waltz, 1979, p. 197). Similarly, (regional) hegemony is supposed to provide particular (regional) public goods and ensure regional stability. However, “in functionally differentiated societies, functional differentiation is central, extensive, and substantially de-linked from stratification. In such cases, stratification, which can be extensive, is a relatively secondary, rather than a defining feature” (Donnelly, 2013, p. 93).

In most social structures, all three types of differentiation coexist. Due to this overlap of several differentiation principles, Donnelly criticizes what he calls a “type” approach in differentiation theory (namely an approach that focuses on which differentiation principle prevails in each system), claiming that “it is an empirical, not a theoretical question, whether a single dimension of differentiation predominates (and often, in fact, it does not)” (Donnelly, 2013, p. 97). Moreover, according to him, typologies based on one prevailing principle of differentiation obscure variations within types (which are often analytically important). Consequently, similarly to Albert, Buzan and Zürn, he maintains that the most promising general path forward is dimensional; that is, to “inquire into the specific ways in which different forms of differentiation overlap and interact with each other” (Donnelly, 2013, p. 97).

Summing up, this thesis approaches the typologies of regional orders (systems) through the lens of differentiation theory: focusing not on the features of the units which compose them, but on their position *vis à vis* the other. The next sub-chapter demonstrates how studies of global and regional orders have indirectly approached the concept of differentiation through concepts such as hierarchy, hegemony, roles and legitimacy.

1.2.2 Differentiation in regional and international orders

Debates about the relations between stronger and weaker actors are often framed using the concepts of hierarchy and hegemony, the former usually denoting certain levels of control and subordination, and the latter being more related to the ways in which this domination is sustained. Both concepts indicate the subordination of some actors to others, thereby indicating the presence of vertical differentiation. Nonetheless, debates about hierarchical or hegemonic systems and their legitimacy also indicate the presence of functional differentiation.

Stratificatory (vertical) differentiation

The 21st century marked a growing interest in hierarchical relations both in global settings (see Cooley, 2005; Hobson & Sharman, 2005; Kang, 2003, 2010; Keene, 2002; Spruyt & Cooley, 2009) and regional settings (see Burges, 2015; Destradi, 2010; Nolte, 2010; Prys, 2010), and differentiation was an important, though often implicit, element of these discussions. Works on hierarchy in IR reject the vision of absolute anarchy in the international sphere. As Lake observes, “the international system is often described as anarchic because it lacks a single, overarching political authority <...> However, it does not follow from this fact that relationships between units within that system are necessarily anarchic. <...> Rather, a hierarchy between units is consistent with and possible within systemic anarchy” (Lake, 2009, p. 17). Similarly, Womack claims that the theory of asymmetry “addresses the blind spot in most thinking about international relations: the gulf between the two contrary but common assumptions that all states are Westphalian equals and that power prevails” (Womack, 2015, p. 2). Thus, in a similar manner to Donnelly, who talks about heterarchies, “systems that are ranked in multiple ways” (Donnelly, 2009, p. 64), these authors try to understand how differentiation principles coexist and interact. Consequently, differentiation is not alien to the debates about power in IR: the concepts of sovereignty and anarchy indicate segmentary differentiation, while the concept of hierarchy indicates stratificatory differentiation, and the concept of roles functional differentiation.

The majority of definitions of hierarchy, however, focus on stratificatory differentiation, pointing out the domination of certain actors over the decisions of others. Similarly, Bially & Zara (2016, p. 624) define hierarchies as any system through which actors are organized into vertical relations of super-ordination and subordination. For Lake, hierarchy is “a variable defined by the authority of the ruler over an increasing number of

issues otherwise reserved to the ruled” (Lake, 2009a, p. 45) According to this definition (also accepted by Cooley (2005)) the hierarchy implies ranking, as some parts of the system (international, regional) are subordinated to others.

Lake observes that there might be a different types of hierarchies either based on the sphere in which the stronger actor predominates over the weaker (he distinguishes political and economic hierarchy), or over how many policies it has control. However, the latter feature is more important (Lake, 2009a, p. 56) since, according to Lake, hierarchy “increases with the number of the subordinate's actions the dominant state can legitimately regulate. If the dominant state expands its authority from issues 1-5 to include 6-8, the defined hierarchy is a continuous variable defined by the number of actions over which the dominant state can legitimately issue commands” (Lake 2007, p. 56). Similarly, in his other work (1996), he speaks about sovereignty as an amount of residual control that each country possesses, and which diminishes when hierarchy gradually replaces anarchy. Cooley (2005) and Cooley and Spruyt (2009) hold a similar view, seeing sovereignty as a “bundle of rights” that are negotiated and surrendered to the dominant power. These authors see hierarchy as based on ranking. Thus, the typology of hierarchies depends on the strength of domination or level of control. Consequently, when talking about hierarchy, the abovementioned works emphasize vertical differentiation.

Functional (horizontal) differentiation

Nonetheless, functional differentiation can also be observed in the literature on hierarchy. First, some authors claim that inequality in resource distribution leads to different opportunities and, consequently, roles which actors can assume. For example, peripheral realism divides the international system into three groups of states: rule makers, rule takers, and rogue states. These different roles arise from the distribution of power: the first one is reserved only for powerful states which set standards and norms, while weak or peripheral states can take only either the second or third role. Moreover, their choices are restricted: being a rogue state comes at a high cost to their citizens and usually requires domestic oppression (Escude, 2015, pp. 45-56). Escude maintains “it is not true that ‘the functions of states are similar.’ It may be that this is easier seen from the periphery than from the center of the world system, but states are not ‘like units’, as Kenneth Waltz mistakenly contended” (ibid. pp. 45-56).

A slightly different angle to the argument that “with great power comes great responsibility” comes from those who analyze how powerful

actors manage to secure compliance. Two classical theories dedicated to hegemony, power transition and hegemonic stability focus on the roles which great powers undertake in the system and how these roles or functions arise from their exceptional position. The literature on hegemonic stability argues that benevolent leaders must be able to accept a certain degree of free-riding by their followers in order to secure a cooperative system (Kindleberger 1981, p. 247). Power transition theory also maintains that powerful states secure their positions over others by providing an international order in which everyone comes to know what kind of behavior to expect from others: habits and patterns are established, and specific rules as to how these relations ought to be conducted come to be accepted by all the parties (Organski, 1968, p. 354).

In his theory of hierarchy, Lake sustains that states “authority” is necessary to ensure hierarchy. The authority, meanwhile, arises from the legitimacy of states actions. In his view, the latter is “rooted in a social contract in which the dominant state provides a political order to the collection of individuals who compose the subordinate state, and those individuals confer rights on the dominant state to restrict their behavior and extract resources necessary to produce that order” (Lake, 2009, p. 9). In such a relationship, legitimacy and moral obligation are the drivers that motivate the follower to follow. According to Lake, “to build and maintain authority, there are two necessary requirements: to provide a social order that benefits subordinates, and thereby binds them into that order, and to commit credibly not to exploit subordinates once they have consented to one’s authority” (ibid. p 28). Thus, the relation between the strong and weak (or the ruler and the ruled) is one of utility – a more powerful actor undertakes certain functions, while the weaker surrenders some aspects of its sovereignty. The weaker gains security (given that Lake’s framework is based on realist premises, it focuses on this sphere) and protection of property rights at home. The dominant state, meanwhile, benefits from setting the rules of the political order in ways that reflect its interests (ibid. p.9).

The concept of hegemony, even more than that of hierarchy, reflects a belief that the prevalent position in any system rests on “legitimacy as well as power” (Reich & Lebow, 2014, p. 31). Similarly, as in the case of “authority”, as understood by Lake, legitimacy is a mechanism (how the rules are defined, what are the outcomes of hegemony), allowing the hegemon to be accepted. For Kupchan, such legitimacy stems from the contract between a self-binding regional/global power and bandwagoning regional states (Kupchan, 1998, p. 47). For both Lake and Kupchan (and

similarly to Reich and Lebow (2014)), the right to rule (which can be defined as authority or legitimacy) rests on the capacity of the power to provide order and to oblige itself not to exploit its subordinates. Lahneman (2003) observes that providing security gives legitimacy to the regional power that is different from simply ensuring obedience through overwhelming material capability and the willingness to use it. Ikenberry also has a vision of hierarchies and hegemonies as “functional bargains” (Mattern, 2016, p. 635). In his “Liberal Leviathan”, he explains the US position as a hegemon, claiming that it is “a hierarchical system which was built on both American power dominance and liberal principles of governance” and which was “made acceptable to other states <...> because it provided security and other ‘system services’” (Ikenberry, 2011). Similarly, in their book “Special Responsibilities”, Bukovansky, et al. (2012) observe that international society has promulgated hierarchies because they give incentives to superordinates and subordinates to support and conform to the order it values (Bially & Zara, 2016, p. 635). Thus, dominance can be legitimized by the agreement of the powerful actor to produce certain outcomes.

Those going beyond the abstract task of “providing order” detail the various roles which a major power undertakes in exchange for the right to rule. For example, Reich and Lebow identify three critical functions that must be performed by major powers to sustain the global economic and political order. First, *agenda-setting* refers to the capacity to initiate, legitimize and advocate policy issues. Second, *custodianship* includes economic management and maintenance of the existing economic system. Third, *sponsorship* encompasses enforcement of rules, norms, agreements and decision-making processes as well as the maintenance of security to enhance trade and finance” (Reich & Lebow, 2014, pp. 37-49). The emphasis on “*quid pro quo*” exchanges between the regional power and other countries of the region, and the focus on what the power does to be considered a legitimate leader, is especially strong in the literature dedicated to regional powers.

Functional (horizontal) differentiation in regional settings

Due to the focus on so-called middle powers and regions with weak power asymmetry (e.g. Latin America or Africa), the authors tend to pay more attention to how actors achieve regional power status, or, in other words, what they do in exchange for followership. The very definition of a regional power often entails references to certain specific functions: according to

Nolte, a regional power is expected to “play a stabilizing and leading role in its region”, and moreover “to assume the role of regional leader, stabilizer and, if not peacekeeper, or at least peacemaker” (Nolte, 2010, p. 890).

Various authors agree about the importance of the role of a regional power in the creation of regional security orders or complexes. For example, Frazier and Stewart-Ingersoll claim that “regional powers can serve a unique set of functions ranging from the development and maintenance of their regional security complexes (RSCs) to the relationship of their RSCs with the global system. These states possess a higher degree of relative power than others within their RSCs, but also behave differently” (2010, p. 737). These authors distinguish three roles assumed by regional powers: a *regional leader*, which acts to influence regional security complex members to move in a specific direction; a *regional protector*, which defends the region from external threats; and a *regional custodian* that engages in efforts to maintain and/or stabilize the current security order, deterring challenges, and providing resources for the stabilization of security concerns and coordination of action against security threats (Frazier and Stewart-Ingersoll, 2010, pp. 740-742). Other roles assigned to regional powers are related to support for the creation of political and economic regional institutions (e.g. Nolte, 2010), coordination, and generation of consensus about how affairs should be ordered and managed.

Regional powers are often described using concepts such as “consensual hegemony,” that grows from a generated consensus about how affairs should be ordered and managed (Burgess, 2008, p. 71), the “cooperative regional leading power,” which does not attempt to achieve hegemony (Gratius, 2004), or a “cooperative hegemony” (Flemes 2010, Pedersen 2002), “discursive hegemony” (Nabers, 2010), leadership (i.e., discursive, entrepreneurial) (Geldenhuys, 2010; Smith 2018). These adjectives indicate both: the ways that regional power becomes such (non-military, based on soft power) and the roles it undertakes in the region in exchange for the followership. For example, in her study of South Africa, Schoeman (2003) distinguishes two essential features of regional powers: the assumption of a stabilizing and leading role in the region and the acceptance of this role by neighboring states. These features manifest by “taking responsibility for those in need of assistance” (ibid., 362) and by being “an example to other countries in a number of ways” (ibid., 364). As observes Destradi, many works dedicated to so-called “leading regional powers” emphasize their cooperative and benevolent attitude (Destradi, 2010, p. 903), seeing them as undertaking some necessary functions in their corresponding regions.

Summing up, one can put the very different roles adopted by regional powers into two broad groups. First, they bear the financial burden of achieving different common policy goals, mostly in the security and economic fields, and of tackling other relevant regional issues such as lack of development. This function can be named as one of *sponsorship*. Second, the regional power is usually seen as bearing responsibility for or as exercising the most substantial influence on the institutionalization of the region through the creation and coordination of different formal and informal regional institutions. It is a large group of activities, including the coordination of joint agendas, promoting norms, and undertaking the role of mediator in regional conflicts, and represents the function of *coordination* or *institutionalization*. These roles reflect the two spheres envisaged in Garzón Pereira's hierarchical regional order framework and, as discussed in its overview, they might, and in practice often do, overlap: the creation of regional institutions requires funds, and the funding of regional projects requires a set of formal or informal institutions.

Input, output legitimacy, and differentiation principles

A few words should be said about differentiation and the concept of legitimacy. From the sociological perspective, legitimacy is not a normative category but an empirical fact that resides in the beliefs of citizens about the rightfulness of political authority (Steffek, 2015, p. 265). However, there might be different reasons for reaching this conclusion. In the 1970s, basing his observations on Easton's analysis of political systems, Scharpf distinguished two perspectives on the political process (Steffek, 2015, p. 265), which led to the formulation of two different legitimacy types. First, input legitimacy focuses on citizens' input into the system. Second, output legitimacy is concerned with the quality of what the system delivers. As Gaus observed, "input-oriented theories justify legitimacy procedurally and voluntaristically referring to the principle of participation, output-oriented theories justify legitimacy substantially through rational results referring to effective problem-solving" (Gaus, 2008, p. 6).

Returning to regional orders, the opinion of the smaller states regarding the public goods provided, or the roles fulfilled, by a regional power reflects the output legitimacy of the regional order. Similarly, the commitment of a regional power to fulfill certain roles and to provide certain regional public goods can also be considered as a proxy for increased output legitimacy. This observation is relevant, since in those cases where the object of study is a desired regional order, one can measure only approximate output legitimacy.

This thesis argues that higher output legitimacy (reflecting strong functional/horizontal differentiation) does not weaken the regional hegemon's control over other countries and, consequently, stratificatory/vertical differentiation.

However, this is not so in the case of input legitimacy. The latter refers to “institutional arrangements that allow citizens to communicate their interests to political decision-making” (Steffek, 2015, p. 266). In regional orders, input legitimacy is reflected in the formal and informal arrangements that allow smaller states of the region to communicate their interests to the regional power and to negotiate policy convergence spheres. Understood in this manner, stronger input legitimacy would indeed weaken the degree of domination. The opportunities for joint decision-making might vary depending on the particular moment, the political institutions or historical traditions relevant to specific regional orders. Nonetheless, repetitive negotiation concerning shared goals or spheres of political convergence, or even more, the existence of formats for regular negotiation, would indeed weaken the degree of domination. Consequently, this thesis separates input legitimacy and output legitimacy, defining the first as a mechanism to weaken stratificatory differentiation, and the latter as an expression of functional differentiation.

Summary

Summing up, this section demonstrates that, albeit indirectly, differentiation principles are present in the debates about hierarchies, hegemony, and their legitimacy both on the regional and global levels. However, stratificatory/vertical differentiation is discussed more often than functional/horizontal one, as ranking and subordination are considered to be an essential features of regional and global orders.

Moreover, in the works referred to, higher functional differentiation is often presented as weakening vertical differentiation. For example, making concessions makes hegemony or hierarchy “weaker” or more “legitimate”. However, from the perspective of differentiation theory, this does not have to be the case, and the input and output legitimacy can be separated. Higher levels of the input legitimacy reflect weak(er) vertical differentiation. Nonetheless, higher output differentiation (an effective provision of certain, agreed outcomes) reflects the strength of functional/horizontal differentiation. Consequently, systems where high levels of functional differentiation coexist with a high level of vertical differentiation are, at least theoretically, possible.

1.3 Conclusion: not only strong or weak hierarchies

This chapter starts with the observation that the focus on conflict and cooperation in the current definition of “order” often leads to the reduction of regional orders to the sphere of security. Consequently, the typologies which have been most elaborated are dedicated to an analysis of RSCs which separates the security sphere from the economic, political and social spheres. Meanwhile, classification based on polarity is very static and obscures differences that appear in unipolar regions. A more general typology, incorporating different spheres of regional interactions and applicable to different regions, is necessary in a world of regions.

An interplay of differentiation principles – egalitarian (segmentary), stratificatory (vertical), or functional (horizontal) – allows a better understanding of the underlying logic of any system or regional/global order. Seeing these principles as complementary rather than antagonistic allows the debate’s limitations about the benignness or coerciveness of specific orders to be overcome. From the perspective of differentiation, any structure “has the annoying habit of possessing traits of [two or more differentiation – author] types” (Yoffee, 1993, pp. 64-65), and such “mixed” systems, whether one dimension predominates or not, require (multi)dimensional analysis” (Donnelly, 2013, p. 95). From the perspective of differentiation theory, in all, and even in the most asymmetrical, regional orders (hierarchies), several differentiation principles should coexist. In practice, in all the regions, different control levels are matched by different roles and spheres of regional institutionalization. Moreover, at the same time, all states, at least theoretically, enjoy the same rights and obligations.

Thus, a focus on the interplay of differentiation principles allows an analysis of regional order as both static and dynamic. First, one can attempt to make a snapshot of existing regional orders asking how the countries of the region interact or what regional visions they attempt to achieve. Second, instead of looking at the whole system, the framework permits an analysis of the *regional vision* of one specific actor, focusing on its commitments and demands upon other states. Finally, the framework thereby allows one to capture the change in regional orders over a period of time, opening up avenues for future investigation of the reasons for the change.

This chapter demonstrates that existing definitions and typologies of regional orders are limited and unsuitable for the analysis and comparison of orders emerging around different major powers. While the classifications based on polarity do not allow the capture of differences between different uni/bipolar regions, other typologies are often limited to one sector of

cooperation, most often, security. They also tend to emphasize the hierarchical nature of unipolar regional orders, often seeing them as simply weaker or stronger hierarchies. Application of differentiation theory allows the creation of a new typology, capable of capturing the main structural features of regional orders, their variety, and their change.

In conclusion, this thesis maintains that different regional orders can be analyzed and compared by looking at the prevalence of both stratificatory and functional differentiation, as varying levels of control are matched with different roles and functional divisions. Regional hierarchies should, therefore, be classified not only according to the prevalence of stratificatory/vertical differentiation but also according to functional/horizontal differentiation.

Using the hierarchical regional order framework as a departure point, the next chapter lays out the principles of a regional order typology based on the interplay of these two differentiation principles.

2. CONCEPTUAL FRAMEWORK AND ITS OPERATIONALIZATION

The previous chapters advanced two arguments: first, existing regional order typologies are narrow and security-focused, not allowing a more nuanced comparison of different regional orders, especially those emerging in unipolar regions. Second, differentiation theory allows the analysis of any structure, even a hierarchical one, in terms which encompass various differentiation principles. This chapter demonstrates how differentiation theory can expand Garzón Pereira's framework of hierarchical regional orders and make it suitable for capturing the interplay of various differentiation principles.

First, bearing in mind the manifestations of the vertical differentiation principle discussed in sub-chapter 1.2.2 above, the negotiations in the sphere of *policy convergence*, as presented by Garzón Pereira, serve as an excellent proxy for vertical differentiation. It allows a full evaluation of how much control over other countries the regional power has or is willing to have. The number of smaller states' policy areas which the regional power attempts to change, together with their type (domestic vs. foreign policy), indicates the prevalence of stratificatory differentiation.

Second, the other two dimensions included in the framework - *resource transfer and institutional power constraints* - represent different levels of functional differentiation. The degree of resource transfer reflects

the sponsor's role, since it indicates that the regional power is bearing a financial burden for activities in various spheres ranging from security to economic and social development. Together with these initiatives, regional institutions might be established, indicating the growing functional complexity of the region. While the regional power might undertake simply the role of *ad hoc* coordinator of a specific common position, or conflict manager, it might also generate functionally separated sub-systems creating a division of tasks in the region. Similarly, formal and informal regional institutions might emerge at the initiative of the smaller states; however, it would be hard to imagine that being possible without the support of the most powerful actor. Thus, if undertaking the role of sponsorship (resource transfer) or institutionalization of formal or informal cooperation would reflect a certain, though somewhat limited, functional differentiation, support for creating a network of formal and informal institutions in different spheres would indicate strong functional differentiation.

Table 2 presents the analysis of regional orders through the lens of the principle of differentiation, distinguishing three levels - weak, moderate, and strong - of both principles of differentiation.

Table 2. Operationalization of differentiation principles in hierarchical regional orders

	Stratificatory (Vertical)	Functional (Horizontal)	Egalitarian (Segmentary)
Strong	The regional power dominates (or attempts to dominate) in many policy fields, including the internal policies of the smaller regional states. It does that using the mechanisms that are questioned by the smaller states due to their weak input legitimation. There are mechanisms to ensure the policy reforms desired by the regional power (conditionality – both positive and negative).	The regional power undertakes the role of provider (for development, security, institutionalization, production of regional public goods), and its policies support the emergence of different regional-level functional sub-systems (security orders, financial and trade integration, civil society cooperation) => strong output legitimation.	Constant (except cases of military intervention)
Mode-rate	The regional power dominates (or intends to dominate) in different policy fields, mostly the foreign policy of the smaller regional states. When demands for policy convergence are made, their	The regional power more regularly accepts fulfilling certain specific roles. However, its efforts do not lead to the creation of formal and informal institutions in different spheres of regional	

Continued table.

	input legitimation is relatively strong. While there are clear mechanisms to ensure the policy reforms desired by the regional power, the regional power mostly uses positive conditionality.	cooperation.	
Weak	The regional power rarely, if ever, attempts to dominate foreign or internal policies of the smaller regional states.	The regional power avoids repeatedly undertaking any roles (or does so only ad hoc)	

Stratificatory/vertical differentiation manifests itself through attempts to dominate and control different areas of sovereignty. A distinction is made between dominance over foreign policy and domestic policy choices, given that domestic policy is more important to a state's sovereignty. Two features indicate **functional/horizontal differentiation**. An emerging (but not constant) division of roles, and the regional/great power's agreement to periodically coordinate and produce regional public goods, indicate *weak functional differentiation*. Agreement to redistribute (to sponsor shared development goals, or produce some regional public goods), and support for the creation of some institutions for joint management, reflect *moderate functional differentiation*. Finally, *strong functional differentiation* is reflected by the sponsorship of development and institutionalization of regional level institutions denoting functional differentiation in the regional/global sphere. The latter reflects the emergence of regional security orders, agreements and frameworks for economic integration, and platforms for civil society's cooperation, among other things. As can be seen from the Table, functional differentiation does not modify vertical differentiation and vice versa. Quite to the contrary – they can coexist without enabling and weakening each other. Finally, **segmentary differentiation** is relatively stable in the majority of the cases and is considered strong so long as there is no formal or informal annexation and occupation. Hence, in most cases, it is not responsible for the variety of potential regional orders.

As demonstrated in Figure 1, this research modifies Garzón Pereira's model from a one-dimensional continuum in all three dimensions to a two-dimensional matrix, with one axis indicating stratificatory/vertical differentiation, and the other functional/horizontal differentiation. The first topic, policy convergence, represents vertical differentiation since it reflects

the traditional view of sovereignty and domination. According to this view, vertical differentiation gets stronger with more intensive demands for policy convergence, focusing not only on foreign but also on domestic policy priorities in the smaller states. On the other hand, the existing role division, together with the emergence of regional institutions governing different spheres of regional interactions, reflects functional differentiation.

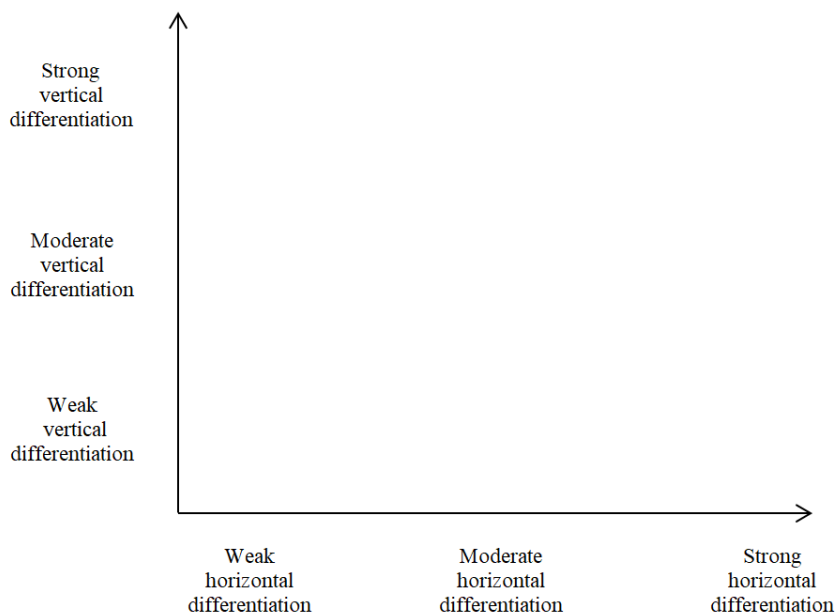


Figure 1. Spatial model of regional orders based on differentiation principle

In this manner, the framework becomes not a continuum with one axis representing more or less domination in three different spheres, but a matrix of nine potential regional orders according to the principle of differentiation. Such a framework allows not only the careful capture of the interplay of differentiation principles but also the comparison of regional orders which are very different in their external features.

Table 3. Matrix of potential regional orders according to the strength of two differentiation principles

Strong vertical differentiation	Strong /Weak	Strong/Moderate	Strong/Strong
Moderate vertical differentiation	Moderate/Weak	Moderate/Moderate	Moderate/Strong

Continued table.

Weak vertical differentiation	Weak/Weak	Weak/Moderate	Weak/Strong
	Weak functional differentiation	Moderate functional differentiation	Strong functional differentiation

Another modification to the model proposed by Garzón Pereira is that the dichotomy between coercion and consensus (or weak and strong input legitimacy), which is central to his model, becomes secondary and relevant only for the measurement of vertical differentiation.

The strength or weakness of functional differentiation is expressed solely by the number of roles that the regional power (and other states) fulfil (the more, the stronger); the intensity of their commitment (the more often different actors accept fulfilling certain roles, the stronger the functional differentiation); and the emerging institutionalization of different spheres of regional interactions. Consequently, higher functional differentiation does not imply or exclude the possibility of domination.

The following sub-chapters discuss the operationalization of vertical and functional differentiation. The complexity of elaborating such a framework lies in the fact that it has to be sufficiently broad to capture features of very different regional orders, based on different norms and formed around different actors. On the other hand, the model has to be sufficiently precise, indicating features necessary for analysis.

2.1 Stratificatory differentiation: demands for policy convergence

2.1.1 How to observe it

According to Garzón Pereira, three elements are essential in the dimension of policy convergence: the *range* (foreign or domestic policy), the *scope* (how many), and the *intensity* of the regional powers' demands. In this manner, his model reflects Lake's claim that "the greater the number of policy areas that are legitimately controlled by the political authority, the more hierarchical the relationship" (Lake, 2009a, p. 9)). In his other work, Lake talks about residual rights of control that are granted to the stronger and which "constrain the [partner country's – author] ability to influence the policy choices" (Lake, 1996, p. 8).

Differently from Lake, who focuses on the legitimacy of the demand, Garzón Pereira places emphasis on the "measure of the degree of 'intrusiveness' – in the sense of violating Westphalian sovereignty – of a foreign policy aimed at correcting the behavior of another (weaker) state"

(Garzón Pereira, 2014, p. 34). While foreign policy can be considered as an important area of national policy, control over domestic policies breaches the Westphalian understanding of sovereignty and indicates stronger vertical differentiation.

What can be considered a “demand for policy convergence”? Garzón Pereira does not dwell much on this question. According to him, “in a bilateral relationship, the degree of intrusiveness whereby one actor A wants to induce a policy change in actor B may vary from zero – when one actor just communicates a desire of policy coordination as when states make treaty proposal that may be accepted or rejected – upwards to an increasingly steeper hierarchy” (Garzón Pereira, 2014, p. 34). The author observes that “a powerful state is likely to have more or less clear preferences about the policy-areas in which foreign (or domestic) policy convergence with the weaker states of its periphery is important as well as the intensity with which such ‘convergence’ is desired. These preferences may vary over time.” (ibid., 34)

This thesis defines demand for policy convergence as a desire for a change in domestic or foreign policies of the neighboring country, openly expressed by leaders of the more prominent neighbor or appearing in its internal documents. Sometimes such demands are made public through speeches of official representatives. On other occasions, they might be less visible, transmitted through diplomatic channels, and usually traceable just after the events through secondary sources (e.g. memoirs of Latin American countries’ ambassadors or diplomatic cables telling of the pressure they received from the US to support the war in Iraq (El País, 2007)). Strategic documents also indicate the expression of desire for policy convergence. These preferences are usually presented as cooperation (political, economic, development) goals and priorities. However, they might also be reflected in trade agreements, which are “increasingly used as engines of change in many developing countries, to promote, implement, and lock in reforms in a wide range of policy areas such as investment regimes, competition rules, and government procurement” (Maur & Chauffour, 2011, p. 1). Moreover, many trade agreements have clauses related to governance, labor standards, or human rights.

Finally, the direction of cooperation funds might also give a deeper understanding of which of these goals are supported by financial and technical aid. Meanwhile, secondary sources and official declarations shed light on these goals’ negotiation. What unites all these different types of demands is the desire of the stronger partner to shape the foreign and internal policy of its neighboring countries according to its vision of regional and

global affairs or to maximize benefits and minimize risks related to mutual interdependencies.

In order to distinguish between weak, moderate and strong vertical differentiation, this thesis pays attention to how many spheres and which domains (domestic or foreign policy) the stronger neighbor desires to transform. The *intensity of the demand* can be measured by looking at the repetition (the number of times the issue was raised in bilateral and regional formats) or by searching to see if the demand is included in a strategic document of the regional power. Such inclusion would indicate commitment and insistence on change. Finally, the absence or presence of a reward and punishment system, established either formally or informally, also shows how intensively the regional power wants to achieve policy convergence. For example, a hot topic for both Western powers, the US and the EU, migration, might be approached in different ways: while the regional power might ask other countries to control their borders, or raise the issue of migration in bilateral, regional and global forums, it also might threaten sanctions if migration flows are not curbed. Finally, it might also include migration and border management in its security strategies, stipulating precise mechanisms for what it wants to change and how it plans to support those changes.

An important feature which Garzón Pereiras' model does not contemplate, is how these spheres for policy convergence are negotiated and agreed upon. In other words, he is not concerned about input legitimacy. In some cases, they might be contested by the smaller states or emerge from the regional power's unilateral needs. However, in other cases, they might be aligned with the priorities of the neighboring states themselves. There is no perfect way of capturing these dynamics. However, the existence of clear channels for negotiation of a joint agenda, recurring talks, and lack of controversy around the goals agreed, might indicate that, at least formally, the cooperation formats have a relatively high input legitimacy. For example, the threat of Donald Trump to cut aid to Central American countries if they do not stop migration towards the US cannot be considered equal to the support that the US or any other donor provides to migration and border control reforms in the Northern Triangle. In both cases, there is a desire to achieve changes. However, there is a clear difference in how it was expressed and how it was agreed upon. Thus, the input legitimacy (the ways of achieving agreements on policy convergence) also helps to distinguish between strong and moderate vertical differentiation.

2.1.2 How to operationalize and measure it

In cases of **weak stratificatory differentiation**, the regional power does not express demands for policy convergence, except ad hoc and usually in the sphere of foreign policy (e.g. voting in the UN, supporting regional powers' position in other multilateral forums, or keeping other powers out of the region). While some pay-offs might happen, they are not "institutionalized" formally or informally. Thus, strategic cooperation and other bilateral or internal documents regarding cooperation are vague about the possibility of punishment and reward. The regional power's interest in the domestic policies of its neighbors indicates **moderate stratificatory differentiation**. In this case, changes are still negotiated with counterparts (regional or country-level documents of the regional power emphasize negotiation, joint-ownership and alignment), and there are established formats for these negotiations to take place. Moreover, if there are mechanisms of reward and punishment (e.g. in the form of conditionality), they are not consistently applied, or preference is given to positive inducements. **Stratificatory differentiation can be considered as strong** when demands for either foreign or, more importantly, domestic policy convergence are institutionalized (clearly laid out in the strategic documents of the regional power). This indicates that domestic and/or foreign processes in neighboring countries have become domestic issues in the bigger one. Established and consistently applied, a system of rewards and sanctions also indicates strong vertical differentiation. Finally, in cases of strong vertical differentiation, one would observe a lack of channels for regular negotiations regarding the policy convergence spheres, leading to controversies and public debates about the legitimacy of the regional cooperation agenda.

Summing up, the vertical differentiation principle is strong in those cases where the regional power openly seeks to achieve policy convergence in a broad range of policy spheres, many of them domestic, and to consistently apply sanctions and rewards according to the behavior of the weaker states. Moreover, the level of cooperation does not envisage clear-cut paths to negotiate spheres for policy coherence, or they are constantly ignored. On the other hand, the principle of vertical differentiation is weak, where the demands for policy convergence are rare, being somewhat ad hoc, and not formalized. Table 4 summarizes the features that allow observation of the prevalence of vertical differentiation.

Table 4. Strength of stratificatory/vertical differentiation principle in regional orders

How to measure it?		
Weak vertical differentiation	Moderate vertical differentiation	Strong vertical differentiation
<ul style="list-style-type: none"> ✓ Limited/ ad hoc demands of policy convergence: mostly in the public discourse ✓ Mostly in the field of foreign policy ✓ No mechanism of sanctions, nor is inducement foreseen: however, both may happen on the ad hoc basis 	<ul style="list-style-type: none"> ✓ Demands for policy convergence are sustained over time and appear in the strategic documents of the regional power, however, in a limited number of topics ✓ There are institutionalized (formally or informally) channels for negotiation of these policy areas ✓ The regional power envisages mechanisms of both sanctions and inducement. However, their use is either sporadic or non-existent 	<ul style="list-style-type: none"> ✓ Demands for convergence in a broad range of foreign and domestic policies ✓ Demands for policy convergence are sustained over time and appear in the strategic documents of the regional power ✓ There are no or limited ways for the negotiation of policies and fields where the regional power is asking for policy convergence ✓ Regional power envisages mechanisms of both sanctions and inducement (sticks and carrots), and they are consistently applied
How to observe it?		
<ul style="list-style-type: none"> ✓ Document analysis – reading official documents outlining areas of cooperation (especially technical documents for development cooperation), trade agreements (what regulations countries need to adopt in order to implement them) ✓ Discourse analysis – speeches and discourses of the main actors responsible for foreign policy/neighborhood relations ✓ Secondary sources (e.g. academic articles, policy analysis) regarding the relationship dynamic between regional power and its neighbors ✓ Interviews with policymakers from the regional power and its neighboring countries 		

2.2 Functional differentiation

2.2.1 How to observe it

While this thesis uses policy convergence as an indicator for vertical differentiation, practically without any modification to the original framework, this is not the case for horizontal differentiation. Here some major changes are made, merging the two dimensions distinguished by Garzón Pereira into one. Besides policy convergence, Garzón Pereira

envisages two other spheres for negotiation: the redistribution of resources and creation of regional institutions. In the first dimension, he analyses the *direction, amount, and reliability* of resource flows; and in the second, the *emergence of regional level institutions and the role of the regional power* in this process. In both dimensions, the key characteristic for distinguishing a neo-imperial regional order from a hierarchical regional society is the regional power's attempt to enshrine or diminish the power asymmetry existing in the region either through redistribution (or the lack of it) or through the power balance in the regional institutions.

This thesis merges these two dimensions - material resource transfer and creation of regional institutions - into one, maintaining that both indicate different levels of the same differentiation principle. First, both features respond to the regional power's (non-)acceptance of fulfilling the specific roles discussed in the presentation of the theoretical framework (chapter 1.2.2 of this thesis), that is, sponsorship and regional institutionalization, both reflecting the prevalence of functional differentiation. Second, it is difficult to disentangle them. Support for institutionalization is impossible without agreement to pay for it, especially when the regional power is significantly more prosperous than the rest of the region's countries. Similarly, large scale and constant resource transfers require a certain level of formal or informal institutionalization, which is necessary to coordinate and sustain the flows. Finally, focusing on the regional institutional constraints conceals different institutions which might be informal or region-specific. Consequently, instead of looking at institutional constraints or redistribution, this thesis proposes to analyze whether the regional power regularly undertakes any roles (e.g. sponsorship, coordination) and whether these roles lead to the emergence of different regional institutions.

Regional sponsorship, which Garzón Pereira calls "the attempt to redistribute from the wealthier core state to the weaker states of the periphery" (Garzón Pereira, 2014, p. S35), can be observed in different ways.

The first way is the analysis of regional public goods, "a class of public goods that lie in between national and global goods in terms of their range of spillovers" (Estevadeordal, et al., 2004, p. 12). These goods "provide non-exclusive and non-rival benefits to individuals in a well-defined region" (Liu & Kahn, 2017, p. 14). While their definition is complicated (what is a well-defined region? How can we measure the geographical outreach of any good?), their provision, especially in the spheres of health, environment, financial market regulation, transport and the energy market, became an important element in the global discussion on

development and development assistance (see Cook & Sachs, 1999; Estevadeordal et al., 2004; Ferroni, 2001). Ferroni (2001, p. 3) distinguishes two core kinds of regional goods or activities to pursue them:

- *Non-country specific investments* in knowledge, dialogue, basic research into technologies meant to be in the public domain (e.g. health or infrastructure), and negotiation of an agreement on shared standards and policy regimes (e.g. in trade or security management).

- *Inter-country mechanisms for managing adverse cross-border externalities or creating beneficial ones*, e.g. coordinated public health measures, or investments in cross-border infrastructure, to enhance the preconditions for growth through trade and integration; creation of regional institutions to facilitate solutions in areas ranging from financial and banking stability to sustainable management of shared environmental resources.

While regional organizations and development banks have a specific role in pursuing these goods, the decision of the regional power to sponsor – to finance, provide or coordinate – them, through development aid, investment, or regular organizations of regional forums, would indicate emerging functional differentiation.

Another way of observing regional sponsorship is to look at different transfers of resources between the regional power and other countries of the region. Garzón Pereira emphasizes the “reverse asymmetry” of transactions: due to the economic and social prevalence of the regional power and its interest in regional security, it is capable of sponsoring solutions for regional development challenges by using development aid and existing trade agreements.

In the model proposed in this research, the redistributive nature of such flows is important; however, it is not an obligation. As shown in the previous chapters, a strong functional differentiation is not an obligatory “benevolent” feature, as it also underlays systems where resources are “extracted” from the smaller states to the bigger ones. In such systems, the role of sponsorship is transferred to the smaller states, as their resources are used for the achievement not only of the regional but also of the domestic and foreign policy goals of the stronger neighbor. In the original hierarchical regional orders framework, extractive regional systems and institutions enshrining the power asymmetries are identified as features of neo-imperial regional orders. In the typology proposed in this thesis, the benignness of interaction is less important than the regularity of its patterns. As a consequence, functional differentiation is manifested by persistent structures

and patterns in resource (re-)distribution irrespective of the direction of these flows.

In order to be able to redistribute, manage or extract resources, a regional power has to undertake some efforts of coordination and institutionalization. The institutions which emerge might be formal and informal and might be related to one issue (e.g. security cooperation) or cover multiple regional interactions (e.g. create regional integration in the political and economic spheres). Through such coordination or creation of norms and regulatory regimes, the regional power potentially fulfills another role, that of *regional institutionalization*. Its acceptance of sustaining institutional arrangements which would ensure stability in the region (this commitment also inevitably requires acceptance of the role of sponsorship as well) demonstrates moderate functional differentiation in the regional system. Such a commitment can be found in its strategic documents and/or speeches of its officials and the budgetary documents concerning the funding of international organizations or international cooperation.

As for redistribution, this could also be reflected in strategic documents or speeches (e.g. the EU publicly presenting the decision to raise the olive oil quota for Tunisia as an attempt to help its economy). On the other hand, it could also be reflected in existing trade agreements. First, existing trade agreements can be perceived as regional public goods, as they offer shared regulations, norms, tariffs, and in this way provide dispute resolution mechanisms, potentially supporting regional economic integration. Second, trade agreements can also be seen as a tool to address (or enshrine) existing inequalities between the partner states. Following Hoekman, who analyzes the features of North-South trade agreements, “development-friendly” (or redistributive) trade agreements must remove barriers to trade in the developed country for the products which the developing country produces. Moreover, they should lower trade barriers in the developing country partner which raise the prices of goods and services consumed by firms and households. Such PTAs should support the adoption of complementary measures and actions that allow the potential benefits of trade opportunities to be realized. Finally, they have to create mechanisms through which the private sector can be regularly informed of progress with PTA implementation and can provide feedback to the authorities (Hoekman, 2011, p. 100). Hoekman maintains that, while the first and second characteristics are the “bread and butter of PTAs <...>”, the adoption of complementary measures that allow the potential benefits of trade opportunities to be realized is the crucial challenge if North-South trade

agreements are to be most relevant from a development perspective” (ibid. p.100).

Consequently, this thesis looks at existing trade relations focusing on a) the presence of such a framework and its elements (Are there dispute settlement mechanisms? Are there any joint governance committees?); on b) how trade agreements address the asymmetries in social and economic development between partners (Are they removing barriers to trade for products which the smaller partners produce? Do they foresee longer transition periods for the smaller partners’ industries?); and on c) the presence of additional measures to support the removal of non-tariff trade barriers, such as adaptation to different phytosanitary and quality regulations. Finally, in addition to the above-mentioned criteria, this thesis also looks at the use of trade instruments as a tool to support development or to achieve political goals.

Summing up, from the perspective of functional/horizontal differentiation, trade frameworks can be considered as the input of the regional power to the creation of regional trade governance. Moreover, they may reflect its attempts to address differences in the socio-economic development between North and South.

2.2.2 How to operationalize and measure it

Regional powers might undertake very different roles depending on the region, its history, and the precise historical moment. Similarly, smaller states of the region may or may not undertake different roles as well. Bearing in mind the focus of this thesis (a regional order desired by the regional power), the operationalization described here focuses on the roles accepted by the regional power, the main indicators being the number of roles (the more roles it agrees to fulfill – the stronger the prevalence of horizontal differentiation), and the strength of the commitment (duration in time, enshrined in strategic documents or expressed ad hoc in the speeches of political leaders). Moreover, it is important to pay attention to whether among these commitments regional institutions are created and to the number of spheres where interactions are being institutionalized.

Thus, a lack of engagement of the regional power in the creation of regional public goods and a weak or non-existent system of regional redistribution would indicate **weak functional differentiation**. In such cases, development aid flows fluctuate and are relatively low; trade agreements do not reflect the redistributive function; and there are no

significant complaints and debates about resource extraction from the smaller states. Finally, the amount of resources – trade, ODA – is relatively insignificant both for the bigger and for the smaller sides. Moreover, the patterns and amount of resources vary and lack stability. Similarly, as the regional power is not willing to undertake the role of sponsorship, it either does not support regional institutionalization, or does so only in a very limited number of spheres. In those cases where the regional power would accept specific roles (for example, in the case of mediation of regional conflicts or humanitarian effort in case of disasters), it would do that ad hoc and would not commit itself to continue fulfilling them.

A more pronounced interest in the role of sponsorship would indicate **moderate functional differentiation**. The regional power might do this through the establishment of formal or informal redistribution mechanisms and through the financing of specific goals relevant for its neighbors. Such behavior would usually lead to the creation of more or less formalized regional institutions (e.g. agreements on regional political and/or security/economic cooperation), which are needed to coordinate common challenges and goals. As in this situation the scale of regional engagement is limited, the emerging institutions would be limited in scope and sector (e.g. only cooperation in trade matters).

Finally, **strong functional differentiation** is manifested through the development of different sub-systems in the region: the appearance of governance in trade, security coordination, or any other spheres that are relevant for the given region at a given time (e.g. environmental or health-related challenges). Moreover, in this case, in line with the literature dedicated to regional powers, the regional power sees itself as having a leading role in the region and actively commits itself to fulfilling this role.

The operationalization described in this chapter adjusts the framework for capturing the prevalence of functional/horizontal differentiation in regional orders which regional powers intend to create. However, one has to bear in mind that, due to the focus on regional power policies, the activities (and functions) of other actors are not included in the analysis. This is not the case in the studies focusing on *existing* regional orders. In these cases, one should take into account the interactions and the roles assumed both by the regional power *and* the other countries of the region. While in the case of weak functional differentiation, these countries do not have clearly defined roles in the system (changing their alliances and policies towards the stronger neighbor), in cases of moderate and strong functional differentiation, clear patterns of interaction become visible. For example, countries act as supporters or even proponents of the regional

power's foreign policy agenda in multilateral formats. Similarly, they might agree to bear some costs of its foreign or domestic policies (e.g. through the acceptance of migration management externalization).

In each case (for studying both existing and intended regional orders), either careful reading of strategic documents or careful analysis of events (e.g. using interviews) is needed in order to establish the context or the patterns of interactions. Table 5 summarizes the operationalization and measurement of functional differentiation.

Table 5. Horizontal differentiation principle in regional orders

How to measure it?		
Weak horizontal differentiation	Moderate horizontal differentiation	Strong horizontal differentiation
<ul style="list-style-type: none"> ✓ The regional power avoids creating regional public goods or does this <i>ad hoc</i> ✓ The amount of resources redistributed is small, and the flows are not reliable ✓ The regional power does not support regional institutionalization besides the <i>ad hoc</i> coordination of issues of common interest 	<ul style="list-style-type: none"> ✓ The regional power produces/supports the production of regional public goods ✓ The regional power regularly undertakes the role of mediator and coordinator of regional level affairs ✓ The amount of resource transfer and direction varies; there is no firm commitment from the regional power either for redistribution or for extraction. 	<ul style="list-style-type: none"> ✓ The regional power produces/supports the production of regional public goods ✓ There is an institutionalized (either formally or informally) system of resource redistribution: through development aid (a significant amount), through trade concessions in the fields relevant for smaller states, <i>or</i> system of resource extraction (e.g. through the purchase of primary commodities below the market price) ✓ The regional power strengthens/supports regional integration in different spheres: e.g. trade, security and defense.
How to observe it?		
<ul style="list-style-type: none"> ✓ Document analysis of a regional power's regional (and global/sectoral – depending on the case) strategies – its vision of the region (institutions, coordination, engagement spheres) ✓ Speeches or other public communication of officials – role of the power in the region, willingness to undertake certain functions/actions ✓ Redistribution of resources: ODA, trade agreements (bilateral or regional, addressing (or not) the inequality between trading partners, is trade used to support the development needs of smaller partners, are trade agreements accompanied by the support for the adaptation to new requirements? ✓ Funding of regional public goods: i.e. non-country specific research and knowledge networks, cross border infrastructure, spheres for coordination and dialogue 		

2.3 Conclusion: A two-dimensional matrix of potential regional orders

The second chapter of this thesis proposes a new typology of regional orders, capturing both the dominance and control and the complexity of institutionalized interactions. Differentiation theory allows the transformation of the original hierarchical regional order framework into a two-dimensional matrix. This chapter's new typology distinguishes nine potential regional orders based on the prevalence of vertical and horizontal differentiation. Table 6 presents the features of each regional order.

Table 6. Overview of nine potential regional orders

<p>Strong vertical differentiation</p>	<p>Strong/Weak Persistent demands of policy convergence in a broad range of spheres, established in the internal documents of the regional power, without clear channels of negotiation of these goals. Mechanisms of conditionality and inducement are provided for and applied. + The regional power avoids undertaking any roles/obligations in the region</p>	<p>Strong/Moderate Persistent demands of policy convergence in a broad range of spheres, established in the internal documents of the regional power, without clear channels of negotiation of these goals. Mechanisms of conditionality and inducement are provided for and applied. + The regional power produces regional goods and undertakes certain roles, such as coordination or mediation.</p>	<p>Strong/Strong Persistent demands of policy convergence in a broad range of spheres, established in the internal documents of the regional power, without clear channels of negotiation of these goals. Mechanisms of conditionality and inducement are provided for and applied. + The regional power produces regional goods and undertakes roles of sponsorship and institutionalization The regional power undertakes certain roles of coordination and establishes the system of recourse extraction from smaller states</p>
<p>Moderate vertical differentiation</p>	<p>Moderate/Weak Persistent demands of policy convergence in a limited range of spheres, established in the internal documents of the regional power, there are channels of negotiation of these</p>	<p>Moderate/Moderate Persistent demands of policy convergence in a limited range of spheres, established in the internal documents of the regional power, there are channels of negotiation of these goals,</p>	<p>Moderate/Strong Persistent demands of policy convergence in a limited range of spheres, established in the internal documents of the regional power, there are channels of negotiation of these</p>

Continued table.

	goals, mechanisms of conditionality provided for but not applied + The regional power avoids undertaking any roles/obligations in the region	mechanisms of conditionality provided for but not applied + The regional power produces regional goods and undertakes certain roles such as coordination or mediation	goals, mechanisms of conditionality provided for but not applied + The regional power produces regional goods and undertakes roles of sponsorship and institutionalization or The regional power undertakes certain roles of coordination and establishes a system of recourse extraction from the smaller states
Weak vertical differentiation	Weak/Weak Limited demands of policy convergence, no clear mechanisms of conditionality and inducement + The regional power avoids undertaking any roles/obligations in the region	Weak/Moderate Limited demands of policy convergence, no clear mechanisms of conditionality and inducement + The regional power produces regional goods and undertakes certain roles such as coordination or mediation	Weak/Strong Limited demands of policy convergence, no clear mechanisms of conditionality and inducement + The regional power produces regional goods and undertakes roles of sponsorship and institutionalization or The regional power establishes undertakes certain roles of coordination and establishes a system of recourse extraction from the smaller states
	Weak functional differentiation	Moderate functional differentiation	Strong functional differentiation

The matrix presented in Table 6 represents “ideal type” regional orders. Such a typology allows analysis of both existing regional orders and their change over time and proposes a benchmark for their comparison.

The typology elaborated here is suitable both for analysis of the (dynamic) structure of different regions and their comparison. Consequently, it can be operationalized and made suitable both for the analysis of existing regional orders and analysis of what regional orders different actors attempt

to create. Finally, the framework allows comparison of both *desired* and *established* regional orders, observing discrepancies and paving the way for studies of the reasons behind the formation of different regions. In both cases, studying the policies of the regional power is a must; however, when desiring to study existing regional orders, policies of the smaller states of the region should also be taken into consideration.

While the current section describes how one can trace horizontal and vertical differentiation in both existing and desired regional orders, the following section details the operationalization of the framework for this case study of the regional orders desired by the US and the EU in their Southern neighborhoods.

3. RESEARCH DESIGN AND METHODOLOGY

The analytical framework presented in the previous chapter has to be operationalized and made suitable for empirical analysis of the regional orders which the US and the EU intended to create in their neighboring regions. This part of the thesis discusses the principles and procedures which guided this research. This chapter first discusses the data and its limitations. Second, it presents the method of analysis used to arrange the empirical data. Finally, it lays out the structure of the empirical part of the thesis.

3.1 Data

Due to this research's focus on a snapshot of the regional order which each actor attempted to create during the period of analysis, the primary source of the data is official documents such as global and regional level strategies and documents describing and evaluating ongoing cooperation. However, the strategic level documents may be vague in terms of clearly measurable goals and instruments. Thus, information about development aid, foreign direct investment, trade flows and movement of people, available public speeches, and secondary sources complement the documents.

3.1.2 Documents

The main document defining US-Central American relations during the period of the analysis is the CEN Strategy, the first coherent and multi-dimensional engagement strategy towards Central America elaborated by the US at the end of 2014. Its creators envisaged that the Strategy would become

a holistic document which would define the guidelines for coordination of different US agencies and establish the underlying universal principles and goals for US engagement. However, in reality, the US cooperation is still a complex and entangled web of activity by different agencies with different goals and funded from different budgetary lines. The CEN Strategy is a short document laying out the fundamental principles, priorities, and aims of the US cooperation, and it overlaps with other strategic documents for thematic engagement, such as the documents establishing goals for the Millennium Challenge Corporation (MCC) or the Central American Security Initiative (CARSI). Moreover, the US National Security Strategy (NSS), which establishes the broadest presidential vision of the US' place in the world and its foreign policy, also defines specific goals and projections related to the region of analysis. While the documents mentioned above are political and thus rather general, the cooperation reports and strategies guiding the disbursement of financial cooperation describe precisely what the US intended to finance. Among such documents are the annual Congressional Budget Justification (CBJ) reports. These annual presentations to Congress justify the entire Foreign Operations Budget, establishing US goals both for Central America and each Northern Triangle country, together with the amounts of money and budget lines to finance their achievement. Besides the CBJ reports, there are USAID reports and strategies, such as the RCDS CAM and its evaluations.

In order to define the priorities and the US role in the region, this thesis also uses public speeches by responsible officials: the US President and Vice President, and representatives of the Department of Defence (DoD) and Department of State (DoS) responsible for different spheres of cooperation with the Northern Triangle countries. Secondary sources such as the reports of the Congressional Research Services and the different evaluations by the US Government and external agencies, elaborated after the 2018 debate regarding the impact of US aid for Central America and especially the Northern Triangle, help to simplify the overview of existing documents and establish common traits of the US Strategy. Finally, to capture the “redistributive” element of US trade relations, this thesis analyses existing trade agreements between the US and Central American countries (e.g. CAFTA-DR).

In the case of the EU and the Maghreb, both sides' cooperation on the regional and bilateral levels is better institutionalized and structured than relations between the US and Central America. However, the EU's priorities are equally hard to track as they are laid out in different strategic and bilateral documents, covering various topics and different time frames.

While the key overarching documents defining the EU's priorities are the Global Strategy and the Reviewed ENP, the bilateral documents elaborated in the partnership framework (joint declarations and joint priorities) also describe cooperation with each partner country. Moreover, while these documents lay out the political priorities, the European Neighbourhood Instrument (ENI) reflects the financial commitments. In its annual programming the ENI defines priorities both for regional and bilateral cooperation. While political cooperation follows the timeline established by the signature of relevant agreements, the ENI programming timeline is more rigid, as it is attached to the EU's multiannual financial framework. Finally, there is a set of other thematic documents such as the European Agenda on Security, the EU's Cybersecurity Strategy, the Mobility partnerships, and decisions adopted at high-level meetings such as the Joint Valletta Action Plan. The documents define the EU's priorities or agreements with partners in different spheres. Moreover, for these agreements' implementation, funds are used from other instruments of the EU budget, such as the Trust Fund for Africa and the European Development Fund (EDF).

To reduce the complexity, this thesis focuses on a) the priorities established in strategic political documents, as they show the essential elements of the EU's regional vision; and b) the ENI regulation and the documents elaborated in this framework, as they indicate the EU's intention to finance specific priorities. Moreover, the majority of aid to the Maghreb countries was delivered through the ENI. Finally, the thesis separately discusses migration-related documents and trade agreements negotiated with the Maghreb countries during the period of analysis.

As for the migration related documents, there is agreement (see Abderrahim, 2019; Koch, Weber & Werenfels, 2018; Limam & Del Sarto, 2015) that they are among the most important elements structuring the EU regional strategy since its inception. Since the 2011 Review of the ENP, the EU declared that it was supporting not only those states committed to strengthening democracy and human rights but also those who were simultaneously undertaking practical actions to meet the EU's objectives in terms of readmission and border management. According to Limam and Del Sarto, "Never before has the EU brought all these elements, i.e. democratic reforms, commitment to addressing migration issues and financial support, under one roof in its relations with the MENA countries" (2015, p. 9). Thus, separate negotiations for migration partnerships, visa facilitation, and readmission agreements were taking place. Furthermore, additional funds for migration-related issues did not come from the ENI budget lines.

In conclusion, the main sources for the thesis are global (strategic), regional and bilateral level cooperation documents issued by the two regional powers. Documents such as the NSS, the CEN Strategy, the RCDS CAM Strategy, the Reviewed ENP and the Global Strategy, establish the broad outlines of policy reforms desired by the regional powers in their Southern neighborhoods. Sub-regional and bilateral documents, such as bilateral cooperation programming documents for Honduras, Guatemala and El Salvador in the case of the US, and for Algeria, Tunisia and Morocco in case of the EU, complement the global strategies. This two-level (regional and national) approach allows triangulation of the data. Since the aid programming documents describe the actions which each actor is planning to finance, it allows one to check whether the real-life policy priorities reflect the strategic level goals. Moreover, the bilateral and regional cooperation documents also indicate what kind of policy convergence the regional powers were aiming to achieve and what (if any) reward and punishment mechanisms they preferred. Finally, seeking to understand the demands for policy convergence, this thesis also looks at the public communications of both the US and EU administrations (US Congress and President, European Commission and Parliament) which include demands or requests to their Southern neighbors. With the aim of simplifying the information, this thesis groups the policies which the US and EU attempted to reform into big thematic groups (i.e. governance, trade, economy), without entering into a detailed description of the content of each group. While imperfect, this approach allows one to capture broad spheres where policy coherence was requested and to compare how many of these broad spheres each actor attempted to change. Table 7 presents the questions which guide this analysis.

Moreover, this thesis uses different secondary sources: the official evaluations of cooperation activities, analytical reports (for example, briefs prepared for Congress by the Congressional Research services, a rich source on the US perspective), and academic articles. These sources help to contextualize the strategic documents and to give a broad and comprehensive view of the regional orders preferred by the two Western powers in their Southern neighborhoods from 2014 to 2017.

The author analyses documentary sources using, in the words of O'Leary (2017, p. 498), the “interview technique”, which signifies a careful reading of documents to answer specific questions predetermined in the phase of elaboration of the conceptual framework. While reading the documents, the author highlighted the passages responding to each question according to their topic.

3.1.3 Data on migration, development aid, and trade

With the intention of offering a more exact picture of the regional orders which both the US and the EU were attempting to create, the existing data on trade (flows, directions, balance), migration, and development aid flows complement the analysis of documents. The migration data is used to illustrate the existing tensions and interdependencies in the sub-regions. Meanwhile, development cooperation flows are analyzed to evaluate the willingness of the regional powers to support the development of the Southern countries (in other words, to produce certain regional public goods or redistribute resources) and to triangulate the data gathered while analyzing the demands of policy convergence. This thesis uses information about the EU's¹⁰ and US' financial cooperation, as gathered in the OECD, EuropeAid and USAID databases, to corroborate that.

Two data sets – OECD vs. EuropeAid and USAID – complement each other. First, the OECD data allows one to follow the long term US and EU engagement and the direction of their development aid flows. Moreover, it allows comparison of the EU's and US' support. However, US military support to Central America is not considered as ODA and, as a result, is not reflected in the OECD database. The USAID database, meanwhile, allows observation of these amounts as well. Moreover, data on the USAID explorer allows one to look into the project descriptions. Such analysis is essential to define what the US and the EU actually financed during the period of analysis. In order to compare the financial support with the political goals and discourse, a wide variety of different projects is grouped into seven big thematic groups, based on the sector assigned by the OECD and USAID:

1. **Social development:** projects and programs targeting areas common to development cooperation such as agriculture, healthcare and education. In the majority of cases, social development projects do not entail any commitments to policy reforms.

2. **Infrastructure:** projects and programs dedicated to the construction of different infrastructure projects, not related to the social development goals. For example, the construction of roads, factories and energy plants.

¹⁰ In the EU case, the analysis uses the data regarding the EU institutional aid (European Commission and European Investment Bank), omitting bilateral ODA between Maghreb countries and EU member states.

3. **Governance:** programs and projects dedicated to strengthening the state's ability to deliver services: public administration reforms and training, decentralization, public finance management. This category also includes projects dedicated to strengthening democracy and support for civil society.

4. **The rule of law:** while the OECD does not separate “rule of law” from “governance”, in this thesis it is made an independent group due to the particular emphasis placed by both the US and the EU on justice sector reforms in both regional and bilateral level documents.

5. **Economy:** projects and programs targeting economic development ranging from strengthening the private sector to adjusting educational systems to meet the needs of the employment market.

6. **Security:** projects and programs dedicated to security cooperation, support for military and policy, and strengthening border security.

7. **Migration:** projects and programs dedicated to migrant re-integration, defense of migrant rights, and support for migratory reforms.

While the EU, in general, follows the OECD classification and funds fewer projects per country in a limited number of sectors, the US has its own project classification system and funds increasingly varied projects. Consequently, the categorization of financed projects is not a simple and clear-cut process. For example, some projects assigned to “Economy and Trade” by USAID were supporting tax reforms (an activity that this thesis considers as belonging to the “governance” sector). Similarly, some projects assigned to the sector of “governance” by USAID focus on youth employment and violence reduction, which this thesis classifies as support for security. Despite the imperfections, such grouping allows one to “count” in how many and in which spheres the US and the EU were seeking policy reforms. In other words, these groups help to measure the comparative prevalence of vertical differentiation.

When analyzing financial aid, this thesis focuses on commitments instead of disbursements (unless indicated otherwise). The reason for this choice is that disbursements might be delayed due to reasons independent of the donor. Moreover, due to these delays, disbursements in a given year might reflect commitments made some time ago. Consequently, in order to understand what vision for their engagement each donor has in a given year, a more suitable approach is to analyze what they commit to support.

3.2. Structure of analysis

With the aim of presenting the analysis in an ordered and transparent way, the empirical part is divided into two parts: one tackling vertical differentiation in the US, and EU strategies, and the other, horizontal differentiation. Each part subsequently analyzes a different sub-region (the US and the Northern Triangle, and the EU and the Maghreb) and concludes with a comparative overview. Five broad questions form the basis of the analysis and the empirical part in general.

Table 7. Structure and questions guiding the empirical analysis and preliminary remarks

	Sub-chapter title	Questions guiding the analysis	Method and sources	Strength of differentiation principles
Vertical differentiation	What has been requested?	<ul style="list-style-type: none"> ✓ How does the US/EU frame its trade/development/political cooperation, is it subordinated to its policy goals? ✓ How many and what type of policies is the US/EU willing to change in its neighboring countries (discourse)? ✓ How are the demands made: are they laid out in strategic documents, as electoral promises, in public speeches, etc.? 	Content analysis of strategic documents: distinguishing broad thematic groups of policies where the US/EU attempted to achieve policy convergence Analysis of existing trade agreements (what has been reformed to implement them?)	<ul style="list-style-type: none"> ✓ Weak vertical differentiation: limited and rare demands (usually in the sphere of foreign policy), non-politicized cooperation/trade, support for policy reforms limited, and there are clear pathways for their negotiation (input legitimacy is high). ✓ Moderate vertical differentiation: demands for convergence sustained over time (strategic documents, recurrent speeches), the spheres still limited (though internal policy is also affected), there are positive inducements to achieve compliance, and there are clearly established mechanisms for uptake of partners' positions regarding policy convergence
	What has been funded?	<ul style="list-style-type: none"> ✓ How many and what type of policies is the US/EU willing to change in its neighboring countries (funding flows)? 	Analysis of aid flows: - Grouping the projects/programs funded, as presented in chapter 3.4 of this thesis. - Counting the number of groups	
	Partners or	<ul style="list-style-type: none"> ✓ In the case of supported 	Analysis of strategic	

Continued table.

	subordinates?	policy reforms: how were their goals defined? Are there regional/bilateral formats for negotiating development goals?	documents Analysis of secondary sources	(input legitimacy is rarely questioned). ✓ Strong vertical differentiation: repeated and sustained (mentioned in strategic documents of the regional power) requests for convergence in a broad range of foreign and, most importantly, domestic policies. The US/EU envisages and applies positive and negative conditionality to achieve their agenda, and there are no established channels for the negotiation of the reform agenda (input legitimacy is questioned).
	Sticks and carrots	✓ Are the policy convergence requests supported with inducements and/or sanctions?	Analysis of aid flows Analysis of strategic documents Secondary sources	
Functional differentiation	Role imagined: what place in the region?	✓ How does the US/EU see its role in the region: does it consider involving itself in regional affairs, undertake certain roles?	Content analysis of strategic documents Discourse analysis	✓ Weak horizontal differentiation: the US/EU does not foresee for itself a strong role in the region. Consequently, it rarely creates regional public goods; the redistributive resource

Continued table.

	<p>Roles taken: what kind of goods and what kind of institutions?</p>	<p>✓ Is there an institutionalized (formally: treaties, informally: practices, history) system of resource (re)distribution? What are the instruments used for that, what is the direction of flows, their stability, and amounts?</p> <p>✓ Does the US/EU produce regional public goods? Does it foresee this function in its strategic documents?</p> <p>✓ What is the US/EU's stance towards regional integration? What institutions are supported, and what sub-systems emerge from them?</p>	<p>Analysis of trade relations (historical and contemporary)</p> <p>Analysis of existing trade agreements</p> <p>Analysis of historical and contemporary development aid flows</p> <p>Content analysis of strategic documents</p>	<p>flows are weak and non-institutionalized (formally or informally). As it is indifferent towards the region and avoids committing itself to the production of regional public goods, it is also not willing to support (nor impede) the appearance of regional institutions.</p> <p>✓ Moderate horizontal differentiation: while the US/EU produces certain public regional goods, it undertakes this role irregularly. Similarly, it might undertake the roles of mediator and coordinator, but it is not committed to fulfilling them for the longer-term. While there might be a certain redistribution of resources, the flows are unstable, and their direction might vary.</p> <p>✓ Strong horizontal differentiation: the US/EU</p>
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				obliges itself to regularly produce various regional public goods and to undertake the role of mediator and coordinator of regional level affairs. There is an institutionalized system of resource redistribution (or extraction), and the regional power supports regional integration in different spheres.
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4. EU, US, AND THEIR NEIGHBORS

After presenting a new typology of regional orders, the fourth part of this thesis applies the framework to the EU's and US' Southern neighborhood strategies during 2014-2017. The chapter starts with a brief overview of regional cooperation on both sides of the Atlantic, demonstrating that both sub-regions qualify as hierarchical regional orders. Further, the framework is applied, first focusing on stratificatory/vertical differentiation, and then on functional/horizontal differentiation. The chapter concludes by observing that both regional powers preferred orders with moderate vertical differentiation. However, the strength of functional differentiation diverged. The US regional strategy indicated a preference for moderate-weak functional differentiation; meanwhile, the EU committed itself to fulfill different roles and to create a functionally, very diverse region, indicating its preference for strong horizontal differentiation. In that sense, both hierarchical regional orders are indeed hierarchies. However, they are quite different from one another, demonstrating the potential of the framework to capture a more nuanced picture of regional orders.

4.1 Hierarchy: voluntary but unequal cooperation

Both sub-regions (the Northern Triangle and the Maghreb) can be considered as examples of hierarchical regional orders, as defined by Garzón Pereira. First, both the US and the EU have a strong material prevalence over smaller neighboring countries, which have limited abilities to “exit” the region. While in the case of the Northern Triangle, China and Russia are attempting to expand their influence in the broader Latin and Central American regions, the US still maintains its prevalent position through military cooperation, commercial links, aid flow, migration, and security-related initiatives. In the case of the EU, after the Arab Spring, outside forces – Qatar, Turkey, United Arab Emirates, Saudi Arabia, Russia, and China - increased their influence. After the period of analysis, Algeria, Tunisia and Morocco became members of the Belt and Road Initiative (Cherif, 2018, p. 57). Moreover, Morocco itself attempted to project its political power to African countries. However, as the following analysis demonstrates, in 2014-2020, the EU countries were still the main focus of Algeria, Tunisia and Morocco.

Besides unipolar power distribution, the US-Northern Triangle and EU-Maghreb interactions might be considered as hierarchical regional orders as they are marked by a) current arrangements of voluntary cooperation whose transactional character has been observed by various authors; b) robust hub-and-spoke type economic integration, and c) constant bargaining around different issues of contention.

4.1.1 Arrangements of voluntary cooperation

As for voluntary cooperation arrangements, both sub-regions have a long history of complex cooperation and resistance between the smaller states of the region and the regional power. In the case of the EU, all three Maghreb countries have been colonies of the European countries through history, gaining independence in the mid-end of the 20th century. From the 1970s, these countries (except Algeria, whose independence war lasted longer) formed part of different initiatives which became a coherent EU neighborhood policy in 2004. Morocco and Tunisia are considered poster-children because of their willingness to negotiate and implement policies promoted by the EU. Meanwhile, oil-rich Algeria positions itself as a “disobedient” neighbor, willing to pursue a more independent and less EU-driven relations model. However, the growing instability in the region after the Arab spring forced Algeria to renew its close engagement with the EU, and it became a member of the ENP in 2013.

Consequently, Euro-Mediterranean relations at the end of the 20th century were negotiated peacefully in the framework of voluntary agreements. Moreover, the smaller states were using their advantages to negotiate more concessions: even the “poster child” Morocco has used its leverage as one of the main migrant entry points to the EU to achieve its goals. The country’s dissatisfaction with the European Court of Justice’s decision that the Association and Liberalization Agreements concluded between the EU and Morocco do not apply to Western Sahara stopped all negotiations for deeper cooperation between 2016 and 2018. The talks restarted when the EU found ways to soften its position.

In the case of the Northern Triangle, while the US has never colonized any country formally, it has been engaged in their domestic affairs, using military, economic, and diplomatic means since the 19th century. Consequently, as presented in the first chapters of this thesis, concepts of imperialism and hegemony often accompany debates about its role in the sub-region. Currently, all three countries, together with the rest of Central America and the Dominican Republic, form part of a Free Trade

Agreement. Moreover, they are closely cooperating with the US in security (mostly through the US led and funded Central American Security Initiative - CARSI) and joint migration management. Honduras, usually seen as the most pro-American, even hosts a US military base, and El Salvador is home to a “forward operating location”, a small military unit dedicated to fighting drug trafficking. During the period of analysis, the government of El Salvador, formed by the traditionally anti-American FMLN party, was more cautious towards US influence in the sub-region, often searching for more independent foreign and internal policy paths and criticizing US policy choices. However, despite harsher rhetoric, the country participated in the majority of bilateral and multilateral cooperation formats and received significant amounts of development aid.

4.1.2 Hub-and-spoke regional relations

According to Garzón Pereira, the hub-and-spoke pattern in the region means that relations between the smaller states and the regional power “should be more intensive and denser than the interactions between them and the international system” (Garzón Pereira, 2014, p. 32). Trade relations are the best indicators for demonstrating this interdependence. However, with the aim of demonstrating the close relationship between the region’s countries, this section also briefly covers other shared issues, such as migration and security challenges.

Trade

The open nature of the regional economies, combined with their geographical proximity to the US, has produced several transmission channels through which US cyclical fluctuations affect Central America (Roache, 2007, p. 2). The main channel is trade: around 50% of the sub-region’s exports go to the Northern neighbor. Low value-added products dominate all three countries’ exports to the US: textiles (especially in El Salvador), with a more substantial presence of foodstuffs and electronics in the case of Guatemala and Honduras respectively. All three countries mostly import petroleum and inputs necessary for the textile and assembly industries (e.g. cotton, different electronic parts). In general terms, the *maquila industry* (sometimes called *assembly industry*) value chain in CAM refers to an integrated production network where basic assembly operations (mostly cutting and sewing of materials sent from US plants) are undertaken and the final product exported to the US, frequently under tariff and quota

preferences (Jansen & Morley, 2007, p. 263). As observed by Roache, all Central American countries share a business cycle with the US with “a powerful cyclical linkage running from the US to Central America” (Roache, 2007, p. 21).

Historically, commercial relations with the US have been the object of intensive academic, political, and social debate in Central America since the end of the Cold War. The debate intensified with the negotiation and signature of the CAFTA-DR agreement. Massive protests accompanied the process of negotiation in most of the Central American countries. Moreover, different authors have debated whether CAFTA-DR deepened Central American dependency on the US and weakened the region (see Guinot Aguado, 2012; Irías, 2015) or created opportunities for growth and economic diversification (see Johnson, 2019).

In the case of the Maghreb, more than 60% of all exports from Morocco, Tunisia and Algeria go to EU countries. Like in the case of the Northern Triangle, Morocco and Tunisia mostly export to EU countries textiles, various types of machines, and foodstuffs. Algeria is distinguished by being mostly a crude exporter. More than 90% of its exports are petroleum (gas, unrefined and refined oil), the majority of which goes to European countries. As in the case of the Northern Triangle, the Maghreb countries import from the EU machine parts, inputs to the textile industry, and petroleum (in the case of Tunisia and Morocco).

Some authors debate whether one can speak about its “dependency” on the EU. For example, Khader claims that the region lacks such a strong presence of the EU’s capital and FDI (Khader, 2015). However, others emphasize the asymmetry underlying these exchanges: Aghrout calls the relations between the EU and the Maghreb “highly asymmetrical interdependence” (Aghrout, 2000, pp. 14-16). Others point to the hegemonic nature of the policies of the EU (see Attinà, 2003; Philippart, 2003; Costalli, 2009), and call the development of the sub-region “subordinated globalization” (Bensaâd, 2011, p. 9).

Other common challenges

In general, remittances and migration form another strong economic and social linkage between North and South in both sub-regions of analysis. Migration management also is one of the most critical issues motivating cooperation between the neighbors, as people from both sub-regions have historically sought to work in the North. However, there are some differences. Before the period of analysis, Mexico, not Central America, was

the principal source of legal and illegal migration to the US. Only in 2013-2014 did citizens of Northern Triangle countries detained illegally crossing the US-Mexico border outnumber Mexican citizens. Central America, consequently, became the first priority for the US in seeking to control migration numbers. Since then, the number of migrants from Northern Triangle countries has steadily grown, turning, after the end of the study period, into a constant flow. This sudden shift was a principal reason for changes in US engagement with the sub-region.

Table 8. Apprehensions at the US border. Author’s calculations based on data from the US Border Patrol (2018)

	2010	2011	2012	2013	2014	2015	2016	2017
El Salvador	13723	10874	22158	37149	66638	43564	72018	50011
Guatemala	18406	19061	35204	54692	81116	57160	75246	66807
Honduras	13580	12197	30953	46865	91475	33848	53402	47900
Total	463382	340252	364768	420789	486651	337117	415816	310531
NT% of total	10	12	24	33	49	40	48	53

While still small for the US, these migration flows are important for the Northern Triangle countries. Remittances grew fivefold between 2000 and 2015 and the US was the main source of remittances to the region (Lesser & Batalova, 2017). In 2017 the share of remittances in Honduran GDP was nearly 19%, in El Salvadoran – 20% and in Guatemala – 11 percent (World Bank, 2018). Thus, the countries are susceptible to US labor market fluctuations and political decisions regarding migration, naturalization and deportation.

In the case of the EU, Maghreb migration was insignificant during the migration crisis of 2014-2015. In fact, during this period, the share of immigrants from the Maghreb diminished. However, the Mediterranean’s migration processes are historically old, and these countries form part of the Euro-Mediterranean migration system (Kassar, et al., 2014). In 2017, Moroccans were the most numerous of the migrants living in the EU; Algeria was in fourth and Tunisia in 18th place. Moreover, for several years in a row, Moroccans are the most numerous of those receiving EU countries’ citizenship (EUROSTAT, 2020). The existence of specialized governmental

institutions managing diaspora related issues in Morocco and Tunisia¹¹ confirm the importance accorded to their nationals abroad. Remittances, on the other hand, are less critical in the Maghreb than in the Northern Triangle – in 2017, they composed one percent of Algerian, six percent of Moroccan, and five percent of Tunisian GDP (World Bank, 2018).

Table 9. Apprehensions at the EU’s external borders. Author’s calculations based on data from FRONTEX (2019)

	2010	2011	2012	2013	2014	2015	2016	2014
Tunisia	1498	28829	2717	1224	1739	1061	1368	6520
Algeria	8763	6157	5479	3299	973	3331	5140	7443
Morocco	1963	3786	2129	1379	3088	12978	6853	11284
Total	103991	140989	72382	107339	282873	1822177	511047	204654
% the Maghreb	11.8	27.5	14.3	5.5	2.1	1.0	2.6	12.3

In conclusion, while each neighborhood has its specifics,¹² this thesis sustains that one can speak about hierarchical regional orders. First, both the US and the EU have a material prevalence in the region. Moreover, both sub-regions have voluntary cooperation frameworks and are marked by a hub-and-spoke cooperation pattern encompassing the economic and political (security, social) spheres. Migration, security challenges and development goals are at the core of the exchange of concessions between the Northern and Southern neighbors, as both parts are employing different tactics and undertaking different roles and functions to achieve their foreign and internal policy goals.

¹¹ The Council of the Moroccan Community in Morocco, the Office for Tunisians abroad, and the High Council of Tunisians abroad in Tunisia.

¹² While Northern Triangle countries are more commercially integrated among themselves and less economically dependent on the US, migratory flows, remittances, military bases, and ODA flows still keep them tightly connected to their Northern Neighbor. While China and Russia are still attempting to access the Caribbean and Central American region, the Northern Triangle countries have limited options to diversify their foreign policy options and are forced to stay under US influence. As shown by the example of El Salvador, the price of keeping a more independent foreign policy is high. Not willing to pay the price, the President elected in 2018 swiftly changed this course to a much more pro-American stance. The Maghreb, on the other hand, which, despite the EU’s efforts, is the least economically integrated region in the world, is economically very dependent on the market of its Northern neighbor. However, due to smaller migration flows and the limited importance of remittances, migration for the countries of the sub-region is leverage rather than a weakness.

4.2 Stratificatory/vertical differentiation

As presented in chapter 3.4, the strength of vertical differentiation in the regional order which is sought by the regional power can be observed by looking at:

- a) *How high among its priorities are changes in the internal policies* of the other regional states (Are these demands registered in strategic documents? Do high-level officials repeat them?);
- b) *How many changes* it tries to achieve;
- c) *What instruments* it uses for the negotiation of these cooperation spheres (input legitimacy) and for the assurance of compliance (positive or negative conditionality).

This chapter starts with reading official documents and registering how many and which (foreign or domestic) policy spheres were seen as “*reformable*”. This information is completed with the analysis of spheres which were supported by financial transfers. Finally, this chapter looks at the existence of channels for negotiation of cooperation areas and the instruments used for the achievement of the regional power’s strategy.

The EU’s and US’ regional visions laid out in various documents allow one to identify the above-mentioned topics (areas for reform and instruments to ensure them). These rather holistic strategies encompass various aspects of political, socio-economic and security development and aim at regional transformation to ensure the stability of the neighborhood. Both strategies are motivated by an attempt to attack the “root causes” of violence, migration and instability, which are defined as a broad range of problems from poverty to economic growth or demographic tendencies.

They both state that the US and the EU seek to achieve changes in governance (ranging from finance management to justice reforms), to boost economic growth and social inclusion (reducing poverty and creating opportunities, especially for young people), to improve the security situation, to tackle climate change, and to increase energy cooperation.¹³ Hence, the “prescribed” recipe for regional stabilization and prosperity looks very similar: regional integration, deeper security cooperation to reduce violence and conflict (gang/drug-related in Central America and terrorism-related in the Southern neighborhood), and provision of finance and technical assistance to promote good governance and fiscal management.

¹³ Another US priority - tackling the HIV/AIDS epidemic - seems to be very region-specific and is not reflected in the EU's review of its Neighborhood policy.

4.2.1 US and Northern Triangle

4.2.1.1 What has been requested? Security, Justice, Governance and Opening economy

Strategic documents

The US' aid programming and strategic documents published during the period of analysis reflect the pressing need to achieve changes in the Southern neighborhood, as the security of the US is inextricably linked to it. In 2015, in the context of the flow of unaccompanied minors, the Northern Triangle countries were explicitly mentioned in the National Security Strategy. The document stated that there was a need to “arrest the slide backward” and to create “steady improvements in economic growth and democratic governance” (White House, 2015, p. 28). In order to achieve that, the US should support democratic consolidation, public-private partnerships in education, sustainable development, access to electricity, climate resilience, and countering transnational organized crime (White House, 2015).

The CEN Strategy starts with the claim that US security is intimately linked to its Southern neighbors' security and prosperity (White House, 2014b, p. 1). Consequently, “it is therefore *in the national security interests* of the United States to develop an integrated US strategy for engagement in Central America” (White House, 2014b, p. 1, emphasis added). Similarly, the RDCS CAM claims that it addresses “the US foreign policy priorities and correlated development challenges in the region” (USAID, 2015, p. 3) and emphasizes that “a more prosperous, democratic, transparent, and peaceful Western Hemisphere is in the direct US national interest” (ibid., p. 9). In the CEN Strategy, different trends taking place in the region (e.g. economic “deficiencies”, high energy costs, a growing population, climate change) are seen as potential threats. To ensure this regional transformation, the CEN Strategy foresees three main lines of US priorities in Central America as:

- **Prosperity and regional integration:** diversification and connection of electric grids, transport systems, raising the quality of education, poverty reduction;

- **Good governance:** professionalization of the civil service, improvements in fiscal accountability, democratization, and justice sector reforms;

● **Enhanced security:** reduction of violence, weakening gangs' role through a community-based security approach, and professionalization of the military and civilian police.

The RDCS CAM repeats these goals, establishing support for their regional dimension: regional economic integration, regional climate-smart economic growth, the regional situation of human rights, and citizen security and containment of HIV (USAID, 2015, p. 3). All three documents - the NSS 2015, CEN Strategy and RDCS CAM - foresee changes in three spheres of the neighbors' internal affairs. First, in the field of *governance*, they target anti-corruption efforts and improvement of public finance management. Second, in the *field of security*, they contemplate support for security sector reforms and the professionalization of security forces. Finally, in the area of *economic development*, they present various measures for the opening of the economy, a rise in competitiveness, and support for the alignment of vocational education and training with market needs.

The only bilateral country strategy adopted during the period of analysis, that for Honduras, echoes this approach. It distinguishes three development objectives: increasing citizen security in high crime areas, reducing extreme poverty in Western Honduras (the poorest part of the country), and supporting governmental transparency and accountability (USAID, 2015).

With the election of Donald Trump, the priorities of the US started changing. While the CEN Strategy and RDCS CAM are still the documents which guide US engagement, their "spirit" was modified. The new administration reformulated the mission statement of the regional strategy. In the original document, the goal of the strategy is diffuse and broad. Furthermore, while it often mentions US interests as a driver, emphasis is placed on common challenges, joint ownership, and partnership. In the review of 2017, without changing the main strategic outlines, a shorter mission statement was formulated, maintaining that the goal of the CEN Strategy was "to secure US borders and protect American citizens by addressing the security, governance, and economic drivers of illegal immigration and illicit trafficking and to promote private sector investment in Central America" (Department of State, 2017, p. 1). Thus, the US focus narrowed down to security. According to Vice President Mike Pence, "under President Trump, the United States has three priorities when it comes to <... the Northern Triangle nations <...> We seek to destroy the gangs and criminal networks to halt illegal immigration. Lastly, we're working to stop the flow of illegal drugs into our county and into our communities that are tearing apart American families" (Pence, 2017).

Trade agreements

Trade relations between Central American countries and the US are governed by the CAFTA-DR, signed in 2004. Since the negotiation and implementation of the agreement took place before the analysis period, its stipulations are not discussed more thoroughly. However, one should mention that signature of this agreement has been seen not only as a trade-related issue by the US but also as a way to lock-in reforms necessary for the region's economic and political development. In the words of the USTR, "free trade is about freedom, and a U.S. Central America FTA will further strengthen nascent democracies and economic reforms through basic building blocks for long-term development, such as...open and transparent governance" (USTR, 2003).

To implement the agreement, Central American countries have to carry out various reforms in their trade governance, and the CAFTA-DR could not come into force until all legal and regulatory changes were made by the partner countries (Hornbeck, 2009a, p. 10). For example, Costa Rica, which had to undertake a major restructuring of its insurance and telecommunications industries, had to pass 13 implementing bills to comply with the obligations entered into under the CAFTA-DR. Consequently, the ratification of the agreement took more than four years. As Hornbeck observed, "this was a challenging, opaque, and at times consuming effort, and importantly, had to be completed to the satisfaction of the United States before the agreement would be implemented. The United States played a behind-the-scenes role, working closely with Costa Rican Representatives to ensure that the changes fully complied with the FTA before implementation was formalized" (ibid. p. 11).

They had to adopt new laws regarding intellectual property, geographical indications of goods, and trade in services (Pacheco & Valerio, 2007, pp. 41-60). For example, the agreement requires the purchases of each signatory government's entities to be conducted in a non-discriminatory, predictable, and transparent fashion and to be accessible to companies from other CAFTA-DR states. While each country had stipulated some exceptions, listed in Annex 9.1.2(b)(i) of the agreement (e.g. the US provided for set-asides for small and minority businesses, all three Northern Triangle countries excluded purchase of food products, beverages, and tobacco, textiles, apparel, and leather products), they still needed to amend their internal laws. As a result of the agreement, Honduras eliminated the discriminatory requirement for foreign firms to act through a local agent to participate in public tenders. Guatemala started using an internet-based open

procurement system and amended the national procurement law to allow firms to dispute the award of tenders through arbitration (USTR, 2011a).

Moreover, the CAFRA-DR included not only trade-related but also environmental and labor clauses. However, its labor chapter can be considered as limited. First, it has been criticized for its unequal approach: while labor-related derogations can only be penalized by fines, commercial derogations can be penalized by sanctions. Moreover, it provides only for domestic labor law enforcement, whereas references to internationally recognized labor rights are only given aspirational status (Paiement, 2018, p. 688). Thus, in terms of labor regulation, it did not require any improvement of standards. Moreover, breaches of labor laws could be disputed at the level of the CAFTA-DR only in those cases where they would affect trade between the parties. The only legal dispute regarding a Central American country not fulfilling its labor obligations under the CAFTA-DR - between the US and Guatemala - finished with the victory of the latter, as the independent arbitration panel concluded that the United States had not proved that Guatemala's failure to enforce its labor laws through recurring or sustained action resulted in effects on trade between the two countries (Paiement, 2018, p. 688). Hence, in the early 2000s, the US was also seeking convergence between US and Central American trade policies. Nonetheless, given that most of the transition periods had been phased out, more substantial trade convergence was no longer on the agenda during the period of analysis.

Summing up the ideas laid out in this chapter, the strategy elaborated in 2014 placed emphasis on a triple transformation: in the spheres of *economy and prosperity* (growth, competition, liberalization - trade convergence included), in the *areas of security* (police and military operations which were community-based and respected human rights) and *good governance*. With the change in US administration, the significance of security grew, and the accent shifted from reforms to migration management effectiveness. While trade convergence had been relevant in the previous years, during the period of analysis it has become a secondary topic.

4.2.1.2 What has been funded?

With the aim of corroborating whether the US was actively supporting its declared goals, this section of the thesis analyses its development aid flows. As presented in chapter 3.2, all the projects funded are grouped into seven thematic groups: social development, infrastructure, governance, the rule of

law, economy, security, and migration. The following analysis presents the main priorities of the US at the regional and bilateral levels.

In general, the US' priorities were followed by financial flows; however, at a **regional level**, security was the primary US priority (see **Table 18** in the Annexes). Only in 2016, the amount dedicated to social development rose to 32%, most probably related to the promise of a more holistic approach to security. Nonetheless, in 2017, security funding (mostly CARSI related) again composed nearly 80% of regional funds.

In the case of bilateral projects, while each country had its peculiarities, one can observe an emerging regional pattern corresponding to the general US strategy. In **Guatemala** (for more details, see Table 19 in the Annexes), the majority of aid targeted the social development sphere, more in line with “traditional” development projects: particular attention was given to food security, as Guatemala participated in the presidential Feed the Future initiative; moreover, USAID supported different family planning projects. These projects mostly targeted the impoverished Western highland region, “responsible” for the highest number of emigrants (USAID, 2019a).

The US tried to achieve reforms in the spheres of governance, rule of law and security, each receiving respectively 16.5%, 15.6%, and 5.6% of US aid. In the domains of *the rule of law and security*, the US promoted new court models and broad security sector reform, including the development of career paths for the Guatemalan police and the strengthening of its procurement systems. The US also trained the Guatemalan police and supported anti-drug initiatives.

In the domain of *governance*, strong support was given to decentralization: the US financed the local municipalities and their national association, seeking to improve their ability to deliver services at the local level. Furthermore, various programs targeted various aspects of accountability and transparency, supporting broader inclusion of civil society actors at the local and national levels, providing funding and technical assistance to these organizations to become effective watchdogs of public institutional activities and providing support for National Transparency policy. Another significant group of governance reforms was related to fiscal policy, both on the national and local level, as US-funded experts supported Guatemala's Tax and Customs Authority and the Ministry of Finance in the revision of tax policy and the establishment of effective procurement systems.

El Salvador participated in Barack Obama’s initiative “Partnership for Growth” (PFG),¹⁴ which had as an objective “to accelerate and sustain broad-based economic growth.”¹⁵ The PFG initiative was envisaged as a catalyst for changes in the economic structure of the participating country. The analysis elaborated in the framework of the PFG initiative concluded that the main constraints to growth in El Salvador were crime and insecurity, together with low productivity in tradables. Based on this assessment, US cooperation in El Salvador, compared with the other countries of the region, had a stronger emphasis on economic reforms. Slightly more than 20% of US aid supported economy-related projects and 17% infrastructure projects, often related to attempts to improve productivity and trade opportunities (see Table 20 in the Annexes). While many economy-related projects were dedicated to trading programs such as the National Cocoa initiative, various initiatives also supported the government in the elaboration of regulatory frameworks. A significant proportion of aid went towards the creation of employment opportunities with the cooperation of private, public and non-governmental sectors.

Thus, differently from the case of Guatemala, in El Salvador, the US was seeking to transform *the economy*. Moreover, it sought policy convergence in the spheres of governance (16.8%), security (6.1%), and the rule of law (4.5% of funding committed during 2014-2017). In the *sphere of governance*, as in Guatemala, emphasis was placed on transparency and accountability, as the US agencies cooperated with the Ministry of Finance, the presidential administration and municipalities improving their transparency, budget execution, tax policy, and ability to implement fiscal reforms (USAID, 2018). Various programs supported the democratization of the political system through support for fair elections and the inclusion of civil society organizations (CSOs). In the *security and the rule of law* fields, significant amounts were dedicated to supporting crime and violence prevention, including the implementation of the Salvadoran National Strategy of Violence Prevention and the establishment of 55 municipal prevention councils (ibid.). The US also funded projects dedicated to reforms in the judicial system which envisaged broad transformation of

¹⁴ Partnership for Growth (PFG) is a partnership between the United States and a select group of countries to accelerate and sustain broad-based economic growth by putting into practice the rigorous joint analysis of constraints to growth, the development of joint action plans to address these constraints. One of PFG’s signature objectives is to engage governments, the private sector, and civil society with a broad range of tools to unlock new sources of investment, including domestic resources and foreign direct investment.

¹⁵ <https://www.usaid.gov/news-information/fact-sheets/partnership-growth>

different elements of the system, such as courts, crime investigation, and services for victims (USAID, 2019b). Implementation of various projects could be assigned to several sectors at the same time e.g. USAID supported various municipalities in their delivery of social services for youth to reduce violence and insecurity.

The focus on *governance* in **Honduras** (for details, see Table 21 in the Annexes) was stronger than in neighboring countries, as it received 38.5% of commitments during the period of analysis. Another sector where substantive reforms were promoted was *security* (14.6%). The economy (3%) and the rule of law (0.9%) did not receive a significant share of US aid. The *governance* reforms promoted by the US aimed at decentralization, transparency, effective public finance management, and participation. The participation was strengthened through support for CSOs, and also through support for an anti-corruption commission, established following the example of its Guatemalan counterpart, whose investigations led to the imprisonment of the President and high-ranking politicians in 2016. Thus, one can conclude that support for various *rule of law*-related issues was also covered by this funding.

The relatively low attention given to economic reforms can be explained by the agreement that Honduras signed with the IMF in 2014. Under this agreement, the IMF provided the Honduran government with access to 113 million USD through a Stand-By Arrangement and 75.4 million USD under a Stand-By Credit Facility to support a three-year economic program. In exchange for the financing, the Honduran government made several commitments, including the reduction of the budget deficit to 2% of GDP by 2017 and implementation of major structural reforms related to the efficiency and effectiveness of the electricity and telecommunications sectors, pensions funds, public-private partnerships, and tax administration (IMF, 2014). From 2015 the US was financially supporting Honduran efforts to meet the IMF requirements.

In conclusion, despite differences between the three countries, a clear regional pattern confirms that the bilateral cooperation reflected the regional agenda. First, in all three countries, the majority of aid was given to projects related to relatively traditional development cooperation fields such as education, health and poverty reduction. This type of assistance was often openly migration-related: through the strategic and cooperation documents, the rationale of making the Central America/Northern triangle countries prosperous and a “better place to stay” is made clear. In practice, many projects were implemented in regions with the highest share of migrants,

directly targeted young people who potentially desired to emigrate, or created economic opportunities where they were scarce. To support the US migration reduction strategies, in 2016, a Northern Triangle reintegration program for returned migrants was launched and implemented in all three countries. In the case of El Salvador, the amounts allocated to it were higher than 10% of all aid. While these projects reflected attempts to change the situation and directly affect migration dynamics, they did not entail pressing demands for policy convergence.

Nonetheless, specific policy reforms were encouraged and supported. In all countries, the US paid significant attention to improving *governance*. This was done through institutional reforms, mainly the decentralization and empowerment of local institutions, thereby raising their potential to ensure security and deliver services. Moreover, US technical and financial aid also supported tax system reforms and the improvement of public finance management. Finally, support was given to transparency and anti-corruption activities. In all three countries, the US supported the opening of the public sector to civil society organizations and their demands, transparent management of public finances and public procurement systems. Hence, the US tried to transform regional governance so that it became more open, sound and decentralized.

Furthermore, the Northern neighbor placed emphasis on reforms related to *the rule of law and security* sectors. In this field of the *rule of law*, the US supported changes to the existing court model and better coordination between different institutions, financed human rights-related projects, and supported the Prosecutor General's offices. As for *security*, a push was made to implement a community-based security model, which, in theory, would be quite different from those existing in Guatemala and Honduras, where consecutive administrations promised "hard fist" security policies. The US invested in the training of police officers, connecting them with the communities where they worked. In all three countries, there were quite a few programs and projects which belonged to more than one category, as they targeted the security situation but used very varied instruments ranging from youth inclusion to the labor market to better services in local government.

The strategic documents single out creation of conditions for prosperity (i.e., facilitation of free trade, support for small and medium enterprises) as an important priority. However, the support for economic development was less reflected in the financial flows dedicated to Guatemala and Honduras from 2014 to 2017. In the case of the latter, a limited amount of funding dedicated to economy-related issues can also be explained by the

wide-reaching economic reform program that the country implemented under the IMF-supported program (2014-17).

Peculiarly, while at the end of the period the topic of migration became more frequent in the discourse of Donald Trump, in general, during the period of analysis, the control of borders was a lower priority. Moreover, migration management was understood in a rather broad manner without often directly referring to it in official documents. As for foreign policy, there were no open demands made towards the smaller countries during the period of the Obama administration. The demands for compliance became louder at the end of the period. The most visible was the implicit request to support the US decision to move its Israeli embassy to Jerusalem. While the El Salvadoran government was reluctant and verbally critical of this decision, Honduras and Guatemala were among the first countries to follow the US lead.

In conclusion, according to the US strategic documents and projects funded, the US attempted to reform four broad policy sectors, all four related to the critical functions of the state:

- a) *governance* (management of public finances, transparency and decentralization)
- b) *security* (policing practices, drug interdiction) and, to a lesser extent,
- c) *economy* (structural reforms, competitiveness) and
- d) *rule of law* (reforming the justice system).

The economic reforms also targeted trade-related policies (e.g. increasing competitiveness). However, the extensive reforms in these areas were supported and implemented before the period of analysis as a consequence of the signature of the CAFTA-DR. Consequently, convergence in trade policies was achieved before the period of analysis. In summary, the desire to transform so many and such vital spheres can be considered a sign of strong vertical differentiation.

4.2.1.3 Partners or subordinates? Input legitimacy of the CEN Strategy

The US is often blamed for unilateralism in its foreign policy. Nonetheless, at least officially, efforts were made to show that the elaboration of the CEN was an inclusive process which took into consideration the needs and positions of the smaller states of the region. In July 2014, Barack Obama met with the three Presidents of the Northern Triangle to discuss the unaccompanied minor migrant crisis. All three of them, both privately and publicly, criticized the initial US response as too focused on border security and pleaded for attention to the “root causes” of migration: drug violence

and lack of economic opportunities, asking the US to accept shared responsibility for the situation and to show stronger support for Central American stability (see Peralta, 2014; Pérez Molina, 2014). From the side of the US, in his speech after the meeting with the three Northern Triangle Presidents, Barack Obama addressed their points, accepting the US' share of responsibility, and promising comprehensive migration reform (White House, 2014a).

To demonstrate their willingness to engage and assume ownership of the problem, the Northern Triangle Presidents, under the guidance of the Inter-American Development Bank (IABD) and with US funding, elaborated the so-called "Plan of the Alliance for Prosperity" (PAP). The plan established four main lines for the development of their countries: fostering the productive sector to create new economic opportunities, promoting measures to develop human capital, improving citizen security and access to justice, and strengthening institutions to increase the trust of citizens in the government. All these elements were consistent with the US' vision of the problem.

The PAP received extensive criticism. On the one hand, different civil society organizations saw it as rushed and reflecting only the interests of local elites and the US without taking into consideration civil society actors (Pineda & Matamoros, 2016, pp. 38-39). The fact that none of them participated in the drafting process led some authors to claim that the plan, in general, lacked legitimacy (ICEFI, 2015, pp. 7-8). Especially criticized was the discussion regarding the PAP between representatives of political and economic elites of the Northern Triangle and their high-level US counterparts, which took place in the US Southern Command base in Miami without any representation of other stakeholders (Solano, 2015, p. 14). Similarly criticized were the exclusive presentations of the plan to private sector actors, but not to the broader public (ICEFI, 2015, p. 8). Thus, in the eyes of some of the partners, the input legitimacy of the US strategy was low.

Nonetheless, on paper, the strategy was aligned with the national development plans in all three Northern Triangle countries. It also became a source of alignment of US policy (as stated both in the RDCS CAM and CEN Strategy), showing that the US government was at least officially listening to proposals formulated by the governments of the region. From 2015, USAID reports on regional and bilateral cooperation indicate with which PAP priority each project is aligned. Currently, the instruments evaluating implementation of the CEN Strategy also consider the benchmarks outlined not only by the US but also by the regional partners.

Finally, the CEN Strategy clearly stated the need for broader agreement and constant coordination between Central American countries, the US, and other donors and states of the region. As stipulated in the document, the US has to catalyze the creation of a “coordinated international structure that will distribute responsibility for lines of action, coordinate assistance, and avoid duplication of effort” (White House, 2014b, p. 3), emphasizing that a “successful outcome requires the involvement of all seven Central American nations” while focusing “on countries most at risk of continued decline” (ibid.)

Thus, while one might debate the independence of the elaboration of the PAP and the role of the US cultural and ideological hegemony over the Northern Triangle elites and their choices of development directions, the initial design of the US strategy envisaged the systematic inclusion of feedback from its weaker counterparts, and put the concept of partnership together with joint ownership at its core.

Furthermore, the US administration promised specific internal reforms that were relevant to the Northern Triangle countries. In November 2014, after failed attempts to reform (or, in the words of the presidential administration, “fix”) the immigration systems due to the bottlenecks in Congress, Barack Obama announced an executive action, which would allow roughly 45% of illegal immigrants to legally stay and work in the US. The most substantial portion of the reform was related to the expansion of a program which Barack Obama’s administration had put in place in 2012, the Deferred Action for Childhood Arrivals program (DACA), which allowed young unauthorized migrants who came into the US as children to get temporary protection and work permits. Another part of the package was relief for parents of legal residents of the US or the so-called Deferred Action for Parents of Americans and Lawful Permanent Residents (DAPA). The Northern Triangle countries were actively advocating similar reform. Together with the CEN Strategy, the presidential administration announced a refugee parole program “to provide a safe, legal, and orderly alternative to the dangerous journey that some children are currently undertaking to the United States” (USCRI, 2016). The so-called Central American Minors program allowed parents who were lawfully present in the United States to petition for their children in Guatemala, El Salvador, and Honduras to come in as refugees. The program also permitted the admission of children ineligible for admission as refugees but at risk of harm.

The Obama administration was criticized for insincerity – during his presidency, removals of illegal immigrants ran at a record high. Moreover, the proposed migration reform included a significant increase in border

patrol. However, his position was still significantly more flexible than both of his political opponents and, consequently, the subsequent US administration: due to resistance, the executive action on migration, together with the CAM program, was very controversial and was challenged in the US courts. In 2017, the presidential administration revoked the executive order and stopped the program altogether. The debate concerning the illegal drivers of migration and the harder stance towards illegal immigration reversed the promises of holistic migratory reform, and the position of the US administration became more hostile towards the Northern Triangle countries. While the first regional conference, envisaged as a potential venue for debate on common challenges, took place in 2017. Its name was telling - "Their success is our security". The conference took place in the context of the US President's threat to reduce aid to Central America and reflected the change in the regional priorities of the US.

In conclusion, the initial version of the CEN Strategy aimed to achieve higher input legitimacy of US policies in the region: it was presented as inclusive, and open to the neighbors' preferences. At least on paper, the document also contemplated the future coordination of implementation, though without establishing a blueprint for doing this. Placing emphasis on inclusion and joint ownership, the CEN Strategy signaled the US' preference for a regional order with weak or moderate vertical differentiation, thereby aligning with the overall promise of a more respectful approach towards Latin America. Nonetheless, the subsequent administration had a significantly different view of regional relations, placing emphasis on US priorities and changes in the partner countries (instead of changing together). This change indicates that it had preferences for a regional order with stronger vertical differentiation with US interests and preferences being the main benchmark for change.

4.2.1.4 Sticks and carrots

Conditionality is defined by Rosa Balfour as "a complex set of issues including the ability to attach strings to demands, the linkages between political demands and economic incentives, the attraction and credibility of these incentives for them to be effective; the ability <...> to coordinate and deliver such incentives by offering assistance and more financial support for progress and sanctions for the lack thereof" (Balfour, 2012, p. 7). Positive conditionality ("carrots") is usually understood as material and political advantages, such as extra funds or signature of free trade and political cooperation agreements.

Negative conditionality (“sticks”, in the form of e.g. human rights clauses) itself is nothing new in US support for other countries, as it usually requires its partners to fulfill certain conditions to receive disbursements. However, in the case of the CEN Strategy, both negative and positive conditionality was stepped up.

The positive conditionality was increased as the plan required a steep rise in expenditure dedicated to Central America, especially after the cuts made during the economic crisis. Consequently, an additional 1 billion USD was requested by the White House for the budget of 2016 to accompany an ambitious program of transformation. Congress approved 705 million USD for the support of Central America. This amount was smaller than requested, but it was more than that initially allocated by the Senate. Moreover, it was a significant increase from the 294 million USD appropriated to the region for 2015.

On the other hand, the negative conditionality also got stronger, given that Barack Obama had to convince a reluctant Congress to support his strategy. The politicians were not eager to commit more money to the governments, widely seen as corrupt and weak after “spending billions of dollars in the last few decades and not seeing the change” (Richter, 2015). The general feeling among the political elite was expressed by the member of a Senate subcommittee concerned with Latin American issues, Senator John McCain, who claimed that any new aid for Central American countries “depends on what they are asking for, depends on what their commitment is to securing their border, it depends on a lot of things” (Raymundo, 2014). Thus, the Obama Administration made it clear that extra funds would not be a blank check, both in the strategic documents and in public communications, placing emphasis on the need for reforms. While speaking after the meeting with the Northern Triangle countries’ leaders in 2014, Barack Obama emphasized the shared US and Northern Triangle responsibility to curb the migration crisis. He also reminded each country that it needed to take steps to discourage parents from sending their children up north (White House, 2014a).

In his defense of the proposed strategy, Joe Biden expressed a determination “to see these countries make their own commitments to depart from business as usual and embark on a serious new effort to deliver opportunity and security to their long-suffering people” (Biden, 2015a). Simultaneously, in his article in the New York Times, the Vice President mentioned the need for Central American governments to take their share of responsibility and to implement the necessary reforms: “Honduras signed an agreement with Transparency International to combat corruption. Guatemala

has removed senior officials suspected of corruption and aiding human trafficking. El Salvador passed a law providing new protections for investors. Working with the IABD, these three countries forged a joint plan for economic and political reforms, an alliance for prosperity” (Biden, 2015b). Similarly, in his speeches, Barack Obama placed emphasis on the willingness of the regional counterparts to implement necessary good governance, economic, and security reforms as a condition for increased US engagement in the region (White House, 2014a).

Moreover, the CEN Strategy makes references throughout to the “readiness of Central American governments to continue to demonstrate political will and undertake substantial political and economic commitments” (White House, 2014, p. 1), and to their “commitment to extensive reforms and increased regional coordination” (White House, 2014b, p. 2). Hence, in seeking Congressional approval and public support for the increasing expenditure, the CEN Strategy was presented more like a conditional agreement rather than a development plan.

For its part, Congress placed strict conditions on the aid. 75% was conditional on the implementation of specific policies. The Consolidated Appropriation Act 2016, enacted in December 2015, provided that 25% percent of the funds could be withheld unless the State Department certified that the recipient government was adopting effective measures to manage migration flows (inform its citizens, combat human trafficking, improve border security and cooperation with the US in the process of return and repatriation). Another 50 percent was conditional on a broad list of reforms addressing issues of *governance* (for example, asking countries to combat corruption and establish an autonomous entity to oversee the implementation of PAP); *justice and security* (i.e. implementing justice reforms and tackling criminal gangs); and *migration management* (i.e. creating jobs in communities from which migrants came) (US Congress, 2015, pp. 554-556).

While conditionality for aid to the Northern Triangle was not new – before the CEN Strategy, 25% of certain types of support were conditional on the fulfillment of specific human rights clauses, making 75% of the money conditional was a big step up from the existing conditionality. The State Department was responsible for checking the fulfillment of a long list of conditions, which delayed the disbursements (Meyer, 2019, p. 11); nevertheless, up to 2018, all of the disbursements were approved. Moreover, payments were often delayed and transferred to the next fiscal year. Thus, while the possibility of withdrawing the support was real, and the implementation of the CEN Strategy and other programs was delayed, before 2017 the US did not threaten to cut financial aid to boost compliance. The

assassination of human rights activist Berta Cáceres and electoral turmoil in Honduras were met with demands to reduce US aid. However, the US continued its support.

The situation started to change with the new administration which, from the outset, placed more emphasis on security and migration management and openly considered US aid as an instrument of migratory control. The Trump administration considered cutting funding to Central America as one of the tools to ensure compliance and proposed reducing funds for the region due to the inability of the countries to stem the flow of migrants. The weaponization of US aid and its conditional use became very visible after 2017 when support for Central America started to diminish. In 2019 the Trump administration reviewed more than 700 foreign assistance programs in the Northern Triangle and announced withholding 42.7 million USD of the assistance committed to Honduras in the 2017 fiscal year (Meyer, 2019, p. 12). Furthermore, the new administration used stronger language to define conditionality, claiming that the US “government will continue to apply diplomatic pressure in areas where progress is still needed and calibrate US assistance to promote the implementation of critical reforms” (ibid. p. 4).

The majority of conditions, both positive (additional funding) and negative (potential loss of funding), targeted the implementation of policy reforms in the spheres of governance, security, and the rule of law. The conditionality seems also to be strongly related to migration and border security management. These topics often appeared in the speeches of US officials but were somewhat absent in the strategic documents. Consequently, one can conclude there were five areas where the US was seeking policy reforms: governance, rule of law, security, opening of the economy, and migration management.

In summary, US aid was conditional with or without the CEN Strategy. However, the latter made conditionality stricter by increasing both the amounts (carrots) and the penalties (sticks). Despite that, negative conditionality was not used during the period of analysis, as the responsible institutions did not use their right to cut aid. The situation started to change with the new US presidential administration, which directly weaponized aid, mostly attaching its delivery to migration management, thereby demonstrating a growing preference for sticks over carrots. Similarly, as in the previously discussed spheres of interactions, we can observe that, with the Trump administration, the US preferred a more and more vertically organized regional order.

4.2.1.5 Conclusions: moderate stratificatory/vertical differentiation shifting to a strong one

Being a stronger counterpart and reacting to the “chaos” in the South, the US proposed a holistic vision of how its partners should transform themselves. The fact that the reforms which were promoted and financed covered such sensitive spheres as governance, security, the rule of law, economic development and migration management indicates that the US preferred regional relations with at least moderate, if not strong, vertical differentiation. This is also confirmed by the fact that the US’ requests for policy convergence repeatedly appeared not only in the discourses of high-level officials (the President and the Vice President) but were also laid out in the cooperation and strategic documents. Finally, a clear conditionality mechanism was established, although, during the period of analysis, the US preferred inducements over punishments.

On the other hand, the US attempted to emphasize partnership and joint ownership and to demonstrate that the regional priorities had a high input legitimacy. The initial strategic documents and public discourses indicate that the US attempted to present the CEN Strategy as a joint effort. As presented, the demands of the Southern neighbors were included in the document’s formulation phase. Furthermore, they laid the ground for the creation of new regional level mechanisms to coordinate actions not among the US, the Central American countries and other international donors. Thus, the regional power attempted to create the perception that the spheres for policy convergence were negotiated, and that it was willing to do its share for regional transformation. These features of regional strategy demonstrate that the regional power, at least initially, preferred a region with moderate, not strong, vertical differentiation.

From the outset, the inclusivity (and, consequently, the input legitimacy) of US intentions has been questioned. Moreover, the situation started to change with the new presidential administration, which immediately placed emphasis on the security and migratory dimensions of cooperation and promised to take a stricter view towards those neighbors not fulfilling their obligations. While the administration started to narrow its focus towards migration, governance (understood as anti-corruption efforts) and security reforms, the supported spheres stayed the same. However, the pressure and threat of using negative sanctions were growing. One can conclude that, from 2017, despite the same strategy being preserved, its spirit was changed, and the order envisaged in it was marked by strong, rather than moderate, vertical differentiation. Thus, the proposed framework

allows one not only to describe the US regional vision but also to capture its change.

4.2.2 EU and Maghreb

4.2.2.1 Wording: what has been asked?

Strategic documents

Various authors observe that the 2015 ENP review reflects the EU's shrinking ambitions and return to "realpolitik" (Blockmans, 2015, 2017). If the CEN Strategy contemplates the transformation of the neighborhood, the Reviewed ENP and the Global Strategy reflect a desire to stabilize it. The Reviewed ENP starts with consideration of the "EU's own interdependence with its neighbors", pointing to the numbers of refugees, energy crises, and internal terrorist acts that took place in Paris on 13 November 2015 (European Commission, 2015c, p. 2). Somewhat similarly to the CEN Strategy, the Reviewed ENP sees a broad range of features of the neighborhood countries as causing instability, stating that "poverty, inequality, a perceived sense of injustice, corruption, weak economic and social development and lack of opportunity, particularly for young people, can be roots of instability, increasing vulnerability to radicalization" (ibid. pp. 3-4).

The Reviewed ENP distinguishes three proposed directions for cooperation: economic development for stabilization, security, migration together with mobility. Moreover, the document identifies good governance, democracy, the rule of law and human rights as "universal values" which frame the EU's cooperation with all its partners (ibid. p. 5).

In the *sphere of governance*, the EU commits itself to strengthening democratic and independent institutions, developing local and regional authorities, depoliticizing the civil service, developing eGovernment, and increasing institutional transparency and accountability. Special attention is given to justice reforms as "they are crucial to social and economic stability, to create trust in state institutions and to provide legal certainty" (ibid. pp. 5-6). The EU also undertakes to strengthen the partnering country's capacity to "deliver": to develop sound policies, manage public finances, and fight corruption. In public finance management, particular emphasis is placed on anti-corruption efforts through reform of public procurement procedures, (re)privatizations, and reform of state-owned/controlled companies. In the *field of economic reform*, the EU focuses on the opening of the economy

(often through the promise of access to the EU market), promoting its inclusiveness towards the most disadvantaged groups and regions, and on the modernization of infrastructure and energy links. In terms of justice, the EU supports judicial reforms and human rights, and promises increased support for civil society and its inclusion in governance. In the *sphere of security*, the EU's strategy envisages support for security sector reforms and better border management, cooperation with the police, and anti-radicalization efforts. Differently from the CEN Strategy, the Reviewed ENP covers various conventional security-related issues like cybercrime, or chemical, biological and nuclear risk mitigation, and foresees cooperation with EU military forces. Finally, in the *sphere of migration* and mobility, the EU proposes three lines of actions: creating channels for mutually beneficial movement of persons, fighting illegal immigration and enhancing border security, and protecting those forced to migrate.

The EU's Global Strategy, adopted in 2016, mentions resilience as a vital goal of the EU in its Eastern and Southern neighborhoods. The policies which seek to strengthen this reflect those mentioned in the Reviewed ENP: support for inclusive and accountable governance, the fight against terrorism, corruption and organized crime, and protection of human rights. The EU also agrees to promote justice, security, and defense sector reforms, and envisages support for migration management and changes in the European asylum system (European Commission, 2016b, pp. 28-30).

Trade agreements

In the Reviewed ENP, the EU as a “market power” seems to be confident that “a key instrument in promoting prosperity in the ENP so far has been granting access to the EU market” (European Commission, 2015c, p. 8). Both in its Global Strategy and the Reviewed ENP, the EU repeats its intention to create a joint free trade area in the Mediterranean region. Moreover, reflecting its attempt to take into consideration the needs of its partners, it pledges to “support the on-going negotiations with Southern Mediterranean partners [on trade – author] including through a differentiated, progressive and asymmetric approach based on mutual priorities” (ibid. p. 8).

Currently, trade relations between the EU and its Mediterranean partners are being conducted within the framework of Association Agreements (AAs, discussed in more depth in section 4.3.2.2 of this thesis), which provide for the establishment of both political dialogue and a free trade area. The signature of these agreements led to the liberalization of trade

in goods but did not, however, include either agriculture or services. With the aim of deepening and expanding the scope of the existing FTAs, the EU is pursuing Deep and Comprehensive Free Trade Agreements (DCFTAs). According to Hoekman, these agreements would also „liberalize trade in services, public procurement markets, and cross-border investment and include disciplines on implementing national regulatory regimes“ (Hoekman, 2016, p. 1). According to the Commission, the new DCFTAs will contribute to the partner countries’ gradual integration into the EU Internal Market (Van der Loo, 2016). Thus, the EU is interested in pushing reforms in trade policies as well.

However, its partners seem to be resistant. Negotiations for a DCFTA between the EU and Morocco were launched in 2013. Since 2014 they have been put on hold to accommodate Morocco’s plan to carry out additional studies before continuing negotiations (European Commission, 2020b, p. 6). Similarly, the negotiations between the EU and Tunisia, launched in 2015, also came to a standstill. Currently, only the EU’s proposals for the negotiations have been made public.

In conclusion, both the EU Global Strategy and the Reviewed ENP express a desire for policy reforms in the spheres of the *economy* (opening, privatization of state monopolies, support for small and medium enterprises), *governance* (public finance management, anti-corruption efforts, the professionalization of civil service), the *rule of law* (judicial reforms, support for human rights), *security* (security sector reform, closer cooperation with EU forces) and *migration management*. There seems to be one more broad area for transformation – trade relations with pressure for the integration of the neighbors into the EU Internal Market. Summing up, the EU does not seem to have a radically different vision of its Southern neighborhood than the US.

4.2.2.2 What has been funded?

To corroborate if the goals established in the EU’s strategic documents were supported in practice, this section of the thesis analyses amounts and directions of the EU’s development aid provided to Maghreb countries. As presented in chapter 3.2, all the projects funded are grouped in seven thematic groups: social development, infrastructure, governance, the rule of law, economy, security, and migration. The following analysis presents the main priorities of the EU at the regional and bilateral levels.

The structure of the multiannual financial framework is quite rigid, and the framework applicable during the period of analysis was based on the

ENP review in 2011. However, some changes in the country and regional-level Annual Action Plans (AAPs) and additional financing showed adaptation to the changing realities of the neighborhood. At the regional level, the EU's key priorities laid out in the ENI Regional South Strategy Paper (2014-2020) and Multiannual Indicative Programme (2014-2017) were liberty, democracy and security; inclusive and sustainable economic development; partnership with the people; and regional and sub-regional institutional cooperation.

Looking at the finances planned in the yearly AAPs 2014-2017 (see Table 22 for details), the most significant proportion (23%) was given to *governance reforms*: institution building, and inclusion of civil society organizations in the process of governance. Nearly fifteen percent of aid was dedicated to environmental and cultural issues, and almost twelve percent to economy-related projects. Security management, mostly defined as cooperation in the spheres of fighting terrorism and protecting borders, received nearly 11%, and a similar amount was assigned to rule of law and security sector reforms. While these priorities were regional, thus targeting not only the Maghreb countries but other countries of the Mediterranean, they were reflected in bilateral cooperation with Algeria, Morocco and Tunisia, despite variations among them.

In **Algeria** (see Table 23 in the Annexes for details), the country with the most “independent” relations with the EU, 36% of EU aid was dedicated to *economic development*. In this field, the EU supported changes in the educational system to align it with labor market needs, and strengthened the diversification of the Algerian economy through support for the creation of small and medium enterprises, industrial enterprises in general, and through the increase in competitiveness and growth of the agricultural sector and tourism.

Despite tense relations, the EU attempted to support some governance reforms, reflected in the fact that the second most financed group of projects was *governance-related* (32.5%). These projects were mainly oriented towards the opening of the Algerian political system (support for decentralization and citizen participation in local governance, strengthening capacities, and independence of media outlets), support for the implementation of the Association Agreement through exchanges of public servants, and training for improvement of public finance management. The third most financed sphere in Algeria was social development encompassing both ODA, administered by DG DEVCO, and humanitarian aid managed by DG ECHO. The latter targeted five Saharawi refugee camps (DG ECHO, 2015). The EU also supported *energy diversification* and *justice system*

reforms. However, the overall amounts committed to these sectors were comparatively low.

Differently than in Algeria, the majority of projects implemented in **Morocco** (see Table 24 in the Annexes) were implemented by Moroccan government and financed through direct payments to its budget, showing the EU's trust in Morocco's capacity to deliver reforms. Moreover, differently than in Algeria, loans from the EIB also composed a significant share of EU support. If one includes these loans, infrastructure projects (mostly roads, but also urban complexes) received the most significant share of the EU's aid. *Economy-related support*, mainly through the Program of Support for Moroccan Growth and Competitiveness (PACC), which targeted Moroccan industrial policies to help producers to access European markets, constituted slightly more than 20% of the EU's funds. The EIB also offered loans for development of the Moroccan energy system (building solar plants, improving the electricity network). The justice system and *governance* reforms were at the lower end of the priorities, with only one program dedicated to the inclusion of civil society in governance. However, many changes in the *social development* sphere (49% of the funds), such as support for forestry reform or the social system, also targeted the capacity of the government to manage public policies and reform different sectors. Thus, they can be considered as attempts to achieve policy convergence in the field of governance. Differently than in the other two countries, in Morocco, the EU supported migration reform, focused on regulation of the situation of illegal immigrants in the country.

Given the importance of **Tunisia** (see Table 25 in the Annexes), the only Maghreb country directly mentioned in the Global Strategy, and in view of the instability there, *governance* in a broad sense was the primary EU priority. 23% of all financed projects and programs (and more than 50% of those foreseen in the AAP 2014-2017) tackled issues related to governance: public finance management, fiscal reforms, decentralization and strengthening of local development, and support for reforms necessary for the implementation of the Association Agreement. The EU, most often through EIB loans, supported infrastructure (mostly roads) and the energy sector (building of gas pipelines). In the latter sphere, the EU supported energy sector reform. Other priorities like *economic development* (with emphasis on private sector development and competitiveness) and *social development* (health, development of poorest regions, support for culture, and research) were less important.

During the same period, the EU committed 300 million euros to Tunisia as Macro-Financial Assistance (MFA).¹⁶ In this agreement, Tunisia undertook to implement structural reforms, such as (a) improving financial sector intermediation by completing the restructuring of public banks and the strengthening of banking regulations; (b) improving budget composition through wage bill containment, tax, energy subsidy reform, and increased public investment; and (c) generating a business climate more conducive to private sector development and investment by revamping the regulatory framework (International Monetary Fund, 2015). The whole amount was disbursed between 2014 and 2016. Moreover, on 6 July 2016, the EU approved an additional MFA to Tunisia of up to EUR 500 million in the form of loans. Following the Member States' endorsement, a memorandum of understanding and loan facility agreement was signed on 27 April 2017. Thus, economic stability and reforms were among the key priorities of the EU during the period of analysis.

Summing up, from the strategic documents and financial aid flows, one can conclude that the EU was seeking policy convergence with its standards and practices in the spheres of:

- a) *good governance* (responsible public finance planning and management, the professionalization of public administration and implementation of different sectorial reforms),
- b) *economic management* (through the liberalization and opening on the one hand, and inclusiveness on the other; together with a strong emphasis on aligning the educational system with employment market needs), and
- c) *rule of law standards* promoting the creation and the consolidation of a common legal space between Europe and the Southern Mediterranean.

While the strategic documents also mention *migration management and security reforms* as priorities, at the programming and financial reward level they seem to be less important than the three above mentioned spheres. This might be related to the rigidity of the financing framework, defined before the immigration crisis. At the end of the period, with the renegotiation of the partnership priorities, migration and security became more important. Moreover, during the period of analysis, migration agreements were

¹⁶ A balance-of-payments support instrument, which complements and is conditional on the existence of an adjustment and reform program agreed with the International Monetary Fund (European Commission, 2016a, p. 3).

negotiated “aside” from the official cooperation: in 2013 and 2014, both Morocco and Tunisia signed Mobility Partnership agreements. Similarly, negotiations on readmission of third-country nationals were taking place with Tunisia and Algeria (Morocco froze its dialogue with the EU in 2016). The agreements emphasize migration management and cooperation with the EU institutions in terms of re-admission. At the same time, they pay relatively little attention to the facilitation of mobility desired by the partner states (Euromed Rights, 2017). Thus, while less reflected in the bilateral development cooperation and financial flows, migration was an important topic in regional cooperation.

In conclusion, during the period of analysis, similarly to the US, the EU was seeking convergence in five spheres, which all can be considered domestic: governance, economy, justice, security, and migration management. Moreover, there seems to be requests by the EU to support specific EU foreign policy causes: for example, the priorities for the advanced partnership with Tunisia 2013-2017 include provision requiring cooperation for the universal application of the Rome Statute concerning the International Criminal Court; adoption of national legislation for the implementation of the Rome Statute; and training to enable its application (European Commission, 2012b, p. 14). However, these requests seem to be more sporadic and somewhat irrelevant. Similarly to the US, the EU’s desire to transform so many and such vital spheres of the neighboring countries can be considered as a sign of strong vertical differentiation.

4.2.2.3 Partners or subordinates? Input legitimacy of the EU regional cooperation

The EU’s regional and bilateral cooperation structure is different from that of the US; consequently, the negotiation process for cooperation goals is also different. Signature of an Association Agreement leads to the creation of an Association Council and Committee. From that moment, negotiations regarding joint agreements take place within these frameworks. While the EU has regional objectives and priorities defined in its regional strategies, joint ownership, and differentiation, to a greater or lesser extent, were always present in the ENP, based on bilateral cooperation agreements. Some authors, e.g. Zardo (2017), criticize the claims about joint ownership and partnership. However, as Ovádek and Wouters observed, the differences in wording regarding the goals of the Mediterranean Association Agreements are a consequence of the negotiations and differentiation of the EU’s policies (Ovádek & Wouters, 2017). Moreover, the Union for the Mediterranean

(UfM) also provides a space for the negotiation of regional-level priorities. Despite criticisms towards this mechanism, compared to the US the uptake pathways for the negotiating preferences and needs are more transparent and better established. In other words, the input legitimacy of the regional order created by the EU is significantly higher.

The consultation process for the 2015 ENP review was different from before, as consultation was organized with every stakeholder willing to engage: NGOs, citizens and national governments. Furthermore, the Committee dealing with foreign affairs in the European Parliament elaborated a position paper on their view of the ENP, and ministerial-level inputs were received from the Barcelona Informal Ministerial meeting. This meeting, with the participation of Algeria, Egypt, Israel, Jordan, Lebanon, Morocco, Palestine and Tunisia, as well as the Secretary-General of the Secretariat of the Union for the Mediterranean, Fathallah Sijilmassi, was primarily convened for discussion of the ENP review and was the first meeting at such a level since 2008 (Government of Spain, 2015).

The Reviewed ENP repeatedly mentions joint ownership and partnership, claiming that the EU would scale up its cooperation in areas where it might find mutual agreement and would search for alternative ways of collaboration in those areas where such agreement did not exist. The introduction of the ENP claims that “differentiation and greater mutual ownership will be the hallmark of the new ENP, recognizing that not all partners aspire to EU rules and standards, and reflecting the wishes of each country concerning the nature and focus of its partnership with the EU” (European Commission, 2015c, p. 2). Positive engagement with those who “wish to pursue deeper relations with the EU based on shared values” (ibid. p.4) is promised, while for those “who prefer to focus on a more limited number of strategic priorities, the reporting framework will be adjusted to reflect the new focus” (ibid. p. 5). The differentiation, and reforms “where there is an agreement”, are repeatedly mentioned throughout the whole Reviewed ENP. Similarly, the Global strategy points to tailor-made partnerships with the neighbors (European Commission, 2016b, p. 25). While “universal values” as a guiding principle also appears in both documents, the emphasis on compliance is much weaker in the Reviewed 2015 ENP and in the Global Strategy than in the previous version of Neighborhood policies.

Furthermore, with the ENP review in 2015, the EU proposed the start of a new phase of engagement with partners in 2016, consulting on the future nature and focus of the partnership. The expectation was that “different patterns of relations will emerge, allowing a greater sense of

ownership by both sides”, claiming that “the EU is ready to discuss the possibility to set new partnership priorities jointly, which would focus each relationship more clearly on commonly identified shared interests” (European Commission, 2015c, p. 4). Not surprisingly, the period of analysis was busy with negotiations on different aspects of EU-Maghreb relations.

Peculiarly, despite the long-term standstill between Algeria and the EU, it was Algeria that became the first country to agree joint priorities for cooperation with the EU in March 2017. The newly approved partnership (“hardly groundbreaking” in the words of Ovádek and Wouters (2017, p. 17)) repeats the goals established in the AAP 2014-2017, except the migration and security clauses, which reflect the priorities of the 2015 ENP Review. Moreover, these goals accommodate Algerian specificity in the overall ENP framework and, as a consequence, the agreed priorities are a prime example of the more significant differentiation avowed in the 2015 revision of the ENP (Ovádek & Wouters, 2017, p. 16).

During the period of analysis, negotiations to set new priorities for cooperation with Tunisia took place. The talks concluded in July 2018. During the negotiations “Tunisia reiterated its determination to make significant progress in its relations with the European Union and to advance them to reinforce its anchoring in the European socio-economic space, as well as to reflect the Tunisian priorities defined in the five-year development plan 2016-2020” (Council of the European Union, 2017). The priorities, agreed after the period of analysis, place emphasis on the partnership for youth, inclusive and sustainable economic growth, democracy, good governance and human rights, bringing people together, mobility and migration, security reform, and mostly reflected previous engagements, except for a stronger emphasis on migration management and security (EU-Algeria Association Council, 2018). In both spheres, Tunisia agreed to adopt broad national-level strategies: in the area of migration, the Tunisian national strategy on migration, and completion of negotiations on readmission agreements and visa facilitation.

The negotiations for a DCFTA between the EU and Tunisia started in October 2015. In February 2016, the European Parliament also expressed its strong support for a Tunisian DCFTA in a resolution and urged the Commission to negotiate “a progressive and asymmetrical agreement which takes into account the significant economic disparities between the parties, to demonstrate flexibility, responsiveness, openness to innovation, transparency and adaptability in the negotiations, and to bear in mind that the agreement must benefit the economies and societies of Tunisia and the EU” (European Parliament, 2015). The European Commission published in April 2017 the

primary texts of most DCFTA chapters proposed by the EU as a fundamental basis for discussion. However, later the negotiations slowed due to the Tunisian desire to assess the impact of its Association Agreement with the EU.

Peculiarly, relations between the EU and a “good student of the ENP”, Morocco, grew colder during the period of analysis. On the one hand, negotiations for a DCFTA froze due to similar concerns as in Tunisia, that is, the desire of Morocco to review the impact of existing economic relations. On the other hand, Morocco froze its ties to the EU due to the European Court of Justice (ECJ) ruling of December 2015, stating that an EU-Morocco agriculture agreement was unlawful due to its inclusion of Western Sahara. A similar decision on fisheries issued in 2018. Considering the question of the “Southern provinces” as a question of Moroccan sovereignty (Giannou, 2019), the country temporarily halted communications with the EU Delegation. In 2018, the European Parliament disregarded the ECJ ruling and approved both agreements despite criticism from the Saharawi and different civil society organizations (WSRW, 2019). Talks with the EU were re-launched in 2018.

In conclusion, the interactions between the Maghreb states and the EU have been very intense during the period of analysis. First, the processes which started after the Arab spring, such as negotiation of the DCFTA and Migration Partnerships, continued. Moreover, renegotiation of the partnership goals shaped bilateral cooperation. While various authors indicate that in these negotiations the EU had the upper hand (though others (see Cassarino, 2007; Tittel-Mosser, 2018) talk about “reversed conditionality” which empowered migrant-sending countries such as Morocco), there were clear channels for negotiating the priorities of the neighbors and for turning them into projects and policy solutions.

Thus, while envisaging the transformation of the region in accordance with its vision, the EU, differently than the US, was establishing channels for the partner countries to negotiate their goals. Consequently, despite a broad reform program forced on the neighbors, it seems that, due to higher input legitimacy, the EU still preferred, in its regional order, moderate rather than strong vertical differentiation.

4.2.2.4 Sticks and carrots

Since the very beginning of the ENP, the EU rewarded countries which implemented the Actions Plans particularly well. For example, in 2006, the European Commission approved the Governance facility, a specific budget

of 300 million euros to pay the partner countries who were making the most progress, and Morocco in particular benefitted from this instrument (van Elsuwege & Lannon, 2012; Leigh, 2007).

Negative conditionality, on the other hand, was also always present in EU cooperation in the form of the so-called “essential elements clause”, which since 1995 has been systematically included in cooperation agreements between the EU and third countries. “Essential elements” are human rights and democracy, and violating them might lead to the suspension of cooperation. However, in practice, the possibility of suspending cooperation on this basis has so far never been used in the Southern Mediterranean. Negative conditionality also includes sanctions, such as travel bans, arms embargos and diplomatic sanctions (Khakee, 2019).

The complex framework of EU cooperation with the Neighborhood countries provides for both positive and negative conditionality. However, even in the strategic documents, it has been laid out non-uniformly. The Reviewed ENP and the Global Strategy place emphasis on differentiation and tailor-made approaches, thus indicating a weakening of conditionality. On the other hand, the financial arm of the ENP and ENI is still governed by the Regulation based on the review of 2011, which stipulates not only positive “more for more” conditionality, but also negative conditionality. Moreover, EU leverage is both strengthened and weakened through the parallel negotiations such as those for different sectoral trade agreements (e.g. those with Morocco and Tunisia), migration and mobility partnerships, and readmission agreements.

The Revision of 2011, guiding the 2014-2020 ENI framework, introduced four “new” elements into the EU’s strategy: a deep and sustainable democracy, conditionality, differentiation, and conflict resolution (Cools, 2017, p. 16). The 2011 Review established stronger negative conditionality, claiming that “support will be reallocated or refocused for those who stall or retrench on agreed reform plans” (European Commission, 2011b, p. 5). Nonetheless, the negative conditionality was scarcely used. As the EU itself recognized, “the initial efforts after the Arab Spring to introduce stricter conditionality and delivery incentives <..> did not lead to greater leverage on the part of the EU in its ability to promote real change in the areas of democracy, human rights and fundamental freedoms in most countries” (European Parliament, 2018, p. 5).

The Reviewed ENP of 2015 recognized this failure, stating that “the incentive-based approach has been successful in supporting reforms in the fields of good governance, democracy, the rule of law and human rights,

where there is a commitment by partners to such reforms” (European Commission, 2015, p. 5, emphasis added). It observed that this approach had not provided sufficiently strong incentives in cases where political will was lacking. Consequently, the EU “will explore more effective ways to make its case for fundamental reforms with partners, including through engagement with civil, economic, and social actors” (ibid. 5).

This growing emphasis on differentiation is reflected in the proposed follow up process. The decision was taken to stop the preparation of a single set of progress reports on all countries simultaneously. Instead, the EU promised to develop a new style of assessment, focusing specifically on meeting the goals agreed with partners. According to the Reviewed ENP, these reports should be timed to provide the basis for a political exchange of views in the relevant high-level meetings with partner countries, such as the Association/Cooperation Councils. However, the 2015 Review did not clarify whether the preparation of these documents would take into account the views of partners. This lack of feedback and inclusion has been a strong point of contestation by the Middle Eastern and North African (MENA) countries, since the unilateral EU assessment has been seen as undermining the “joint ownership” principle (Stivachtis, 2018). Some authors observe that this growing differentiation is likely to complicate the application of conditionality (Kostanyan, 2017, p. 1), especially negative conditionality, given that the benchmarks for evaluation would be less uniform.

Despite these changes, the overall logic of engagement stayed more or less the same, since the financial logic underpinning ENP conditionality remained unchanged. The ENI Regulation of 2014 made the level of financial support dependent not only on the country’s needs and absorption capacity, but also on the partner’s commitment and progress towards “political, economic and social reform objectives” and “deep and sustainable democracy”. The document specifies that 10% of the financial envelope is to be allocated following the two latter criteria. Regardless of the wording present in the Reviewed ENP, in December 2015 the Council underlined that the implementation of reforms “will continue to guide the allocation of funds under the ENI umbrella program, in line with the incentive-based approach”. The reports elaborated at the end of the period of analysis (Reports on cooperation with Tunisia (Council of the European Union, 2018) and Algeria (European Commission, 2017a) were no different from earlier documents, focusing on measuring partner-countries progress in implementing the reforms agreed.

Some authors claim that, from 2011, EU-supported reforms were forced on weak countries suffering tumultuous periods in their histories (see

Limam & del Sarto, 2015; Zardo, 2017). For example, the inclusion of Tunisia in two separate “blacklists” in 2017 (Mzalouat & Lac, 2017) and 2018 (Ducourtieux & Bobin, 2017) - the first designated Tunisia as a tax haven; the second stated that the country was at risk of money laundering and financing terrorism - was seen as an instrument of pressure. Some Tunisian observers concluded that these two events, while said to be purely technical issues, served as a means of exerting pressure on the Tunisian government as it was negotiating the DCFTA and other agreements with the EU (Cherif & Kausch, 2018, p. 10). However, the documents defining cooperation indicate that, during the period of analysis, negative conditionality was not applied.

The principle of “more for more” and other forms of positive conditionality, on the other hand, were openly applied. For example, in 2014, out of 169 million euros allocated for Tunisia, 50 million was assigned based on the “more for more” principle (Délégation de l’Union européenne en Tunisie, 2015, p. 17). In conclusion, the preference for positive conditionality indicates that, while openly attempting to shape the choices of its neighbors, the EU preferred a regional order which would not be completely “vertical”. In other words, the unwillingness of the EU to use negative conditionality indicates moderate vertical differentiation.

Conditionality related to the support modality: MFA and budget support

While, as discussed above, the political and economic cooperation has its conditionality, two instruments used in the Maghreb countries - budget support and Macro-Financial Assistance (MFA) – had their separate “sticks and carrots”. The MFA is a highly conditional mechanism – as not only is it conditional on respect for human rights and effective democratic mechanisms but also the payments are released “strictly” dependent on the successful implementation of reform measures aimed at putting the beneficiary country’s economy back on a long-term sustainable path (European Commission, 2018c, p. 2). In the case of Tunisia, the MFA was expected to “support the Union’s external policy towards Tunisia” together with “Tunisia’s commitment to values shared with the Union, including democracy, the rule of law, good governance, respect for human rights, sustainable development and poverty reduction, as well as its commitment to the principles of open, rule-based and fair trade” (European Parliament, European Council, 2016, p. 186/3). The preconditions for receiving MFA were similar to those for budget support: respect for effective democratic

mechanisms, including a multi-party parliamentary system, and the rule of law and human rights.

Moreover, “the specific objectives of the Union’s macro-financial assistance should strengthen the efficiency, transparency, and accountability of the public finance management systems in Tunisia and should promote structural reforms aimed at supporting sustainable and inclusive growth, employment creation and fiscal consolidation” (European Parliament, European Council, 2016, p. 186/3). The general rules of the MFA provide that fulfillment of the preconditions and achievement of those objectives should be regularly monitored by the Commission and the European External Action Service. Tunisia asked for the MFA at the end of 2013 after signing the IMF agreement. Out of the agreed 300 million euro in loans, the EU disbursed 200 million in 2015. Delays by the Tunisian authorities over the implementation of the agreed policy measures prevented the EU from paying the third and last tranche of the program in 2016 as initially planned (European Commission, 2017c, p. 6). Despite that, reacting to the terrorist events that took place in the country in 2015, on 6 July 2016 the EU approved an additional MFA to Tunisia of up to EUR 500 million in the form of loans. The second MFA phase was launched in 2017. During 2017-2018 the European Commission planned to disburse 500 million euros, tied to the implementation of several policy conditions targeting fiscal consolidation and improvement of Tunisia’s social assistance schemes and business climate (European Commission, 2017b).

The majority of aid given to Tunisia and Morocco was delivered in the budget support modality, considered by the Commission as an “effective means of delivering aid to support reforms and sustainable development goals” (European Court of Auditors, 2017a, p. 1). Budget support involves financial transfers to the national treasury account of the partner country. The funds transferred are not earmarked for a specific purpose and, the partner country can use them in its normal budgetary process (European Court of Auditors, 2019, p. 10). Budget support is paid in fixed and variable tranches. Fixed tranches have a fixed value, specified in advance within the financing agreement, and are disbursed in full or not at all. Variable installments can be paid in whole or in part, with the amount spent being based on the performance achieved in relation to pre-specified targets (*ibid.*, p.10). Thus, the variable payments are highly conditional and are supposed to depend on the results of the partner country.

However, as indicated by the evaluations of the European Court of Auditors (ECoA), the budget support-related conditionality in the Maghreb seems to be lax. In their assessment of the EU support for Morocco 2014-

2018, the ECA auditors observe that, though the disbursements were delayed due to delays in implementation on the Moroccan side, variable tranches were often paid when conditions were neither met nor verified (European Court of Auditors, 2019, p. 25). While the European Commission disbursed the variable tranches as if more than 60% of indicators had been met, according to the ECoA, in reality, the Moroccan government achieved only 40% of indicators (ibid. p. 29). Moreover, the majority of indicators were output or process-oriented and thus weakly reflected the EU's potential impact. In Tunisia the situation was similar – the evaluation of EU aid (though slightly before the period of analysis) indicates that the conditionality used for budget support operations was too lax. Moreover, a significant part of budget support was classified as “state-building contracts”: the most flexible form of budget support designated for fragile countries. Disbursement conditions under this form of budget support are more flexible, since, for instance, the eligibility condition for partner countries to have a reliable and credible national development plan is not required so long as the government commits to developing one (European Court of Auditors, 2017b, p. 21). According to the experts of the ECoA, the European Commission did not comply with best practice in budget support by not agreeing to a clear reform schedule and program before the first disbursements, conceding that the reforms already made were sufficient (ibid., p. 22). In some cases, there were no clear baseline indicators. As in Morocco, the rest of the indicators were outcome-focused, and the overall monitoring of implementation was weak (ibid., p. 30).

It seems that, especially in the case of Tunisia, which was very fragile, the EU provided much needed funds without a serious push for the reforms. This choice might reflect both the EU's weakness and a deliberate decision to support the problem-ridden country. In both cases, as discussed above, it indicates moderate vertical differentiation.

It also confirms the EU's reluctance to apply negative conditionality regarding the Southern Mediterranean countries, mostly due to migration and security-related issues and its desire to maintain the strategic partnerships (Balfour, 2012; Cassarino, 2007). Cassarino (2007, p. 192) even calls such power held by the EU's neighbors “reversed conditionality,” and most probably it is nowhere so evident as in migration management.

Migration related-conditionality

Migration management, where the stakes of interaction with neighbors and third countries are very high, is among those spheres where the EU attempts

to use all its tools to achieve the desired solutions. Not accidentally, both internal and external EU political documents and communications frame migration cooperation as conditional. In 2016, the European Commission explained that “given that return and readmission has become a top priority for the EU in the context of the current migratory crisis, the European Council <...> tasked the High Representative and the Commission to conduct High-Level Dialogues on Migration in order to further step up cooperation with priority third countries, in particular in the area of readmission of irregular migrants. Morocco, Algeria, and Tunisia are included in the list of priority countries, and the Council has decided on which incentives and leverages can be used by the EU in the relations with these countries in order to improve their cooperation on return and readmission (European Parliament, 2016). Moreover, the European Commission claimed that “the EU will use its leverages and tools to deliver better results on cooperation on migration, in particular on returns and readmission, with the countries of origin and transit” (European Parliament, 2016).

The measures used by the EU for migration management comprise a broad range of instruments and programs on issues like development aid, temporary visa facilitation, circular migration programs, and the fight against irregular migration (Wild, 2016, p. 2). Moreover, there is a desire to connect all these instruments. For example, the EU’s Action Plan on Return, adopted in September 2015, suggests that the EU’s “leverage should also be identified outside the home affairs area to increase cooperation on readmission from third countries” (European Commission, 2015a, p. 14). It further specifies that this should include “development assistance, neighborhood policy, trade agreements and trade preferences (with the possibility to link the conclusion of free trade agreements or the granting of preferential treatment for certain third countries to the parallel conclusion of a readmission agreement)” (ibid. p. 14).

The Mobility Partnerships (MPs) are “non-binding instruments concluded between the EU, interested member states and a third country to cooperate with third countries on migration and asylum issues” (Tittel-Mosser, 2018, p. 350). Various authors have observed that the MPs, while non-binding, gave the EU opportunity to link border control, migration and democratization, thus pushing weak countries to accept its migration regime, and outsourcing migration management to them (see Euromed Rights, 2014; International Federation for Human Rights, 2013; Limam & del Sarto, 2015; Tittel-Mosser, 2018). On the one hand, these partnerships include incentives for mobility of third-country nationals and provide incentives for migration

management, such as a visa-free regime for the partner country's citizens. On the other hand, they might imply an adverse change in mobility conditions due to the signature of readmission agreements, and, consequently, return of migrants, with the potential impact of falling remittances and growing unemployment. Even more contested is the EU's attempt to make the partner countries admit third-country nationals. Thus, the EU's general migration policy is in essence "a fine balance of incentives and pressure" (European Council, 2015).

While the negotiations of Mobility Partnership Agreements with Eastern neighborhood countries were successful, in the South, they were bitter-sweet. The MPs with Morocco and Tunisia were signed in 2013 and 2014 respectively; meanwhile, Algeria preferred limited engagement. Various authors observe that the volatile context of the Maghreb, especially in Tunisia, and the economic dependency of the Maghreb countries on the EU and its member states, were used by the EU to press for their signature (see Limam & Del Sarto, 2015; Zardo, 2017).

However, if one looks more closely the EU's incentives look weak, and the conditions are not fulfilled. On the one hand, some "carrots" were meager and unequally distributed. While promising "mobility" for Moroccans, the EU's MP with the country reveals a clear emphasis on the fight against irregular migration: out of 60 projects, 27 concern the prevention of irregular migration and border management, and only 15 projects are listed under the heading of "Mobility, legal immigration, and integration". Moreover, most of them are related to information activities, and none of the proposed projects aims at the creation of new opportunities for labor migration for Moroccan citizens (Kaister, 2019, p. 11). Similarly, in the MP with Tunisia, out of 31 initiatives, twelve are related to border control and migration management, and only eight target regular migration and mobility (European Commission, 2014a). Out of these, two envisage providing better information about existing migration regulations or simplifying entry requirements for already privileged groups such as students, business people and scientists (Abderrahim, 2019, p. 22). Given the high stakes of cooperation with the EU for the Southern countries, the EU's proposal seems narrow and insufficient. Moreover, it appears that the EU did not have sufficient appetite for a real visa facilitation program – quite the opposite: in 2019, the new EU visa rules explicitly linked visa procedures and cooperation on readmission, "giving the EU new tools for a dialogue with partner countries about migration" (European Commission, 2020a).

On the other hand, the positive inducements, when offered, did not take into consideration whether the EU's conditions had been met. After

signing the Mobility Partnership at the end of 2013, Morocco received generous aid for its migration and border management reform. The regularization process that took place between 2014 and 2017 in the framework of the new “more humane” Moroccan migration policy enabled nearly 40,000 migrants to regularize their situation in the country (Lahlou, 2018). The EU welcomed the reform, hoping that it would prevent migrants from going to the North. However, with the growing influx of immigrants, its policies started changing, and the country more openly refused to be considered a “European policeman” in the region.

Consequently, the negotiations towards a readmission agreement stalled in 2015, and Morocco started using its position (or “reversed conditionality”) as the main transit point more skillfully. Despite this, the EU pledged to the country 232 million euros between 2014 and 2019 to support migration-related activities in Morocco (European Commission, 2018a). As Kaister observed, the EU’s agreement with another country of the wider Mediterranean region, Turkey, on the readmission of migrants demonstrated its vulnerability and the possibility of extracting more money (Kaister, 2019, p. 10). Tunisia, on the other hand, shaken by instability, did not have the opportunity to resist the EU as skillfully: as Zardo (2017) observed, the EU’s pressure increased significantly, forcing the Tunisians to sign the MP. However, similarly to Morocco, the country has still not signed a readmission agreement.

In conclusion, the EU’s migration cooperation, both in general and during the period of analysis, was constructed as highly conditional engagement, based on the careful balance of rewards and potential punishments. The majority of the EU’s conditionality was related to progress with the agreed reforms – ideally, comparing the performance of each country against indicators stipulated in advance. However, the application of both sticks and carrots was uneven, as the EU was more focused on positive “rewards” even in cases when progress was insufficient.

Thematically, the EU’s “sticks and carrots” targeted the same five spheres which the Union was attempting to transform: governance, economy, justice, security, and migration management. Differently than in the case of the US, the conditionality foreseen by the EU was more tailor-made and adapted to each policy sector, or to the instrument used, or to the country where it was applied. However, similarly to the US, the EU showed a preference for positive conditionality over negative conditionality, thus indicating its preference for a regional order with moderate vertical differentiation.

4.2.2.5 Conclusions: Moderate stratificatory/vertical differentiation shifting to weak

The analysis presented in this chapter allows the conclusion that, in a similar way to the US, the EU had a clear vision of how its neighbors should transform their domestic policies. During the period of analysis, the EU tried to change a broad spectrum of internal policies in the Maghreb countries as it promoted and financed reforms in governance, economic transformation, the security sector, the rule of law, and economic and migration management. All these spheres represent domestic policy. Given that shared challenges were presented as existential threats to the EU's security, requests for policy convergence appeared both in communications and operational/strategic documents.

Moreover, the EU's strategy provided for clear inducement and sanction mechanisms – cooperation, in general, was presented as a conditional endeavor. Thus, the requests were broad, and they targeted internal policies in the neighboring countries. Furthermore, these requests were sustained over time, as the EU framed them as the main goal of cooperation. Finally, they were supported by clear mechanisms for positive and negative conditionality. All these features of the EU's regional vision indicate moderate-strong vertical differentiation, since the regional power envisages a region where its policy priorities become guiding principles for transformation in the neighborhood.

However, the EU did not prefer a purely “vertical” regional order. While using positive incentives, the EU avoided cutting aid to those who did not deliver the agreed reforms. Moreover, the EU's cooperation, in general, provided mechanisms for regular uptake of partner priorities and wishes. While sometimes called out for being asymmetrical and selective in the inclusion of topics and stakeholders, they created a steady path for negotiation. This feature distinguishes the EU's strategy from the US', which attempted to demonstrate the inclusiveness of the elaboration of the CEN Strategy without laying out the form of more structured feedback and exchange. In the case of the EU, the new partnership priorities, negotiated during the period of analysis, while still focused on the preferences of the Northern neighbor, reflect the inclusion of specific concerns of the partner countries. Consequently, the EU demonstrated a preference for a regional order with moderate vertical differentiation: it desired to shape and press; however, it accepted its share in the process (e.g. it included legal mobility in its strategic documents), and had clear mechanisms for the negotiation of shared goals with the neighbors (stronger input legitimacy).

With the Revision of 2015, the EU's cooperation became somewhat contradictory. While the goals of financing and the procedures providing for conditionality were based on the 2011 Review, the political documents, such as the Reviewed ENP and the Global Strategy, placed emphasis on more flexible cooperation on mutually agreed priorities. The newly agreed cooperation goals, for their part, seemed to reflect the partners' needs. This change potentially indicates a weakening of vertical differentiation as the EU becomes more open to the limitations and realities of the partner countries. It requires more time to see how the EU's neighborhood strategy will evolve (e.g. how the EU is going to apply new visa rules). However, one might conclude that at the end of the period, the EU's strategy took the opposite direction than that of the US, as the EU seems to prefer (or rather accept) a regional order with weaker vertical differentiation.

4.2.3. Overview of the comparison: more similar than different

The comparative overview summarized in Table 10 demonstrates that, in terms of vertical differentiation, both regional powers had quite a similar vision of how their Southern neighborhoods should be arranged.

a) **They both had clear preferences for broad transformation of the political life of the neighborhood countries. They both financed, promoted and sometimes exerted pressure for policy convergence in the following domestic policies:** *governance*, understood as responsible management of public finances, decentralization and transparency; *sound management of the economy* encompassing tax reforms, promotion of competitiveness (privatization of state-owned monopolies, improving the business climate, and support for specific products) and the convergence of trade regulations; the *rule of law*, understood as strengthening an independent and effective judicial system and human rights oversight. *Security sector* reforms seem to be more relevant to the US than to the EU, which mentioned security in their regional and global level documents, without reflecting that support in their bilateral cooperation. However, growing migratory pressure and the newly renegotiated partnership priorities indicate that security sector reforms are becoming more relevant. Moreover, policies related to *migration management* are also becoming more and more relevant.

Finally, while during the period of analysis the EU was the one demanding convergence in terms of *trade policy*, this can be explained by the fact that very similar requirements were made and successfully achieved by the US five years before the period of analysis.

Based on the theoretical framework presented in this thesis a demand of such a broad transformation of domestic policies indicates either moderate either vertical differentiation. It is telling that both Western powers have such similar “recipes” for order and positive transformation, and this partially confirms the claims of those who see the engagement of both powers in their Southern neighborhoods as alike.

b) **Both the US and the EU provide for mechanisms to induce change, and these frameworks include both positive and negative conditionality.** However, during the period of analysis, both were willing to rely more on carrots than on sticks, demonstrating that, despite willing to transform their neighbors, they still wanted to present themselves more as partners than “masters”. While in the case of the EU, this choice is often explained as a result of the Union’s weakness, in the case of the US, it seemed to be part of the Obama administration’s effort to achieve a more coherent strategy in Latin America. This shows that the “pushiness” of the strategy depends not only on sheer power asymmetry or the relevance of the goals which the regional power is trying to achieve. The end of the period of analysis marked a growing divergence between the US and the EU. While the Trump administration became more openly demanding of compliance in exchange for any financial engagement of the US, the EU placed emphasis on tailoring its engagement and listening to its partners. This demonstrates that, while the regional order that Trump tried to create was becoming more vertical, the EU’s preferences were taking the opposite turn.

c) **Both at least formally provided for mechanisms for the inclusion of the weaker partners in the elaboration of joint goals for policy convergence,** and civil society representatives criticized both powers for giving preference to friendly governments. However, the EU’s mechanisms seem to be better “tuned” and more structured: despite the CEN Strategy providing for various initiatives for the regular uptake of cooperation priorities, the change in the US presidential administration opened this up only temporarily.

In conclusion, during the period of analysis, both the US and the EU envisaged and attempted to create regional orders with moderate vertical differentiation: they both had “civilizational” visions of how their neighboring regions should develop and laid out frameworks guiding developing countries in the desired direction. At the same time, while they had instruments for “punishment”, they preferred positive inducements and more or less inclusive ways for deliberation of areas for policy convergence. Thus, the regional orders which both powers were intending to create during

the period of analysis were those reflecting their supremacy and remaking the region according to their requirements. However, as none of the strategies was fixed, they reflected both the changing internal and external environments and changing perceptions about the desired outcomes. While the newly elected US administration was taking an increasingly confrontational stance, the EU seemed to move away from the rather imposing tone set in the original ENP in 2004 towards a more “modest” vision of the region and its role within it.

Table 10. Vertical differentiation. Summary of comparative analysis

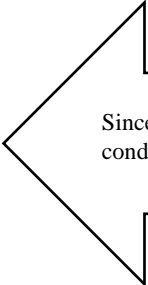
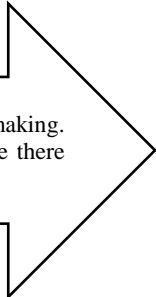
Strong vertical differentiation	Moderate vertical differentiation	Weak vertical differentiation
	<p>US: 5 spheres for policy convergence + clear framework for conditionality (preference for positive) + attempts to create paths for negotiating regional cooperation goals.</p>	
	<p>Since 2017 growing emphasis on obedience and negative conditionality; closing spaces for negotiations.</p>	
	<p>EU: 5 spheres for policy convergence + a framework for conditionality (preference for positive) + clear and established paths for negotiation of cooperation goals</p>	
	<p>Emphasis on differentiation and joint decision making. Promise of engagement only in those sectors where there is an agreement with partners.</p>	

Table 10 indicates that the framework proposed in this thesis allows the capture of both the static and dynamic elements of these regional visions. However, for a full understanding of the type of regional order, one has to look also at the prevalence of functional differentiation.

4.3 Functional differentiation

As presented in chapter 3.4, the prevalence of functional differentiation in the regional order which the regional power attempts to create can be observed by looking at:

- a) its *willingness to undertake certain roles* that include the production of regional public goods and coordination/mediation of regional interactions; and the overall number of roles taken;
- b) its *support for creation and maintenance of regional institutions* and the variety of spheres where these (formal or informal) institutions appear;
- c) the *redistribution or extraction of material resources* from the regional power to the weaker states (or vice versa).

The preference for a regional order with strong functional differentiation would be expressed by the commitment (enshrined in treaties and internal strategies) and actual support not only to ad hoc joint activities but also to the creation of different regional sub-systems, each involving different stakeholders and governance.

Like the previous chapter, this one starts with a careful reading of how both the US and the EU imagined their role in the region – what they were willing to commit to in terms of joint efforts. The analysis is complemented with analysis of current US and EU activities: the production of regional goods, observed by looking at aid flows, existing trade relations and a (lack of) support for the institutionalization of varied spheres of regional interactions.

4.3.1 US and Northern Triangle

4.3.1.1 Role imagined: what place in the region?

After the end of the Cold War, Central America was among the lowest priorities in the US foreign policy agenda. The drug-related insecurity at the beginning of the 21st century revived its interest in Colombia and Mexico. However, the area between them was not considered significant: during the period 2002-2014, neither Central America nor its countries appeared in the US NSS. Thus, it is not easy to define the US vision of the sub-region and its role within it.

The CEN Strategy lays out the vision of the US, stating that “our objective is the evolution of an economically integrated Central America that is fully democratic; provides economic opportunities to its people; enjoys

more accountable, transparent, and effective public institutions; and ensures a safe environment for its citizens” (White House, 2014b, p. 1). Nonetheless, interest mostly arises from the security challenges to the US. During the period of analysis, in nearly every speech, the US President and Vice President (during both the Obama and Trump administrations) and any other US official were mentioning Central America and the Northern Triangle in the context of insecurity, instability and migration. For example, in his open editorial, placing emphasis on the linkages between Central America and the US, Vice President Biden paints a dramatic picture of “inadequate education, institutional corruption, rampant crime and a lack of investment”. In such a context, according to him, “six million young Central Americans are to enter the labor force in the next decade. If the opportunity is not there for them, the entire Western Hemisphere will feel the consequences” (Biden, 2015a).

These claims echo those made by different DoS officials in the hearings in Congress and the Senate when justifying requests for increased financing. Moreover, the CEN Strategy itself states that “more than five million Central Americans are expected to join the workforce over the next decade, many of them in Guatemala and Honduras. If economic prospects remain poor and the crime rate remains high, migration and organized crime may present challenges for the United States and Mexico. In short, US security is intimately linked to the security and prosperity of Central America” (White House, 2014b, p. 1). Similarly, the RDCS CAM justifies the desire to change the situation in which “Central America remains the least developed sub-region in the hemisphere” by “its proximity to the US, <meaning that> the problems that plague it directly affect US interests” (ibid. p. 5). Not accidentally, the most repeated word in the official communications and documents of White House officials, related to Central America, is “security”.

Thus, since its inception, the US Strategy for Central America was mostly informed by two interrelated issues falling under the umbrella of security: migration and violence. However, the US “projected the impression that the United States <...> recognized a degree of responsibility in finding solutions” (Hiemstra, 2017) by promising to increase its support to Central America and reform the US migration system.

This emphasis on shared responsibility and partnership was a repeated leitmotiv of the Obama administration’s engagement with its Southern neighbors. Formulated as a principle to “renew the common stake that we have in one another”, to “seek an equal partnership” and to “have a responsibility to each other” (White House, 2009), it was most firmly expressed in the rhetoric regarding the CEN Strategy and in the

radical change in relations towards Cuba. The RDCS CAM heralds the US' "shared responsibility to promote safety and stability in the region" (USAID, 2015, p. 3) and emphasizes its commitment "to close collaboration and enhanced cooperation to strategically target the region's most pressing development challenges" (ibid. p. 3). The US seeks to lead these efforts, claiming that "American leadership, <...>, remains essential to arresting the slide backward and to creating steady improvements in economic growth and democratic governance" (White House, 2015, p. 28).

The original CEN Strategy indicates the US' desire to undertake the role of coordinator of regional-level efforts to tackle common challenges. The document presents the US approach as based on the mediation and coordination of different stakeholders who can support the Central American countries. According to the document, "an approach is required that will encourage private sector investment and combine the financial, intellectual, and human resources of North American governments, Colombia, the European Union, and multilateral development banks <...> We know from our discussions with potential donors that they are prepared to work with us in support of Central America" (White House, 2014b, p. 2). The implementation of such a plan rests mostly on financing and coordinating: the CEN Strategy envisages convening partners to establish a common understanding of the problem, working with Central American governments to develop a common vision, and establishing a mechanism to coordinate international support for Central America (ibid. pp. 2-3).

The concepts of "sharing" (commitments, problems, solutions, responsibilities) and joint ownership are repeated both in the CEN Strategy and RDCS CAM. The emphasis on collaboration is also seen in the RDCS CAM document, where next to the description of the goals which the US seeks to achieve, the donor landscape is described, pointing out potential coalitions and plans on how to engage them. The partners range from the other countries of the region (such as Colombia, Mexico and Chile) and other bilateral and multilateral donors (such as Canada and the EU) and various NGOs. Thus, somewhat to the opposite of what is often claimed, the US strategy, as laid out in the initial documents, promotes a multilateral approach to the problems which the region is facing. This principle – to cooperate, to convene, and to act together with others - permeates all the instruments and goals which the US contemplates, from strengthening the integration of Central America to the adaptation to climate change and the fight against HIV epidemics.

Thus, the US envisaged itself as part of the region. And while it did that due to security concerns more than for any other reason, it took its

“share” of responsibility, foreseeing for itself the role of coordinator and sponsor of the solution of common problems. Moreover, the initial US approach was based on the inclusion of different stakeholders and the creation of regular formats for their cooperation.

In a similar way to other features of the US Strategy, this attitude started slowly changing after the 2016 Presidential elections. In the beginning, this shift was not so visible: for example, in his interview in the summer of 2017, the National Security Secretary John Kelly observed that the US should treat Latin American countries as equal. Moreover, according to him, the US should retreat from its “dominant position in Latin America”, letting other countries lead changes in Central America (Pascual Macías, 2017). Similarly, in his opening speech at the First Conference on Prosperity and Security in Central America, Mike Pence repeated the commitment that the US and the Northern Triangle countries “are in this together”.

However, at the same time, Mike Pence distanced the US from the efforts of the Northern Triangle countries, making a clear distinction between “you” and “us”: “You have courageously pursued the fight against corruption, crime, and drug trafficking. You’ve undertaken structural reforms to establish a stronger foundation for economic growth, and you are working in close cooperation with regional partners, your business communities, and multinational institutions to implement long-term solutions to the problems facing Central America. Your resolve is impressive, and know today that you have the great respect of the President of the United States and the American people. And on behalf of the President, allow me to assure you the United States of America stands with the nations and people of the Northern Triangle. We stand with you in your *commitment to root out crime and corruption*. We stand with you in your *commitment to stop the scourge of drug trafficking* once and for all. And the United States of America stands with you as you build a more secure and prosperous future for the benefit of your people and the benefit of the Western Hemisphere. In a word, we’re in this together. As the President has said often, his highest duty as President of the United States is to keep America safe” (Department of Homeland Security, 2017, emphasis added). Hence, the main US goal switches from the development of the Northern Triangle to the fight against drug trafficking and corruption.

This push for security was reflected in the changed mission statement of the CEN Strategy and the more hostile US stance towards the requests of its neighbors: the end to Obama’s migration initiatives and the drift from “fixing the broken immigration system” was accompanied by demands for the countries to stop the emigration flows. These changes demonstrated that

discursively the US was withdrawing from the region and seeing its challenges as something that had to be solved there and in a specific manner, rather than searching for joint solutions and putting its share into the process.

In conclusion, since the inception of the CEN Strategy, the US saw itself as part of the region and accepted that it bore its share of responsibility for the resolution of common challenges. It also imagined itself as mostly a sponsor and coordinator of joint efforts for economic integration and security. Moreover, the US committed to taking part in the resolution of HIV epidemics and to strengthening the regional resilience to climate change. Nonetheless, as with other features of US engagement in Central America, the approach to its role in the sub-region started to change in the second half of 2017, and the emphasis on holistic involvement in the region becomes weaker, as the US narrows its attention down to trade relations and management of security threats.

4.3.1.2 Roles taken: what kind of goods and what kind of institutions?

Redistribution of resources inside the region

Official development aid and other assistance

The CEN Strategy confirms the US' disposition "to invest significant resources in an effort" (White House, 2014b, p. 1) to ensure prosperity and security in Central America. The most significant promise is related to development assistance flows, as the Obama administration sought one billion extra dollars for implementation of the CEN Strategy and pledged to broaden the security-focused approach. As can be seen in Figure 2, the amounts allocated to the three Northern Triangle countries and the regional aid to Central America in 2014-2017 were significantly higher than during the period 2010-2013.

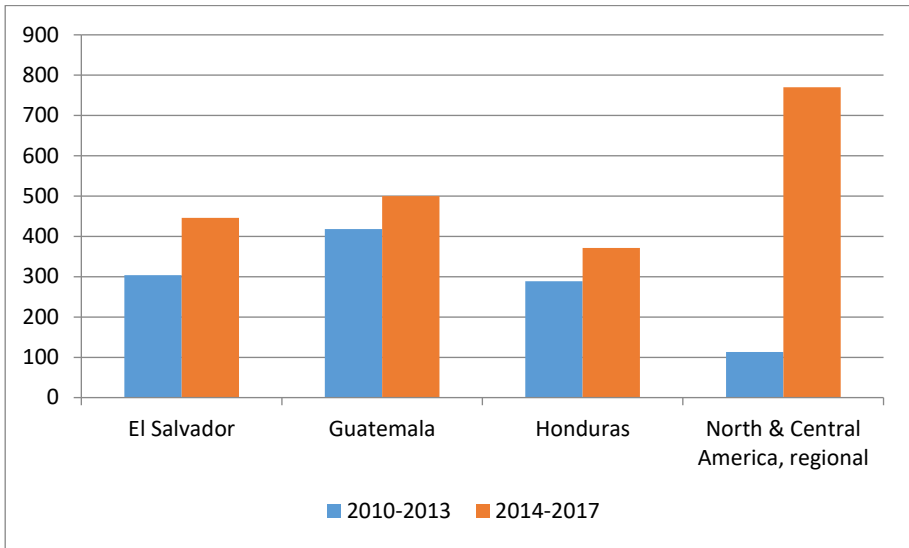


Figure 2. US commitments to Northern Triangle countries. Millions, constant 2017 US dollars. Source: OECD. Dataset: Creditor Reporting System

In order to understand the level of institutionalization of resource redistribution, the changes in the amounts (as one can say “more” or “less” only by comparing) and the level of attention given to the sub-region, the analysis of development aid flows and trade relations extends beyond the period of this research.

The US has a long history of support to the Northern Triangle and, in general, Central and Latin America, as it tends to respond both to humanitarian crises (e.g. hurricanes that devastate the region regularly) and support specific political and economic goals of the regional governments. The beginning of regular financial support goes back to the end of the Second World War, when the US engaged in efforts to fight communism globally, and especially in its own “backyard”.

As can be seen in Figure 3, the amounts and direction of aid flows fluctuated strongly, closely following the changing foreign policy goals of the US. For example, support for the Southern Cone and Andean region grew significantly during the Kennedy administration, as it announced its “Marshall Plan for Latin America” designed to support prosperity and avoid alignment of the Latin American countries with the USSR. The plan ended with the death of the President. The second peak of aid was in the 1980s during the Central American crisis when the US supported pro-American actors in the civil wars which were ravaging the region. Finally, aid peaked once more in 2000 with support for the Andean region, mostly in the framework of Plan Colombia. The current growth of aid to Central America

and Mexico reflects the shift of attention to migration and security-related challenges. One might also observe that the growth of aid during the period of analysis still did not reach its historical peaks.

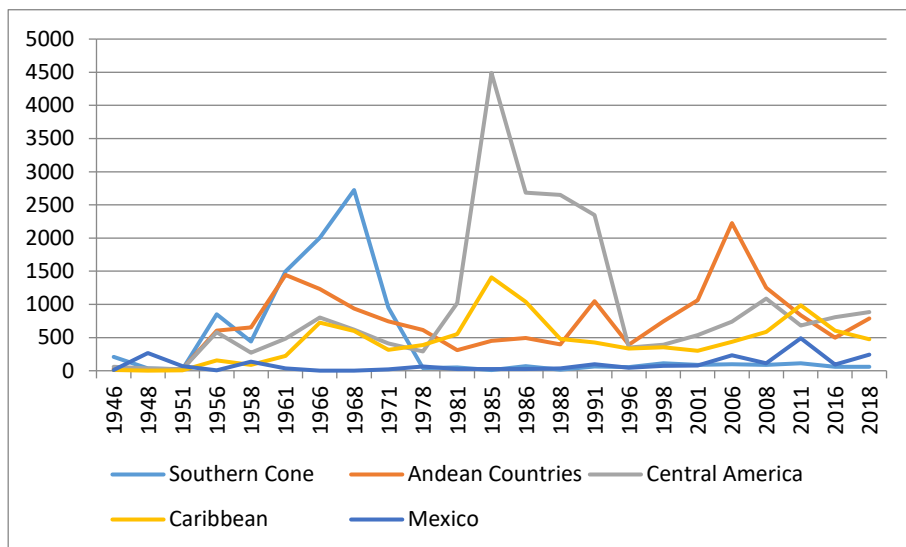


Figure 3. US obligations (including military aid) to Latin American sub-regions¹⁷. Millions, constant 2018 US dollars. Source: USAID

Another important element is the share of total US foreign aid committed to the region. As indicated in Figure 4, from the end of the Cold War, Central America has been among the smallest aid recipients, overshadowed by nearly all other regions, with the exception of Northern Sahara, Europe, South-East Asia and Oceania. Foreign policy goals moved the US' attention from the neighboring region to more relevant global regions, such as the Middle East during and after the Iraq war. Moreover, the general shift of donor attention to the poorest and least economically developed countries affected the US as well, making Africa the main recipient of US aid. Thus, during the period of analysis, Central and

¹⁷ Southern Cone – Argentina, Brazil, Chile, Paraguay, Uruguay. Andean countries - Bolivia, Colombia, Ecuador, Peru, Venezuela. Central America - Costa Rica, El Salvador, Guatemala, Honduras, Honduras, Nicaragua, Panama, and regional aid. Caribbean - Antigua and Barbuda, Aruba, Bahamas, Barbados, Cuba, Dominica, Dominican Republic, Grenada, Guyana, Haiti, Jamaica, St. Kitts and Nevis, St. Lucia, St. Vincent and Grenadines, Suriname, Trinidad and Tobago, and regional aid.

Northern American countries received slightly less than 7% of official US development aid.

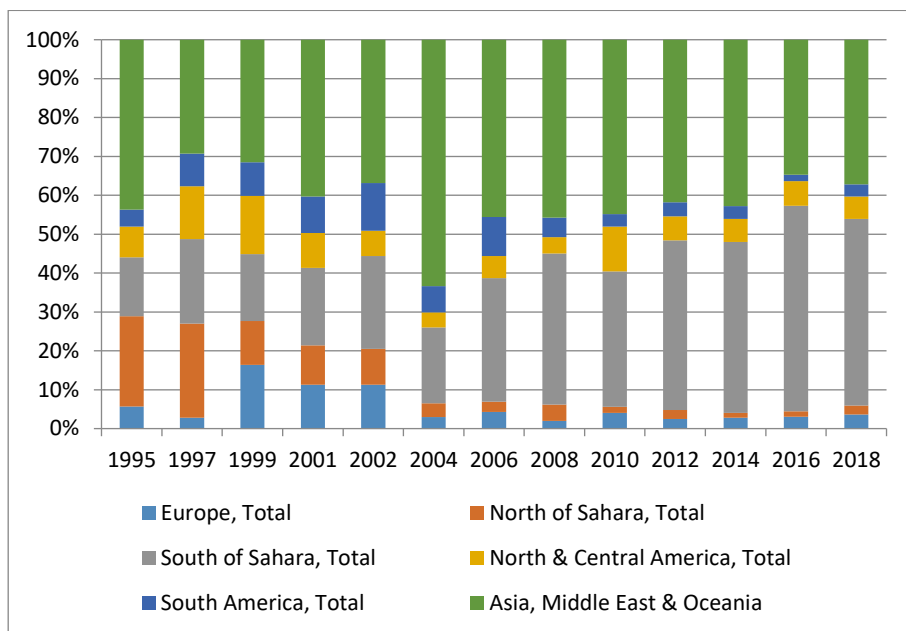


Figure 4. Share of US aid (commitments) according to geographical destination. Source: OECD. Dataset: Creditor Reporting System

As shown in Figure 5, apart from some peaks in obligations, on average the amounts dedicated to Central America historically were relatively stable; however, their direction also varied depending on the main focus of US support: between 2004 and 2007, the main US emphasis was on the implementation of regulations in the framework of the CAFTA-DR, which led to a sharp increase in support for Honduras and El Salvador. The biggest share of support was dedicated to economy-related projects (Giedraityte, 2019, p. 182). Meanwhile, the regional dimension of cooperation was getting weaker. The economic crisis pushed both bilateral and regional aid down until the spillover of insecurity from Mexico led to the creation of a separate Central American level security program and, consequently, to an increase in the regional component of the aid. The increase in 2015 reflected the response to the migrant crisis and had a stronger regional component.

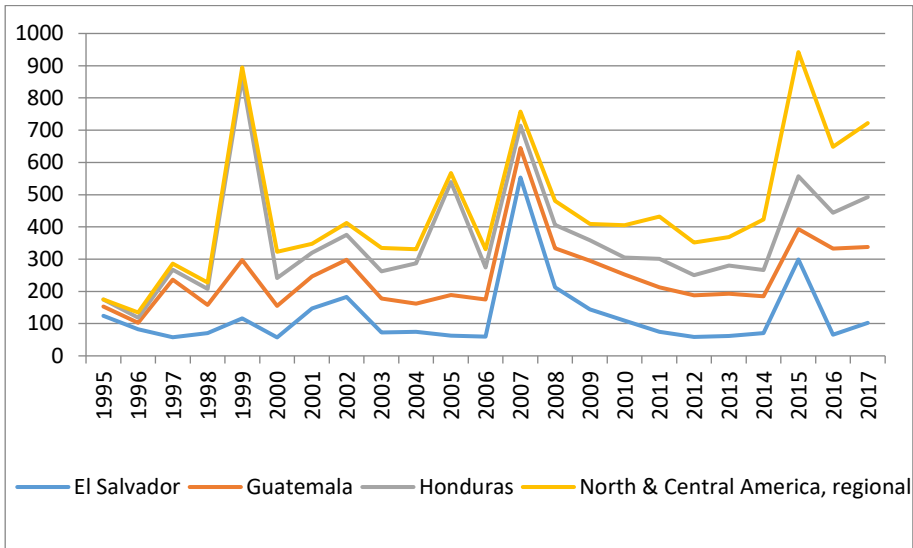


Figure 5. US commitments to Northern Triangle countries 1995-2017. Millions, constant 2017 US dollars. Source: OECD. Dataset: Creditor Reporting System

As for the significance of US aid for the budgets of the Northern Triangle countries, this was somewhat limited: during the period of analysis, the US ODA composed 0.5 % of Honduran GDP, 0.3% of El Salvadoran GDP, and only 0.2 % of GDP in Guatemala¹⁸, and this percentage had not in practice changed since the earlier four-year period. While the US has been the principal bilateral donor for all three countries, its weight in overall ODA received varied strongly.

Figure 6 demonstrates the main donors that supported the Northern Triangle countries. During 2016-2017 in Guatemala, the US ODA was markedly higher than aid from any other donor; in Honduras, the IABD was the primary donor, with the EU and EU member states nearly overtaking the amounts designated by the US. In El Salvador, the EU institutions, together with the member states, most notably Spain and Germany, provided in total a higher share of ODA than the US. The importance of these flows was limited: for comparison, remittances from the US to the Northern Triangle countries in 2017 were equal to 18.5% of GDP in El Salvador, 10.2 % GDP in Guatemala, and 16.4 % in Honduras (World Bank, 2018).

¹⁸ Calculations based on OECD (ODA, disbursements, current US dollars) and World Bank (GDP, current US dollars) data.

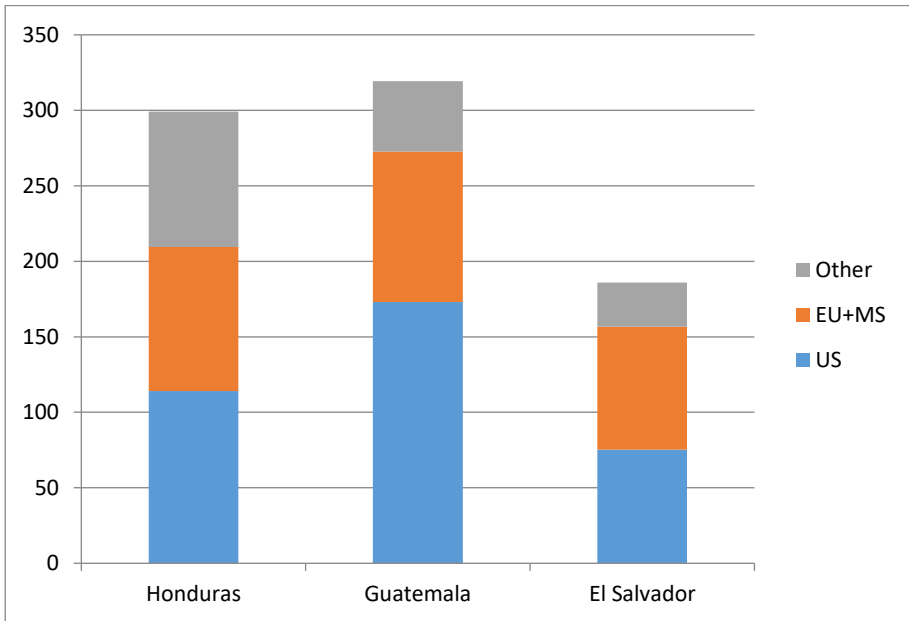


Figure 6. Top donors of gross ODA to Northern Triangle countries 2016-2017. Millions, constant 2017 US dollars. Source: OECD. Aid at Glance charts. [Accessed 10 11 2019]

In summary, there is an established pattern of US engagement in the Northern Triangle (and Central/Latin America) through financial support for its countries. However, the amounts of US aid fluctuated strongly both over the long term and during the period of analysis. Historically, the attention which the US paid to Latin American countries depended on its foreign and domestic policy agenda. Meanwhile, during the period of analysis, the boom and bust of US aid were related to the differences between the two consecutive US administrations. In 2016, due to the new approach from the Obama administration, the amount allocated increased strongly, only to fall sharply with the change in the US presidential administration.

Moreover, after Donald Trump came to power, the aid was increasingly politicized or even weaponized. Since the very beginning of his term, the President declared his intentions to cut the aid to Central America, whose governments supposedly were not doing enough to curb migration. In 2017 the presidential administration proposed cutting humanitarian and development aid to Latin America and the Caribbean by 36% (including cutting USAID projects in Central America by 75%), reducing funding for refugee services by over 30%, and cutting all money given to the IABD (Hiemstra, 2017). While Congress refused to implement such steep cuts, the pressure on Central American countries and Mexico to stop migratory flows

grew, culminating with open threats and demands also to sign the re-admission agreements.

Thus, while there is a clear and established pattern of resource redistribution in the form of ODA, the flows are unstable and politicized. The amounts and directions vary strongly depending on the foreign policy agenda of each presidential administration. Moreover, bearing in mind the amounts redistributed during the period of analysis, they were far less significant than other transfers such as remittances or economic flows.

In conclusion, the analysis of development aid flows indicates that in 2015 the US seemed to be willing to undertake the role of sponsor for regional development challenges, something that was not typical of US engagement in the region. This feature allows one to talk about at least moderate functional/horizontal differentiation. However, the politicization of the aid flows (their direction and drastic change in amounts depending on the pressing security and foreign policy priorities) indicates weak functional differentiation.

CAFTA-DR as a framework for trade

While financial support for economic transformation and trade-related issues was not prominent during the analysis period, the CEN Strategy mentions the promotion of trade facilitation under existing FTAs as a tool for enhanced prosperity and regional integration (White House, 2014b, p. 5). Given that the CAFTA-DR is the main framework for trade between the US and Central America, the current section of this research analyses its key provisions. This innovative trade agreement was negotiated, in part, as a regional agreement in which all parties would be subject to “the same set of obligations and commitments”, but with each country defining its schedules for market access on a bilateral basis (Condo, et al., 2005, p. 12). This flexibility allowed variations in the duration of negotiation, market access schedules, and inclusion and exclusion of sensitive goods.

Signature of the CAFTA-DR was marked by vast protests and debates in both the Central American countries and the US. The secondary literature paints a contradictory picture. Some authors point out that the agreement increased exports from the Central American countries (e.g. Banco de Guatemala, 2007; Lanuza Díaz & Bone Delgado, 2013; Molina et al., 2010) and consequently increased their economic growth (Calderón & Poggio, 2010). Other authors point out the negative effects that the agreement had on food production and food prices in Central America (e.g. Fearon Chang, 2017; Irías, 2015).

Without asking whether the trade relations are beneficial or not for smaller neighbors, this section of the thesis focuses on three elements: a) the US' willingness to create and sustain trading rules and frameworks (considered as production of regional public goods); b) the ways in which the US approached asymmetry between itself and its partners in its trade policy (this may be reflected in preferential treatment, financial support, or inclusion of sensitive products in the FTAs or, conversely, agreement on longer transition periods); c) financial and technical support for the implementation of regulatory standards and procedures necessary for the FTAs. To analyze these aspects, the thesis expands the period of analysis, focusing on the overall implementation of the CAFTA-DR. Finally, the thesis analyses the instances when (and if) d) any trade instruments were used as a tool to support development or achieve political goals during 2014-2017.

A. Creation and maintenance of the framework for trade

In 1983 Ronald Reagan's administration launched the Caribbean Basin Recovery Act (CBERA) which provided twelve years of duty-free access to the US market for twenty-one developing countries in Central America and the Caribbean. With this so-called Caribbean Basin Initiative (CBI), the US aimed to balance trade and national security. On the one hand, it expected that the agreement would increase the markets for its goods and its companies' opportunities to do business. On the other, the region's geopolitical situation was tense, and the CBI was seen as a tool to ensure the prosperity and influence of US business interests there (Busbin, 1988, p. 426).

The main provisions of the CBI for partner countries initially were related to duty-free entry to the US market of articles which were grown, produced or manufactured in any of the twenty-one beneficiary countries. To be eligible, the article had to be imported directly into the US, and to have at least 35% of its cost value-added in one or more of the twenty-one Basin countries. Moreover, in the case where it had foreign components, it had to be substantially transformed into "new and different articles of commerce". However, some products¹⁹ above a US predetermined quota level were

¹⁹ Such as textile and apparel articles, footwear, handbags, leather, clothing apparel, gloves, tuna, petroleum, certain watches and watch parts, and sugar.

excluded from this duty-free treatment, primarily for the protection of select US product and labor markets (Busbin, 1988, pp. 426-427).

NAFTA's entry into force on 1 January 1994, strongly affected the *maquila industry* in Central American countries, as it eliminated the initial advantages of the CEBRA beneficiary countries over Mexico. Furthermore, Mexican producers were not subject to the restrictive rules of origin on intermediate inputs. To offset this negative effect of NAFTA on Central America, in 2002, CBERA was expanded by the US-Caribbean Basin Trade Partnership Act (CBTPA). This Act also provided duty-free entry to the United States of textile goods and certain sensitive non-textile goods (such as CBTPA beneficiary products including all textile and apparel products, footwear, tuna, petroleum and petroleum products, and watches and watch parts). The CBTPA also aimed to expand foreign and domestic investment in non-traditional sectors. The CBI was due to expire in 2008. This "deadline" for the CBI provisions and the re-orientation of US producers towards Mexico forced the Central American countries to seek new trade agreements, proactively mirroring NAFTA.

The CAFTA-DR was criticized for its very swift negotiation – the negotiations for NAFTA took more than seven years, while the main agreements for the CAFTA-DR were reached in one calendar year (WOLA, 2003, p. 2). The most contentious issues during the negotiations were labor standards, imports of sensitive goods (textiles and agriculture), and the impact of the CAFTA-DR on the agricultural sector, mostly in Central America (though the US sugar producers were worried too) (WOLA, 2003, p. 2).

The signature of the CAFTA-DR did not imply the adoption by partner countries of common policies in areas not expressly agreed upon or the creation of supranational authorities (Pacheco & Valerio, 2007, p. 15). However, the CAFTA-DR created certain shared regulatory frameworks. Chapter 19 of the Agreement, "Administration of the Agreement and Trade Capacity Building", foresees the creation of the Free Trade Commission (at Ministerial level) and the appointment of Free Trade Coordinators, a body made up of the equivalent of the Foreign Trade directors of each country. Moreover, the Agreement included the commitment to create an administrative support office for the arbitration panels employed for dispute resolution (a dispute resolution mechanism was also provided for in the Agreement). Finally, the CAFTA-DR established a Committee for the Creation of Commercial Capacities, providing support to the Central American countries and the Dominican Republic for implementation of the Agreement. US institutions also oversee implementation of the Agreement –

the USTR is responsible for overall oversight, the Department of Commerce oversees commercial/trade issues, and the Department of Labor oversees labor compliance (it also publishes reviews regarding labor rights in the CAFTA-DR countries) (Hornbeck, 2009a, p. 16).

In conclusion, the CAFTA-DR creates a set of multilateral coordination mechanisms and, as discussed further, the US financially supported its establishment and maintenance.

B. Preferences: tariffs and inclusion of sensitive goods

The CAFTA-DR Agreement provides detailed rules which govern market access for goods, trade in services, government procurement, intellectual property, investment, labor, and the environment.

Table 11. US-Central American Trade Framework. Source: author

	El Salvador	Guatemala	Honduras
Regulatory framework	CAFTA-DR	CAFTA-DR	CAFTA-DR
Current stipulations	<p><u>Institutions</u></p> <ul style="list-style-type: none"> •Environment •Dispute settlement mechanism (related not only to trade but also to labor issues) <p><u>FTA:</u></p> <ul style="list-style-type: none"> • Tariffs <ul style="list-style-type: none"> - Liberalization of industrial goods. Immediate for most US goods and more phased for El Salvadoran, Guatemalan, and Honduran goods. <ul style="list-style-type: none"> o More flexible rules of origin (relevant for Central American textiles as it allows more varied inputs). - Liberalization of agricultural goods ((more phased for Central American countries). <ul style="list-style-type: none"> o Exceptions for El Salvador, Guatemala, and Honduras: white corn (increasing quotas). o Exception for the US: sugar. <p style="padding-left: 40px;">Non-tariff regulations</p> <ul style="list-style-type: none"> • Government procurement – liberalized but with exceptions • Intellectual property • Protection of investment 		

Signature of the CAFTA-DR deepened the trade partnership between the United States and partner countries by transitioning the relationship from one of trade preference arrangements to a binding reciprocal FTA between the parties. Given that the favorable special treatment of the five Central

American countries under the CBTPA and the CBI was due to expire, the CAFTA-DR offered permanent tariff concessions, which were particularly important for the *maquila industry* (Morley, 2006). Moreover, while the majority of tariffs were removed upon implementation, some tariffs were phased out gradually. In response to consideration of so-called “asymmetries” between the US and the developing countries of Central America, the number of Central American products with gradual phase-outs was significantly higher than for the US (Lederman, et al., 2006, p. 38).

The CAFTA-DR liberalized trade in manufactured goods. Duties on 80% of US exports were eliminated immediately, with phasing out of the rest envisaged over a period of up to 10 years (Hornbeck, 2009b, p. 16). Central American and Dominican industrial products, mostly apparel, had been entering the United States duty-free for years, yet only if assembled from US yarn and fabric. The CAFTA-DR expanded this duty-free access to textiles and garments assembled from components made in the CAFTA-DR countries, and, in some cases, woven apparel assembled from other NAFTA members. Besides, the Agreement foresaw some exceptions for specified products (affecting less than 10% of trade) with limited amounts of material from third countries (Hornbeck, 2009b, p. 16).

According to Morley (2006), the CAFTA-DR removed some significant tariff barriers which still existed in the US under the CBI for agricultural commodities. For example, products like apparel, bananas and sugar, have a better position under the CAFTA-DR than under the previous arrangements (Condo, et al., 2005, p. 4). For the majority of agricultural goods, the tariffs were scheduled to expire in stages up to 20 years. Exemptions were made for four products: sugar imports into the US, fresh onions and potatoes imports into Costa Rica, and white corn imports into the four other Central American countries (CRS, 2006, p. 1). The Agreement also includes special agricultural safeguards to provide temporary protection against import surges of selected sensitive products, activated automatically if import quantities surpass specified levels (Lederman, et al., 2006, p. 35).

During the negotiations, the Southern countries expressed fears that opening up their markets to US corn and rice would undermine the region’s small subsistence farmers who were unable to compete against the subsidies which the US producers received (Jurenas, 2006, p. 5). These subsidies provided under the so-called Farm Bills and updated every five years, covered an array of agricultural and food programs. Historically, the Farm Bills focused on farm commodity program support for a handful of staple commodities—corn, soybeans, wheat, cotton, rice, peanuts, dairy, and sugar (CRS, 2019a, p. 1). Despite their pressure to include the subsidy issue on the

negotiating agenda, the Central American countries eventually accepted the US position that it should be addressed multilaterally in the WTO (Jurenas, 2006, p. 5). The US subsidies between 2014 and 2017 reached nearly 98 million USD annually (Irias, 2015, p. 6) and allowed US producers to offer products cheaper than their Central American counterparts.

The CAFTA-DR also opened the countries for trade in services, including commitments in a long list of service sectors, including financial services, telecommunications, professional services, distribution, tourism, express delivery, energy transport and construction (Lederman, et al., 2006, p. 42).

Summing up, the US and Northern Triangle countries are engaged in an institutionalized trade framework that, at least on paper, was designed bearing in mind the disparities in the socio-economic development of its participants. While the CBERA excluded various goods relevant to the Northern Triangle, and in general to the Central American states, the product list included in the CAFTA-DR was more inclusive and, according to various authors, led to non-traditional exports (Morley, 2006). Moreover, lower tariffs on imports and, in general, the more stable framework for trading with the US also benefited the local industry which could import necessary technologies and materials more cheaply. On the other hand, the US protected its producers and limited the import of some basic goods relevant to its Southern partners.

C. Non-tariff regulations and support for their implementation

As discussed in chapter 4.2.2, implementation of the CAFTA-DR required regulatory convergence in terms of governance (public procurement and transparency laws), sanitary and phytosanitary measures, and removal of technical barriers to trade. Desiring to improve their ability to use the agreement, each country prepared National Action plans to outline existing capacities and the capacity building needs in all these spheres. The US aligned its financial support with these topics. The USTR, State Department (SD), USAID, US Trade and Development Agency (USTDA) and US Department of Agriculture (USDA) carried out the majority of so-called trade capacity building and technical assistance.

Trade capacity building (TCB) is development assistance focused on helping countries build the physical, human and institutional capacity to participate fully in international trade (Hornbeck, 2009a, p. 15). As Hornbeck observed, TCB grew considerably “under the CAFTA-DR, contributing to the implementation of the agreement’s technical aspects in

areas where partner countries required assistance”, giving priority to four areas: rules of origin; customs administration; sanitary and phytosanitary (SPS) regulations; and industry regulatory reform (Hornbeck, 2009a, p. 15). For example, for the support of labor capacity building, the US committed over 142 million euros for the period 2005-2010. The funds dedicated to labor capacity building programs focused on strengthening labor ministries and courts, promoting an overall culture of compliance, and removing or preventing children from exploitative child labor (USTR, 2011). Similarly, in 2007 the US spent over 1.5 million USD to help the CAFTA-DR countries improve their SPS capabilities. Another two million US dollars was dedicated to assessing weaknesses in the administration of rules of origin and to providing training and manuals for public and private sector actors to improve their knowledge of the rules (Hornbeck, 2009a, p. 18).

Given that during the period of analysis the majority of its provisions were fully implemented (the last tariffs were phased out in 2020), US support for implementation of the Agreement was minimal. Both discursively and financially, US attention from 2014 shifted to governance reforms, particularly anti-corruption efforts. While “prosperity” was mentioned continuously by President Obama and his administration representatives, mention of the CAFTA-DR as a framework or mention of the trade preferences such as quotas was scarce.

After the election of Donald Trump, there was another shift, and the emphasis on trade opportunities grew once more. Two regional conferences for Central America, organized by the new administration, were nearly exclusively dedicated to the debate on economic prosperity. The security topics were intermeshed with business opportunities, and politicians and security officers were joined by representatives of corporations such as Monsanto, Coca Cola, and Walmart. However, no preferential instruments were mentioned which would help countries tackle their development challenges. Instead, emphasis was placed on attracting private foreign investment. In the words of Rex Tillerson, the Miami conference for Prosperity and Security was an event to discuss “how we can bring more private capital into investment opportunities in Central and Latin America” (Tillerson, 2018).

D. Conclusion

In conclusion, US-Central American commercial relations took place in a framework built with consideration for the unequal socio-economic development of the partner countries. Moreover, the CAFTA-DR supported

the growth of some local industries as it made their imports cheaper and created a more attractive framework for investment. The US supported implementation of the regulatory practices necessary for partner countries to benefit from the trade agreement, yet at the same time shielded its products from competition. While the emphasis on asymmetrical relations became weaker with full implementation of the CAFTA-DR, the existing trading arrangements (summarized in Table 12) can be considered as reflecting weak to moderate functional/horizontal differentiation.

Table 12. Summary of US trade policy in Central America. Source: author

Criteria	US policy
1. Creation of a framework for trade	Yes. CAFTA-DR provided rules for trade and dispute settlement mechanism for their application
2. Responsiveness to partner needs in terms of tariffs (inclusion of relevant products, preferential treatment)	From preferential to reciprocal trade. Certain elements addressed existing asymmetries: e.g. restriction of sensitive agricultural goods or more flexible rules of origin. However, despite the demands from its partners, the US was not willing to include issues sensitive for itself (such as its agricultural subsidies) into the negotiation framework.
3. Non-tariff regulations and support for their implementation	Yes. The signature of CAFTA-DR required certain regulatory approximations between the US and its partners, and the partners had to implement various reforms in their governance and trade policy. The US supported the financial costs of these adaptations.
4. Use of trade to punish/support	None

Coordination and institutionalization of different spheres of cooperation

From the strategic documents and information on development and trade cooperation, one can conclude that the US funded the creation of certain regional public goods in the spheres of security, environment and trade integration. Similarly, the US undertook the role of coordination in all three spheres. Moreover, the regional power supported the institutionalization of formal and informal governance networks in all three spheres. While the US led the cooperation, different frameworks for coordination and, in some cases, joint decision making appeared, allowing one to speak about certain, albeit weak, institutionalization of regional interactions in spheres of security, climate and trade disputes.

Security management

While the CEN Strategy was supposed to expand the US approach beyond security, as discussed in the previous chapters, more than two-thirds of US aid during this period was still dedicated to security-related (though most often non-military) matters. This security cooperation took place in the framework of the CARSI, which came within the ambit of the US Strategy for Engagement in Central America.

Information regarding security operations is scarce, and there is not much information available about CARSI activities either before or during the period of analysis. This has been observed not only by various independent observers seeking to evaluate US security engagement in the region (see Isacson & Kinoshian, 2017) but also by US legislators (US Senate, 2016, pp. 33-35). Despite the lack of a detailed description of the activities (even in the USAID explorer, these projects do not have a detailed description), as indicated both by the discourse and the amounts assigned, security cooperation occupied an important position in US strategy towards the region.

The new approach laid out in the CEN Strategy and RDCS CAM places emphasis on joint problem solving and support for regional-level institutions which would facilitate more effective solutions of regional security problems. Recognizing that “crime and violence do not respect borders, and transnational problems require a collaborative, regional approach to ensure consistency and prevent “weak links” that can negatively impact across borders”, the RCDS CAM envisages a number of regional-level activities to tackle the situation in the region (USAID, 2015, p. 23). Most regional-level activities relate to increasing capacity and expertise through the “exchange of best practices, and the scale-up of effective models by addressing select cross-border citizen security” (USAID, 2015, p. 22). The RCDS CAM foresees two intermediate results: an increase in regional capacity to address citizen security through more coordinated governance systems and the strengthening of human rights protection systems (USAID, 2015, p. 14).

The majority of regional-level activities foreseen by the US are related to the creation and dissemination of reliable data regarding the security situation (e.g. a regional observatory of homicide statistics), coordination of identification and exchange of good practices between both the states of the region and others with similar challenges (Mexico, Chile, Brazil and Colombia). Similarly, the CEN Strategy envisages US efforts to strengthen regional defense cooperation and invite “increased multilateral

defense activities in Central America with other capable partners in the Western Hemisphere” (White House, 2014b, p. 7). Moreover, it foresees establishing a High-Level Security Dialogue which would bring together other international partners supporting Central American security, including countries of the region, the European Union, and multilateral organizations (ibid.). A key element of the strategy is the development of a regional training academy-like network, through which experts in crime prevention and violence reduction share and learn about international and regional comparative evidence-based practices on citizen security-related topics, providing civil society organizations, social service providers, police, journalists, youth and other stakeholders with enhanced knowledge of what was effective internationally and regionally (USAID, 2015, p. 24). Thus, from the strategic documents and secondary sources, one can conclude that, in terms of security, the US agreed to coordinate joint responses to regional challenges and take part in them; to support regional-level training efforts; and to support security reforms and evidence-based decision making in this area.

The US coordinated various joint operations with a number of stakeholders, even before the CEN Strategy. While the natural partner for these activities in the Northern Triangle was Mexico, the US also actively supported the Colombian lead in the region. Colombia was involved in US coordinated and funded anti-narcotics operations from 2012, when it signed the US-Colombia Action Plan on Regional Security Cooperation, which, drawing on Colombia’s established expertise in developing security assistance programs and operational efforts, supported the Northern Triangle countries. The US facilitated the deployment of Colombian-led training teams and subject matter experts, and attendance of Central American personnel at law enforcement and military academies in Colombia (Department of Defence, 2015, p. 271). Moreover, during the period of analysis, Colombia, with the support of the US, hosted ministerial-level dialogues on defense and security in Central America’s Northern Triangle (Ruiz, 2016).

Another prominent aspect of US regional engagement in the security sphere also predates the CEN Strategy. From 2012, the US led the so-called “Operation Martillo”, a multinational anti-drugs operation including no less than thirteen countries,²⁰ including the Netherlands, Canada, Spain and the

²⁰ Belize, Canada, Colombia, Costa Rica, El Salvador, Guatemala, Honduras, the Netherlands, Nicaragua, Panama, Spain, United Kingdom, United States.

UK. Most of the costs of the operation were paid by the US. Meanwhile, Central American countries' participation in "Operation Martillo" was funded through the CARSI (Isacson & Kinosian, 2017).

Training activities seem to compose another important part of the US' security engagement. At the bilateral level, the US-trained military and police and established vetted units were constituted by host country law enforcement officers operating with US mentors. The DoS, the primary agency responsible for foreign police assistance, allocated about 37 million USD for training police in these countries from appropriations for the fiscal years 2014 through 2017. The majority of bilateral training programs focused on drug interdiction efforts (the International Military Education and Training program and Counter-Drug Training Support received the most financial support during the period 2014-2017 (see DoD & DoS, 2015, 2017)). Many of the training efforts had a regional dimension, as their goal was to "further the <...> regional stability through effective, mutually beneficial military-to-military relations through increased understanding of security issues and the means to address them and improved defense cooperation among the United States and foreign countries" (DoD & DoS, 2017, pp. II-1).

At the regional level, the US also funded the Central American International Law Enforcement Academies which trained local police officers. The International Law Enforcement Academy of San Salvador inaugurated the first phase of the Central American Police Academy Development Project on 23 February 2015 (US Embassy in El Salvador, 2015). Moreover, the US financed the participation of Northern Triangle officers in the programs offered by the William J. Perry Center for Hemispheric Defense Studies (WJPC). One of the US-funded regional centers for security studies which offered programs on topics ranging from security and defense to human rights trained 373 students from Northern Triangle countries during 2014-2017 (WJPC, 2015, 2016, 2017).

Finally, the US supported the production of inputs necessary for evidence-based decision making. It was the main financier of the InfoSegura project²¹ (around 37% of all regional-level governance aid committed during 2014-2017 based on the USAID data), implemented together with the United Nations Development Programme (UNDP). The project supported a better violence-related data management, regional collaboration and networking of

²¹ <https://infosegura.org/en/>

CSOs, and promoted exchange of expertise and best practices on citizen security issues. One of the outputs of these initiatives was a regional network of universities, NGOs and think tanks dealing with security-related issues. Currently, the Network is composed of 12 different organizations from all over Central America.

Environmental governance

Environmental resilience and climate-smart economic growth were priorities of the US Strategy during the period of analysis, reflecting the overall priorities of the Obama administration. However, cooperation in the sphere of the environment predates 2014. In 2005, in parallel to the CAFTA-DR Agreement and its Chapter 17 (Environment), the Central American countries, the US and the Dominican Republic signed an Environmental Cooperation Agreement (ECA). The Agreement (and Chapter 17 of the CAFTA-DR) provides for the establishment of several institutions for joint management of environmental questions and for assurance that lowering environmental standards would not become a means of gaining competitiveness.

The highest political-level institution created through the Agreement is the joint Environmental Affairs Council (EAC), with the Secretariat in San Salvador within the Central American Commission for Environment and Development. The EAC is comprised of cabinet-level or equivalent government officials and meets annually to oversee implementation of CAFTA-DR Chapter 17 and to review progress. Another institution, the Secretariat for Environmental Matters (SEM), functions as a sort of arbiter for environmental conflicts as, in accordance with Article 17.7 of the CAFTA-DR Agreement, “any person of a Party may present a submission that asserts that one of the Parties to the Agreement is failing to effectively enforce its environmental legislation.” (CAFTA-DR, n.d., pp. 17-5) The SEM then verifies the request and may request the country in question to reply to it. Submissions are quite rare – there have been 43 cases since entry into force of the Agreement in 2007, with 2010 and 2011 being the most active years. However, the mechanism still exists, and during the period of analysis, there have been nine submissions. At the level of day-to-day activity, representatives from Environmental or other relevant ministries or departments serve as general Points of Contact (CAFTA-DR Environmental Cooperation Program, 2018). Moreover, various governmental and non-governmental organizations implement the activities, which, in general, involve an even higher number of stakeholders.

The EAC is overseen by the Organization of American States Department of Sustainable Development, which prepares annual reports on the implementation of the Agreement. From the reports, one can conclude that the ECA's activities emphasize capacity building (e.g. training of civil servants, regional environmental organizations), creation of partnerships, exchange of information and best practices, and other voluntary mechanisms for compliance with environmental standards. While the impact of such activities might vary, without doubt they create a structure for the engagement and cooperation of various stakeholders working in the field of environmental governance.

Regional integration

Given that the US goal is “the evolution of an economically integrated Central America”, the CEN Strategy emphasizes support for different aspects of regional economic integration. Hence, US agencies implemented a variety of actions designed to promote prosperity and regional integration. For example, the US strengthened the capacity of regional organizations, including the Central America Integration System, to analyze, formulate and implement regional trade policies. Likewise, the Department of Commerce provided training and technical assistance intended to improve customs and border management and facilitate trade (CRS, 2019a, p. 5). USAID also worked with the governments of the region to develop uniform procurement processes and transmission rights as well as regulations to facilitate investment in renewable power generation projects (ibid.).

However, US engagement was limited to technical assistance and coordination of donor support. No formalized exchange structures in these spheres were established, and US engagement with the Central American Integration System (SICA) was limited to specific issue areas, mostly security. While during the period of analysis the US also undertook the financing of certain SICA offices (e.g. the Central American Observatory of Violence), the majority of the investment enabling the organization to function came from other donors and the countries of SICA.

Other areas of cooperation

During the period of analysis, the US funded various regional-level roundtables and the organization of Pan-American Summits of the Americas (Department of State, 2013, 2014, 2015, 2016). Moreover, it was and still is the key provider of finance for the Organization of American States (OAS) and its sub-organizations, such as the Pan-American Health Organization.

However, when looking at US financial commitments, one can observe that the amounts dedicated to these initiatives were small (ibid.).

Central American countries also form part of different Latin American or Western Hemisphere level initiatives. As members of the OAS, they also participate in the initiatives funded and managed by this organization. Moreover, they receive funding from the Iberoamerican Development Bank or are included in activities managed by other donors, such as the EU or Canada. In several cases, the US also participates in these initiatives: for example, it participates in the Group of Friends of Central America, comprising more than 20 countries and multilateral organizations. However, these initiatives pass practically unmentioned in the US strategic documents and thus cannot be considered as forming a strong element in the US' regional vision during the period of analysis.

4.3.1.3 Conclusions: from moderate to weak functional differentiation

The CEN Strategy, drafted in the context of the unaccompanied migrant crisis, demonstrates that, due to shared insecurities, the US considered itself as part of the region and responsible for the solution of joint problems. It oversaw a comprehensive and broad engagement in more than one issue area and supported the production of various regional public goods, such as shared frameworks for trade, security, and environment management.

As for support for reducing the socio-economic asymmetries between the US and its neighbors, the US' efforts seem to be more limited. As for ODA, in general the US tends to be ambivalent towards Central American realities, focusing on them only when the processes there seem to threaten its security. Thus, ODA flows seem to be highly politicized and unstable. Moreover, their impact on the economy of the receiving states is rather weak.

Trade relations initially were drafted as preferential with the aim of supporting industries in the South by giving special access to the US market for sensitive goods. During the period of analysis, preferential treatment was changed through reciprocal engagement, as the CAFTA-DR was nearly fully implemented. The new Agreement provided more opportunities for the smaller countries and allowed them longer transition periods. However, the US attempted to shield its sensitive industries, and its refusal to engage in discussion of the subsidies offered to its local farmers indicates that trade relations were not seen as a means to support development in the South.

As for the production of regional public goods, the CAFTA-DR created various institutions and regulatory frameworks supporting regional

cooperation and integration in the areas of trade and environment. The US mostly foots the bill for security-related issues and supports various initiatives in terms of environment, HIV prevention, and trade integration. However, in general, its cooperation with the region is mostly focused on security issues. In this sphere, it has created a broad network of training, cooperation, and coordination between various stakeholders. The environmental cooperation envisaged in the CAFTA-DR also seems to give space for the regional actors to engage with one another and coordinate their activities. However, other spheres, e.g. labor rights and civil society cooperation, seem to be secondary and subordinated to security cooperation. Thus, the output legitimacy of the US strategy is rather limited.

The abovementioned features indicate the regional order which the US attempted to craft was marked by moderate functional differentiation – limited production of regional goods in the most relevant spheres (security), limited and strongly politicized redistribution, and support for certain regional governance and institutions in a limited number of spheres.

However, with the change of the US administration, the functional differentiation became weaker as regional cooperation was scaled back to one issue (security), and the US disengaged from the solution of regional problems, started scaling down the aid, and, in general, in discursive terms, disengaged from the region.

4.3.2 EU and The Maghreb

4.3.2.1 Role imagined: what place in the region?

Differently than the US, from its very birth, the EU prioritized the Southern neighborhood. The colonial ties, migratory pressures, and instability in the South, together with the EU's expanding borders, conditioned the EU's interest in the Southern Mediterranean region. Its emphasis on regionalism as a response to the post-Cold War crisis made it eager to create regional-level strategies. As can be seen from the strategic documents defining the broadest goals of EU engagement, from the time of the Barcelona Declaration, its first regional-level strategy in the South, it felt part of the region, and was willing and able to formulate a proposal for regional order, to engage with other countries for the implementation of its vision, and was ready to bear the financial burden of such cooperation.

The earliest engagement, the Euro-Mediterranean partnership (EMP) (or Barcelona Process), started in 1995 with the signature of the Barcelona Declaration, which laid out the EU's ideal vision of its Southern

Neighborhood. However, the very form of the document – it being a Declaration, not the EU’s unilateral strategy - indicates an emphasis on shared effort. This approach is reflected in the first two paragraphs that confirm “the strategic importance of the Mediterranean” and point out that the EMP is “moved by the will to give their future relations a new dimension, based on comprehensive cooperation and solidarity, in keeping with the privileged nature of the links forged by neighborhood and history” (Euro-Mediterranean Conference, 1995, pp. 2-3). Moreover, participants in the Declaration are “aware that the new political, economic, and social issues on both sides of the Mediterranean constitute common challenges calling for a coordinated overall response” (ibid.).

The Barcelona Process, an “immense transformation and modernization project” (Florensa, 2015, p. 88), aimed at creating an “area of peace and stability, of shared economic progress and understanding and intercultural dialogue among the peoples living along the Mediterranean” (Euro-Mediterranean Conference, 1995). The Declaration also mentions that “the participants consider that the creation of a free-trade area and the success of the Euro-Mediterranean partnership require a substantial increase in financial assistance, which must above all encourage sustainable indigenous development and the mobilization of local economic operators” (ibid. p. 7). Moreover, the EU indicates a willingness to fill this gap, as the document lists the EU’s (and not its partners’) obligations of financial assistance (more than 4.6 million ECU agreed by the European Council for the period 1995-1999) and the supplementary EIB loans. The financial commitments of the other partners (besides sound financial management) are not mentioned in the document. Thus, the Barcelona Declaration confirms the EU’s commitment to bear the financial burden of the Mediterranean region-building. As Miskimmon observes, the EU’s self-narrative which can be read between the lines of the Barcelona Declaration is one of an actor fostering [*regional* – author] cooperation (Miskimmon, 2017).

The EMP envisaged signature of bilateral Association Agreements (AAs) establishing the spheres, goals and pace of political cooperation. Tunisia and Morocco were the first to sign an Agreement (both in 1995: the Tunisian AA entered into force in 1998 and the Moroccan AA in 2000). Algeria signed an AA in 2001, which was ratified in 2005, making it the last ratified EMP agreement. Each agreement is unlimited in duration and has similar elements: reciprocal liberalization of movement of goods; provisions on the right of establishment (investment) and the supply of services; competition policy and other economic provisions; regional integration;

economic, social and cultural cooperation; and financial assistance (development grants and concessional loans) (Hoekman, 2016, p. 4). Thus, the EMP had both regional and bilateral dimensions.

The EU's enlargement to the East forced it to rethink the place of the Southern Neighborhood in its strategies. The European Commission's approach to the new and old neighborhood was laid out in the Communication "Wider Europe". Differently than the Declaration of Barcelona, this document reflected purely the EU's vision of how the neighborhood should look. While placing emphasis on interdependence, the European Commission points out the EU's "duty, not only towards its citizens and those of the new member states but also towards its present and future neighbors to ensure continuing social cohesion and economic dynamism," claiming that it "must act to promote the regional and sub-regional cooperation and integration that are preconditions for political stability, economic development and the reduction of poverty and social divisions in our shared environment" (European Commission, 2003, p. 3). The Communication places emphasis on shared responsibility in solving joint challenges related to proximity, poverty and prosperity and confirms the need for "the whole range of the Union's policies (foreign, security, trade, development, environment, and others)" (European Commission, 2003, p. 3) to respond to these challenges.

Thus, for its neighbors in the South and East, the EU proposes a differentiated, progressive, and benchmarked approach (*ibid.* p. 16), providing for an annual review of Action Plans and initiatives for the fulfillment of agreed reforms. In this manner, the EU presents itself as part of the region, or even its leader, capable of generating a joint vision, proposing joint solutions, and willing to finance the change it seeks.

A first revision of the ENP took place in 2011 in the context of the Arab Spring and the economic crisis. If the original ENP attempted to balance the attention given to the Eastern and Southern Neighborhoods, in 2011 the emphasis is clearly placed on the South. The ENP Communication was complemented by special Communications "A dialogue for migration, mobility and security with the southern Mediterranean countries" (European Commission, 2011a), and "Partnership for Democracy and Shared Prosperity with the Southern Mediterranean" (European Commission, 2011b). While some of the EU's general ideas about the region changed (e.g. these documents emphasize a "more for more" principle and deep democracy; meanwhile, the neighborhood is perceived as a source of instability), the EU's perception of what needs to be done is similar. The Union emphasizes financial support (increased humanitarian aid, additional support from the

EU External Borders Fund and European Refugee Fund, long term commitments to prosperity and democracy) together with political dialogue and international co-ordination (European Commission, 2011b, p. 3).

The 2015 review continued in the same direction. Among the key differences between the spirit of this document and the previous one is the sense of urgency, as the 2015 review mentions all the security threats ranging from the refugee and energy crises to the terror attack in France in the third paragraph of the document. The EU also recognizes its limits, as the optimism of the initial ENP is replaced by the acknowledgment that “the EU cannot alone solve the many challenges of the region, and there are limits to its leverage” (European Commission, 2015c, p. 3), envisaging for itself a more modest role of an actor “helping to create the conditions for positive development (ibid.).

As discussed before, the 2015 review also placed a stronger emphasis on shared responsibility and engagement only in those spheres where there was mutual agreement. Cooperation and coordination is another prominent aspect of this strategy. Discussing challenges and opportunities for sustainable growth, the document states that “the EU should step up cooperation with the International Financial Institutions, notably the European Investment Bank (EIB), the European Bank for Reconstruction and Development (EBRD), the World Bank (WB) and the International Monetary Fund (IMF) and relevant international organizations” (ibid. p. 7). In other sectors, from aviation to research, the EU foresees supporting region-wide frameworks and partnerships. Similarly, in spheres such as security and migration, “an impetus for deeper cooperation with ENP partners” (ibid. p 15) is envisaged. Finally, the regional and sub-regional dimension of the ENP receives extensive attention, also mentioning the commitment to engage more with sub-regional organizations such as the Arab Maghreb Union (AMU).

In conclusion, similarly to the US, the EU has a long history of engagement in its neighborhood. However, differently than on the other side of the Atlantic, right from the early stages, the EU’s engagement was well structured. The key features of the Union strategies are well documented, and channels of cooperation, while diverse, are relatively stable. Both during the period of analysis and before it, the EU considered itself not only part of the region but an active leader in the promotion of a particular regional order, proposing ordered and patterned interaction frameworks in the shape of AAs, FTAs, and joint spheres of sectoral cooperation. Moreover, it indicated its willingness both to bring together partners for deliberation and implementation of (joint) decisions and to bear a significant financial burden

for such cooperation. Finally, differently than in the US strategic documents, both during the period of analysis and before it, the EU dedicated significant attention to non-political and non-economic spheres of interaction (e.g. cooperation in research, science, and innovation), promising the participation of neighborhood countries in EU initiatives such as the Enterprise Europe Network, Horizon 2020, COSME²² and Erasmus +.

4.3.2.2 Roles taken: what kind of goods and what kind of institutions?

Redistribution of resources

Official development assistance

Similarly to chapter 4.3.1.2, this section of the thesis expands the time-frame of analysis and discusses trade relations and development aid flows in the context of the EU's longer-term engagement in the Mediterranean.

Although the EU financed its cooperation activities on the basis of the framework established before the migratory crisis, the budget of 2015 was amended eight times, which allowed an increase of available funds of 1.36 billion euros in commitments (Savage & Siter, 2018, pp. 132-133). Given that the increased funds were mostly allocated to settlement of the migration crisis, the ODA directed to the Maghreb and North Sahara region did not reflect this increase (see **Figure 7**). The exception was Tunisia, where the EU's support grew significantly due to the complicated political and economic situation and fear of instability. Nonetheless, one has to bear in mind that the Arab Spring had already affected the EU's aid to the Maghreb. As can be seen in Figure 8, despite the economic crisis in the EU, support for Morocco and Tunisia, which were both suffering political turbulence, grew significantly from 2011.

²² Europe's programme for small and medium-sized enterprises

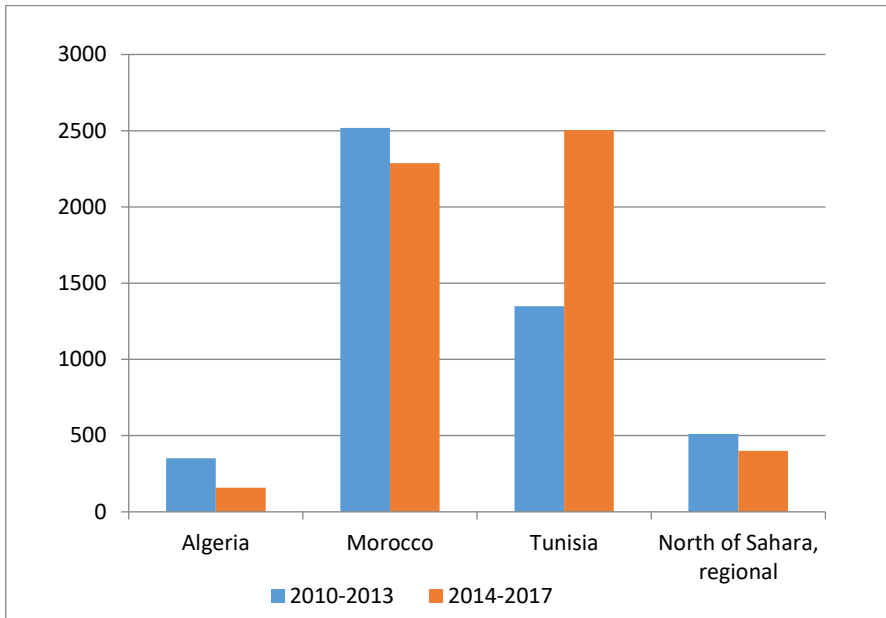


Figure 7. EU’s commitments to Maghreb countries not counting the MFA support for Tunisia. Millions, constant 2017 US dollars. Source: OECD. Dataset: Creditor Reporting System

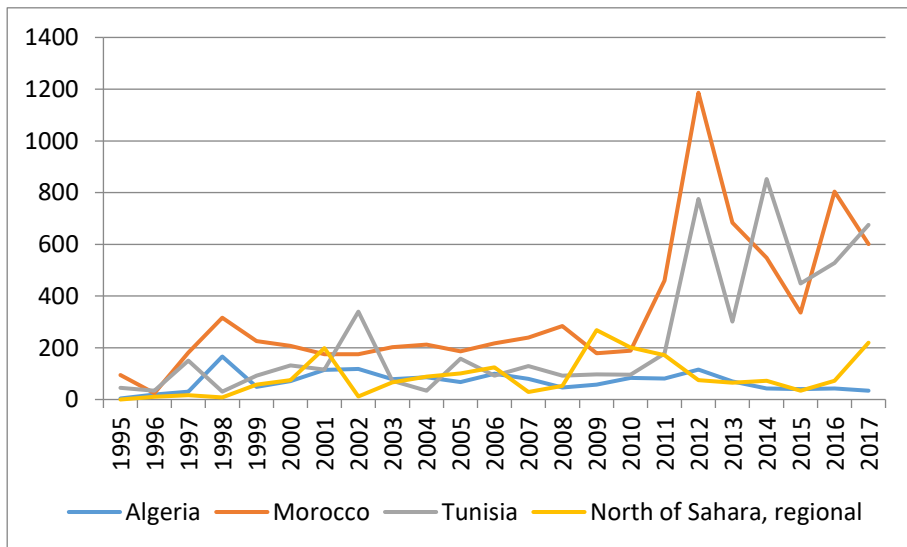


Figure 8. EU’s commitments to Northern African countries 1995-2017. Millions, constant 2017 US dollars. Source: OECD. Dataset: Creditor Reporting System

The EU’s support for the regional agenda and resolution of regional challenges, both in terms of preferential trade agreements and ODA, has a

long history. In the words of Florensa, “the entire Barcelona Process appears as a major operation of development aid that offers as well a limited integration through the use of the same methods with partner countries as those used as a pre-accession system for candidate countries to the EU” (2015, p. 89). Since the inception of the Barcelona Process, the EU created special financial instruments, first so-called Accompanying measures (MEDA, from *Mesures d'accompagnement*), then the European Neighborhood and Partnership Instrument (ENPI), and the European Neighborhood Instrument (ENI), to finance the regional priorities.

Similarly to Central America and the US, North Africa was not a priority destination for the EU’s ODA. While the share dedicated to the region grew exponentially after 2010, on average, it still composed only slightly more than 10% of all EU aid (see **Figure 9**). The biggest recipients of it were European and African (Sub-Saharan) countries, which received around 30% each.

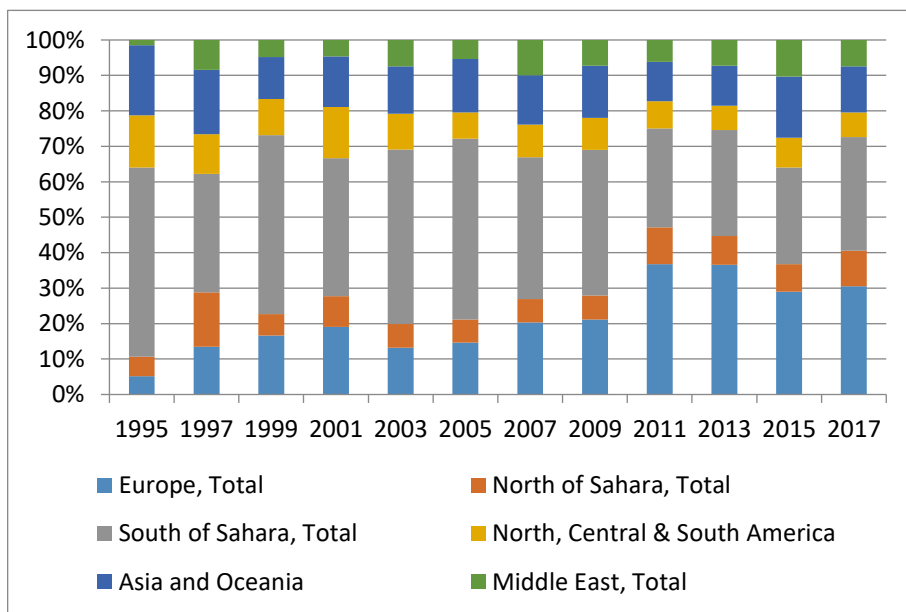


Figure 9. Share of EU aid (commitments) according to geographical destination. Source: OECD. Source: OECD. Dataset: Creditor Reporting System

The importance of the EU’s aid for the Maghreb countries was not equal. In Algeria, it composed a meager 0.03 % of GDP during the period of analysis, falling from 0.05 during the previous four years. In Morocco, the share of the EU’s ODA in the GDP grew from 0.5 to nearly 0.6% of GDP. However, in Tunisia, even without counting the MFA assistance, it exceeded

1% of GDP²³. Thus, at least in this country, and to a lesser extent in Morocco, the aid flows provided relevant support for the troubled economy. During the period of analysis, the EU was among the main donors to all three Maghreb countries. The EU institutions were the primary donor in both Morocco and Tunisia, followed by Germany and France. In Algeria, France was the principal donor, followed by the EU institutions, mostly the European Commission. Only in Morocco, the donor landscape was more diverse, since the US, Turkey and Arab states were involved there as well.

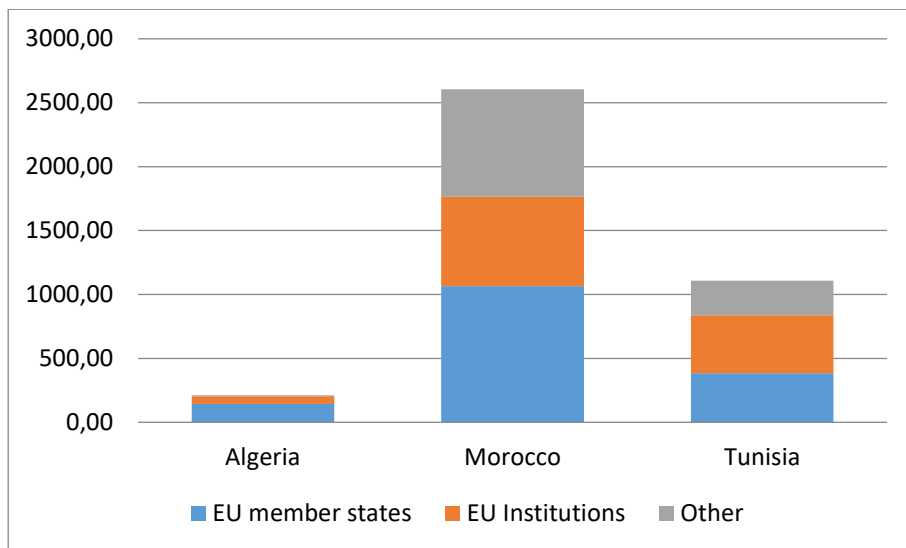


Figure 10. Top donors of gross ODA to Maghreb countries 2016-2017. Millions, constant 2017 US dollars. Source: OECD. Aid at Glance charts. [Accessed 10 11 2019]

In conclusion, the EU’s ODA does not seem any less politically motivated, as it follows external events and the EU’s priorities. However, the flows are historically more stable, in view of the fact that building the Mediterranean region has been among the EU’s priorities since the mid-1990s. The relevance of the EU’s aid for its partner countries varies: it is meager in the case of oil-rich Algeria and is more relevant for countries such as Morocco and even more for Tunisia. The fact that the EU managed to

²³ Calculations based on OECD (ODA, disbursements, current US dollars) and World Bank (GDP, current US dollars) data.

increase ODA flows after 2011 despite the economic crisis demonstrates belief in the need for an increased level of redistribution.

Association Agreements/Deep and Comprehensive Free Trade Agreements

The challenges of asymmetry, together with the debates on how to address it, have been at the core of the EU-Maghreb economic relations since their inception.

As in the case of the US, the trade agreements between the EU and its Southern partners receive contradictory evaluations. While some point out their positive effect on the overall flows of trade between both shores of the Mediterranean (see Dadush & Myachenkova, 2018), others claim that free trade with the EU has weakened already weak economies (see Khader, 2015; Langan, 2015, Langan & Price, 2020); while others, in general, observe that the impact of the AAs was, in general, small as compared to other internal and external factors (see Gasiorek & Mouley, 2018; Hoekman, 2016). Without asking whether the trade between both sides is beneficial or not, this section of the thesis focuses on three elements: a) the EU's willingness to create and sustain trading rules and frameworks (considered as production of regional public goods); b) the asymmetrical approach in EU trade policy (which may be reflected in preferential treatment, financial support, the inclusion of sensitive products in the FTAs, or, conversely, agreement for longer transitional periods; c) financial and technical support for the implementation of regulatory standards and procedures necessary for the FTA; and d) the use of trade instruments as a tool to support development or to achieve political goals.

A. Creation and maintenance of the framework for trade

The common trade policy, from the outset, provided the European Economic Community with an instrument that could be used to achieve development in neighboring countries, that is, by granting the developing countries particular advantages in terms of access to the common market (Beringer, et al., 2019, p. 6). In this framework, as early as 1969, many of the agreements signed between the EU and its Southern neighbors already envisaged various trade preferences under the General Preference Scheme (Parra et al., 2016). An attempt to harmonize existing arrangements ended with the formulation of the Global Mediterranean Policy, which resulted in the signature of Cooperation and Association Agreements with various Mediterranean countries (including Algeria, Morocco and Tunisia). Each of these agreements provided for duty-free market access for industrial goods to the

EU and preferential market access for agricultural products. However, the EU applied a flexible approach to agricultural imports, establishing agreements for various products in various countries. Between 1986 and 1988, the Euro-Med agreements were amended by Additional Protocols, which included extended trade preferences for agricultural products (Ecorys, CASE, FEMISE, 2019, p. 11).

Nonetheless, trade in both industrial and agricultural goods continued to be a contested issue, since European and Northern African countries were competing in some sectors and had somewhat diverging interests in others. While the European states were attempting to contain tensions and to enter the Northern African markets, meanwhile protecting their own agricultural producers, the Maghrebi counterparts were thinking about the EU market for their products (mostly agricultural) and protection of their own industries. Illustrating this point, in 1994, the Moroccan King, Hassan II, threatened Jacques Delors, claiming that, if the EU did not allow import of Moroccan tomatoes, 5 million of their growers might knock at the Union's doors as terrorists (Khader, 2015, p. 196). These tensions were reflected in the EU's policies *de facto*, as by the mid-1990s, it was already granting duty-free trade on more than half of tariff lines to the Southern Mediterranean countries. However, tariff preferences on unprocessed and processed agricultural products, especially those which were covered by the EU's Common Agriculture Policy and deemed sensitive, were, in general, more limited. Moreover, EU import duties remained significant for industrial products where Mediterranean partners' production was important and appeared to be internationally competitive, such as in textiles and clothing (Ecorys, CASE, FEMISE, 2019, p. 12).

In the framework of the Barcelona Process, which envisaged the establishment of a free trade area in the Mediterranean by 2010, the EU and its partners started negotiating new Association Agreements (AAs). These Mediterranean AAs were similar to each other. They started with a short political preamble outlining the creation of a similar structure of governance – each AA created Association Councils which were responsible for political dialogue and for drafting joint priorities in the areas of political, economic, social and cultural cooperation. However, by far the largest part of each AA was dedicated to the trade agenda, which provided mostly for the liberalization of trade in manufactured goods (immediate for the EU and transitional for its partner states) and for a very limited liberalization of a small number of agricultural products, fixing quotas for others. It also established provisions for the right of establishment (investment) and the supply of services, competition policy, support for regional integration and

EU financial assistance (Hoekman, 2016, p. 4). These FTAs also referred to some non-tariff measures, such as technical barriers to trade (TBT) and sanitary and phytosanitary measures (SPS), but mainly expressed the need for transparency and cooperation, rather than stipulating concrete commitments. For example, most of these agreements mention that both parties to the agreement are required to take appropriate steps to promote the use by the given Mediterranean countries of the EU's technical rules, standards and certification procedures (Ecorys, CASE, FEMISE, 2019, p. 14). However, besides declarations of goodwill to conclude future agreements on these issues, no precise actions or commitments are specified (*ibid.*, p. 14).

The existing EMAs were complemented with additional protocols, such as agreements on trade in agricultural, agro-food, and fisheries products which directly tackled trade in the agricultural products not liberalized by the previous AAs. Moreover, in the framework of EMAAs, countries negotiated dispute settlement mechanisms – while the initial AAs had very limited provisions regarding this procedure, new agreements regarding dispute settlement mechanisms were later negotiated with the Mediterranean partners, except Algeria.

Finally, although each AA was bilateral, it fed into the creation of a shared regional space of trade. In 2004, with the support of the EU, Jordan, Egypt, Morocco and Tunisia concluded the Agadir Agreement, which established a free trade zone among the four nations and included the adoption of a harmonized set of rules of origin which permitted cumulation and which was accepted by the EU (Hoekman, 2016, p. 5). Moreover, in order to promote broader regional integration, the EU has also promoted wide participation in the Pan-Euro Mediterranean system of cumulation for rules of origin (in which EFTA and Western Balkans countries also participate) (European Commission, 2020b, p. 5).

B. Tariffs, preferences, and inclusion of sensitive goods

All three Mediterranean AAs provided for liberalization of industrial goods (for the EU –immediately, for its partners – through step-by-step liberalization over 12 years). However, they exclude agricultural products and services. As for industrial goods already liberalized, the rules of origin apply. For example, in the case of textile manufacture (a third of manufacturing jobs in Tunisia), the so-called “double transformation” rule applies: tariff exemptions apply only if two transformation steps have been completed. If one step is lacking (for example, in cases where Tunisia lacks

the second processing industry), a higher tariff will apply (Rudloff, 2019, p. 5).

As for agricultural producers, all partners attempted to protect their sensitive products – for the EU, fruits and vegetables produced by its Southern member states. Hence, the EU established an import regime for fruits and vegetables, establishing temporary quotas and minimum import prices, thereby protecting its producers. Later, the EU attempted to improve the situation by signing protocols on trade in agricultural, agro-food, and fisheries products. However, out of the three Maghreb countries, only Morocco signed such a protocol (which entered into force in 2012). The Moroccan Protocol established a transitional period for Morocco, which would lead to the liberalization of 70% of imports from the EU in terms of value over a period of ten years. The EU, on the other hand, immediately liberalized 55% of its imports from Morocco. However, for the most sensitive products, trade was not fully liberalized. The Agreement basically kept the quotas and minimum entry prices for sensitive Moroccan agriculture products (such as tomatoes, clementines and oranges, and cucumbers) (Martín, 2014, p. 3). Moreover, in April 2014, a unilateral modification of the calculation method for the prices of entry to the EU market for fruits and vegetables caused a row between the EU and Moroccan authorities (Martín, 2014, p. 3).

The EU and Morocco also concluded negotiations in January 2015 on an agreement to mutually protect their Geographical Indications (GIs) in the area of agri-food products (European Commission, 2016). However, Tunisia still needs to negotiate such an agreement, while Algeria, in general, was not willing to proceed with the deepening of trade relations with the EU.

Table 13. EU-Maghreb trade framework. Source: author

Country	Tunisia	Morocco	Algeria
Regulatory framework	AA (in effect since 1998) + Negotiations of DCFTA + signed agreement	AA (in effect since 2000) + Negotiations of DCFTA	AA in effect since 2005
Current stipulations	<u>Institutions</u> <ul style="list-style-type: none"> • Association Committee • Dispute Settlement Mechanism (Tunisia 2010, Morocco 2011, Algeria - none) 		

Continued table.

	<p><u>FTA</u></p> <ul style="list-style-type: none"> • Liberalization of industrial goods. With immediate effect for the EU market and with a 12 year transitional period for partners (for Tunisia ended in 2008, for Morocco in 2012, Algeria asked to prolong the period until 2020 for products such as steel, textiles, electronics, and vehicles (EURACTIV, 2020). • Only a limited opening for agricultural products. Only some products like dates and spices are free of tariffs. • EU established import regime for fruit and vegetables defining seasonal quotas and minimum import prices. • No discussion of trade in services and investment. • Technical aid to achieve EU's quality standards (emphasis on sanitary and phytosanitary norms). 	
<p>Other agreements</p>		<ul style="list-style-type: none"> - Fisheries agreement – permits EU vessels to fish in Moroccan territorial waters - Agricultural agreement - Wide liberalization of agricultural goods with exceptions (minimum price and quota) - Agreement on GIs
<p>DCFTA (EU's position)</p>	<p>Proposal:</p> <ul style="list-style-type: none"> - To cover all trade in goods and services. - Address non-tariff barriers – broad consultation with stakeholders regarding the areas where these barriers may arise and technical assistance to coordinate positions. - Legally binding agreements on legislative approximation (Van der Loo, 2016, p. 17). 	
		<p>Not on the agenda</p>

In summary, from the “non-reciprocal” trade envisaged in the agreements signed by the EU and its partners before the Barcelona Process, the EU is moving to more reciprocal economic relations on the basis that reciprocal trade is seen as bringing better development outcomes. However, as Hoekman has observed, the AAs represent “shallow liberalization”, as they contemplate long transitional periods and liberalization is still restricted to industrial goods. Services and capital liberalization are excluded, and agricultural trade liberalization is confined to a limited expansion of quotas

for goods which are allowed to enter EU and partner markets free of duties (Hoekman, 2011, p. 4). Given that the partners already had nearly zero-tariff entry for many products (with the exception of sensitive goods), the EU's promises appeared to be limited, as some of the partners (e.g. Tunisia) have not dismantled the tariffs agreed (Gasiorek & Mouley, 2018, p. 4).

The difference of position in respect of agricultural exports is also related to criticism of the EU's Common Agricultural Policy, which, according to some authors (Langan, 2015, p. 1834), makes producers in neighboring countries less competitive. Bearing in mind that during the period 2014-2015, the total support for EU farms as a share of family farm income amounted to 57% of their income, they were able to produce more and to sell at lower than market prices. For example, when world prices increase, mechanisms such as EU quotas (e.g. for milk) reduce the production of EU farmers and further increase prices. When prices are decreasing, CAP mechanisms such as export subsidies increase EU farmers' production and further accelerate such price reductions. CAP instruments thus stabilize EU farmers' incomes but accentuate price volatility at the global level (Cantore, 2012, p. v). This problem is widely acknowledged, since various reports (elaborated by the EU institutions, academics, and civil society activists) point out the detrimental effect of CAP on developing countries and European neighbors (see Boysen and Matthews, 2012; Driouech, et al., 2014; Matthews & Soldi, 2019; Zahrnt, 2011).

Hence, the EU's will to offer trading conditions which are asymmetrical (or beneficial to the Southern countries) has been questioned. As Dadush and Myachenkova have observed, "given the asymmetric nature of the trade liberalization required by the agreements, it is surprising that the North African countries did not receive more as a quid pro quo for allowing the EU unrestricted access to their markets for manufactured products" (2018, p. 15). According to the authors, while the EU offered some concessions, the commitments in four spheres which would significantly benefit Southern partners – agriculture, liberal rules of origin, labor mobility, and incentives to strengthen competitiveness – failed to live up to expectations (*ibid.*). Moreover, the quasi-exclusion by the EU of agricultural products from these limited free-trade agreements did not only contradict the spirit of WTO rules (Licari, 1998, p. 7), but also denied the partners the possibility of capitalizing on their comparative advantage in this sector and limited their benefits from the proposed FTA (Zaim, 1999, pp. 46-48).

C. Non-tariff regulations and support for their implementation

Many of the provisions in the Mediterranean AAs call for cooperation across a broad array of economic, financial, social and cultural areas, recognizing the need to improve economic governance and the business environment, address implementation costs and bolster domestic regulatory regimes and administrative capacities (Hoekman, 2016, p. 4). While the AAs do not provide for a legal obligation to adopt the EU's *acquis*, countries have to implement various reforms if they are to benefit from the agreements. The negotiated DCFTAs are much more demanding and expensive for smaller countries. According to Hoekman, "DCFTAs are similar to the EMP trade agreements in terms of issue areas covered, but they differ substantially in the approach taken to address them. Instead of extensive 'soft law' language, they establish specific, binding (enforceable) disciplines and aim at the (gradual) convergence of policies in covered areas with those of the EU" (Hoekman, 2016, p. 6). For example, with regard to technical barriers to trade, the EU is willing to address "issues ranging from the preparation, adoption, and application of technical regulations, standards and accreditation and conformity assessment procedures to rules on the marking and labeling of products and cooperation in the field of technical regulations, standards, metrology, and market surveillance" (Gasiorek & Mouley, 2018, p. 5).

Consequently, exchanges of good practice, provision of technical assistance, and twinning were important instruments for cooperation, and the EU supported these reforms, which were necessary to provide the partners with capacity to implement the AAs. As discussed in chapter 4.2.2 of this thesis, the EU intensively supported economic and political reforms in their partner countries, and many of them, in one way or another, contributed to the implementation of trade agreements (e.g. supporting SMEs, fostering competitiveness, strengthening the quality sector, and encouraging good governance).

During the period of analysis, the EU committed 331 million USD for economy-related projects in all three Maghreb countries. Moreover, in all of them, the EU financed projects that specifically targeted implementation of the Association Agreements. Moreover, in the majority of cases, this was not the first phase of the program. For example, in Algeria, the EU committed two million euro to the program in support of the AA (*Programme d'Appui à la mise en œuvre de l'Accord d'Association (P3A-IV)*), which targeted the quality of public finances supporting the Algerian Strategic Plan for the Modernization of Public Finances. In 2014 the EU

committed an additional one million euro to the second stage of the program which helped Morocco to successfully achieve Advanced Status. In 2013 87 million euros had already been committed to the program. This aimed to support the National Regulatory Convergence Plan, bringing Moroccan legislation into line with the EU to progressively integrate the Moroccan economy into the European single market (European Commission, 2013). Similarly, the program of Support for the Association Agreement and for Integration (*Programme d'appui à l'accord d'association et à l'intégration* (P3AI)) received slightly more than twelve million euros in Tunisia. Moreover, the EU committed an extra six million euros to a program supporting the elaboration of EU-Tunisia partnership priorities (*Programme d'Appui à l'accord d'Association et à la Transition phase*). Thus, the EU's technical and financial support for transformation (including the economy) was constant and was considered as a "part of the package" of the EU's cooperation.

D. Use of trade instruments to punish or support

The EU has attempted to present its trade policy as responsive to the needs of its partner countries. For example, the original FTAs foresaw the possibility of partner countries increasing or reintroducing custom duties in order to protect infant industries or certain sectors undergoing restructuring or facing serious difficulties, particularly where these difficulties were producing major social problems.

During the period of analysis, in response to the Tunisian economic crisis in September 2015, the EC twice agreed to raise the quota for Tunisian olive oil exports until 2017 and simplified the mechanism of quota management, bearing in mind that Tunisia was the world's fifth-largest exporter, after Southern European EU member states, and olive oil accounted for 40 percent of its total agricultural exports (Rudloff, 2019).

E. Conclusion

According to the criteria presented at the beginning of this section, the EU's continuous support for the trade regime in the Mediterranean, reflects its agreement to produce regional public goods (in the form of trade rules and frameworks). Moreover, the application of a coherent structure for all Mediterranean agreements and the fostering of regional integration between the countries can also be considered as a push towards regional economic integration.

Second, while the EU’s trade shifts from preferential to reciprocal, and to deeper integration and convergence, it still declares the need to keep its progressive and asymmetric approach favoring its Southern partners (European Commission, 2019). Finally, while some authors criticize the EU’s push for DCFTAs as being in line with broader foreign policy considerations, being economically driven and streamlined according to a specific template (Bossuyt, et al., 2020, p. 51), the lengthy negotiation periods, and the undertaking to make all the negotiation materials public, contrast with the quick pace negotiations preferred by the US. Finally, the EU constantly invests and supports the reforms necessary for implementation of the AAs. In short, the brief overview presented in this section, and summarized in Table 14, indicates that the EU attempted to create a regional order with at least moderate functional/horizontal differentiation.

Table 14. Summary of THE EU’s trade policies in Maghreb countries. Source: author

Criteria	EU policy
1. Creation of a framework for trade	Yes. EMAs, dispute settlement mechanisms, provide a framework for trade in the Mediterranean area. EU supports regional economic integration.
2. Responsiveness to the partners’ needs in terms of tariffs (inclusion of relevant products, preferential treatment)	From preferential to reciprocal trade. However, instruments to address the asymmetry are in place, and, in discourse, the EU emphasizes the need for asymmetric and gradual liberalization.
3. Non-tariff regulations and support for their implementation	Support for the reforms necessary to implement the AAs established both through financial means and technical assistance.
4. Use of trade to punish/support	Support. Case of Tunisian olive oil quotas.

Coordination and institutionalization

Since the Barcelona Declaration, the EU has involved itself in various regional and thematic frameworks composed of both the Maghreb countries and countries from the broader Mediterranean region. Building on this experience, and responding to the mounting challenges, the Reviewed ENP acknowledges that “the EU cannot alone solve the many challenges of the

region, and there are limits to its leverage” (European Commission, 2015, p. 2). Thus the EU undertakes the task of reinforcing relations between the neighbors and sub-regional cooperation (European Commission, 2015, p. 3).

The Reviewed ENP envisages different partnerships and different channels (the majority already exist, but some are new) which are crucial for regional integration. In the Reviewed ENP, the EU agrees to engage more with the UfM and other (sub/extra)regional organizations, to promote cooperation and networking for the creation of a Common Knowledge and Innovation Space, to include partners in its Common Security and Foreign Policy activities and to support the emergence of different thematic/sectorial negotiation frameworks and formats, which are as diverse as the common Aviation Space and the thematic frameworks for the solution of the migration crisis. The following sub-chapters briefly discuss the main structures which were supported during the period of analysis.

Union for the Mediterranean

The Maghreb region is one of the least economically integrated regions in the world (Kireyev, et al., 2019, p. xi), and the EU has for a long time supported its integration.

The Reviewed ENP mentions the AMU as a potential partner in the region. However, while the EU had already attempted to engage with the AMU (European Commission, 2012c)), the cooperation was limited as the AMU itself was a rather dysfunctional organization, due mostly to disagreements between Morocco and Algeria. However, the mention of the AMU in the Reviewed ENP indicated that the EU was willing to pursue cooperation. In the evaluation of the ENP between 2015 and 2017, the EU regrets the lack of cooperation in the Southern Neighborhood, expressing its desire to encourage various forms of regional cooperation, including among the countries of Maghreb (European Commission, 2017d, p. 10). The European Commission declaration in 2012 outlined opportunities to work for Maghreb integration using other formats where the Maghreb countries were present: the UfM, the Arab League, and the Western Mediterranean Forum, composed of five Maghreb countries and five Mediterranean EU member states (European Commission, 2012a). Thus while committing itself to regional integration, the EU worked with Maghreb countries in various broader formats, the most important being the UfM, and promoted regulatory convergence and harmonization of terms of trade which might finally lead also to integration of the sub-region.

In its reviewed ENP, the EU pledged to give priority to the UfM in regional cooperation affairs, hoping that it “can play an enhanced role in supporting cooperation between southern neighbors” (European Commission, 2015c, p. 3). With such promises, in essence, the EU committed itself to the revival of the moribund regional organization, which had been left irrelevant by the economic crisis (Khader 2015, p. 200) and conflicts among the Southern neighbors. The UfM was created in 2008 under strong pressure from the French President, Nicolas Sarkozy. The Union, which currently includes 42 countries from both shores of the Mediterranean, can be considered as a real regional building effort initiated by the EU, which finances up to 50% of the UfM Secretariat (EEAS, 2021): 8.4 million euros were foreseen for the UfM during 2014-2017.

Originally planned as a union of the Mediterranean states, the UfM currently includes all the EU states, making it crowded with countries that have no interest in the region and tilting the power balance towards the EU side. However, the duality of the region is reflected in the UfM co-presidencies, as it is led by two presidents from each shore of the Mediterranean; moreover, it creates a space for regional cooperation, learning and co-ownership. The UfM has two dimensions: political, structured around ministerial and governmental representatives’ meetings, and policy, structured around regional dialogue platforms. These platforms involve a broader range of stakeholders, such as representatives of international and regional organizations, local authorities and civil society. At present the platforms focus on topics of business development, higher education and research, social and civil affairs, water and environment, transport and urban development, energy, and climate action.

Having taken over the role of coordinator of the Euro Mediterranean partnership, the UfM is responsible for the implementation of various initiatives, such as the Regional Transport Action Plan 2014-2020 addressing maritime, aviation, rail, road and urban transport, various initiatives for business development, and support for energy and environment.

The ENP review overlapped with the reinvigorated regional-level cooperation. The meetings of the UfM became more frequent: based on the meeting agenda available on the UfM website²⁴, while in the seven years between 2007 and 2013, there were 26 official meetings, in just four years

²⁴ <https://ufmsecretariat.org/info-center/past-events/>

between 2014 and 2017, there were 38 such meetings, the majority of them in 2017. In the same year the second high-level meeting of UfM foreign ministers took place, where the UfM Roadmap for Action, defining the UfM priorities and working mechanisms, was published. It was the first political document adopted by the UfM foreign ministers since 2008 (Bergman, 2018). Moreover, during 2015 and 2016, the first UfM projects were effectively implemented (Albinyana, 2017), covering very diverse areas and demonstrating the UfM's potential. Among these projects was the creation of the Mediterranean University, capacity building, a small grant scheme for Mediterranean environmental CSOs, and support for Egyptian, Jordanian, Moroccan and Tunisian SMEs adopting Sustainable Consumption and Production models.

While the academic literature (and official EU evaluations) are silent about the real success of the UfM in reinvigorating the Mediterranean partnership (and there was quite a broad agreement that until 2015 the UfM as an organization was weak and irrelevant), the intensification of dialogue has meant the opening of new channels for debate and negotiation. The Global Strategy also mentions the UfM as a key partner in the region. According to the document, the EU is ready to engage with the region through the UfM on issues such as border security, trafficking, counter-terrorism, non-proliferation, water, and food security, energy and climate, infrastructure, and disaster management. (European Commission, 2016b, p. 34). However, the UfM is a depoliticized organization, and while some of its projects have been positively labeled by the UfM as having positive spillover effects in terms of security (Cohen-Hadria, 2016, p. 246), security cooperation takes place in other formats.

In summary, the EU finances and coordinates the production of regional public goods and regional cooperation. These efforts indicate a desire to create a regional order with strong functional differentiation.

Thematic cooperation

Security

While the EU, strictly speaking, does not have an autonomous security and defense policy, the security dimension is important both in the Global Strategy and the Reviewed ENP. The latter claims that “structures set up under the EU's security and defense architecture can be a forum for an exchange of best practice, for cooperation on common objectives, and for capacity building. Thus, a new impetus will be given to cooperation on matters related to the CSDP” (European Commission, 2015c, p. 14). As with

the EU's overall engagement with the Mediterranean, these structures were born at the early stage of the formation of the EU's security policy.

Already in 2002, in the framework of the Western European Union – Mediterranean dialogue, the partners adopted the Valencia Action plan, establishing an effective dialogue on political and security matters, including the ESDP. The Action Plan foresaw the possibility of meetings between the Political and Security Committee Troika and the Heads of Mission of the Mediterranean Partners once per Presidency; the establishment by the Mediterranean partners of contacts with the Secretariat General of the Council and the Commission, with a view to exchanging information on respective crisis management procedures; the holding of regular meetings including the European Union Military Staff on specific subjects of crisis management; and an invitation to the EU Institute for Security Studies to examine possible activities in support of the dialogue with Mediterranean partners. However, this multilateral track of the EU's security engagement with the region failed, mostly due to internal problems among the Mediterranean states themselves.

More productive cooperation is conducted on a bilateral basis, either with the EU as a coordinating actor or through the EU's cooperation with the subregional 5+5 Dialogue group.²⁵ Since 2007 the European Council has authorized the participation of certain neighboring countries in activities of a large number of EU agencies, such as FRONTEX, EUROPOL, and Council Conclusions in 2013 welcomed the inclusion of the neighboring countries into the CDSP (Stivachtis, 2018).

The Reviewed ENP states that the EU “should also explore the possibility of involving partner countries in existing financial investigation networks (such as networks of Financial Intelligence Units)”. According to the report on the implementation of the Reviewed ENP, this was implemented since “in 2016, the EU allocated dedicated funding to support ENP countries in their use of Interpol's Information Technology systems and databases” (European Commission, 2017d, p. 21). Moreover, according to the document, various EU agencies such as the European Conference Business Group, Europol, the European Union Agency for Law Enforcement Training, the European Monitoring Centre for Drugs and Drug Addiction, and Eurojust were providing capacity-building support to partner countries. Moreover, between 2015 and 2017, there was intensification of the exchange

²⁵ A sub-regional forum for the ten Western Mediterranean, including Spain, France, Italy, Malta and Portugal, Algeria, Libya, Morocco, Mauritania and Tunisia.

of operational and strategic information with ENP partner countries to combat organized crime, as well as terrorism, smuggling of migrants, and trafficking (European Commission, 2017d, p. 21).

Summing up, the EU's attempts to coordinate joint efforts in the security spheres in the Maghreb seems weak, not only due to the EU's lack of capacity but also due to the divisions existing among the countries of the region. Here the EU prefers the bilateral track, building capacities through training and support for security sector strategy and border management programs. However, the EU's member states (both bilaterally and in the framework of the 5+5 Dialogue) seem to be much more active in this field, providing both training and arms for their Southern neighbors.

Migration: from Rabat to Valetta

As migration was one of the reasons for revision of the ENP, both the Reviewed ENP and the Global Strategy pay attention to various aspects of its management. Among the instruments for the management of migratory flows, the document mentions regional dialogues such as Rabat and Khartoum. The report on the implementation of the reviewed ENP points out that, between 2015 and 2017, the EU worked closely with the members of both regional processes, stating that “the EU is enhancing efforts to increase cooperation on migration in North Africa countries through increased political dialogue as well as deepened technical and financial cooperation” (European Commission, 2017d, p. 23).

The so-called Rabat process (or Euro-African Dialogue on Migration and Development) was founded in 2006, with the aim of finding a collective response to a problem which for a long time was considered as a Spanish and Moroccan responsibility: the increasing number of migrants wishing to cross the Straits of Gibraltar or to reach the Canary Islands (ICMPD, 2017). The idea behind the Rabat process was to connect origin, transit and destination countries along the migration routes from Central to West and Northern Africa towards Europe. Currently, 60 stakeholders are involved in the process, including the European Commission. The Rabat process is governed by a Steering Committee composed of the 5 European and 5 African countries, plus the EU and the Economic Community of West African States. The Chair of the Steering Committee rotates between African and European countries. Technical support is provided by the Secretariat, which is funded by the EU (Rabat Process, n.a.). Since its inception, the process has functioned through regular meetings and dialogue. A parallel Khartoum process covers the EU countries and the Horn of Africa.

At the height of the migration crisis in 2015, a meeting took place in Valletta, where participating countries adopted an Action Plan, and where the EU announced the establishment of the EU Emergency Trust Fund for stability and addressing the root causes of irregular migration and displaced persons in Africa (Valletta Summit on Migration, 2015). The meeting defined five priorities which partners should attempt to achieve²⁶ and set out a regular structure for meetings and debates about the process. The first meeting for the evaluation of the joint efforts took place in 2017, and the representatives of Rabat and Khartoum process presented reports.

Hence, in terms of migration, the EU supports a separate framework of exchange and dialogue, both on the topics relevant for the EU (migration management) and those relevant for its partners (protection of migrants and support for origin and transit countries).

Mediterranean community

From the beginning of the Barcelona Process, the EU and its partners promoted the creation not only of an economic and political but also of a cultural sphere in the Mediterranean region. In the chapter titled “Partnership in Social, Cultural and Human affairs: Developing Human Resources, Promoting Understanding between Cultures and Exchanges between Civil Societies”, the Barcelona Declaration envisages various spheres of interaction, ranging from the development of human resources to exchange information in the health sector to building respect for different cultures. In both the Reviewed ENP and the Global Strategy, the “human dimension” of the Southern Neighborhood is also very important. The Reviewed ENP maintains that “the EU will also encourage exchanges on education, training and youth policies between the Southern Mediterranean countries within existing fora for cooperation in the region” (European Commission, 2015c, p. 10)

It also mentions the cross-cultural dialogue and the work of the Anna Lindh Foundation as essential for the counter-terrorism efforts (ibid. p 13). The latter, conceived in 2003, aims to “take action to restart dialogue and refuse the risk of a clash of civilizations” (Anna Lindh Foundation,

²⁶ Development benefits of migration and addressing root causes of irregular migration and forced displacement; Legal migration and mobility; Protection and asylum; Prevention of and fight against irregular migration, migrant smuggling and trafficking in human beings; Return, readmission and reintegration.

2018, p. 3), and the EU is its principal donor and a strategic partner. The Foundation supports more than 3000 organizations and is also responsible for the organization of MedForum, a conference taking place every three years and reuniting various stakeholders from Mediterranean countries. The importance of the Foundation is reflected in the EU's ENI regional programming documents, where the organization is mentioned as an important vehicle for regional civil society cooperation (European Commission, 2014b) and as the "EU's main interlocutor in matters of intercultural dialogue" (European Commission, 2017d, p. 10). During the period of analysis, the EU supported the Fund's activities for intercultural dialogue (Phase IV of support, seven million euro). Moreover, in 2017, the Foundation received funds from the "South Programme III – Support for Institution-building and International Co-operation in the Southern Neighbourhood".

Another way in which the EU is making an effort to connect different stakeholders in the Mediterranean region is Cross-Border Cooperation (CBC), which promotes cooperation between EU member states and neighborhood countries sharing a land border or sea crossing. The main program during the period of analysis involving the Maghreb countries was the ENI CBC "Mediterranean Sea Basin Programme". Presented as a "hub for cooperation in the Mediterranean", more than 200 million euros was committed to this program for the period between 2014 and 2020. The main objective of the CBC program is to promote economic and social development in the Mediterranean Sea Basin countries. The three thematic priorities are business development, support to education, research and technological development and innovation, promotion of social inclusion, and the fight against poverty (European Commission, 2015b, p. 26). While the main modus operandi of the program is issuing grants for cross-border projects, the decisions are not made by the EU institutions, as various autonomous managing bodies have been established to oversee the program. The main decision-making body, a Joint Monitoring Committee, has been set up by the participating countries, which, moreover, are obliged to ensure "the adequate participation of concerned stakeholders, including local authorities and civil society organizations" (European Commission, 2015b).

Common Knowledge and Innovation Space

The Reviewed ENP repeats the EU's intention to create a Common Knowledge and Innovation Space between the EU and its neighbors, taking into account that "research, science, and innovation are crucial to creating

decent and sustainable jobs in the neighborhood so the modernization and diversification of economies should be encouraged by facilitating increased participation of neighborhood countries in EU initiatives, such as the Enterprise Europe Network, Horizon 2020 and COSME” (European Commission, 2015c, p. 9). Since 2016 Tunisia has been afforded the opportunity to participate in Horizon 2020.

As foreseen in the Reviewed ENP, in 2017 the EU launched the Partnership for Research and Innovation in the Mediterranean Area (PRIMA). This initiative is jointly undertaken by Croatia, Cyprus, France, Germany, Greece, Israel, Italy, Luxembourg, Malta, Portugal, Slovenia, Spain, Tunisia and Turkey, with the expectation that Algeria, Egypt, Jordan, Lebanon and Morocco will become participants in the initiative after the conclusion of international agreements for scientific and technological cooperation with the Union. It is the “first public-public partnership under Horizon 2020, enabling the participation of non-EU countries which are not associated with the EU research framework program on an equal footing with the Member States and Associated Countries” (European Commission, 2018b). PRIMA’s budget at the moment of its establishment was 494 million Euros, out of which nearly half was assigned by the EU (European Commission, 2018b).

The decision regarding the establishment of PRIMA also defines its governing structure, which is composed of a Board of Trustees constituted by representatives of all partners, a Steering Committee, a Secretariat, and a Scientific Advisory Committee. The European Commission will represent the EU and will participate in all the meetings of the Board of Trustees as an Observer (European Parliament & European Council, 2017).

Briefly summing up, the EU’s cooperation created a vibrant network of different frameworks, formats, and more or less formal institutions, each having its own governance system and overlapping membership.

4.3.2.3 Conclusions: strong functional differentiation

Summing up the overview presented above, the strategic documents of the EU demonstrate its feeling of belonging to the Mediterranean region. The economic and security interdependence, together with the legacy of the Barcelona Process, influence the EU’s self-perception as a regional actor desiring to propose a vision of its preferred regional order and steering the region closer to it. The changing EU strategies indicate that external and internal challenges took their toll on the over-optimistic vision of the mid-

1990s. Nonetheless, the EU's willingness to initiate, to coordinate joint responses, and to pay for them, remains unchanged.

The EU also undertakes the role of financing joint projects both bilaterally and through the UfM, in this way producing regional public goods, in the form of regional-level investment in exchange of knowledge, dialogue between cultures, research, infrastructure, and the offer of shared standards and regulations for trade. Its development cooperation flows are stable and quite significant. Its trade engagement historically has been tailored as an attempt to spur growth, to promote the EU's production, and to mitigate differences in social and economic development. The EU's push for signature of DCFTAs and emphasis on reciprocity strengthened the perception of those who saw the Union as abandoning its vocation to support development in the South. In a search for compromise, the EU proposes for its neighbors both DCFTAs and more flexible arrangements for those not willing to enter into them. Material and technical support for the implementation of trade-related reforms was high and constant. Finally, when acting in the region, the EU creates and relies upon a dense network of formal and informal institutions (e.g. regional and sub-regional thematic groups, negotiation frameworks, treaties). Moreover, strengthening them is among the key goals of the Union, which claims "not [to be] able to solve all the problems alone" (European Commission, 2015c, p. 2).

All these features indicate that the EU prefers a regional order which is marked by strong functional differentiation. It agrees to undertake the burden of producing regional goods in a very broad range of spheres. Moreover, it engages in a stable redistribution of resources, and these flows are more stable than in the case of the US. Finally, it consistently supports the emergence of different regional sub-systems: for example, thematic groups on migration and security coordination, forums for civil society, and joint environmental groups. This engagement creates different sub-systems of governance in different thematic sectors.

4.3.3 Overview of the comparison

The comparative overview summarized in Table 15 demonstrates that, **in terms of functional differentiation, both regional powers had a very different vision of how their Southern neighborhoods should be arranged.**

a) While they both feel part of the region and their interests are strongly affected by security threats emanating from the perceived lack of development there, **the EU seems to be more "in" the region, seeing itself**

as part of the Mediterranean space and openly shaping the development strategies for the whole region and undertaking more roles within it than the US.

b) **Both produce certain regional goods:** they finance regional infrastructure projects, cover the costs of cooperation on management of environmental, health-related matters and trade integration. Nonetheless, the US seems to be doing much more in terms of security, while the EU's approach appears to be much more diversified across different sectors. In general, it seems that the EU is aiming for a higher output legitimacy of its regional order.

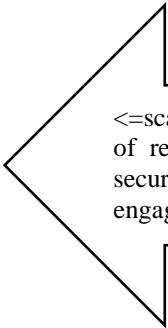
c) **The EU seems to be more willing to redistribute resources – its ODA is less politicized, more relevant for the recipients, and stable.** Moreover, it tends to use trade preferences and emphasize the asymmetrical nature of trade relations between North and South. In practice, trade relations seem to be more similar, as both regional powers tend to push for more reciprocal economic engagement. Nonetheless, during the period of analysis, the EU was still placing emphasis on the “asymmetrical nature” of trade between the two shores of the Mediterranean and using preferential trade instruments, such as raising quotas for Tunisia.

d) **The most significant difference between the US and the EU is in their support for different sub-regional frameworks/institutions/cooperation channels.** The US' support is strongly focused on one issue (security), where it creates and maintains the appearance of regional networks and different sub-systems. The EU meanwhile is supporting a broad range of formal and informal institutions in very varied thematic sectors, creating a “more lively” or more diversely organized region, as it creates spaces for regional and sub-regional thematic cooperation.

e) Finally, the shift in the US' regional strategy was also reflected in the horizontal differentiation. The initial version of the CEN Strategy envisaged the creation of, and support for, the emergence of different regional-level initiatives. However, the administration of Donald Trump scaled down these efforts, focusing instead on security and, to a lesser extent, commercial engagement. Moreover, the division between “them” and “us” became more visible, with demands for the Central American countries to solve “their” problems. The EU strategy, while changing in terms of vertical differentiation, seems to be stable regarding functional differentiation.

Table 15. Horizontal differentiation. Summary of comparative analysis

Weak horizontal differentiation	Moderate horizontal differentiation	Strong horizontal differentiation
	<p>US: sees itself as part of the region but only to some extent + finances financing regional public goods (security, environment, trade integration, infrastructure, HIV + redistributing resources through ODA – however, flows unstable and politicized) + weak support for regional institutionalization (one issue approach: favoring security cooperation and coordination).</p>	<p>EU: finances regional goods (trade, culture, scientific cooperation, environment) + redistributes resources through ODA (significant and stable amounts) and partially through trade (preferential agreements) + supports a wide variety of regional organizations and thematic exchange frameworks.</p>



<=scaling down the thematic scope of regional engagement. Focus on security (+/- commercial engagement)

4.4. Differentiation and the regional orders in the EU's and US' neighborhoods

This chapter applies to the cases of the US and the EU the theoretical framework elaborated in chapter 2 and operationalized in chapter 3 for the analysis of the regional orders that the US and the EU intended to create in their southern neighborhoods. **Table 16** summarizes the questions which guided the empirical analysis.

Table 16. Questions guiding the empirical analysis

	Questions guiding the analysis
Vertical differentiation	<ul style="list-style-type: none"> ✓ Framing of regional goals: subordinated to political priorities? Attached to the security of the regional power? ✓ The number of spheres in which the regional power seeks to reform, and their sector (domestic/foreign). ✓ The way requests are made (in strategic documents, repeatedly or ad hoc in speeches).

Continued table.

	<ul style="list-style-type: none"> ✓ Funding of reforms: do the sectors funded correspond to the priorities laid out in the strategic documents? ✓ How and who defines the spheres for policy convergence? ✓ Use of positive and negative conditionality.
Functional differentiation	<ul style="list-style-type: none"> ✓ A vision of the region and of itself within it (involvement). ✓ Redistribution/extraction of resources; direction, amounts, and stability of flows? ✓ Stance towards regional institutionalization. How many and how developed are the institutions? ✓ Production of regional goods.

The comparative analysis demonstrates that stratificatory and functional differentiation principles are not antagonistic. Moreover, somewhat unexpectedly, the comparative research demonstrated that the “mix” of differentiation principles is not static and might change, and the changes in one differentiation principle might be unrelated to the changes in the other.

During the period of analysis, the US and the EU had similar visions of their regions in terms of vertical differentiation. Their approach seems to be strongly affected by the “traditional concept of modernization understood as the convergence of different human societies towards the model developed first in Europe in the Western World, and that has, according to this view, gradually become the universal model through globalization. It is a modernization project considered ‘universal’ and acceptable by all. It is assumed that social and economic structures will be capable of progressively adapting and become flexible in order to advance towards each country’s own modernization” (Florensa, 2015, p. 89). The US and the EU both attempted to shape and encourage change and search for ways to penalize those who were not willing to accept it. The US engagement can be considered somewhat “more vertical”, as the spirit of the CEN Strategy was short-lived, and from 2017 the US became openly pushy in demanding changes from its neighbors. The EU, meanwhile, seems to be softening its tone and admitting the need to adapt to realities and the demands of its neighbors.

Nonetheless, the real difference between these two visions is at the level of functional differentiation. Here the EU seems to have a continuous and robust preference for functionally differentiated regions, where it would be part of different networks, spreading across different issue areas. Such diversification itself is not a sign of its “benignness”. However, it creates more functionally complex regions and opens more space for negotiation of smaller partner preferences. Meanwhile, straight after the unaccompanied

minor migrant crisis, the US created a regional vision of order with moderate vertical and moderate functional differentiation. However, with the change of administration and mounting pressures from the South, this vision was transformed into one where the US would more openly have the upper hand (strong stratificatory differentiation) while engaging and committing its support to a more limited number of regional issues (weak functional differentiation). A summary of the analysis and comparison is presented in Table 17 and which shows the changes in the preferences of both regional powers (seen also in **Figure 11**. Summary of comparison).

Table 17. Summary of analysis

<p>Strong vertical differentiation</p>	<p>US (end of the period of analysis): requests for policy convergence grew louder and became more one-sided. Threats to use negative conditionality (fulfilled after the period of analysis).</p>		
<p>Moderate vertical differentiation</p>		<p>US (beginning of the period of analysis): requests for policy convergence in five domestic spheres established in high-level strategic (NSS, CEN Strategy) and cooperation (RDCS CAM) documents. The documents also envisaged conditionality (both negative and positive); however, during the period of analysis, the positive was preferred. The emphasis was placed on presenting the regional strategy as a joint endeavor that included and would include different actors in its implementation.</p>	<p>EU (beginning of the period of analysis): requests for policy convergence in five domestic spheres established in high-level strategic (Global Strategy, Reviewed ENP) and cooperation) documents. The documents also envisaged conditionality (both negative and positive), and cooperation modalities such as budget support were highly conditional. However, during the period of analysis, positive conditionality was preferred, and payments were made without fulfilling all the necessary conditions. EU cooperation traditionally establishes pathways towards the uptake of necessities and preferences of partner countries.</p>

Continued table.

Weak vertical differentiation			EU (end of the period of analysis, potentially): an emphasis on differentiation and cooperation only in those sectors where there is an agreement with the partner.
	Weak functional differentiation	Moderate functional differentiation	Strong functional differentiation

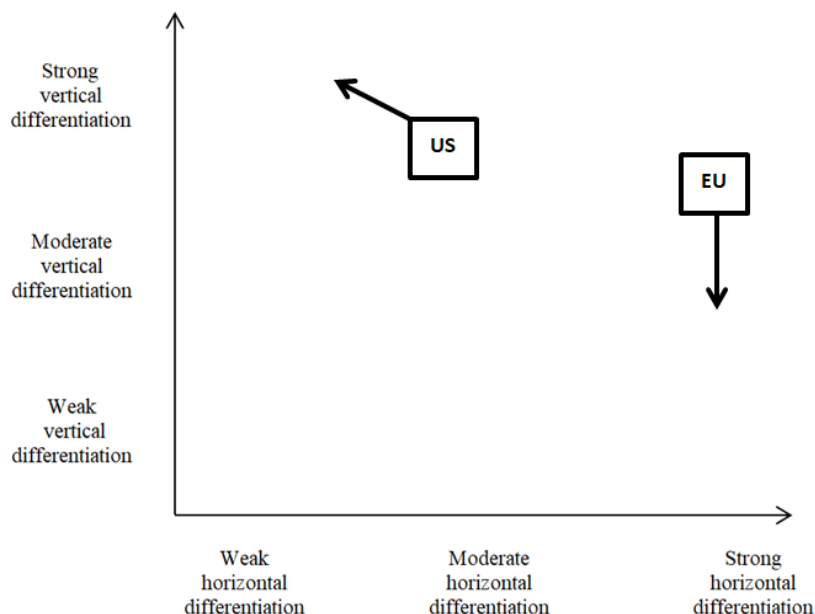


Figure 11. Summary of comparison

In conclusion, the comparative analysis demonstrates the utility of the framework elaborated in this thesis and allows the formulation of the following statements:

First, while the literature on regional and global hierarchies tends to see them only in terms of strong/weak domination, different regional powers may have different preferences in terms of both, stratificatory/vertical differentiation and functional/horizontal differentiation.

This research demonstrates that regional orders preferred by the US and the EU during the period of analysis were similar in terms of stratificatory differentiation (moderate) and different in terms of functional differentiation (moderate and strong, respectively). Both powers intended to

create regions distinguished by moderate vertical differentiation. They both attempted to reform various domestic policies in neighboring countries. They both established clear mechanisms of sanctions and inducements, mostly giving preference to the latter. Simultaneously, they both attempted to present their strategies as highly legitimate (or inclusive).

At the same time, both powers had different preferences for functional differentiation. The US undertook a limited role in sponsoring the resolution of specific regional challenges and supported the institutionalization of a limited number of regional interactions. Meanwhile, the EU committed itself to the sponsor's role in financing and coordinating the solution of a broad range of regional problems. Moreover, it supported the emergence of a broad range of formal and informal institutions in various spheres.

Second, while the literature on hierarchy suggests that stronger functional differentiation *should* weaken stratificatory/vertical differentiation, this research shows that this is not always the case.

The research has demonstrated that a regional power may prefer a regional order with weak functional differentiation and strong stratificatory differentiation. However, this is not always the case. Even more, a change in one principle may not lead to changes in the other.

While both the EU and the US changed their regional strategies during the period of analysis, these changes were not uniform. While the US strategy changed in terms of both functional and stratificatory differentiation, the EU's preference for strong functional differentiation seems to be stable despite weakening stratificatory differentiation.

The limitations and theoretical implications of these conclusions are discussed in the final chapter of this thesis.

CONCLUSIONS

This thesis starts by observing contradictions in the debate regarding how powerful actors treat asymmetrical power relations and what kind of orders they create around themselves. Some authors claim that all powerful actors treat power relations in a similar manner, consequently creating similar regional and global orders. However, others point out that some actors (most noticeable US and EU) may differ both in their approach to power politics and in their preferences for the type of order.

Proceeding from a discussion regarding the differences and similarities in the US' and EU's management of asymmetrical power relations, this thesis argues that existing definitions and typologies of regional orders do not capture their peculiarities. Studies using the concept of "regional order" often define it either very vaguely or, to the contrary, narrow it down to the analysis of security cooperation. Meanwhile, those willing to understand the dynamics and interactions in regions marked by strong power asymmetries often use the concept of hierarchy and focus purely on the strength of domination. Thus, the "backyards" (or neighborhoods of powerful actors) seem to be uniform spaces, their characteristics depending purely on the power distribution. Consequently, according to this view, the strength of domination is the primary indicator necessary to categorize them.

Arguing that a more nuanced approach is needed to understand regions emerging around both old and new powers in the 21st Century, this research proposes a new typology of regional orders and applies the framework to analysis of the US and EU Southern Neighborhood strategies (2014-2017). The typology is innovative as it merges regional order studies and differentiation theory, approaching regional orders as structures classifiable by looking at how their components (countries and/or other actors) are organized vis-à-vis each other. While such a structural approach is similar to that of Waltz (1979), it focuses not on the ordering principle (anarchy or hierarchy), or polarity (fixing the weaknesses of neorealism observed by Donnelly, 2009), but on differentiation principles that define how the parts of any system are arranged.

The main theoretical assumption of this thesis, formulated in Chapter 1, maintains that different regional orders can be analyzed and compared by looking at the prevalence of two differentiation principles: stratificatory (or vertical) differentiation, which usually denotes the level of control which a regional power has (or attempts to have) over its neighbors; and functional (or horizontal) differentiation, expressed by the emerging functional division

of tasks inside the region and subsequent institutionalization of different spheres of regional interactions. Implicitly, both stratificatory and functional differentiation have been present in the studies of regional orders through concepts such as hierarchy, hegemony and legitimacy. However, often these two principles are presented as antagonistic: those who study hierarchies maintain that the production of certain goods and redistribution of resources by the regional (or even global) power weakens coercion, making hierarchies and hegemonies “*more legitimate*”. Such a view is flawed from the perspective of differentiation theory, which sees both differentiation principles as complementary, or at least not entirely dependent on one another.

This research builds on the existing literature on regional hierarchies and uses the hierarchical regional order framework (Garzón Pereira, 2014) as a departure point for the creation of the new typology. However, it significantly modifies this framework, converting it into a matrix of nine potential regional orders, based on the prevalence (weak, moderate, strong) of stratificatory and functional differentiation. The proposed tool is much more complex and nuanced than those focusing on strong or weak hierarchies.

Being the fruit of purely theoretical effort, the model needs to be tested, and the empirical part of this thesis demonstrates its capability to help understand the diverse evaluation of the US and the EU as regional actors. The comparative analysis allows the main theoretical assumptions to be confirmed and sheds light on the similarities and differences in the US’ and the EU’s regional projects.

First, the empirical research presented here demonstrates that regional powers may have different preferences not only in terms of vertical but also in terms of horizontal differentiation, as the regional orders preferred by the US and the EU were similar in terms of stratificatory differentiation and different in terms of functional differentiation. Both powers desired to achieve policy convergence in a broad range of domestic policies in their neighboring states; both had instruments for both inducement and sanctions, with a strong preference for positive conditionality. Finally, while the input legitimacy of both strategies has been questioned, they both tried to demonstrate that the elaboration of joint action plans was very inclusive. In conclusion, while there were some differences between their approaches, their overall visions of the neighborhood were similar in terms of stratificatory differentiation.

At the same time, the prevalence of functional differentiation in each of the regional strategies differed. The US agreed to the limited production of

regional goods, mostly in the sphere of security (and to a lesser extent in trade and environmental governance). Moreover, its development aid was politicized and unstable, and its support for sub-regional institutions was relatively low. Meanwhile, the EU preferred a regional order distinguished by strong functional differentiation: it undertook a burden of producing regional goods in an extensive range of spheres. It also engaged in a stable redistribution of resources and consistently supported the institutionalization of different regional sub-systems. Consequently, while the EU intended to create a region with strong functional differentiation, the US opted for one with moderate functional differentiation.

Second, while the literature on hierarchy suggests that stronger functional differentiation *should* weaken stratificatory differentiation, the empirical study presented in this thesis shows that this is not the case. While both the EU and the US changed their regional strategies during the period of analysis, these changes were not uniform: the US strategy changed in terms of both functional and stratificatory differentiation. However, the EU's preference for strong functional differentiation seems to be stable despite weakening stratificatory differentiation. Consequently, the strength of one differentiation principle seems to be independent of the strength of the other.

Somewhat unexpectedly, instead of offering only a "purely positional picture of society" (Waltz, 1979, p. 80), the framework also allowed one to capture the change in both strategies. The newly elected Trump administration hardened its stance towards the Southern neighbors, preferring a more "vertically organized" region. The EU, meanwhile, promised to renegotiate its priorities and engage only with those who desired to do so and only in those spheres where there would be mutual agreement. Such a position may indicate a weakening of vertical differentiation. Interestingly, such a shift placed the US and the EU in opposite squares of the matrix: while the regional order preferred by the US seems to be situated in the upper-left corner of the matrix (strong stratificatory and weak functional differentiation), the regional order preferred by the EU is situated in the bottom-right corner (weak stratificatory and strong functional differentiation).

This observation tells us something about the US and the EU. The similarities in terms of stratificatory differentiation and differences in terms of functional differentiation might explain the contradictory evaluations of their engagement with other actors, especially in the Global South. Both attempt to dominate and to mold the neighboring countries according to their image. They both set out clear goals and indicators of how their partners should change their domestic policies in order to be considered successful;

they both create frame the cooperation with partners by using positive and negative conditionality, technical support and benchmarking. Thus, some consider them both “colonizing” and “oppressive”. These attempts to dominate are consistent with the ideas about the powerful actor’s behavior presented in Chapter 1 of this thesis. One might conclude that unipolar regions with one strongly prevailing power are inevitably hierarchically organized spaces, marked by attempts of dominance and contestation.

On the other hand, by preferring different levels of functional differentiation, the US and the EU create different regional structures and, consequently, different opportunities for other countries and their political agendas. Hence, the claims that the US and the EU prefer different world orders seem to be also correct. These differences do not mean that the EU is more “benevolent” than the US; it merely indicates that the structures it prefers are different. In that sense, not every powerful actor tends to treat asymmetries in the same manner.

Summing up, the research presented here not only offers a new and more complex way of seeing regions. It also points out, and hopefully offers a way to correct, the tendency to simplify the understanding of asymmetrical or hierarchical relations.

Limitations

One cannot conclude without addressing some limitations of the conceptual model and the empirical case presented in this thesis.

As for the former, the typology of regional orders created in this thesis presents “ideal type” regional orders. Such ideal types “will never accurately or exhaustively describe the concrete manifestations of a specific phenomenon” (Jackson and Nexon 2009, p. 921). This can be observed in the empirical analysis which, when summarized in the framework, has lost some nuance and richness. For example, the framework distinguishes only weak, moderate, and strong differentiation. At the same time, when analyzing rich empirical material, assigning the value becomes more complicated. Placing the intended regional orders of the US and the EU in the matrix potentially obscures the power relations between the US and the governments of Central America, thus complicating the measurement of input legitimacy (if these considerations were to be included, maybe we would conclude that the US strategy was still more vertical than that of the EU?). It also requires taking decisions about which spheres of cooperation are more developed (thus included in the measurement of prevalence of functional differentiation). Finally, the empirical research requires the

inclusion of longer periods of time and analysis of the context which is not reflected later in the final matrix. There is no ideal way of solving this problem since, in order to compare, one needs to reduce the complexity. As Jackson and Nexon observed, the “ideal types do provide benchmarks for the analytical comparison of real phenomena” (Jackson and Nexon 2009, p. 921). Hence, the model proposed should be seen as a flexible tool, not a “Procrustean bed”, and should be applied always bearing in mind the peculiarities of each case and its context.

Another limitation is related to the application of the framework. Focusing only on what powerful actors attempt to achieve, this thesis does not analyze what regional orders they actually create. The expected and unexpected outcomes of their actions, and the positions of other states (and actors), are left out of the analysis, despite being relevant to the understanding of existing regional orders. This is exceptionally challenging for the analysis of the prevalence of functional differentiation where the functions of other actors and the output legitimacy of regional power politics (best measured when analyzing the perceptions of other regional states) should be evaluated. Nonetheless, this thesis maintains that focusing on the desires of the main regional actors is not a perfect, but is nevertheless a sufficient strategy to achieve the main goal of this research: to demonstrate the utility of the theoretical framework for understanding of how different though similarly powerful actors imagine their surrounding regions. Moreover, it helps to answer the question, posed at the outset of this research, “What do the powerful want, when they can”?

Finally, the conclusions based on the two empirical cases analyzed in this research – two strategies implemented over a short span of four years – cannot be automatically transposed to the macro level. However, the conclusions of this thesis are consistent with the contradictory evaluations of similarities and differences between the regional and global orders preferred by the US and the EU. The fact that the EU is a particular actor (in many senses more limited than traditional great powers) partly explains the results. The application of the framework to other actors, such as Russia and China, or more in-depth case studies of regional orders emerging around other regional powers over longer periods of time are needed to corroborate the findings.

In conclusion, these limitations are relevant. However, they do not prevent the attainment of the main objective of this research: to build an expanded structural typology of regional orders and, through the analysis of the US and EU Southern Neighborhood strategies (2014-2017), to demonstrate its ability to capture more diversified features of existing and

desired regional orders than is allowed by concepts of hierarchy and unipolarity. Thus, they should also be seen as an invitation for further research and improvement of the framework proposed.

Theoretical implications and lines for further research

The main contribution of this thesis for IR and differentiation theory is the theoretical framework proposed. This thesis agrees with Albert, Buzan and Zürn, who claim that an “approach based on differentiation theory allows analyzing changes on a macro level by using the coherent and highly durable framing of an interplay between various forms of differentiation” (2013, p. 4).

As demonstrated in the empirical analysis, the analytical tool proposed allows the capture of various regional interactions not limited to the sphere of security. Moreover, this typology is adaptable to the study of various regional orders, and in this way would be particularly suitable for comparative studies. Furthermore, it can be operationalized for the study of both existing regional orders and those that one actor or another (most likely a regional power) is attempting to create. The comparison of these two (desired and existing) regional orders opens up the possibility of studying the reasons behind the formation of different “backyards”. Finally, as this research demonstrates, the framework is not static and allows one to capture changes in the regional orders. All these features make the framework proposed in this thesis a perfect tool for further studies of regional orders and approaches of various regional powers to power relations and regional politics. Further improvements of the framework could include a more thorough analysis and definition of roles that countries of the region could fulfill, or a further operationalization of the measurement of input and output legitimacy.

Furthermore, this thesis demonstrates the utility of differentiation theory for IR: the focus on differentiation principles allows one to overcome the dichotomies of weak and strong (and consequently, good or bad). Why bother with using differentiation theory instead of basing the research on the premises of, for example, liberalism? As observed by Albert, Buzan, and Zürn, (2013), the use of new theoretical concepts for the analysis of social phenomena must be justified. According to them, the “midterm criterion for passing the test is <...> the theoretical concepts utilized shed light on issues that both grasp developments that are in line with our intuitions and existing evidence *and* are neglected by the dominant theories” (p. 241). This thesis

maintains that the use of differentiation theory makes a contribution to three different theoretical discussions.

First, the typology of regional orders presented in this thesis enriches our understanding of regional powers and the regions developing around them. Separating functional/horizontal and stratificatory/vertical differentiation opens the door to a more nuanced analysis of hegemonic and hierarchical structures. The principles of differentiation bring the diffuse debate on roles, functions and hierarchies in regional systems within a single framework, and thus offer a more holistic way to study them. This thesis agrees with Donnelly, who argues that societies (and structures) “are differentiated along multiple dimensions that often do not coalesce into a small number of types. And even where a single dimension of differentiation predominates, other dimensions may be of vital analytical importance” (Donnelly, 2013, p. 92). Thus, the main contribution of this thesis – a qualitatively new typology of regional orders, opens the door to a more thorough comparison and analysis.

Second, this thesis enriches the literature on differentiation and structures. The empirical part demonstrates that regional orders (or structures) are not fixed, and that they change – further studies of the same type over longer periods of time might help one to understand the causes of change and how changes in one dimension might lead to changes in another. The studies based on society see functional differentiation as “more modern”, emerging when societies become more complex. However, do these claims hold true in IR? What leads to more functionally diversified regions? Answering these questions would be of benefit to both IR and differentiation theory.

Third, the emphasis on vertical differentiation in the US and EU regional strategies allows one to ask whether this is typical of all regional powers in cases of strong power asymmetry, or whether it is more typical of Global North-South relations, thus also enriching studies on, for example, global development. If even the “Normative power Europe” is willing to shape its neighbors, can we claim that asymmetry automatically leads to more “vertical” engagement? Or is this approach related to the post-colonial history or, in general, the predominant role of Western powers in the global system? These examples, together with the empirical study presented here, indicate that the differentiation perspective enriches regional power studies and the whole of IR.

Finally, the hierarchical order framework distinguishes between domestic and foreign policies, as intrusion in the domestic sphere is considered as a stronger violation of sovereignty than a demand for convergence in foreign policy. In the empirical case studies presented in this

research, this distinction seems to be irrelevant, as both the US and the EU were far more interested in domestic policies and less demanding regarding their foreign policy goals. This may be a typical pattern of cooperation between North and South countries or a consequence of globalization and the increased relevance of development cooperation.

To understand all possible variations of principles of differentiation in regional orders, further research could expand the timeframe of comparison - bearing in mind a “geopolitical” European Commission. Perhaps, in some aspects, the EU would become closer to the US? Or, as it seems now, there might be a growing discrepancy between a “geopolitical” discourse and the real preferences for the regional order? Or, maybe, the EU as a peculiar actor, would express its geopolitical ambitions less through domination (stratificatory differentiation) and more through proactive engagement in the resolution of regional challenges? Moreover, a more in-depth case study of regional engagement of both powers over longer periods of time would help to understand the changes in regional strategies, thereby opening the door to an analysis of their causes.

However, by far the most interesting endeavor would be to expand the analysis of regions around other powers such as China or Russia. The analysis of these actors is important in the context where they challenge the West, presenting themselves as an alternative for its hegemony. For example, China presents itself as the largest developing country in the world that speaks on behalf of other developing countries (Zhang, 2015, p. 62). The Asian power “is engaged in a high-profile charm offensive to overcome long-standing animosities and draw its Southeast Asian neighbors into its orbit, through trade agreements and massive infrastructure projects” (Feinberg, 2017). Meanwhile, Russia, while preferring the term “near abroad” instead of “backyard”, openly pressures neighboring countries to join its regionalist project. Studies of these regional orders would expand both our knowledge of the principles of differentiation in different systems and the variety of regions emerging around powerful actors with competing claims for regional and global hegemony. An old Mexican proverb says, “Poor Mexico, so far from God and so close to the US”. A broader comparative study of unipolar regions might indicate whether all neighbors of great powers share the sentiment.

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ANNEXES

Table 18. Distribution of the US aid based on sector in Central America (regional), 2014-2017. Direct Administrative costs excluded. Source: US Foreign Aid Explorer. [Accessed 11 08 2019]

	2014	2015	2016	2017	2014-2017
Social development	17.2	8.4	31.2	12.6	17.4
Economy	2.3	5.5	2.6	0.6	2.7
Security	69.3	82.4	52.9	77.7	70.6
Governance	4.4	2.5	6.1	7.6	5.1
Infrastructure	6.4	1.2	7.2	0.0	3.7
Migration	0.4	0.0	0.0	1.5	0.5
Total	100%	100%	100%	100%	100%

Table 19. Distribution of the US aid based on sector in Guatemala, 2014-2017. Direct Administrative costs excluded. Direct Administrative costs excluded. Source: US Foreign Aid Explorer. [Accessed 11 08 2019]

	2014	2015	2016	2017	2014-2017
Social development	66	60	69.4	44.7	60.1
Economy	1.7	3	0.6	7.1	3.1
Security	20.7	19	12.5	13.9	15.6
Governance	8.8	10	12.8	27.9	16.0
Rule of Law	2.3	7	4.6	5.9	4.9
Other	0.5	0	0.2	0.4	0.3
Total	100%	100%	100%	100%	100%

Table 20. Distribution of the US aid based on sector in Salvador, 2014-2017. Direct Administrative costs excluded. Source: US Foreign Aid Explorer. [Accessed 11 08 2019]

	2014	2015	2016	2017	2014-2017
Social development	44.9	39.8	19.8	12.7	33.6
Infrastructure	1.5	28.4	1.2	0.9	17.0
Migration	0.0	0.0	11.2	0.1	1.1
Economy	14.4	23.4	-1.7	29.4	20.9
Security	7.9	3.1	21.7	6.6	6.1
Governance	24.0	3.6	39.4	41.2	16.8
Rule of Law	7.2	1.7	8.3	9.1	4.5
Total	100%	100%	100%	100%	100%

Table 21. Distribution of the US aid based on sector in Honduras, 2014-2017. Direct Administrative costs excluded. Source: US Foreign Aid Explorer. [Accessed 11 08 2019]

	2014	2015	2016	2017	2014-2017
Social development	48.2	52.4	28.5	38.9	41.8
Economy	10.9	0.0	-0.1	2.8	3.0
Security	14.5	19.1	16.7	9.6	14.6
Governance	26.4	28.4	45.3	48.7	38.5
Rule of Law	0.0		3.8		0.9
Other	0.0	0.0	5.7	0.0	1.3
Total	100%	100%	100%	100%	100%

Table 22. EU priorities in Southern Neighborhood according to the projects foreseen in AAPs for regional cooperation in the South 2014-2017. Source: European Commission (2014f, 2015h, 2015i, 2015j, 2016g, 2017j)

Regional South AAP 2014-2017	% of all
Governance	23.17
Other	17.38
Development	14.52
Economy	11.58
Security	10.86
Rule of Law	9.49
Infrastructure	6.34
Migration	3.62
Union for the Mediterranean (support for the secretariat)	3.05

Table 23. Distribution of the EU aid based on sector in Algeria. Source: AAP in favor of Algeria (European Commission, 2014e, 2015e, 2016c, 2017f) and OECD database. [Accessed 13 02 2020]

	2014	2015	2016	2017	2014-2017
Social development	27.9	28.6	19.0	0.0	18.9
Economy	27.4	48.6	0.0	66.7	35.7
Governance	20.0	22.9	54.0	33.3	32.5
Rule of Law	24.7	0.0	0.0	0.0	6.2
Energy	0.0	0.0	27.0	0.0	6.8
Total	100%	100%	100%	100%	100%

Table 24. Distribution of the EU aid based on sector in Morocco. Source: AAP in favor of Morocco (European Commission, 2014c, 2015f, 2016d, 2016f, 2017e, 2017i) and OECD database. [Accessed 13 02 2020]

	2014	2015	2016	2017	2014-2017
Social development	23.40	3.42	24.82	25.62	19.32
Economy	0.00	54.79	2.13	37.48	23.60
Governance	2.13	3.94	2.13	1.78	2.49
Rule of Law	14.89	3.60	0.00	0.00	4.62
Energy	38.30	34.25	7.09	4.17	20.95
Infrastructure	21.28	0.00	55.32	30.95	26.89
Migration	0.00	0.00	8.51	0.00	2.13
Total	100%	100%	100%	100%	100%

Table 25. Distribution of the EU aid based on sector in Tunisia. Source: AAP in favor of Tunisia (European Commission 2014d, 2015d, 2015g, 2019e, 2016h, 2017g, 2017h) and OECD database. [Accessed 13 02 2020]

	2014	2015	2016	2017	2014-2017
Social development	4.7	1.5	33.1	3.4	10.7
Security	2.5	6.9	0.0	0.0	2.3
Economy	13.3	21.0	15.4	28.3	19.5
Energy	30.6	38.4	0.0	20.2	22.3
Governance	15.5	32.2	29.4	15.0	23.0
Rule of Law	2.0	0.0	0.0	10.0	3.0
Infrastructure	31.0	0.0	22.1	23.1	19.0
Migration	0.4	0.0	0.0	0.0	0.1
Total	100%	100%	100%	100%	100%

SANTRAUKA

Problema ir jos aktualumas

Šioje disertacijoje ieškoma atsakymo į klausimą, kokias regionines tvarkas aplink save kuria veikėjai, pasižymintys gerokai didesniais galios pajėgumais nei jų kaimynai. Kai kurie autoriai, dažniausiai remdamiesi realizmo teorija, pabrėžia, jog dėl anarchinio tarptautinių santykių pobūdžio stipresni veikėjai neišvengiamai siekia dominuoti (Gilpin, 1981). Šių veikėjų kaimynystės ar regionai, kuriuose jie veikia, neretai vadinami „galiniais kiemais“ (angl. *backyards*), t. y. erdvėmis, kurios priklauso nuo didžiųjų kaimynų ir pasižymi įtemptais dominavimo, paklusimo ar pasipriešinimo santykiais. Vis dėlto gyvenant „regionų pasaulyje“ (Katzenstein, 2005), kuriame kyla įvairios „naujosios“ (pavyzdžiui, Europos Sąjunga (ES), Kinija ar Turkija) ir vis dar egzistuoja „senosios“ (pavyzdžiui JAV) galios, svarbu suprasti, ar tikrai visų didžiųjų tarptautinių santykių veikėjų kaimynystės yra vienodos?

Egzistuojantys regioninių tvarkų apibrėžimai nepadedą atsakyti į šį klausimą. Viena vertus, regionus galima klasifikuoti pagal galios pasiskirstymą juose, išskiriant vienpolius (vienas regioninis veikėjas, pasižymintis gerokai didesne galia nei kitos valstybės), dvipolius (du tokie veikėjai) ir daugiapolius (keletas tokių veikėjų) regionus. Tačiau toks skirstymas nieko nepasako apie kitas regionų charakteristikas. Ar visi vienpoliai regionai vienodi? Kita vertus, regionus galima klasifikuoti susitelkiant į bendradarbiavimą tam tikrame sektoriuje. Pavyzdžiui, regioninių saugumo kompleksų studijos (Buzan, 2003; Morgan, 1997) siūlo labai išplėtotas šių kompleksų tipologijas. Visgi jos apima tik vieną, saugumo, sritį, menkai paliesdamos kitas.

Galiausiai darbai, skirti regioninių galių, veikėjų, turinčių itin didelę įtaką regioninės tvarkos susiformavimui, analizei, dažniausiai jas apibūdina būtent per jų dominavimo stiprumą ir būdą. Pavyzdžiui, Destradi (2010) ir Mitchel (2016) išskirtas regioninių galių strategijas išdėsto tiesėje nuo imperialistinių iki grįstų lyderyste (t. y. paremtų minkštąja galia ir įtikinėjimu). Taigi, pagrindinės šių strategijų (o ir susikuriančių regioninių tvarkų) charakteristikos yra tai, kiek stipriai ar silpnai siekia dominuoti pagrindinė regioninė galia, taip suponuojant, jog jos visada siekia tai daryti.

Tuo pat metu įvairūs veikėjai teigia skirtingai žvelgiantys į galios ir dominavimo santykius. Europos Sąjunga yra, ko gero, labiausiai matomas „kitokio veikėjo“ pavyzdys: tarptautinė organizacija, pasižyminti itin plačiomis kompetencijomis ir aktyviai propaguojanti savo „postimperinį“

(Ashton, 2011) pobūdį bei vertybes tarptautinėje arenoje. Ne vienas autorius (Manners, 2002) ES mato kaip „normatyvinę“ ir „veikiančią išorinį pasaulį kitaip, nei įprasta didžioji galia, vedama savo geopolitinių interesų“ (Hettne & Ponjaert, 2014, p. 135). Neretai „normatyvinė galia Europa“ supriešinama su kita Vakarų galia – JAV (ar „Amerikos imperija“). Pastebima, kad jos ne tik pasižymi skirtingomis strateginėmis kultūromis (Kagan, 2002), bet ir turi labai skirtingas preferencijas globalioms ir regioninėms tvarkoms. Lygindami JAV ir ES požiūrius į regionalizmą Hettne ir Ponjaert teigė, jog šie du veikėjai atstovauja dviem priešingiems pasaulio tvarkos modeliams – *Pax Americana* ir *Pax Europea*. Pasak autorių, pirmoji tvarka pasižymi vienašališkumu, dominavimu ir asimetrija. Savo ruožtu antroji grindžiama daugiašališkumu, partneryste ir dialogu (Hettne & Ponjaert, 2014, p. 115).

Būtent šis pastebėjimas tampa šios disertacijos atspirties tašku – jei skirtingi veikėjai iš tiesų turi skirtingas preferencijas tvarkoms, kokios gali būti šios preferencijos? Juolab ką reiškia „*kitokios* preferencijos“? Nepaisant aptartų JAV ir ES skirtumų, ne vienas autorius pastebėjo, jog tiek viena, tiek kita veikėja yra linkusi dominuoti ir primesti savo poreikius, ypač santykiuose su globaliems Pietums priklausančiomis valstybėmis jų kaimynystėje²⁷.

Apibendrinant, XXI amžiaus regionai yra sudėtingi ekonominiai, politiniai, socialiniai ir saugumo dariniai, o egzistuojančios regioninės ir globalios galios skiriasi savo kultūra, politinėmis sistemomis ir veikimo būdais. Taigi, reikalingos tipologijos, galinčios apimti šią įvairovę ir sujungti ją į vientisą ir prasmingą klasifikaciją. Sujungdama regioninių tvarkų ir regioninių galių tyrimus ir struktūrinę, sociologijoje taikomą diferenciacijos teoriją, ši disertacija pasiūlo naują regioninių tvarkų tipologiją. Svarbu tai, kad siūloma tipologija leidžia analizuoti ir lyginti tiek regioninių veikėjų preferencijas (t. y. jų regionines strategijas), tiek ir egzistuojančias regionines tvarkas. Kadangi siekiama pasiūlyti įrankį, kuris būtų naudingas

²⁷ Diskusijos apie „Amerikos imperiją“ jos kaimynystėje buvo ypač aktyvios Šaltojo karo metais ir vėliau, dažnai vertinant Šaltojo karo laikų įvykius (pvz., Grandin, 2001; LeoGrande, 1998; Livingstone, 2009; Reyna, 2006). Savo ruožtu diskusijos apie globalią „Amerikos imperiją“ suaktyvėjo po 2001-ųjų rugsėjo 11-osios (pvz., Cox, 2004; Ferguson, 2004; Gilderhus, 2005). Europos sąjungos „kitoniškumas“ taip pat buvo smarkiai kritikuotas, ypač vertinant jos politikas globaliuose pietuose. Autoriai pastebi neatitikimų tarp normatyvinės retorikos ir realių politinių prioritetų (pvz., Dandashly, 2018; Pace, 2009; van Hüllen, 2019) ar kritikuoja jos elgesį kaip „neokolonijinį“ (Cebeci, 2017). Kai kurie autoriai bandė suderinti ES „normatyvumo“ ir realių politikų neatitikimą jos pasienyje, teigdami, jog ES elgiasi kaip „normatyvinė imperija“ (del Sarto, 2016, p. 216).

plačiam tyrimų spektrui, disertacijoje daug dėmesio skiriama jo operacionalizacijai ir pritaikymui skirtingiems tyrimams. Nors darbu visų pirma siekiama pasiūlyti naują tipologiją, norint parodyti sukurtos tipologijos potencialą, ji pritaikoma dviejų Vakarų galių – JAV ir ES – pietų kaimynystės strategijų analizei. Šie du veikėjai lyginimui pasirinkti dėl jau aptartos diskusijos apie panašumus ir skirtumus jų kuriamose regioninėse ir globaliose tvarkose.

Tyrimo tikslas ir uždaviniai

Šios disertacijos tikslas yra sukurti naują struktūrinę regioninių tvarkų tipologiją ir ją patikrinti pritaikant JAV ir ES pietų kaimynystės strategijų (2014–2017 m.) analizei.

Siekiant tikslo, darbe suformuluoti **penki pagrindiniai uždaviniai**:

1. Parodyti dabartinių regioninių tvarkų tipologijų ribotumus ir struktūrinės teorijos teikiamas galimybes praplėsti šias tipologijas.
 - a. Aptarti egzistuojančių regioninių tvarkų tipologijų ribotumus;
 - b. Aptarti pagrindines diferenciacijos teorijos prielaidas ir tai, kaip jos elementai atsispindi globalių ir regioninių hierarchijų studijose;
 - c. Pagrįsti, kodėl ir kaip diferenciacijos teorijos naudojimas gali praturtinti egzistuojančias regioninių tvarkų tipologijas.
2. Sukurti analitinį įrankį, leidžiantį klasifikuoti ir lyginti regionines tvarkas atsižvelgiant į stratifikuojančios / vertikalios ir funkcinės / horizontalios diferenciacijos principų sąveiką.
 - a. Remiantis diferenciacijos teorijos prielaidomis ir hierarchinių regioninių tvarkų modeliu sukurti naują regioninių tvarkų tipologiją;
 - b. Operacionalizuoti sukurtą tipologiją, paverčiant ją įrankiu, tinkamu regioninių tvarkų ir regioninių strategijų analizei ir lyginimui.
3. Operacionalizuoti sukurtą įrankį, pritaikant jį regioninių tvarkų, kurias JAV ir ES siekė sukurti savo pietų kaimynystėje 2014–2017 metais, analizei.
4. Pritaikyti sukurtą įrankį JAV ir ES pietų kaimynystės strategijoms 2014–2017 m., taip nustatant stratifikuojančios / vertikalios ir funkcinės / horizontalios diferenciacijos stiprumą kiekvienoje iš jų;

- a. Pagrįsti, jog abu subregionai gali būti analizuojami kaip hierarchinės regioninės tvarkos;
 - b. Nustatyti stratifikuojančios / vertikalios diferenciacijos stiprumą JAV ir ES regioninėse strategijose;
 - c. Nustatyti funkcinės / horizontalios diferenciacijos stiprumą JAV ir ES regioninėse strategijose;
 - d. Suformuluoti išvadas regioninių tvarkų, kurias JAV ir ES siekė sukurti savo kaimynystėje, panašumų ir skirtumų.
5. Suformuluoti išvadas apie:
- a. JAV ir ES regioninių vizijų panašumus ir skirtumus;
 - b. Sukurto įrankio tinkamumą regioninių tvarkų analizei.

Tyrimo dizainas

Kadangi darbo tikslas pirmiausia yra teorinis, jo pagrindas yra literatūros apie regionines tvarkas, regionines galias bei regionines ir globalias hierarchijas skaitymas ir analizavimas remiantis diferenciacijos teorijos prielaidomis. Savo ruožtu antroji disertacijos dalis struktūruojama kaip lyginamoji atvejo studija – siūlomas instrumentas pritaikomas JAV ir ES strategijų analizei bei formuluojamos išvados tiek apie regionines tvarkas, kurias jos bandė sukurti per tyrimo laikotarpį, tiek ir apie pačią siūlomą tipologiją.

Siekiant susiaurinti tyrimo lauką ir pagilinti patį tyrimą, pasirinktos JAV ir ES strategijos atitinkamai Šiaurinio trikampio (Gvatemala, Hondūras ir Salvadoras) ir Magrebo (Alžyras, Marokas ir Tunisas) šalyse. Disertacijoje daroma prielaida, jog Centrinę Ameriką (savo ruožtu ir jai priklausantį Šiaurinį trikampį) bei Viduržemio jūros regioną (ir jam priklausantį Magrebą) galima laikyti regionais²⁸, o JAV ir ES – regioninėmis galiomis²⁹ juose, nes šie veikėjai prisiima tokį vaidmenį, kuria regioninės raidos vizijas, skatina bendradarbiavimą ir siekia aktyviai įsitraukti ir formuoti regiono raidos procesą.

²⁸ Valstybių ir teritorijų grupę, susijusią tarpusavyje per geografinį artumą ir tam tikrą tarpusavio priklausomybę, sąveikos ir bendrumo lygį (pvz., Fawcett & Hurrell, 1995; Lake & Morgan, 1997; Russett, 1967).

²⁹ Regioniniais veikėjais, pasižyminčiais didesniais galios ištekliais, dalyvaujančiais regiono valdysenos struktūrose ir save matančiais bei siekiančiais brėžti regioninę darbotvarkę (Nolte, 2010, p. 15).

Tyrimo laikotarpis (2017-2017) pasirinktas atsižvelgiant į tai, jog 2014–2015 metais tiek JAV, tiek ES susidūrė su panašiais iššūkiais iš Pietų – migracijos krize ir didėjančiu nesaugumu pasienyje – ir sukūrė naujas kaimynystės strategijas. Taigi, abi Vakarų veikėjos priėmė naujus strateginio lygmens dokumentus, kuriuose apibrėžė savo pietinės kaimynystės vizijas – kėlė tikslus, numatė instrumentus, kurie bus naudojami. Tuo pačiu 2017 metais buvo paskelbtas pirmasis vidurio laikotarpio ES kaimynystės strategijos vertinimas, o JAV savo veiklą pradėjo naujoji prezidento Donaldso Trumpo administracija, po truputį pradėjusi keisti ankstesniosios administracijos sprendimus.

Šiame darbe „kaimynystės strategija“ suprantama kaip vizija, kokios regioninės tvarkos siekiama. Taigi, pagrindinis tyrimo šaltinis yra strateginiai dokumentai ir atsakingų politikų kalbos. Visgi tyrimui svarbu ne tik kas sakoma, bet ir tai, ką JAV ir ES bandė daryti. Todėl disertacijoje remiamasi gausiais pirminiais šaltiniais apie paramos vystymuisi srautus, prekybos santykius, migraciją. Tyrimą taip pat papildė antriniai šaltiniai – akademiniai straipsniai, įvairūs įgyvendintų politikų vertinimai.

Tyrimo ribotumai

ES buvimas tarptautine organizacija, o ne valstybe ir apsunkina tyrimą, ir suteikia papildomų galimybių. Viena vertus, tai, kad ES neturi savarankiškos užsienio politikos, kelia klausimų, ar apskritai šioje srityje galima ją lyginti su valstybėmis. Vis dėlto ES turi savo kaimynystės politiką, kurią įgyvendina ES institucijos (Europos Komisija, ES Delegacijos) ir kurios prioritetai suderami valstybių narių bei įtvirtinami ES lygmens dokumentuose. Be to, ES partneriams ypač aktuali ES rinka ir jos vystomojo bendradarbiavimo parama. Savo ruožtu prekybos sutartys, migracijos valdymo susitarimai ir programos pasirašomos ne tik su valstybėmis narėmis, bet ir su ES.

Apibendrinant, šiame darbe teigiama, jog ES turi pakankamai aktoriškumo³⁰ kaimynystės politikoje ir ją lyginti su JAV galima ir yra

³⁰ Sjøstedt (1977) išskiria dvi savybes, būtinas, kad subjektas būtų laikomas veikėju: „Jis turi parodyti minimalų vidinės sanglaudos ir atskirties nuo išorinės aplinkos laipsnį“ (Sjøstedt, 1977, p. 15). Bretherton ir Vogleri (1999, 2006) bei Jupille ir Caporaso (1998) prie šių sąlygų pridėjo ir išorinius aplinkos apribojimus bei galimybes. Aktoriškumo sąvoka naudota lyginant įvairias ES ir JAV (ir kitų veikėjų) politikas (pvz., Börzel, et al., 2015, Brattberg & Rinhard, 2012; Murau & Spandler, 2016).

prasminga. Dar daugiau, specifinis ES pobūdis leidžia testuoti sukurtą tipologiją su dviem veikėjais, pasižyminčiais panašiu simboliniu ir materialiniu pranašumu prieš savo kaimynus ir tuo pat metu smarkiai besiskiriančiais vienas nuo kito savo struktūra ir pobūdžiu. Siekiant analizuoti politikas, kurios būtų palyginamos, šiame darbe nagrinėjami tik ES lygmens instrumentai.

Kitas tyrimo ribotumas yra susitelkimas ties „norima sukurti“, o ne egzistuojančia regionine tvarka. Dėl šio pasirinkimo disertacijoje nagrinėjamos tik JAV ir ES politikos, neįtraukiant jų pasekmių ar kitų valstybių atsako. Galima sutikti, jog šis apribojimas neleidžia gerai atskleisti regioninių galių ir kitų regiono valstybių santykių. Visgi, turint omenyje šio tyrimo apimtį, reikalingas tyrimo lauko apribojimas. Be to, jis netrukdo įgyvendinti pagrindinio disertacijos tikslo – patikrinti ir patobulinti sukurtos tipologijos. Be to, aptariant pačią tipologiją, itin didelis dėmesys skiriamas jos operacionalizavimui ir pritaikymui tiek egzistuojančių, tiek ir norimų regioninių tvarkų tyrimams.

Teorinė prieiga

Kaip jau minėta, šiame darbe siekiama pasiūlyti regioninių tvarkų tipologiją, pritaikomą tiek egzistuojančių regioninių tvarkų, tiek ir regioninių strategijų (t. y. tvarkų, kurias siekiama sukurti) analizei. Siekiant sukurti tipologiją, apimančią ir skirtingus veikėjus, ir skirtingus regionus su juose egzistuojančia santykių įvairove, siūloma regionus klasifikuoti pagal bendriausią jų bruožą – struktūrą. Visgi ši disertacija seka ne neorealizmu, o sociologijoje taikoma diferenciacijos teorija, kuria būtent ir siekiama spręsti neorealizmo trūkumus.

Panašiai kaip ir pastarasis, diferenciacijos teorija nagrinėja struktūras (visuomenių, klanų, grupių). Vis dėlto ši teorija susitelkia ne į hierarchijos / anarchijos skirtį ar galios pasiskirstymą (vien-, dvi- ar daugiapoliškumą), o į diferenciacijos principus, nurodančius, kaip sistemos dalys išsidėsto viena kitos atžvilgiu (Albert, Buzan, & Zürn, 2013), išskiria tris pagrindinius diferenciacijos principus (arba tipus):

• ***Stratifikuojanti / vertikali diferenciacija (disertacijoje abu terminai vartojami kaip sinonimai)*** nurodo, jog vienos sistemos dalys yra subordinuotos kitoms. T. y. sistemoje egzistuoja hierarchija, o jo dalys suskirstytos pagal statusą. Geriausiai taip organizuotų sistemų pavyzdžiais galima laikyti kunigaikštystes ar imperijas.

• **Funkcinė / horizontali diferenciacija (disertacijoje abu terminai vartojami kaip sinonimai)** gali atspindėti du fenomenus. Viena vertus, diferencijuotų funkcijų sistemos viduje atsiradimą, t. y. veikėjai skirstomi ne pagal rangą, o pagal tai, ką jie daro, kad sistema išliktų. Kita vertus, funkcinė diferenciacija parodo ir tai, jog sistemoje atsiranda tam tikros posistemės, susijusios, bet dalinai nepriklausomos viena nuo kitos. Funkcinės diferenciacijos pavyzdžiais tarptautinėje sistemoje galima laikyti atsirandantį globalų ar regioninį vaidmenų pasiskirstymą (pvz., taisyklių kūrėjai vs. taisyklių priėmėjai (Escude, 2015)) ar atsirandančias globalias ekonomikos ar politikos posistemas su savo valdysenos mechanizmais.

• **Egalitarinė / segmentuojanti diferenciacija (disertacijoje abu terminai vartojami kaip sinonimai)** nurodo, jog visos sistemos dalys yra neranguotos, „panašios“ ir neskirstomos pagal funkcijas. Vestfalijos valstybių sistema atspindi egalitarinės diferenciacijos principus: visos valstybės, nesvarbu jų dydis ar ekonominė situacija, formaliai yra vienodos, turinčios tas pačias teises ir pareigas.

Kaip matyti iš aprašymo, visose sistemose šie trys diferenciacijos principai egzistuoja tuo pat metu – kalbėdami apie regionines tvarkas ir regionines galias kalbame apie formaliai lygiavertes valstybes (*segmentuojanti diferenciacija*), dėl turimų materialių ir simbolinių išteklių turinčias nevienodą įtaką regionams (*stratifikuojanti diferenciacija*), kartu, tikėtina, prisiimančias tam tikrus vaidmenis juose (*funkcinė diferenciacija*). Taigi, kaip teigia Albert, Buzan, ir Zürn, diferenciacijos teorijos suteikiamo žodyno analitines stipriąsias puses galima efektyviausiai išnaudoti ne tada, kai klausiama, koks diferenciacijos tipas vyrauja vienoje ar kitoje struktūroje, bet analizuojant, „kaip skirtingos diferenciacijos formos atsiranda, keičiasi laikui bėgant ir sąveikauja tarpusavyje“ (2013, p. 5).

Apibendrinant, diferenciacijos teorija suteikia įrankius išanalizuoti kartinį regioninės tvarkos bruožą – jos struktūrą. Regioninių tvarkų tipologija, pagrįsta diferenciacijos principų sąveika ir stiprumu padėtų analizuoti ir lyginti iš išorės labai skirtingus regionus. Siekiant sukurti tokią tipologiją, šioje disertacijoje remiamasi egzistuojančiais regioninių galių ir tvarkų tyrimais, pasinaudojant hierarchinių regioninių tvarkų modeliu (Garzón Pereira, 2014) kaip atspirties tašku.

Siūloma regioninių tvarkų tipologija

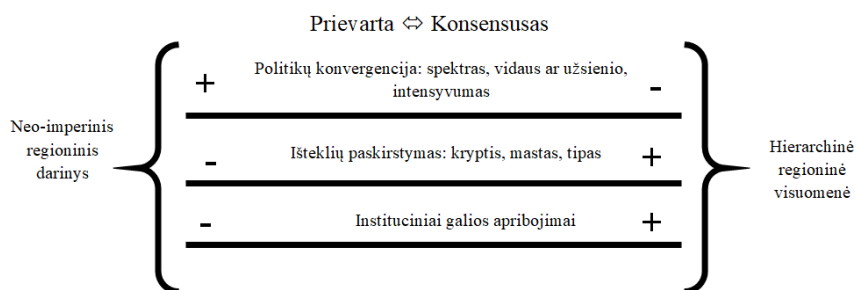
Garzón Pereiros (2014) tikslas – suprasti, kuo viena nuo kitos skiriasi regioninės tvarkos su vienu itin stipriu veikėju (jo vadinamosiomis

hierarchinėmis regioninėmis tvarkomis). Pasak autoriaus, visos hierarchinės regioninės tvarkos pasižymi tais pačiais trimis bruožais: ašies ir stipino (*hub and spoke*) integracijos modeliu, tuo, jog santykiai yra savanoriški, t. y. nesiremia prievarta, bei tuo, jog tokiuose regionuose nuolat vyksta derybos tarp regioninės galios ir kitų valstybių dėl vienu ir kitų vidaus ir užsienio politikos tikslų įgyvendinimo.

Būtent trečiasis kriterijus – derybos – yra svarbiausias, siekiant nustatyti regioninės tvarkos tipą. Pastarąjį nulemia kaip – konsensuso ar prievartos (nebūtinai materialios) būdu – pasiekiami susitarimai ir kiek regioninė galia apriboja save derybose dėl trijų sričių:

- *politikų konvergencijos*, nes regioninė galia siekia keisti mažųjų valstybių vidaus ir išorės politikas sau reikiama linkme;
- *išteklų paskirstymo regione*, nes mažosios valstybės nori, kad didžioji prisiimtų finansinę bendrų klausimų ir vystymosi iššūkių regione našta. Savo ruožtu regioninė galia gali norėti atvirksčiai – traukti išteklius iš mažųjų;
- *naujų regioninių institucijų kūrimo*, nes mažosios valstybės nori, kad didžioji palaikytų jos įtaką regionine atsverti galinčių regioninių institucijų kūrimą.

Pasak autoriaus, derybų šiose trijose srityse rezultatai ir nulemia, tam tikros regioninės tvarkos susikūrimą. Savo ruožtu, potencialios regioninės tvarkos išsidėsto tiesėje nuo regioninės hierarchinės bendruomenės (sistema, kurioje regioninis hegemonas sąmoningai riboja savo įtaką, siekdamas sustiprinti ir mažąsias regiono valstybes) iki (neo)imperinės regioninės tvarkos (kai hegemonas siekia „primesti“ savo užsienio politikos prioritetus mažosioms valstybėms). 1 paveikslėlyje pateikiama visa Garzón Pereiros tipologija.



Paveikslėlis 12. Hierarchinių regioninių tvarkų tipologija. Šaltinis: Garzón Pereira, 2014, p. 38

Garzón Pereiros siūlomas modelis leidžia įtraukti skirtingus regioninio bendradarbiavimo sektorius, taip įgyjant visapusiškesnę regioninės tvarkos viziją. Be to, jo susidomėjimas derybomis tarp valstybių ir jų rezultatu leidžia sujungti tiek egzistuojančių, tiek ir norimų regioninių tvarkų analizę.

Vis dėlto jame nėra aiškių sąsajų tarp kiekvienos iš trijų derybų dimensijų, o svarbiausia, išteklių paskirstymas ir regioninių institucijų kūrimas matomi kaip sušvelninantys (kompensuojantys) regioninės galios dominavimą. Toks požiūris dažnas regioninių ir globalių hierarchijų studijose, kalbančiose apie hegemonijos ar autoriteto legitimumą (pvz., Bukovansky et al., 2012; Bially & Zara, 2016; Lake, 2009a) Visgi, pažvelgus į regioninių galių ir tvarkų studijas per diferenciacijos teorijos prizmę, matyti, jog išteklių paskirstymas ir institucijų kūrimas atspindi funkcinę, o politikos konvergencijos siekis – stratifikuojančios diferenciacijos stiprumą regione. Taigi, tai yra du skirtingi diferenciacijos principai, nebūtinai automatiškai stiprinantys ar silpninantys vienas kitą.

Šioje disertacijoje trys derybų sferos, išskirtos Garzón Pereiros, virsta dviem ašimis, atspindinčiomis stratifikuojančią / vertikalią ir funkcinę / horizontalią diferenciacijas. Taip pat, remiantis regioninių galių ir tvarkų studijomis, disertacijoje išskiriami trys kiekvieno diferenciacijos principo lygiai: silpnas, vidutinis ir stiprus. Galiausiai pastebima, jog egalitarinė (segmentuojanti) diferenciacija yra pastovi, tad nėra svarbi klasifikuojant regionines tvarkas.

Lentelė 26. Diferenciacijos principai hierarchinėse regioninėse tvarkose. Šaltinis: autorė

	Stratifikuojanti (vertikali)	Funkcinė (horizontali)	Egalitarinė (segmentuojanti)
Stipri	Regioninė galia dominuoja (arba bando dominuoti) daugelyje politikos sričių, įskaitant mažesnių regioninių valstybių vidaus politiką. Tai daro naudodamasi mechanizmais, kurių įeigos legitimumą kvestionuoja kitos regiono valstybės. Egzistuoja mechanizmai, užtikrinantys regioninės valdžios norimas politikos reformas (pozityvus ir negatyvus sąlygiškumas).	Regioninė galia apsiima finansuoti ir remti įvairius regioninius projektus (vystymąsi, viešųjų regioninių gėrybių gamybą ir pan.). Be to, ji remia skirtingų regioninių institucijų kūrimąsi (regioninių santykių sferų institucionalizaciją). Regioninės galios politikos pasižymi stipriu išeigos legitimumu.	Pastovi (išskyrus karinės intervencijos atvejus) => nereikalinga regioninių tvarkų tipologijai.

Lentelės tęsinys.

Vidutinė	Regioninė galia dominuoja (arba bando dominuoti) įvairiose politikos srityse, dažniausiai mažesnių regiono valstybių užsienio politikoje. Vis dėlto regioninės galios vizijos pasižymi gana aukštu įcigos legitimumu. Nors egzistuoja aiškūs mechanizmai, užtikrinantys regioninės valdžios pageidaujamas politines reformas, regioninė galia dažniausiai naudoja pozityvų, o ne negatyvų sąlygiškumą.	Regioninė galia reguliariau sutinka atlikti tam tikrus specifinius vaidmenis. Tačiau jos pastangos nesukuria oficialių ir neoficialių institucijų įvairiose regioninio bendradarbiavimo srityse.	
Silpna	Regioninė galia retai, jei kada, bando dominuoti mažesnių regioninių valstybių atžvilgiu užsienio ar vidaus politikoje.	Regioninė galia vengia atlikti bet kokias funkcijas regione (arba tai daro tik <i>ad hoc</i>).	

1 lentelėje pristatoma, kaip skirtingi diferenciacijos principai atsispindi hierarchinėse regioninėse tvarkose, taip sujungiant Garzón Pereiros hierarchinių regioninių tvarkų modelį ir regioninių tvarkų tipologiją, pristatomą šioje disertacijoje. Disertacijoje pastaroji konstruojama remiantis regioninėms galioms bei globalioms ir regioninėms hierarchijoms skirta literatūra. Taip pat, aptariant stratifikuojančią / vertikalią ir funkcinę / horizontalią diferenciacijas, detalizuojama, kaip jų stiprumas gali būti pastebimas ir išmatuojamas tiek norimose, tiek ir egzistuojančiose regioninėse tvarkose.

Lentelė 27. Potencialių regioninių tvarkų tipologija. Šaltinis: autorė

Stipri vertikali diferenciacija	STIPRI / SILPNA	VIDUTINĖ / STIPRI	STIPRI / STIPRI
	- Nuolatiniai politikos konvergencijos reikalavimai įvairiausiose sferose. - Šie reikalavimai išreikšti strateginiuose regioniniuose dokumentuose, be aiškių kanalų, kaip kitos regiono valstybės gali derėtis (ar derėjosi) dėl šių	- Nuolatiniai politikos konvergencijos reikalavimai įvairiausiose sferose. - Šie reikalavimai išreikšti strateginiuose regioniniuose dokumentuose, be aiškių kanalų, kaip	- Nuolatiniai politikos konvergencijos reikalavimai įvairiausiose sferose. - Šie reikalavimai išreikšti strateginiuose regioniniuose dokumentuose, be aiškių kanalų, kaip kitos regiono valstybės gali derėtis (ar derėjosi) dėl šių tikslų.

Lentelės tęsinys.

	<p>tikslų.</p> <p>- Numatomi ir taikomi sąlygiškumo bei skatinimo mechanizmai.</p> <p>+ Regioninė galia vengia priiinti bet kokius vaidmenis / įsipareigojimus regione.</p>	<p>kitos regiono valstybės gali derėtis (ar derėjosi) dėl šių tikslų.</p> <p>- Numatomi ir taikomi sąlygiškumo bei skatinimo mechanizmai.</p> <p>+ Regioninė galia gamina regionines gėrybes ir atlieka tam tikrus (pvz., koordinavimo) vaidmenis.</p>	<p>- Numatomi ir taikomi sąlygiškumo bei skatinimo mechanizmai.</p> <p>+ Regioninė galia gamina regionines gėrybes ir priiima rėmimo bei institucionalizavimo vaidmenis</p> <p>arba</p> <p>Regioninė galia priiima tam tikrus vaidmenis (e. g. institucionalizavimo) ir sukuria mažesnių valstybių išnaudojimo sistemą.</p>
Vidutinė vertikali diferenciacija	<p>VIDUTINĖ / SILPNA</p> <p>- Nuolatiniai politikos konvergencijos reikalavimai, tačiau „keistinių“ politikų skaičius ribotas.</p> <p>- Šie reikalavimai išreikšti strateginiuose regioniniuose dokumentuose, numatančiuose ir aiškius kanalus, kaip kitos regiono valstybės gali derėtis (ar derėjosi) dėl šių tikslų.</p> <p>- Numatyti, bet netaikomi sąlygiškumo mechanizmai (taikomos paskatos).</p> <p>+ Regioninė galia vengia priiinti bet kokius vaidmenis / įsipareigojimus regione.</p>	<p>VIDUTINĖ / VIDUTINĖ</p> <p>- Nuolatiniai politikos konvergencijos reikalavimai, tačiau „keistinių“ politikų skaičius ribotas.</p> <p>- Šie reikalavimai išreikšti strateginiuose regioniniuose dokumentuose, numatančiuose ir aiškius kanalus, kaip kitos regiono valstybės gali derėtis (ar derėjosi) dėl šių tikslų.</p> <p>- Numatyti, bet netaikomi sąlygiškumo mechanizmai (taikomos paskatos).</p> <p>+ Regioninė galia gamina regionines gėrybes ir atlieka tam tikrus (pvz., koordinavimo) vaidmenis.</p>	<p>VIDUTINĖ / STIPRI</p> <p>- Nuolatiniai politikos konvergencijos reikalavimai, tačiau „keistinių“ politikų skaičius ribotas.</p> <p>- Šie reikalavimai išreikšti strateginiuose regioniniuose dokumentuose, numatančiuose ir aiškius kanalus, kaip kitos regiono valstybės gali derėtis (ar derėjosi) dėl šių tikslų.</p> <p>- Numatyti, bet netaikomi sąlygiškumo mechanizmai (taikomos paskatos).</p> <p>+ Regioninė galia kuria regionines viešąsias gėrybes ir priiima rėmimo bei institucionalizavimo vaidmenis</p> <p>arba</p> <p>Regioninė galia priiima tam tikrus vaidmenis (e. g. institucionalizavimo) ir sukuria mažesnių valstybių išnaudojimo sistemą.</p>

<p>Silpna vertikali diferenciacija</p>	<p>SILPNA / SILPNA Riboti politikos konvergencijos reikalavimai, nėra aiškių sąlygų ir skatinimo mechanizmų. + Regioninė galia vengia prisiimti bet kokius vaidmenis / įsipareigojimus regione.</p>	<p>SILPNA / VIDUTINĖ Riboti politikos konvergencijos reikalavimai, nėra aiškių sąlygų ir skatinimo mechanizmų. + Regioninė galia gamina regionines gėrybes ir atlieka tam tikrus (pvz., koordinavimo) vaidmenis.</p>	<p>SILPNA / STIPRI Riboti politikos konvergencijos reikalavimai, nėra aiškių sąlygų ir skatinimo mechanizmų. + Regioninė galia gamina regionines gėrybes ir prisiima rėmimo bei institucionalizavimo vaidmenis arba Regioninė galia prisiima tam tikrus vaidmenis (e. g. institucionalizavimo) ir sukuria mažesnių valstybių išnaudojimo sistemą.</p>
	<p>Silpna funkcinė diferenciacija</p>	<p>Vidutinė funkcinė diferenciacija</p>	<p>Stipri funkcinė diferenciacija</p>

Tipologija, matoma **Error! Reference source not found.**, darbe papildomai pritaikoma konkrečiam empiriniam tyrimui, apibrėžiant tyrimą struktūruojančius klausimus, empirinės dalies struktūrą bei nurodant šaltinius, kuriais remiamasi darbe. Ketvirtojoje disertacijos dalyje išsamiai aptariamos JAV ir ES regioninės strategijos skirtos jų Pietų kaimynystei ir įgyvendintos 2014-2017 metais.

Ginamieji teiginiai

Sukurto teorinio įrankio pritaikymas JAV ir ES regioninių strategijų analizei leidžia suformuluoti šiuos ginamuosius teiginius:

Pirma, nors literatūra apie regionines ir pasaulines hierarchijas linkusi jas vertinti pagal kontrolės (dominavimo) stiprumą ar silpnumą, įvairūs regioniniai veikėjai gali turėti skirtingas preferencijas tiek stratifikuojančiai / vertikaliajai, tiek funkcinėi / horizontaliai diferenciacijoms.

Kaip parodė empirinis tyrimas, analizės laikotarpiu JAV ir ES kūrė regionines tvarkas, pasižyminčias panašiu stratifikuojančios / vertikalios diferenciacijos (vidutinis) ir besiskiriančias funkcinės / horizontalios diferenciacijos (atitinkamai vidutinė ir stipri) stiprumu. Abi valstybės siekė sukurti regionus, pasižyminčius vidutine vertikalia diferenciacija: jos bandė reformuoti daugelį vidinių kaimyninių valstybių politikų, nustatė aiškius

sankcijų ir skatinimų mechanizmus, pirmenybę teikdamos pastariesiems. Tuo pat metu abi bandė pateikti savo strategijas kaip legitimias ir įtraukias.

Tuo pat metu abiejų regioninių veikėjų preferencijos funkcinėi diferenciacijai itin skyrėsi. JAV prisiėmė ribotą vaidmenį remdamos konkrečių regioninių problemų sprendimą ir palaikė riboto regioninių sričių skaičiaus institucionalizavimą. Tuo tarpu ES įsipareigojo remti ir koordinuoti įvairių regioninių problemų sprendimą, palaikė įvairių oficialių ir neformalių institucijų atsiradimą įvairiose regioninių santykių srityse.

Antra, nors literatūroje apie hierarchiją teigiama, kad stiprėjanti funkcinė diferenciacija silpnina stratifikuojančią, šis tyrimas rodo, jog nebūtinai. Kaip rodo JAV ir ES pavyzdžiai, veikėjai gali teikti pirmenybę skirtingoms regioninėms tvarkoms, ir vieno diferenciacijos principo sustiprėjimas ar susilpnėjimas nebūtinai paveikia kitą. Analizės laikotarpiu tiek ES, tiek JAV pakeitė savo regionines strategijas, tačiau šie pokyčiai nebuvo vienodi. Nors JAV strategija pasikeitė tiek funkcinės, tiek stratifikuojančios / vertikalios diferenciacijos prasme (t. y. funkcinė diferenciacija susilpnėjo ir sustiprėjo stratifikuojanti), ES pirmenybė stipriai funkcinėi diferenciacijai nepakito, nepaisant silpnėjusios stratifikuojančios / vertikalios diferenciacijos.

Mokslinis reikšmingumas

Šioje disertacijoje pristatoma nauja regioninių tvarkų tipologija, sujungianti regioninių galių ir tvarkų tyrimus bei diferenciacijos teoriją. Pasirinktas žiūros taškas padeda peržengti vienmatį hierarchijos matymą, pernelyg akcentuojantį stratifikuojančią / vertikalią diferenciaciją. Taigi, sukurta tipologija padeda geriau suprasti ir palyginti skirtingas hierarchines regionines tvarkas bei leidžia į tyrimą įtraukti skirtingiems regionams svarbias bendradarbiavimo sritis ir būdus.

Vertinant teorinį disertacijos indelį, be pačios sukurtos tipologijos, svarbus ir diferenciacijos teorijos taikymo praplėtimas. Iki šiol tarptautiniuose santykiuose diferenciacijos teorija taikyta globalių reiškinių analizei. Pavyzdžiui, Donnelly (2006) naudojo ją analizuodamas vadinamąją „Amerikos imperiją“ arba siūlydamas naują požiūrį į tarptautinių santykių hierarchijas (2009, 2012). Kleinschmidt (2018) ir Lees (2012) sutelkė dėmesį į stratifikuojančią diferenciaciją, norėdami iširti takoskyrą tarp globalios Šiaurės ir globalių Pietų. Albert, Buzan ir Zürn, 2013-aisiais redaguotame tome subūrė autorius, diskutuojančius tiek apie diferenciacijos teorijos pritaikomumą skirtingiems tarptautinių santykių aspektams, tiek apie jos naudingumą. Daugelis į rinkinį įsitraukusių autorių labiausiai domėjosi

„pasauline visuomene“ ir jos pokyčiais ir mažiau gilynosi į vidurinio lygmens, regioninę analizę. Taigi, šioje disertacijoje siūlomi nauji būdai diferenciacijos teorijai taikyti.

Empirinis tyrimas parodė, jog sukurta tipologija geba atskleisti ne tik egzistuojančią struktūrą, bet ir jos pokytį. Naujai išrinkta Donaldo Trumpo administracija smarkiai pakeitė JAV politiką pietų kaimynių atžvilgiu, akivaizdžiai demonstruodama norą sukurti „vertikaliau struktūruotą“ regioną. Savo ruožtu ES suko priešinga kryptimi – po 2015 m. Europos kaimynystės politikos peržiūros ji išpareigojo persvarstyti bendradarbiavimo su partneriais prioritetus ir siekti bendradarbiauti tik su tais, kurie to nori, ir tik tose srityse, dėl kurių galima susitarti. Tokia pozicija nurodo silpnėjančią vertikalią diferenciaciją. Taigi, preferencijos vienokiai ar kitokiai tvarkai kinta ir tolesni tyrimai galėtų nagrinėti, kas lemia jų pokytį.

Empirinė darbo dalis taip pat suteikia išvalgų apie JAV ir ES pageidaujamų regioninių tvarkų panašumus ir skirtumus. Nors negalima apibendrinti poros atvejų analizės išvadų, tai, kad JAV ir ES kuriamos regioninės tvarkos pasižymi panašiu stratifikuojančios ir skirtingu funkcinės diferenciacijos stiprumu, atspindi prieštarigus veikėjų vertinimus. Viena vertus, abi Vakarų galios turi aiškią viziją, koks turėtų būti pasaulis (ir jų kaimynai), bei aktyviai siekia juos pakeisti. Pavyzdžiui, kuriamos ir remiamos reformų programos, numatomi ir taikomi sąlygiškumo reikalavimai. Taigi, teisūs tie, kurie sako, jog šie veikėjai yra panašūs. Kita vertus, ES nori kurti sudėtingesnę regioną ir daug labiau į jį įsitraukti. Negalima teigti, jog tai ją daro „geranoriškesnę“, bet tokios ES politikos kuria skirtingas galimybes regiono valstybėms įgyvendinti savo tikslus. Taigi, galima kalbėti ir apie regioninių *Pax Americana* ir *Pax Europea* skirtumus.

Be to, disertacijos empirinėje dalyje paliečiamos diskusijos apie hierarchinių regioninių santykių valdymą. Tyrimas rodo, kad net „normatyvinis“ veikėjas ES nori kurti „vertikaliai organizuotus“ regionus, o šį norą, tikėtina, labiausiai riboja jos galimybės. Ar tai būdinga visoms regioninėms galioms, ar galbūt atspindi globalios Šiaurės ir globalių Pietų valstybių santykių dinamiką? Panašus klausimas kyla ir vertinant tai, kad skirtis tarp vidaus ir išorės politikų konvergencijos, pirminiame modelyje išskirta kaip svarbi, norint atskirti stipresnę ar silpnėnę stratifikuojančią diferenciaciją, empiriniame tyrime neteko reikšmės. JAV ir ES norėjo pakeisti daug kaimyninių vidaus ir mažai išorės politikų. Ar gali būti, kad šis vidaus politikos akcentavimas taip pat susijęs su globalios Šiaurės ir Pietų valstybių santykiais bei paramos vystymuisi svarba? Įtraukiant į lyginimą

tokias galias kaip Kinija, Rusija ar Turkija, atsakymai praturtintų ne tik tarptautinius santykius, bet ir vystymosi studijas.

Kitų veikėjų įtraukimas į lyginimą yra ypač įdomus turint omenyje, jog kai kurie autoriai mato naujų galių iškilimą ne tik kaip alternatyvą Vakarų hegemonijai, bet ir perėjimą prie teisingesnės pasaulio tvarkos (Kovaleva, 2013, p. 87). Sukurta regioninių tvarkų tipologija gali padėti suprasti ir palyginti, kokias tvarkas (ir kokį teisingumą) šios regioninės ir globalios galios kuria savo kaimynystėje. Sena meksikiečių patarlė sako: „Vargšė Meksika, taip toli nuo Dievo ir taip arti JAV.“ Platesnis lyginamasis vienpolių regionų tyrimas gali parodyti, ar visi didžiųjų valstybių kaimynai jaučiasi panašiai.

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- 2019/11 Pranešimas “Good Neighbor and Bad Neighbor? Differentiation in the EU and US Southern Neighborhood Strategies 2014-2017”, Winter Training School – Images of Europe at Times of Global Challenges, University of Aarhus, Danija.
2019/11 Pranešimas “From the migration crisis to the migration crisis: five years of the US Strategy for Engagement in Central America”, International seminars on Latin America, Liublinas, Lenkija.

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Mars and Venus in Action? The US and EU's foreign relations strategies in academic discourse³¹

Abstract

This article reviews the existing academic literature that compares and explains the differences between the US and the EU's external actions. An analytical matrix is devised to group publications by level of analysis (micro-, mid-, and macro) and by theme of comparison criteria. The key findings are that in the macro level of analysis, authors tend to compare the role actors have in international relations before claiming either that the EU is a different kind of power due to its peculiar historical experience, or that the EU is weak due to its complicated structure and lack of military capacities. Furthermore, authors conducting their analyses at the micro level tend to find more similarities between the EU and the US's external actions than those working at the macro level. The article concludes by making a point in favour of further comparisons as an essential tool to better understand the EU and other actors in international relations.

Keywords: EU, US, actorness, regionalism, security studies, democratization studies,

INTRODUCTION

The European Union (EU) often pictures itself as different (i.e., more normative, civilian, or, generally more benign) than other traditional powers, especially in its relations with developing countries. This self-assessment is related to the normative power Europe (NPE) concept coined by Manners (2002). According to Manners, "Not only [was] the EU constructed on a normative basis, but importantly this predisposes it to act in a normative way in world politics" (2002, p. 252). As Diez observes (2005, p. 621), this vision of EU normativity and exceptionality, is based on its supposed differences from a specific nation that had traditionally wielded hard power: the US.

Authors from a variety of subfields in international relations (IR) ranging from regionalism (Grugel, 2004; Escribano, 2007; Hettne and Ponjaert, 2014) to security studies (Cox, 2003; Kagan, 2002) observe similar differences between the EU and the US. Some claim that these actors not only prefer different models of cooperation with other countries and regions,

³¹ Giedraityte, I. (2018) "Mars and Venus in Action? The US and EU's foreign relations strategies in academic discourse". *Baltic Journal of Political Science*, No 7-8, pp.12-28.

but also represent completely different approaches in their logic of interaction in the international system. Sometimes the EU's model of cooperation with other countries and regions is seen as more ethical or just (Escribano, 2007; Grugel, 2004; Hettne and Ponjaert, 2014). Yet, various studies refute claims regarding the EU's normativity (Tocci, 2008; Hamilton, 2008; Diez, 2005), or observe that the EU and the US behave in a somewhat similar manner across various cases (Durac and Cavatorta, 2009; Huber, 2017).

Therefore, while the EU is indeed a unique actor—or even an “unidentified political object” according to Jacques Delors (1985)—it is less clear how this characteristic difference from other actors is reflected in the EU's foreign policies, especially when it is compared to more traditional actors. Although comparison best highlights exceptionality, there are still doubts regarding whether it is fair to compare the EU with other states (Wright, 2011).

Recent tensions among Western allies following the election of the new the US administration renewed discussions regarding the differences between the *modus operandi* of the EU and the US. Kupchan claims, “During previous rifts, they [the EU and the US] parted company over means . . . This is the first time they are parting company over ends” (Johnson et al., 2018). The re-emerging debate presents an excellent opportunity to look at how claims about the EU's exceptionality, in comparison to the US's, were being tackled in academia.

The purpose of this article is to review literature³² that compares the EU and US's external actions and their foreign policy goals and instruments, to shed light on what I argue became a subfield in various IR disciplines. This review is concerned with three key lines of exploration: 1) How can we compare the EU's foreign policies to those of the traditional actor—a state—in IR? 2) When comparisons are made between the EU and traditional actors, what differences and similarities do we find and how do we explain them? 3) What do existing comparisons say about the EU as an actor in IR?

³² Due to the object of this inquiry—foreign policy—the selection of articles was restricted to the field of political science. The primary criterion for the selection of articles and books was topic: comparisons of the EU and the US's external actions (in different spheres, but usually towards developing countries). While this comparison was a central goal for the majority of articles, in some cases it was more implicit, often with a purpose to explain the exceptionality of the EU, or (in the case of security-related literature) to understand a so-called “trans-Atlantic rift”. This article presents a sample of over 60 publications, published from the mid-1990s to 2017.

These questions structure this article. The first part of the article is dedicated to an overview of strategies authors use to address challenges related to the EU not being a traditional actor, resulting in comparison problems. In the second part, I examine comparative works, arranging literature thematically and by level of analysis. Existing literature is structured in four broad groups, each group is labelled according to the main topic of inquiry: regionalists, Atlanticists, security studies, and democratization studies. While presenting each group, I discuss differences and similarities identified by the authors and the arguments they use to explain them. This article concludes by claiming that comparing the EU to traditional actors is not only possible, but very necessary and fruitful for EU studies and also for other sub-fields of IR. Furthermore, while academic discussions show that on many occasions the EU acts similarly to traditional actors, it also exhibits exceptional characteristics. Finally, the article concludes with suggestions for further research.

1. COMPARING APPLES AND ORANGES: CONSIDERING COMPARABILITY

Before exploring relevant literature, I would like to address the issue of comparability as the EU is not a state and foreign policymaking is primarily in the hands of its member states. Given this, whether the EU can be considered an actor in IR at all is questionable.

Sjöstedt set forth the first concepts related to attempts to define the EU's (the European Economic Communities until 1993 (EEC)) role as an actor – the actorness.

He defined an actorness as two characteristics necessary for an entity to be considered an actor: “It must display a minimal degree of both internal cohesion and separateness from its internal environment” (Drieskens, 2017, p. 1536). The more recent, and by far the most popular, approaches of Bretherton and Vogler (1999, 2006) and Jupille and Caporaso (1998) argue for considering also the external constraints and opportunities posed by the EU's structural environment (Klose 2018) and expand the number of characteristics necessary for an entity to be considered an actor.

The concept of an actorness itself has been criticized for its lack of clarity and for being too attached to the case of the EU; many authors mix and match different elements of popular definitions of an actorness and apply them to various aspects of the EU's external governance (Drieskens, 2017). Despite criticisms, actorness can still be considered a helpful heuristic

device for studying relevant elements of the EU's capacity to act (Drieskens, 2017, p.1537-1538). Another, somewhat less strict concept used to define the EU as an actor in IR, is presence. This approach gives priority to being over acting, and holds that the EU has an international impact because it is different from state actors (Drieskens, 2017, p. 1541). The separation of presence from actorness is a prominent feature of this approach (Hoffman and Nieman, 2018). Allen and Smith (1990) argue that although the EC could not fulfil the criteria to be considered an actor, it has significant presence in the international system. The argument of presence is strongly related to the NPE concept as, according to Manners, "The most important factor shaping the international role of the EU is not what it does or what it says, but what it is" (Manners, 2002, p. 252).

To recapitulate, there are different ways to define an actor in IR and, as a consequence, to justify its comparability with other actors. Paradoxically, a majority of works analysed in this article do not refer to the question of comparability at all, they merely proceed to compare official US and EU documents or specific policies (see Berenskoetter 2005; Bridoux and Kurki, 2015; Coffman, Wites and Youngs, 2009; del Biondo, 2015, 2016; Durac and Cavatorta 2009a, b; Huber, 2008, 2017; Lavenex et al, 2017; Omelicheva, 2015; Zyla, 2015). This lack of concern can be attributed to the object of study: the majority of publications following this strategy focus on democratization policies or trade-related issues (where it is easier to discuss EU-level decisions), or analyse official EU-level documents.

The second most common strategy is observed predominantly in, though not limited to, literature dedicated to the analysis of the so-called transatlantic rift (see Balibar, 2003; Buzan and Gonzalez Velez, 2005; Cox 2003; Heiduk, 2011; Kagan, 2002). Given that the majority of publications in this second group focus on disagreements between Europeans and Americans after the Iraq war, they tend to use the concepts of Europe, Europeans, and European countries as synonyms. So-called Europe is seen as a unitary actor with specific shared characteristics reflected in its foreign policy. This view is illustrated by Cox, who claims that "the world is fast changing not because of terrorism . . . but because two of its key players—the United States and Europe—are increasingly diverging on how to deal with these key security problems" (Cox, 2003, p. 529). Meanwhile, the EU has become a part of this wider and less defined Europe.

Significantly fewer works belonging to the sample refer to existing definitions of actorness (Bretherton and Vogler, 2006; Caporaso and Jupille, 1998) to justify the comparison (Börzel et al. 2015a, 2015b; Brattberg and Rinhard 2012; Murau and Spandler, 2016; Powel, 2009). In various cases,

these authors also apply the concept of actorness to other actors analysed. Brattberg and Rhinard (2012) compare the actorness of the US and the EU as both of are complex, multilevel systems. Meanwhile, in her study of democratization efforts, Huber (2015) compares the actorness of the EU, the US, and Turkey, and concludes that although the EU lacks some aspects of actorness in foreign policy, it is comparable to other states in the field of democracy promotion. In their comparison of the EU, Turkey, Russia and the US's reactions to so-called arabellions in North Africa, Börzel and colleagues (2015 a, b) employ a modified definition of actorness by Jupille and Caporaso (1998). Finally, Murau and Spandler (2016) analyse the EU, the US, and ASEAN's actorness in IMF reform negotiations within the G20 framework and observe an unexpectedly high degree actorness exhibited by the EU.

The concept of presence is common in the works of regionalists (Hettne and Ponjaert, 2014; Telo, 2014), who emphasize the EU's economic size and strength as its primary source of power. Finally, some authors base the comparison between the EU and the US on specific shared characteristics. For example, Fabbrini and Sicurelli (2008) maintain that the EU and the US are comparable as they both are compound democracies. Lavenex and colleagues (2017) refer to both the EU and the US as "global regulators," and Zielonka (2011) references them as "kind of empires."

To conclude, despite being a somewhat non-traditional actor in IR, and despite debates regarding the EU's actorness, in practice, the EU is compared to states. While concepts like presence or actorness often help to establish a common ground for comparison, certain characteristics (including the size of its economy, EU-level policy-making procedures in certain fields, and perceptions of the EU as a part of a broader concept of Europe) allow authors to proceed with the comparison between the foreign policy of the EU and other states without recurring to these concepts.

2. ANALYTICAL MATRIX OF COMPARATIVE LITERATURE

To understand how different authors perceive similarities and differences between the US and the EU's external actions, I arranged the literature into four groups according to emerging themes and level of analysis: the regionalists, the Atlanticists, security studies and democratization studies. Three different levels of analysis are distinguished. Macro level works consider the place of the EU and the US within the international system; mid-level literature deals with regional cooperation, relations with specific

geographical regions, or broad sectorial strategies in various countries; and micro-level literature analyses and compares cases with a single country and sector. Table 1 illustrates the analytical matrix.

Table 1. Analytical matrix of comparative literature groups

GROUP	MACRO	MID	MICRO
<p>Regionalists</p> <ul style="list-style-type: none"> • Analyse the regional orders promoted by the EU and US. • Analyse the ways that the EU and US export their rules. • Try to define the EU's role in the regionalist processes. • Majority of works – macro level. Mid-level works concentrated on NAFTA and EU comparison. <p>Few micro-level studies, focusing on precise cases of EU and US's interaction with emerging economies or comparison of EU and US's actorness in multilateral negotiations.</p>	+ (majority)	+ (NAFTA and EU comparisons)	+
<p>Atlanticists</p> <p>Analyse differences in security cultures and the state of Transatlantic relations, their works are strongly influenced by Kagan's (2003) claim about different security cultures in the US and Europe.</p> <p>Analyse different aspects of the EU and US's foreign policy through the lenses of realism and often refer rather to "Europe" as a unitary.</p> <p>Majority of works – broad macro level studies.</p>	+		
<p>Democratization studies</p> <p>Analyse how differences (both observed by the Regionalists and the Atlanticists) are reflected in the praxis of democracy promotion (in some cases – development aid or relief policies).</p> <p>Majority of works – country level case studies.</p>		+	+ (majority)
<p>Security studies</p> <p>Analyse if/how the claims made by the Atlanticists are reflected in security documents/praxis.</p> <p>Majority of works – micro level analysis of documents or security policies in different contexts.</p>			+

While the first two groups focus mostly on the macro- or mid-level analysis by analysing the most general features of the EU and the US as international actors, the third and fourth groups focus on mid- and micro-levels are comprised mostly of country or sector case studies. Thematically, the first group of literature, written by the regionalists, includes works

featuring different regionalism models promoted by the EU and the US. The second group of literature, authored by the Atlanticists, is comprised of works concerned with the current and future transatlantic relations. The works in the third group, security studies, compare security strategies, and the literature in the fourth group, democratization studies, compares the EU and the US's democratization efforts.

While this proposed classification is not flawless, not all of the authors' works fit neatly into a group, it relates the main interrogations behind existing comparisons of the EU and the US's foreign policies in different fields and generates new observations regarding the role of the EU as an actor in IR.

2.1. "The Regionalists": Representatives of different world orders

2.1.1. Comparing NAFTA and EU as models of integration

The end of the Cold War and accelerating different regional integration processes stimulated discussions about the creation of a new world order. At the time, the EU and the US were compared as promoters of integration processes: In North America, the North American Free Trade Agreement (NAFTA) was established and in Eastern and Central Europe the Eastern enlargement was underway (Gamble and Payne, 1996; Bruszt and McDermott, 2011; Bruszt and Greskovitz, 2009).

One line of investigation on this topic attempts to conceptualise regional orders formed around different regional powers. Gamble and Payne (1996) employ an international political economy perspective and a world order approach to distinguish three modes of regional block formation: American, European, and Asian. They base their ideal types in three regional organizations: NAFTA, the EU, and the Association of Southeast Asian Nations (ASEAN). The precise differences between regional models are not clearly defined. Nevertheless, the authors state, "Although regionalist projects have certain assumptions in common . . . they are also quite different from one another. This diversity reflects the different historical structures which exist within each region, as well as the uneven impact of globalisation" (Gamble and Payne, 1996, p. 253). This work forged a path towards defining and explaining differences among these regional formations.

The mid-level analysis works in this group focus mostly on economic integration and rule transfer, and their consequences within NAFTA and the EU. Bruszt and Greskovitz (2009) analyse how differences in capitalism that

emerged in peripheral regions relate to interactions with neighbouring hegemony. The authors attempt to explain how different economic and regulatory integration modes affect political and economic regimes in third-wave democracies. They observe that the EU's policies towards potential members-states in the East helped to strengthen domestic demand for policy change and inclusion. Bruszt and Greskovitz observe, that while the EU empowers the diverse public and private actors, not simply via resources but particularly by enhancing their political and functional participation in institution building efforts, the emphasis on economic incentives in NAFTA provide weak bottom up pressure for altering the properties of regulations and of the regulative state" (Bruszt and Greskovitz, pp.34-42).

Similarly, Bruszt and McDermott (2011, 2014, 2016) compare NAFTA and EU in order to understand how international integration regimes affect the formation of national regulatory institutions in developing economies. These authors observe that the US is less willing to strengthen political integration and prefers to limit itself with economic cooperation under its own rules. Meanwhile, the EU pays more attention to deeply diffusing its standards and is consciously trying to diminish existing asymmetries between current and potential member states. Risse (2015) and Sbragia (2007) observed similar trends.

Analyses of both mid- and macro-level approaches in the literature indicate differences between regional integration models promoted by the US and the EU. The authors belonging to the first group claim that the model proposed by the EU is: (a) significantly different from the US's, both in its principles and in its implementation; and (b) that the model preferred by the EU was deeper and more transformative.

Furthermore, they relate differences in how the EU and the US view trade (free trade vs. strategic trade) and ideas behind integration mechanisms (technical approach, related with precise, most often economic questions vs. ideas-based approach with an emphasis on socialization and the creation of joint mechanisms of managing integration).

Finally, the authors compare NAFTA and the EU as examples of different integration processes. As a consequence, the peculiarities of the EU integration model, in that it transforms neighbouring countries into member states, often explain why the EU's model is so different. Nevertheless, these studies led to a broader comparison of the EU and the US's external governance models.

2.1.2. Qualitatively different model of EU cooperation?

As the EU integration process gained depth and intensity, regionalists shifted their attention towards the interrelations between regional hegemons (including the EU and the US) and other states. In their analysis of the EU and US from a regionalist perspective, Hettne and Ponjaert (2014) conclude that they represent two different world orders: Pax Americana, marked by unilateralism, dominance, and asymmetrical relations; and Pax Europea, based in multilateralism, partnership, and dialogue. The authors second the Gamble and Payne's main arguments and explain the difference in models through historical experiences. They note that, at the moment, both sides of the Atlantic Ocean represent two different world orders (Grugel, 2004; Escribano, 2007).

Common among these authors is recognition of the EU as an independent regional actor, capable of proposing different cooperation and integration stimuli and models that are not limited to the possibility of membership. They claim that the principles of the EU's international governance are rooted in its integration process, and this is the crucial difference between the experiences of the EU and the US.

Telo (2007, 2014) observes that unlike the US, the EU promotes regional cooperation and fosters regionalisation processes by helping to create regional organisations. Meanwhile, the US prefers to forge bilateral agreements directly with other countries. In assessing the EU and the US's relations with Latin American countries, Escribano (2007) claims that the EU not only qualitatively differs from other actors in international relations, but also proposes an alternative model for organising the international community in the face of globalisation (Escribano, 2007, p. 19). Many authors explain the EU's so-called exceptionalism by claiming that the EU's history of integration and the principles of its foundation affect its external policy.

Somehow different from the rest of the group, nevertheless very interesting, are two recent mid-micro level studies dedicated to the global rules expansion and actorness of the EU and the US. The first is a special edition of the *European Foreign Affairs Review* dedicated to the analysis of the EU and the US's attempts at norm transfer with emerging economies (Lavenex et al., 2017). Meanwhile, the other study compares the actorness of the EU, the ASEAN, and the US in the IMF's reform negotiations within the G20 framework (Murau and Spandler, 2016). While both studies have different goals, they both emphasize the similarities between compared

actors, in this manner they distinguish themselves from the rest of the work in the group.

To summarize, the turn of the century marked a shift from the analysis of EU's integration processes (or integration as a tool of its foreign policy) to that of its relations with other countries and regions. Regionalists have become more enthusiastic about the fundamental differences between the integration models and world orders created by the US and the EU; they highlight examples aligning the US with unilateralism and the EU with multilateralism intertwined with inter-regionalism. Furthermore, in some cases, sometimes following the logic of the NPE concept, the EU's cooperation model is seen as more normative and democratic than that of the US. Therefore, while works before the aforementioned shift, see the EU as unique merely due to its structure in that it was born and grew due to regional integration processes, later works see the EU positively, as not only as unique entity but also as an advocate of an alternative mode of integration and regional cooperation.

Although it is not always expressed, it often seems that in comparison to the US, the EU represents a less selfish and more normative cooperation model. Nevertheless, at the same time, the many authors participating in the NPE debate (Diez, 2005, Hyde Price, 2006; Martin-Maze, 2015; Tocci, 2008) espouse a more critical than positive view of the EU. Studies (Youngs 2004; Barbé and Johansson-Nogués, 2008) show contradictions between the goals and instruments in the EUs' foreign policy, especially in its neighbourhood, and a deep interrelation and complementarity between norms and interests in general. Furthermore, various authors observe that the US's foreign policy is not less value-driven than the EU's (Diez, 2005; Hamilton, 2008).

Finally, regionalists are more interested in the economy and values. They are less interested in power, especially military power, and power asymmetries between the EU and US and other players in the international system. The question of power, as a preponderance of military and economic means—and, as an extension, of weakness—is far more interesting to the scholars in the second group, the Atlanticists.

2.2. “The Atlanticists”: Representatives of different planets

The events of September 11, 2001 and the US's subsequent wars in Afghanistan and Iraq triggered what can be considered a renaissance in analyses of the US and EU's relations and their foreign policies. The unilateralism of George W. Bush's administration and the resistance of some

Western European countries like France and Germany to support the military operation in Iraq, prompted interest in the future of transatlantic relations. One of the most famous works on this discussing the different views of Europeans and Americans towards the international system, is Robert Kagan's *Of Paradise and Power* (2003). The author states, "On major strategic and international questions today, Americans are from Mars and Europeans are from Venus: they agree on little and understand one another less and less" (2003, p. 3). Kagan's central assertion is that the EU and the US, due to differences in their historical circumstances and material resources, not only act differently in the international system, but also approach the international system completely differently. Kagan's work and this statement have become a framework for academic discussions of international relations and foreign policy analysis.

According to Kagan, differences in American and European approaches to security can be attributed to the resources they have and are willing to use to achieve their goals. Americans solve problems using all of the resources available to them, including military resources, while Europeans give priority to instruments that brought prosperity after 1945: negotiations, trade, and multilateralism. Kagan's core ideas are based on a realist perspective and emphasize the notion of power. In his article, *Power and Weakness*, (2002) he argues that unlike the US, Europe deliberately chose to abandon Hobbesian politics; as a consequence, the EU's foreign policy instruments are soft weapons of the weak. Kagan argues that the main source of tensions between the two sides of the Atlantic lies in Europeans not wanting to admit that their post-war economic miracle was supported by the US, which, was the *deus ex machine* that led to world order and guaranteed European security (Kagan, 2003, pp. 58-59).

Kagan's ideas were not new, but, perhaps due to very appropriate timing, his arguments were widely discussed in the fields of international relations, foreign policy analysis, and security studies.

The majority of authors concurring with Kagan's are concerned with transatlantic partnership and with describing foreign policy differences seen on either side of the Atlantic. In some cases they seek to explain these differences and propose guidelines for transatlantic cooperation (Andrews 2005; Buzan and Gonzalez Velez, 2005; Cox 2012; Parsi, 2006; Pond, 2004). Most of these authors agree with Kagan's main ideas about the differences between the US and the EU. Nevertheless, many of them are unclear in communicating whether they are analysing the objectives, measures or specific instruments used by both powers (Berenskoetter, 2005). Interestingly, many authors analysing the EU and US "strategic culture"

prefer discourse or historical analysis to a thorough examination of the specific actions of each actor and strategic documents.

Seeking to explain differences between the EU and the US's strategic cultures, many scholars mention the EU and the US's different historical experiences and the EU's unique institutional setting. Zielonka summarizes this argument well, "Europe's polycentric system of governance is more suited to creating institutional structures and setting up the rules of legitimate behaviour than to swift and bold power projection abroad . . . the EU's system of governance is conducive to the type of foreign policy advocated by Hugo Grotius or Immanuel Kant, but ill-matched to the type of policies advocated by Thomas Hobbes or Niccolo Machiavelli." (2011, p. 297).

Nevertheless, the realist group ignores most types of power assets such as economic power and asserts that the primary factor for the EU and the US's different security cultures and foreign policies is their differing military capabilities (Balibar, 2003). While realists' emphasis on military power is in general typical, this emphasis could be related to the fact that most of the realists' works rely on the analyses of the Iraq and Afghanistan wars and their aftermath.

While regionalists tend to favour the EU, realists often seemed to side with the US, which they depict as more capable of properly responding to the contemporary security challenges like terrorism or rogue states. They portray Europeans, in turn, as attempting to avoid these challenges. Often, these arguments turn into an open critique of so-called anachronistic Europeans who are actively avoiding real-world commitments.

Asmus and Pollack (2002), Cavatorta and Durac, (2011), Kissinger, Summers, and Kupchan (2004) propose more nuanced views of the differences between the EU and the US's security cultures. This group of scholars argue that Kagan's arguments are simplistic. Though they agree that there are some fundamental differences between the EU and the US due to differing historical experiences power resources, they point out that most of the differences between the two powers are reflected in tactics more than strategy, and are related to rather specific cases of Iraq and Afghanistan.

Concluding, the events that marked international politics at the beginning of the 21st century sparked a security-lens analysis of EU and US relations. Kagan and others' main proposes that the EU and the US view security and international relations in fundamentally different ways. Authors worry about what these differences mean for the international system, primarily regarding security. Most authors consider the US and the EU as actors in international relations solely through the lenses of realism; they

perceive power mainly as military power and pay less attention to other types of power such as structural power. Most of the works analysed in this paper are from the field of international relations, and the analysis conducted therein is macro-level analysis, dealing with the US and the EU's responses to international political events and their roles in the international system. His works, tackling differences between the EU and the US, have been cited more than 4,000 times in Google Scholar, JSTOR digital library and Scopus reference database.

Insights about the differences of EU and US foreign policy have become a starting point for micro-level empirical research looking at US and EU's actions in different regions or issues in the same thematic areas (e.g., security policies) (Berenskoetter, 2005; Garlicki, 2014; Rees, 2011; Zyla, 2015).

2.3. Into the details: Security studies

The Mars and Venus narrative and the changing international security situation framed further analyses of the EU and US's security strategies. For example, Daalder (2001, p. 553) argues that fundamental differences between the two actors contribute to a divergent definition of threat. According to him, the US puts an emphasis on new security threats like emerging terrorist groups, or the proliferation of weapons of mass destruction. The EU, in turn, is focused on global challenges such as climate change, migration, poverty, and human trafficking.

Garlicki (2014) draws similar conclusions in his comparison of the US and the EU's security approaches. Garlicki writes, "since the end of the Cold War, there have been two different approaches to security in transatlantic relations: the American one and the European one. The first one has been focusing more on military issues, while the latter one on civil aspects of security." Furthermore, he points to an EU preference for multilateralism and an US preference for unilateralism. However, his work, like the works preceding it, focuses on the cases of the wars in Iraq and Afghanistan and is not concerned with an analysis of relevant security documents. Nevertheless, various authors undertake the task of comparing the actual security strategies of both powers. In this article, this particular school of work is referred to as the security studies group.

Berenskoetter (2005) compares the US and the EU security strategies during George W. Bush's presidential term. Berenskoetter addresses the shortcomings of more general-level works as he observes a lack of clarity regarding what was compared: objectives or strategies to

achieve objectives. In examining the EU and the US's security strategy documents Berenskoetter distinguishes between their: (a) realm of responsibilities, (b) assessment of threats, and (c) the tasks and instruments identified as necessary for addressing threats.

Berenskoetter asserts that semantically the two strategies are very similar in that they have similar goals and obligations (e.g., development of democracy, defence of human rights,). On the other hand, he notices differences, both confirming and denying the Kagan's Mars and Venus" argument. Berenskoetter claims, "At first glance, the major fault lines fit familiar stereotypes: here, the USA, the self-appointed global defender of the liberal ideal, with a strong tendency towards unilateralism and forward-leaning militarism; there, the EU, primarily concerned with the process of European integration, favouring multilateralism and non-military tools" (2005, p. 88).

On the other hand, the author also notices that contrary to expectations, the US's security strategy is far less realistic and more normative than the EU's security strategy, which, Berenskoetter states, relies more on non-utopian ideas about the ideal world order (Berenskoetter, 2015, p. 89). Besides, Berenskoetter does not find any differences in the threat perceptions of the two actors. While the Mars versus Venus argument holds that the United States is more interested in hard threats—like terrorism or aggressive states— and the EU is more concerned with soft threats, the definition of threat in their respective strategies is mostly the same.

Benjamin Zyla (2015) compares the US and the EU's security strategies during the Obama presidency, seeking to understand the security culture of both actors. He notes that while the US and the EU share beliefs and ideals about goals, prefer common instruments in international security policy, and favoured the same forms of international cooperation, they have completely different approaches to the structure of the international system, the role of international organizations, and how to respond to emerging threats. The US sees itself primarily as a world hegemon and pursues this position, while the EU sees the international system as consisting of sovereign, interconnected states, whose cooperation is needed both to deepen trade and to open borders.

Oliverio (2008) compares the attitude of the US and the EU towards international and domestic terrorism, he argues that Europeans respond to the threat of terrorism very differently than the US. Oliverio (2008) writes that after the terrorist attacks on September 11, 2001, Americans began to see the fight against terrorism as a moral crusade, and the media contributed to existing public perceptions of Iraq as a terrorist state. The EU, says

Oliverio, which has a longer experience of tackling terrorism (and has a large and often poorly integrated Muslim community), tends to regard terrorism as a crime. The EU is not prone to launching preventive strikes or pursuing military intervention in response to terrorism, relying instead on intelligence and targeted actions.

Most of the authors from security studies group compare the EU and the US's documents and discourse. Although these scholars discuss how the EU and the US perceive their foreign policy and security issues, they do not analyse how both actors implement their strategies. In an attempt to do analyse implementation of strategies, Heiduk (2011) compares the US and the EU's approaches to strengthening the Afghani police. Departing from the Mars and Venus argument, he analyses whether Europeans are more likely to train democratic, civilian Afghani police, while Americans aim to transform the police force into an auxiliary military force for the Afghan army. His findings are contradictory, "These differences between the strategic cultures of Europe and the US - between Mars and Venus - seemed to have been most apparent on a macro-level concerning the 'no' of most EU member states to the Iraq invasion in 2003. They also seem to become distinct on the micro-level, that is when comparing EU and US approaches to police assistance in Afghanistan" (2011, p.363). Heiduk observes that both powers contributed equally to the militarization of the local police.

To conclude, a micro-level analysis of discourse and behaviour shows a more nuanced picture of differences between the EU and the US compared to macro or mid-level works. The majority of authors from the security studies group are interested in testing whether the Mars and Venus argument is reflected in the EU and the US's strategic documents and actions. While some of the scholar's arguments have been confirmed (e.g., the US's preference for unilateralism), others—such as the two powers holding differing definitions of threat or the EU's aversion to militarization—have been refuted. The authors in this group are not interested in the sources of differences; their primary goal is to test macro-level constructions.

2.4. Into the details: democratization studies

As both the EU and the US are the most prominent development aid donors and promoters of democracy, democratization presents another field in which comparisons of their policies proliferate. Del Biondo (2016, p. 11) states that the "EU and the United States are very different foreign policy actors, and this is also reflected in their development policies." Various

authors in democratization studies test macro-level theories regarding these development policy differences, thus the majority of these works are micro-level analyses of the strategies, instruments, and goals the US and the EU use to promote democracy and human rights in specific countries or regions. The Middle East and North Africa get most of the spotlight, reflecting an increased interest in these regions and growing links between security, democratization, and development aid in the twenty-first century.

One of the main goals of the democratization studies authors is to identify a guiding influence—such as security interests or defence of values perceived as universal—on the actions of both actors. One group of authors argues that the US is more proactive, or even aggressive, than the EU in defending and promoting democratization and human rights, by actively advocating its policies and building on bottom-up strategies. In turn, these scholars assert the EU frequently cooperates with undemocratic governments; they view the EU as more pragmatic, suggest the EU prefers stability to radical change (Huber, 2008; Khana, 2004), and argue that the EU favours cooperation over conflict (Stahn and van Hüllen, 2007). Another sub-group of democratization studies authors, on the other hand, emphasizes that the US's support is more politicised and instrumental to its strategic objectives. Furthermore, due to processes within the EU, the EU's support is much less dependent on political processes within the Union (Del Biondo, 2016), and its democratization strategies are much more holistic and robust than those of the US (Holden, 2009; Börzel et al., 2015).

The second discussion within this group is centred on the kind of changes the US and the EU are promoting. Some authors claim that the US is more likely to seek the radical transformation of a given regime and provide support to civil society rather than support undemocratic states; these authors argue that the EU is more focused on long-term state-building and social development processes even in non-democratic states than the US (Bridoux and Kurki, 2014; Kopstein, 2006). This argument, however, does not always hold. Durac and Cavatorta (2006, p. 7) observe that in the case of the US's Middle East Partnership Initiative, despite declared objectives, over 70 per cent of US aid was devoted to programs that directly reinforced Arab state agencies or government training and only 18 per cent of all funds went to non-governmental organizations.

Nevertheless, other democratization studies authors argue that there are more similarities than differences between the US and the EU, taking into account their goals and their strategies. According to Cavatorta (2009), when analysing the US and the EU's objectives and instruments in North Africa, it is clear that these actors are more similar than different; , he writes

that the images of the EU as a good cop and the US as the bad cop are not due to fundamental differences, but due to the EU's ability to present itself better than the US does.

Durac and Cavatorta (2009, p. 3) analyse the US and the EU's democracy promotion policies in North Africa and conclude that both actors pursued similar objectives with similar restrictions and suffered from the same contradictions and policy gaps. Similarly, Huber (2017) observes that in North Africa, the EU and the US's policies towards youth are very similar; both powers promote a neoliberal economic and social model. Likewise, both actors seem to prefer a particular—and to a certain point, shared—understanding of democracy rooted in their experiences and ideals, ignoring the context where the policies are implemented (Omelicheva, 2015). Furthermore, Börzel and colleagues (2015a; 2015b) in their study of external actors' reaction to so-called Arabellions, observe that as an agent of democratization, in some ways the EU is similar not only to the US, but also to non-democratic countries like Russia or Turkey.

Finally, even those authors, who distinguish specific differences in the policies of the EU and the US (Holden 2009; Huber, 2008; del Biondo, 2016) agree that the goals and strategies of the EU and the US, over time, are becoming more and more alike.

The majority of authors in the democratization group publish micro-level, country, or policy-based case studies. The only mid-level work belonging to the democratization studies group (Magen et al. 2009) is a comparative study of the EU and the US's democracy promotion policies in different regions. After analysing the democratization policies of both powers in the Middle East, Latin America, North Africa, the Southern Caucasus, and Indonesia, the authors of this mid-level analysis conclude that the US and the EU are not very different: they share the same goals, promote a very similar set of values, and use similar instruments to achieve those goals.

As Magen and colleagues state, "One could even argue that the democracy promotion policies of the EU and the US resemble those of 'civilian powers' in the sense that non-military means and cooperative practices are far more prominent than the use of force and sanctions" (Magen et al., 2008, p. 250). They add, "the use of the various instruments of democracy promotion does not so reflect the characteristics of the promoting agents (the US vs. the EU), but depends more on the geostrategic context and the political circumstances of the target countries" (Magen et al., 2008, p. 250).

Like the scholars in the security studies group, the authors analysing democratization policies are less interested in the roots of the differences between the powers. Nevertheless, when they try to explain them, they turn to either to differing historical developments or to the structure of actors, where they encounter the actorness dilemma (Magen et al., 2008; Börzel et al. 2015; del Biondo, 2016). For example, some claim that the EU's history of EU integration and the different approaches of the EU and the US to post-Soviet democratization processes have shaped their cooperation (Kopstein, 2016, Magen et al., 2008).

3. Overview of the comparison

The main divergence between the regionalists and the Atlanticists lies in their respective views of the role the US and the EU play in international relations. The regionalists, often mirroring the NPE debate, tend to have a rather positive assessment of the EU as a qualitatively different power—one that is more democratic, bases its interactions on the principles of multilateralism, and is more willing to bind itself with international agreements. On the other hand, the Atlanticists claim that while the EU's foreign policy goals and instruments differ from those of the US, this is not due to the EU's normativity, but to its lack of military power and the EU's aversion to power politics. Thus, Atlanticists often perceive the EU as weaker than the US, and they perceive the latter more positively due to its capacity to assume international challenges. In turn, the security studies group and the democratization studies group propose a more nuanced analysis, arguing that in different contexts and different fields, both actors can act rather similarly.

Although both macro-level groups generally agree about the roots of differences between both actors (different decision-making processes, levels of actorness, power assets, and historical experiences) they give priority to somewhat different elements. The regionalists emphasise the multi-layered structure of the EU and its experience of integration, the Atlanticists prefer different power capabilities and the conflictive history of the European continent as explanatory variables.

Finally, it can be observed that the most important research themes in both macro-level groups are related to two dichotomies—power versus weakness and normativity versus pragmatism—found in broader debates in the fields of EU studies and international relations. The question of norms and interests has already been touched on in this article, there is no simple

way to separate one from the other. As for the discussion of power versus weakness, it mirrors broader considerations of the importance of hard and soft power. How important is military power in the power politics of the twenty-first century? Moravcsik (2017) asserts, "[Europe] . . . manipulates economic power with skill and success unmatched by any other country or region. Also, its ability to employ 'soft power' to persuade other countries to change their behaviour is unique."

Conclusion

Different, nevertheless, related academic discussions presented in this article lead to the following observations regarding the particularities of the EU's external actions and the utility of comparison. Firstly, comparisons of the EU to the US have become more common. Many authors do not feel a need to justify comparability, and this shows that the EU has managed to become an international relations actor and is, at least to some point, comparable to more traditional actors. Judging from the number of studies, the main areas where comparisons can be made between the EU and the US are related to the fields of democratization, (economic) regionalism, and development policy.

Within the analysis of the macro-level security-related topics, the concept of Europe prevailed over the EU. Nevertheless, these studies were mostly written in the first decade of the twenty-first century. In the after-the-Lisbon-treaty context, and bearing in mind the push for better coordination of EU's response to rising security threats, do the claims made by the Atlanticists still hold and if yes, to what extent? The realists are somewhat sceptical of studies of the EU's foreign policy, as their primary object of interrogation is a state. Nevertheless, neoclassical realism might be a useful paradigm for questions regarding the EU's security culture.

Secondly, the tension between macro-level works (observing significant differences between two actors) and mid/micro-level works (painting a more nuanced picture) shows that despite its particularities, in many ways, the EU acts similarly like other actors. Hence, more attention should be paid not to differences between the EU and other actors, but to their similarities. This type of comparison could enrich not only EU studies but also other IR sub-fields like the studies of (regional/great) powers or hegemony. Diez (2013) and Haukkala (2008, 2017) have already proposed solutions to problems of the NPE debate by naming the EU as a (normative) hegemon. How does this "hegemon" compare to others in the IR?

Thirdly, while many authors have criticised the NPE concept, there is one repetitive claim in regionalists' works, which signals the EU's exceptionality. Since the early comparisons between EU and NAFTA as integration models, there have been recurring claims about the fact that unlike the US, the EU is trying to diminish the existing asymmetry existing between it and its partners. Various authors, studying European Neighbourhood Policy claim that the EU might act in neo-colonial or even imperialistic ways. Nevertheless, the comparison with neighbourhood policies of other regional or great powers (or, referring to the abovementioned discussion, hegemons) would help in understanding if the EU's "hegemony" can be considered exceptional.

Finally, the concept of effectiveness, is more and more salient in EU studies and has been absent from the comparisons discussed. Many authors seem to agree that the EU's foreign policy lacks effectiveness. Nevertheless, the US's inability to tackle the situation in Central America or democratize Iraq does not tend to lead to such damning conclusions about the US. Hence, the comparison could be helpful in corroborating whether the EU is "exceptionally ineffective." Even more, the comparison with the EU might lead to new insights into the limitations of other, traditional actors in international relations.

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Empire, leadership or hegemony: US Strategies towards Northern Triangle countries in the 21st Century³³

Abstract

The goal of this article is to conceptualize the US strategies towards Northern Triangle countries during 2005-2015. Using Destradi's framework of regional power strategies, this paper analyses strategic documents and secondary sources with regard to how US defined goals of its regional cooperation and means for their achievement. It concludes claiming that the US strategy towards the region can be called hegemonic as it was openly subordinated to its needs. Nevertheless, there has been a shift from hard to intermediate hegemony as the US became more perceptive to the needs of its regional partners.

Key words: *Northern Triangle, Regional powers, Regional strategies, Empire, Hegemony*

Resumen

El artículo sistematiza las estrategias de los EE.UU. hacia los países del Triángulo Norte, siguiendo las categorización de Destradi. Para ello, se ha analizado el contenido de los documentos estratégicos de EE.UU. e identificado como son definidos los objetivos de la cooperación regional y las medidas para conseguirlos. Como conclusiones el texto afirma que la estrategia de los EE.UU. hacia la región puede definirse como hegemónica, sin embargo, progresivamente la hegemonía cambio de dura a intermedia a medida que los EE.UU. se hicieron más perceptivos a las necesidades de sus socios regionales.

Palabras clave: *Triángulo Norte, poderes regionales, estrategias regionales, imperio, hegemonía*

Central America (CA), an important region for the US during the Cold War, seemed to be forgotten by politicians, academics and broader public since the 90s until the recurrent migration crisis started at the US border. Unaccompanied minors, mostly from Honduras, Guatemala and El Salvador that reached the US in 2014, sparked public debates and renewed interest in the US-CA relations.

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Interestingly, even in the 21st century, studies of US policies in the region often focus on the Cold War period (e.g., Colby 2011, Grandin 2006, 2011, Joseph and Grandin 2010, LeoGrande 1998, Travis 2016). Furthermore, the literature tackling US relations with CA is rare, and more often the analysis is done in the broader, Latin American-wide level (e.g., Livingstone 2009, Long 2011, Long and Pastor 2010, Lowenthal et al. 2009). Finally, various authors describe the relationship between the US and its neighbors using concepts coined before the end of the Cold War, without rethinking changes in the US priorities and without a clear definition of the concepts. This article addresses these gaps conceptualizing strategies of the US in CA during 2005-2015. The period has been chosen due to two documents signed by the US during this period: Dominican Republic-Central America Free Trade Agreement (DR-CAFTA) signed in 2005 and US Strategy for Engagement in CA (CA Strategy) adopted in the very end of 2014. Both strategies “frame” a decade of the US involvement in the region.

The first chapter of the article presents the literature on the US policies in Central/Latin America in the 21st century showing a lack of clear conceptualization of US strategies towards the region. The second discusses different theoretical concepts: empire, hegemony and leadership, and, using Destradi’s (2010) framework, proposes how to operationalize each strategy. Finally, this framework is applied to the analysis of the US strategy towards CA. This article focuses on the Northern Triangle (NT) countries – Honduras, Guatemala, and El Salvador. All three are by far the biggest recipients of the US aid in the region. Moreover, many of documents dedicated to CA, explicitly target NT sub-region and distinguish these three countries from their neighbors.

After the analysis of strategic US documents, development aid flows and secondary sources, the article concludes claiming that even though the period of analysis covers two different administrations, the main characteristic of the US CA strategy - its open subordination to the US security objectives - did not change. Thus, I propose to conceptualize it as “hegemonic”. Nevertheless, with B. Obama’s election, the hegemony changed from hard to intermediate as the discourse has softened, making more efforts to include the demands from the partners, designating more funds to enhance the reforms in the neighborhood. The article concludes with the claim that a clear framework focused on what actor does, allows clarifying conceptually vague affirmations, and adds to a better understanding of regional interactions also outside the Western hemisphere.

1. EMPIRE AND ITS BACKYARD?

Since the 19th century, the US influence over CA is unquestionable. The US policies in the region before and during the Cold War are widely analyzed (Cox 1994, Mitchener and Weidenmier 2004, Ricard 2006, Stirton Weaver 1994), and the military, economic and ideological dominance of the US over its neighbors during the period is widely acknowledged.

Nevertheless, since the end of the Cold War the interest, of the US policymakers and broader academic community in the region fell. Two regional-scope trends that acquired more scholarly attention was the negotiations and entry to the force of DR-CAFTA and, more recently, the rise of insecurity and migration. The latter renewed a discussion about the role of the US in CA, especially in NT countries. Journalists (Lima 2018, Planas and Grim 2014, Tseng-Putterman 2018), academics critical with the US role in the region (Akram 2018, Chomsky 2018) and even CA presidents (Otto Perez Molina 2014), pointed to the US attempts to dominate the region as one of the root causes for the migration crisis.

The concept of “empire” referring to the US role in the CA (and in the broader sense Latin) is often paired with the one of “backyard” (Grandin 2001, LeoGrande 1998, Livingstone 2009, Reyna 2016), in this manner showing the US dominance over the region and its persistent efforts to maintain it. Nevertheless, many authors do not attempt to define what these terms mean and how their meaning might have changed during different periods. For example, G. Grandin, in his book “Empires Workshop: Latin America, the United States, and the Rise of the New Imperialism” traces the “US imperial policies” in Latin America. Connecting the 19th Century policies of the US private companies, Cold War and the rise of so-called “neo-cons” in the US, G. Grandin observes that “it was in CA where the Republican Party first combined the three elements that give today’s imperialism its moral force: punitive idealism, free-market absolutism, and right-wing Christian mobilization” (Grandin 2006: 6). He uses the terms of empire and hegemony as synonyms, discussing everything from the US attempts to rearrange Mexican economy or in general, the promotion of free trade, to military interventions and use of American soft power since 19th Century to the War on Terror.

J. Colby (2011) analyses the pre-Cold War events in CA, establishing relations between US private business companies, its racial attitudes and the expanse of its influence in the region. He connects the business model of United Fruits Company with so-called “American empire,” nevertheless, without going into the details what empire is and how it works.

G. M. Joseph in the book “Close encounters with Empire” (1998) goes even further claiming that he has no interest in the “attenuated debate” about whether the United States constitutes an empire as, according to him “such arguments also ignore structures, practices, and discourses of domination and possession that run throughout U.S. history”(Gilbert 1998:6). There is no effort to separate what empire is from what it is not. The essays in this volume discuss many facets of the US policies from movie propaganda to the role of Rockefeller Foundation in CA, always emphasizing the one-sidedness, subordinated position and sense of US superiority. Nevertheless, the clear-cut clarification if all these characteristics are typical to an empire (or imperialist foreign policy) is missing. Long observes this tendency in many works on the US empire in Latin America, as they start with the proclamation of the US as an empire with little attention to the previous usage of the term or attempts to define it (Long 2011: 15).

Loose use of the term “empire” in the discussion about the US foreign policy, especially during the years of G. W. Bush administration, is not limited to Latin American studies. The War on Terror led to the re-birth of academic discussion about the “American empire.” The number of adjectives attached to it multiplied: Ferguson (2004) and Mallab (2002) calls the US “a reluctant empire,” Cox an “empire by denial,” Gilderhus (2005): an “informal empire.” Prys and Robe (2011), claim that the vision of the US as an empire in the 21st Century is based on a particular historical period. According to them, the proponents of “empire” have largely misinterpreted the policy strategy of empire — as applied by the George W. Bush administration — for the real thing, an existing empire (Prys and Robe, 2011: 254).

Their proposal to separate a strategy (what actor does) and the status/role (what actor is), becomes a departure point of this article. Instead of asking what the US is in CA/NT, this article focuses on how different US governments engaged with the region. While this approach does not allow easy generalizations (if one maintains hegemonic strategy – is it hegemon or empire in disguise?), it allows seeing variation and change of roles the powerful actors choose for themselves.

2. STRATEGIES OF REGIONAL POWERS: LEADERSHIP, HEGEMONY, AND EMPIRE

Given the preponderance of the US in comparison to NT countries, and its attempts to shape the political and economic dynamic in the sub-region, it is analyzed as a regional power. Given that the majority of regional powers are

middle powers, their studies do dwell on the idea of domination and pay more attention to the nuances of regional powerhood (see Nolte 2006, 2010, Prys 2010, Mitchell 2016), regional hegemony and leadership (see Burges 2008, 2015, Flandes 2010, Pedersen 2002, Prys 2008), and strategies of stronger states (Destradi 2010). This article uses the framework of S. Destradi (2010), as it is the most elaborated conceptual attempt to understand not what regional power is, but how it might act towards its corresponding region. According to Destradi, five strategies of engagement: imperial, hegemonic (distinguishing three different types: hard, intermediate and soft), and leadership, can be distinguished based on the following characteristics:

1. *Ends of a regional strategy.* An attempt to realize regional actor's self-interests tells apart all strategies from the leadership, which is marked by a genuine attempt to achieve objectives important for majority states of the region.

2. *Means used to achieve them.* While the imperial strategy is distinguished by the reliance on the military intervention (or a threat of it), different hegemonic strategies rely on a broader spectrum of instruments ranging from sanctions and political pressure to economic inducements and normative persuasion/socialization.

3. *Self-representation of regional power* (e.g., in its documents, speeches of leading politicians) might vary from aggressive/threatening (typical to imperial strategy) to a cooperative (in case of leadership).

4. *A discrepancy between the real actions and self-representation.* A higher discrepancy is more typical to hegemonic strategies, as the regional power "pretends" to be softer than it is.

5. *Legitimation.* While in case of imperial and harder hegemonic strategies there would be no or low-level of legitimation, in case of softer hegemony and leadership the role of regional power would be seen as legitimate by its neighbors.

6. *Subordinated states strategies.* In the case of "harder" strategies implemented by regional power, countries either intent to resist either obey out of the sheer calculation. In the case of softer hegemony or leadership, they either comply due to changed values, either willingly follow its lead.

7. *Change in subordinated states' normative orientation.* Paradoxically, in case of harder strategies, the change of normative orientations is rarer as states tend to resist.

According to Destradi, "when it comes to operationalizing these concepts for empirical research; however, a reduction in the number of dimensions considered seems to be appropriate" (Destradi 2011:928). Two

characteristics that allow distinguishing different ideal types are a) a commonality or divergence of goals pursued by the regional power and neighboring countries and, b) means employed by the regional power in its relations with these countries. These dimensions are complementary and both necessary: the ends distinguish soft hegemony from leadership; means - empire from hegemony. Moreover, looking at means we can capture different types of hegemonic strategy. Therefore, this article focuses on these two elements of the US CA strategy, sustaining that while the additional characteristics would help to understand better the consequences and context of regional strategy, these two are sufficient seeking to characterize it. Table 1 summarizes the analytical matrix guiding empirical research.

Table 1. Potential strategies that could be employed by regional power. In bold: a key feature that allows to distinguish the strategy

	Empire	Hegemony			Leadership
		Hard	Intermediate	Soft	
Ends	Self-interested	Self-interested	Self-interested	Self-interested	Common
Means	Military, Intervention, threat of intervention	Sanctions, threats, political pressure	Material benefits/ inducements: economic side-payments, military support	Normative persuasion, socialization (for example, through joint working groups or committees on contentious issues)	Normative persuasion, socialization process

3. US IN NORTHERN TRIANGLE

Development in international relations after the Iraq war and the consequences of the Great Recession affected the priorities of the US in the region. The first trend led to what some analyst called a “benign indifference” (Loventhal et al. 2009: 43) towards the neighboring region. The second one put the pressure on the US foreign aid capacities, forced to rethink the intervention logic and reconsider finances dedicated to it.

As for Latin America, the primary challenge during the whole period was a so-called left turn taking place in the region. Left-wing governments coming to power in nearly all countries in Latin America tended to have a more critical view of the US role and started various regionalist projects

without its participation. The breakup of US promoted Free Trade Area of the Americas (FTAA) negotiations in 2005 was one of the signs of “rebellion,” and the spread of Venezuelan influence was seen as potentially problematic by the US. NT countries also felt these changes. Honduran president M. Zelaya, elected in 2006 with time forged closer relations with Venezuela joining Petro Caribe initiative and the Bolivarian Alternative for the Americas (ALBA). The rule of M. Zelaya was disrupted by the coup in 2009, finishing 27 years of peaceful civilian rule. In the same year, after 20 years of right-wing party rule, a left-wing party, formed by former guerrillas won presidential elections in El Salvador. It can be concluded that by the end of the first decade of the 21st Century, politicians searching for more autonomy changed the actively pro-American presidents. Furthermore, the security was becoming more relevant. The homicide rates were growing in all three countries until the second decade of the 21st Century. Especial violent changes took place in Honduras since between 2007 until 2011 and in El Salvador between 2013 and 2015 when murder rates grew two to three times (World Bank data) and finally insecurity became one of the reasons for migration, which reached the peak in 2014.

To sum up, two trends were shaping the US - NT relations: a diminishing role of the US in the region and the growing importance of NT to the US through the security challenges and migration flows. The two US administrations approached these changes in somewhat similar, and yet, different way.

3.1. G.W. Bush administration

A. Ends of the regional strategy

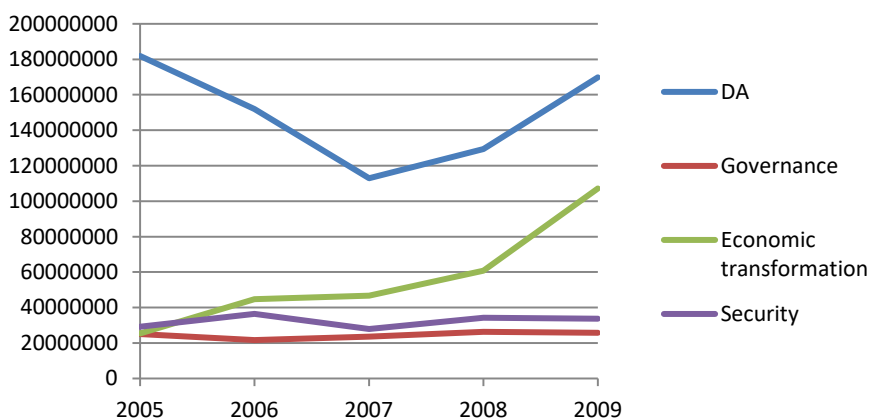
In 2001, G.W. Bush claimed that the primary goal of his presidency was “to ignite a new era of economic growth through a world trading system that is dramatically more open and free.” (Bush 2001). Thus the signature of DR-CAFTA was reflecting one of the main objectives of his presidency. During the period 2005-2009 the second biggest thematic group of projects financed by the US in three NT countries was related to economic liberalization (Table 2). The exception was Guatemala, where economy-oriented projects were somewhat marginal, partially due to the fact that Guatemala was tackling painful recovery process after the civil war and support for the Peace Accords and stability was a more immediate priority.

Table 2. Thematic distribution of projects financed by the US in three North Triangle countries (disbursements) in 2005-2009. Source: USAID

2005-2009			
Thematic group*	El Salvador	Honduras	Guatemala
DA	36,7	49,5	69,3
Governance	9,6	6,3	11,9
Economy	26,6	37,1	7,8
Security	27,2	7,1	11,0
Total	100%	100%	100%

*DA (Development aid) – projects in “traditional” development assistance field, such as healthcare, agriculture, environment, education. Governance: decentralization, strengthening of political system and institutions, support to human rights and independent media. Economy: economic liberalization, economic infrastructure, strengthening the private sector, support for DR-CAFTA. Security: military support, training of the police, community security programs.

Similarly, the amount of aid disbursed for projects related to the economic transformation was growing – many of the funds were going directly to support the implementation of DR-CAFTA (Graph 1).



Graph 1. US financed projects (disbursements) 2005-2009 according to their thematic sphere. Source: USAID

The political elites of CA were actively seeking the signature of DR-CAFTA due to the losses after the entrance to the force of NAFTA (Condo et al., 2005: 8). Nevertheless, the opening of the negotiation was more related to the foreign policy goals (failure to secure an FTAA because of a

spread of “socialism of 21st Century”) and general “freedom” agenda of Bush’s administration, than an active push from CA.

The US administration saw DR-CAFTA not only as merely commercial but rather as a transformative agreement, “adding up” to the democratization of the neighborhood. As stated the official position of US government “The CAFTA-DR is a regional trade agreement among all seven signatories, and will contribute to the transformation of a region that was consumed in internal strife and border disputes just a decade ago” (USTR 2004: 1). The transformation should come through the “more open and transparent procedures, which should deepen the roots of democracy, civil society, and the rule of law in the region, as well as reinforce market reforms” (USTR 2004: 3). Thus, given the marginal importance of CA in the US export market, the signature of the treaty was instead a demonstration of the power and success of US “pushy” free trade agenda, which seemed stuck after the collapse of the FTAA negotiations and the delays in the FTA negotiations with Australia and Morocco.

Second, the way the DR-CAFTA was negotiated shows unequal power setting - the negotiations for the initial agreement were very brief, bearing in mind the number of countries involved and the disparities between the Southern Countries. Similarly, in the majority of the cases, the US had the lead in the pace of the negotiations, being the first to propose its position or initial draft versions of the documents, often, basing them on the FTA with Chile (Gonzalez 2006: i). The US has been reluctant to make concessions given that the negotiations were seen as an example and blueprint to future FTA negotiations (Gonzalez 2006: 85). Hence, while the governments of CA countries supported the agreement, the negotiations and the final agreement strongly reflected the needs (rather political than economic) of the US and its broader foreign policy agenda.

The expected regional transformation did not happen, and the security situation worsened. As a response, a so-called Merida initiative was designed to tackle transnational crime in Mexico and CA (mostly NT). Its funds in were used to bolster the capacity of government to inspect and interdict drugs and to support the US Strategy for Combating Criminal Gangs from CA and Mexico, (Cook, Rush and Seelke 2008: 2). Nevertheless, different security strategies did not mean a steep jump in security-related projects – as can be seen in graph 2, their value between 2007 and 2008 grew less than by 8%.

Concluding, the major preoccupation of the US in NT was related with the broader foreign policy goals (DR-CAFTA as a continuation of ambitious Latin American scale policies) and security issues, mostly related

with the spillover of insecurity from Mexico and Colombia. While a fight with this phenomenon was in the interests of NT countries, the US policies primarily centered on its needs. For example, while NT countries were claiming that the deportations of their citizens are aggravating gang situation, the US migration services were not indicating which of the deportees were belonging to the gangs, unless this was the primary reason of deportation (Ribando Seelke 2016). Similarly, the push from Latin America to tackle drug consumption instead of fighting the production or tackling the lax gun laws production passed unheard. Thus, regarding its goals, the US strategy towards CA can be considered as imperial or hegemonic. However, the analysis of means used to achieve these goals is needed to define which category of these two is more suitable.

B. Means to achieve them

Since the attack on Panama in 1989, the US has never used open military force in the region, and thus according to the framework of Destradi, the US strategy was hegemonic, not imperialist. Nevertheless, its governments have never ceased picturing the US as a natural leader of the region, claiming that “while we do not seek to dictate to other states the choices they make, we do seek to influence the calculations on which these choices are based. We also must hedge appropriately in the case states choose unwisely” (NSS 2006: 41). One of the principal instruments was foreign financial assistance which in internal documents on the US foreign aid was called “one of the tools the United States employs to advance US interests in Latin America and the Caribbean, and the focus and funding levels of aid programs change along with broader US policy goals” (Meyers 2018: 1).

The importance of FTAA and later on of DR-CAFTA agreement led to significant US pressure for countries to sign the deal. In Costa Rica, which was the last one to sign DR-CAFTA agreement and only after the close win of the agreement’s supporters in the referendum, before the voting the US ambassador M. Langdale often repeated the threat that country would lose the existing preferential treatment in case of negative voting. These threats were angrily picked up by agreement’s opponents in the US Congress, stating that the US is not going to retaliate to the countries deciding against the free trade agreements (Congressional Records 2007: H11132).

For those, willing to sign the agreement, the possibility of US blocking it, was a strong motivator to support military intervention in Iraq. All three NT countries not only supported the war (despite generalized opposition in Latin America led by Mexico, Chile, and Brazil) but also sent a

small number of soldiers to support the mission. The DR-CAFTA treaty has been signed, and countries received military aid. Moreover, in aid programming documents elaborated under the administration of G. W. Bush, this choice was always mentioned as a demonstration of the will to cooperate.

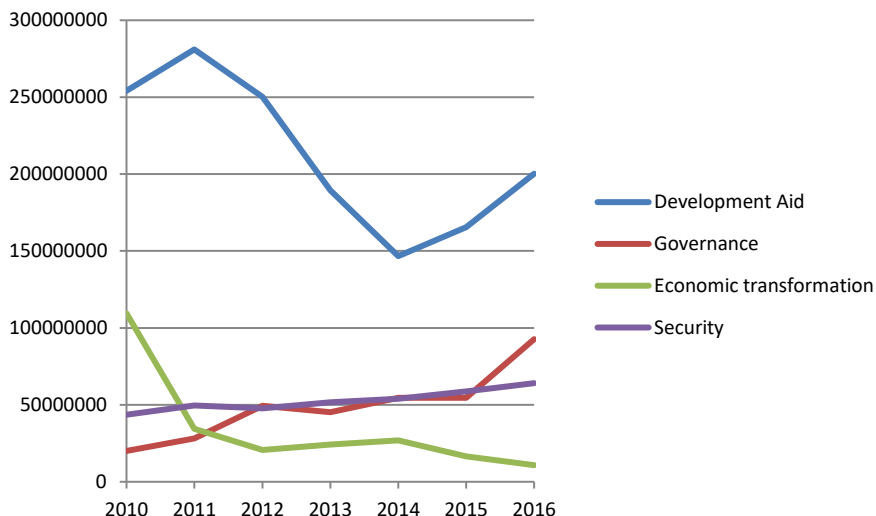
Furthermore, during this period, smaller countries were aware of the possibility of sanctions in case of not supporting US foreign policy goals. For example, they were quick to sign so-called Article 98 Agreements, stipulating that signatory countries were agreeing not to hand over US citizen to the International Criminal Court. The massive US-led campaign against the Court's Jurisdiction was accompanied with the pressure and threats to cut off the military and economic aid, given to the countries. All NT countries signed Article 98 Agreements, El Salvador being the first country in Latin America to do that. The price of not signing was real – Costa Rica, which, together with other 11 countries, refused to sign it, was temporarily refused military and economic aid. By 2009, the majority of Article 98 limitations were lifted, due to concerns of G. W. Bush administration that it leads to the diminishing US role in these countries (Ribando Seelke 2006). To sum up, the instruments used by the US: political pressure, sanctions or economic rewards indicate that we cannot call the US strategy imperial, as, according to the framework of Destradi, the latter is defined by military intervention. However, the selfish goals, together with economic and political pressure and rewards, indicate the use of hard hegemonic strategy towards the NT countries during the period of analysis.

3.2. B. Obama administration

A. Ends of the regional strategy

Implemented projects and strategic documents show that at the beginning of B. Obama presidency, there has been more continuity than change. For example, the priorities of the US in CA countries, enumerated in Congressional Budget Justification for Foreign Operations acts (democratization, economic growth, and security) did not change substantially between two administrations. Moreover, supporting economic liberalization or rather “ensuring an economic growth” still was among the main priorities. In 2010, B. Obama launched a new Presidential initiative, a Partnership for Growth, to accelerate and sustain broad-based economic growth. El Salvador became one of the first countries to take part in it. As well, fostering economic growth became one of the priorities in Guatemala's

and Honduras Country development strategies – key documents for the USAID involvement in the countries. Nevertheless, as can be seen in graph 3, since 2010, the number of directly economy-related projects and interventions fell sharply.



Graph 3. US financed projects (disbursements) 2010-2016 according to their thematic sphere. Source: USAID

The concerns related to economic growth were pushed aside by growing security issues. The increasing homicide rates in CA, drug trafficking, and growing drug-related violence led to the shift in the US involvement. In 2010 from the CA branch of Merida initiative, the CA Regional Security Initiative (CARSI) was created. Officially it “was supposed to take a broad approach to the issue of security that goes well beyond the traditional focus on preventing narcotics from reaching the United States” (Meyer and Ribando Seelke, 2013: 2).

Growing migratory pressures and insecurity “brought back” NT countries to National Security Strategy in 2015. Similarly, the CA Strategy and USAID Regional Strategy for CA and Mexico, adopted respectively at the end of 2014 and in 2015, reflect the fear related to the instability in the sub-region. CA Strategy mentions different trends taking place in the region (i.e., economic “deficiencies,” high energy costs, a growing population, climate change) as a source of threats. According to the document, “implications are stark for the United States if the aforementioned concerns become a trend. More than five million Central Americans are expected to

join the workforce over the next decade, many of them in Guatemala and Honduras. If economic prospects remain poor, and the crime rate remains high, migration and organized crime may present challenges for the United States and Mexico”(CA Strategy, 2014). Thus, the growing number of governance and development aid projects, which can be seen in table 3, also can be explained by the fact that more facets of CA reality were seen as dangerous.

Table 3. Thematic distribution of projects financed by the US in three North Triangle countries (disbursements) during 2010-2017. Source: USAID

2014-2016			
	El Salvador	Honduras	Guatemala
DA	39,4	49,6	63,1
Governance	27,5	29,2	14,4
Economy	19,7	2,7	2,7
Security	13,4	18,6	19,8
Total	100%	100%	100%
2010-2013			
	El Salvador	Honduras	Guatemala
DA	75,2	49,2	60,6
Governance	7,1	10,2	14,7
Economy	9,7	27,7	3,8
Security	8,0	12,9	20,9
Total	100%	100%	100%

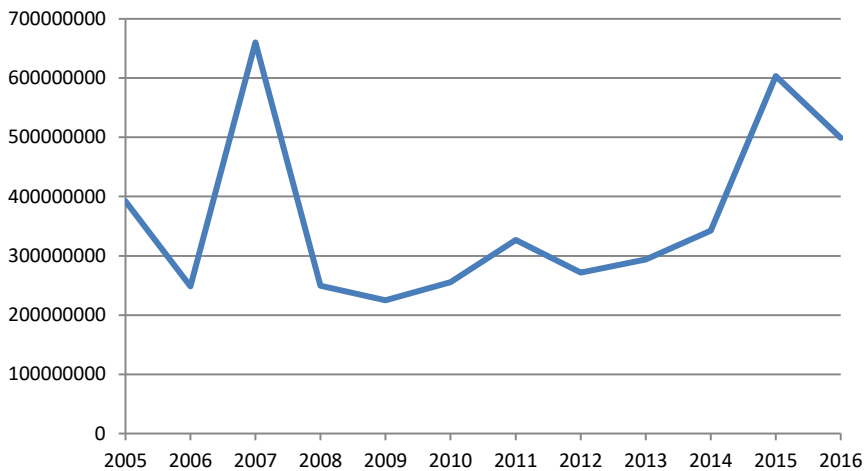
While opening himself to an alternative approach towards drug-related problems, B. Obama was strict about deportation policy, and the number of deported illegal migrants steadily grew since his election despite CA countries protests. The so-called removals reached their peak in 2014 when, compared to 2005, 3,6 times more people were removed from the US (US Customs and Border Protection). Additionally, as a foreign assistance program, CARSI was unable to address two of the principal factors contributing to insecurity the US migration policy (including the large-scale deportation of criminal youth) and the widespread availability of trafficked firearms (Olson et al. 2015: 10). Concluding, the strong primacy of the US foreign policy goals indicates the continuation of hegemonic strategy towards the region. However, we need to study the means used by the US in order to define the type of hegemonic strategy.

B. Means to achieve them

While the discourse of partnership has never disappeared from official documents, the B. Obama distinguished himself as being more “inclusive.” The proposed approach to CA problems foresaw three groups of actions: convening different partners to establish a common understanding of the problem, developing a shared vision with CA countries and establishing a mechanism to coordinate international support for a region. Hence, at least theoretically, more emphasis was given and space foreseen for socialization processes both between the US and CA countries and between the US, CA, and other donors.

In the meeting with B. Obama, that took place on July 2014 three presidents of NT countries criticized US response to the migration crisis, as too focused on border security and pleaded to attend the “root causes” of migration: drug violence and lack of economic opportunities. Their demands were at least partially heard as at the end of the same year under the guidance of the Inter-American Development Bank (IABD), they elaborated so-called “Plan Alliance for Prosperity” (PAP), establishing main lines for their countries. Despite being criticized for its speedy preparation and exclusion of civil society from the process (Pineda and Matarmoso 2017: 38-39), PAP was aligned with NT priorities and national development plans. It also became a source for alignment for the CA Strategy, showing that the US government was at least officially hearing the proposals formulated by the governments of the region.

Moreover, the funds designated to CA grew since 2009. As can be seen in the graph 4, despite the fall in the disbursements for the projects implemented by US agencies in NT countries between 2010 and 2013, the amount of financial aid was growing steadily under the B. Obama government, with a steep jump in 2015.



Graph 4. US Obligations in NT Countries 2005-2016 (2016 USD). Source USAID

Seeking Congressional approval for growing expenditures, the CA Strategy was presented as a conditional agreement rather than a development plan. A commitment of NT (and more broadly speaking, CA) countries to the reforms were mentioned in various discourses presenting CA Strategy (e.g., Biden, 2015). For its part, Congress has placed strict conditions on the aid. A 75% was conditional to the implementation to specific policies ranging from the management of migration flows (including the cooperation with the US agencies in the repatriation of illegal migrants proceeding from these countries) and improving border security to the transparency of governance and persecution of human right abusers (Consolidated Appropriations Act 2016, p. 554-555). The State Department was responsible for checking the fulfillment of a long list of conditions, which delayed the disbursements (Meyer 2019: 11).

To sum up, the main change in the US strategy during the B. Obama administration was related to the means rather than its ends. While latter were still subordinated to US foreign policy goals, material payments and military support took the place of open political pressure and a threat of sanctions. Hence, the strategy implemented by B. Obama was corresponding to intermediate hegemonic strategy. What is more, the emphasis on cooperation and joint problem solving is also typical to soft hegemonic strategy, and thus, there was a shift towards it at the end of the period.

CONCLUSIONS

This article applies Destradi’s framework of regional power strategies in order to conceptualize the US strategies towards NT countries during two consecutive US administrations: G. W. Bush and B. Obama. From seven dimensions proposed by Destradi, only two (ends and means used) are analyzed, as only they are necessary, complementary and sufficient features to understand the type of regional strategy employed. Looking at the results of the comparison, we can observe both continuity and change. The primary goal of G.W. Bush administration was related to the economic opening of the region, while B. Obama had a more ambitious and holistic vision of neighborhood transformation. Moreover, the unilateralist push in the post-Iraq war context gave place to a broader regional level coalitions building, seeking to address the unaccompanied minor migrant crisis of 2014.

Nevertheless, in both cases, the primary motivation of the US was its pressing needs and its security. The NSS of 2006 states that “If America’s nearest neighbors are not secure and stable, then Americans will be less secure.” A similar rationale can be observed in the CA Strategy, claiming that “U.S. security is intimately linked to the security and prosperity of CA” (CA Strategy 2014). Thus, both administrations were implementing hegemonic strategies yet, during the period of analysis, there has been a shift from hard to intermediate hegemony. Table four summarizes these findings.

Table 4. US Strategies in Central America 2005-2015

	Hegemonic strategy	
	Hard 2005-2009 G.W. Bush administration	Intermediate 2010-2015 B. Obama administration
Ends	<p>Self-interested</p> <p>US Strategy in Central America is clearly subordinated to the foreign policy goals: free trade agenda and support of the Iraq war;</p>	<p>Self-interested</p> <p>US Strategy in Central America is subordinated for US security agenda – first, drug trafficking and gangs, later migration management.</p>
Means	<p>Sanctions, threats, political pressure</p> <p>Political pressure and threats of financial sanctions in CAFTA negotiations; Financial sanctions for those, not signing Article 98 Agreements; Pressures for the support of Iraq war.</p>	<p>Material benefits/ inducements: economic side-payments, military support</p> <p>Rise in financial support, nevertheless with the strong conditionality causing delays; Military support: reframing Merida’s Central American branch into CARSI;</p>

Continued table.

		<p>⇒ Shift towards soft hegemonic strategy (?): normative persuasion and socialization through joint initiatives and working groups.</p>
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These variations can be hidden under broad and loosely defined concepts such as an “empire” or “colossus,” in this manner hiding the peculiarities of the US power and limiting the analytical usefulness of the concepts themselves. Future research could focus on the policies of Donald Trump administration, seeking to compare how two similar migration crisis, 2014 and 2017, changed US strategy under two different administrations. Besides, the expansion of the framework to other dimensions, such as legitimation, subordinate states strategies and changes in their internal norms, would also be necessary, as it would also allow discussing the effectiveness of different strategies. A clear framework focused on what actor does instead of on what actor is, allows not only to understand better the US policies, but also to compare them in time (between the administrations) and, even more importantly, with the ones of other regional powers. Such comparisons would help to overcome the ideas about the US exceptionalism and, as a consequence, understand better the relationship dynamics between different powerful actors and their neighbors.

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