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THE CHALLENGE OF SOCIAL SECURITY IN THE CONTEXT OF AN AGEING EUROPEAN UNION - FORECASTS AND IMPLICATIONS

ABSTRACT: *According to the latest research on socio-demographic trends, global demographics will continue to change in the period to 2030, influenced by increasing life expectancy, declining fertility and rising levels of education. These changes will alter the structural foundations of the global economy: the ageing of the world's population could have a major impact on both developed and emerging economies. The current demographic situation also has important implications for the social, economic and territorial cohesion of the European Union. It is therefore important for the EU to take demographic aspects into account in all its actions and policies, bearing in mind that the working-age population (people aged 15-64) is expected to decrease significantly, from 333 million in 2016 to 292 million in 2070, while the number of people aged 80 and over is projected to rise to 14.6 %. In an era of ageing societies in the European Union, the analysis of the impact of this process should coincide with the implementation of activities aimed at developing a model of social security in which individual and social needs are compatible with the socio-economic development of these societies. The authors of the article will focus on several issues. Firstly, the analysis of existing data and key indicators illustrating the process and evolution of demographic change in Europe; secondly, the embedding of the issue in the socio-demographic determinants of ageing processes in the context of social security. Thirdly, the coordination of social security in the European Union. Finally, the projections and implications of ageing for the European Union.*

KEYWORDS: social security; social protection; sustainable development; ageing society; European Union.

1. Introduction

The ageing process has not included within its reach only the populations of the societies in the European Union but those of such societies as China or Japan. The number of elderly people is constantly growing not only in the EU but all over the world. Coping effectively with the consequences of demographic

changes in ageing societies is nowadays more important than ever. The events of recent years such as the COVID-19 pandemic, the migration crisis or the war in Ukraine test and change the priorities not only of individuals but also whole societies. In the case of demographic changes occurring due to ageing and depopulation of societies gradual implementation of the strategy of fighting the demographic crisis and the resulting social consequences should take place. Speaking for the implementation of such strategies and the resulting constant changes in the world are connected with the introduction of changes in defining the issue of social security.

Following longer life expectancy, progressing process of double ageing as well as changes in the models of fertility rate accompanied by intensive migrations, not only external but also internal ones, an increase in the age dependency ratio occurs. Results of mutual interactions between these phenomena and the popularization of new lifestyles based on individualism enforce re-orientation of the understanding of social security in the ageing society. A long-term demographic transformation inevitably leads to key social and economic changes. Public mechanisms do not seem to be prepared for new economic and social burdens which create a serious risk of destabilization of the social order and the appearance of new social crises even in seemingly stabilized economic systems of countries such as Germany, France or Italy. The consequences of population ageing have been for many years masked by short-term solutions which did not take into consideration the orientation towards understanding the ongoing demographic changes. Desk research will enable noticing new areas of social protection requiring intervention aimed to ensure social security. The perspective of such analyses seems to provide interesting solutions whose application will facilitate better identification of problems of both people experiencing their own old age and the future generations which will gradually enter this stage of life.

This, however, requires departing from the established stereotypes where the senior citizens are presented as those who occupy the peripheral social positions. Each person has the right to a broadly understood social security. The development and establishment of formal systems of social security aimed at ensuring the support of incomes and medical care have always been considered to be a significant step in social development. The appearance of different forms of formal social protection and different mechanisms of social protection (obligatory contributory and non-contributory public plans of social security) were examples of institutional responses to the escalation of various social problems.

The understanding of ageing was for a long time concentrated on the medical and biological perspective (Vaillant 2002; MacDonald, DeCarlo, Dixon 2011; Schaie 2013). The most recent studies show that ensuring good quality of life in this phase is also connected with such factors as social relations and bonds, which – besides the institutional support – build the feeling of security (Mitchell, 2004; Waldinger, Schulz, 2016). The ageing process was mainly related to the progressing decline of social abilities as a consequence

of irreversible changes of the human body potential. Results of the present studies point to a different dependence. A good level of wellbeing and satisfaction with life are also achieved by people classified as old (Costa, McCrae 1986; Costa, McCrae, Zonderman, Barbano, Lebowitz, Larson 1986). The adoption of a more global perspective in the understanding of this problem is obvious and necessary. This follows from the fact that the problems of the ageing society have become the key object of sociological and economic analyses. The theoretical and research frameworks of studies on ageing are of multi-dimensional and interdisciplinary character (Ferring 2018). In this context the category of social security is a crucial matter requiring implementation of an integrated strategy of problem solving on the international, national and local levels and the involvement of both societies and individuals in the process of perspective planning of the future. The activities aimed at establishing an effective social system which ensures safety on the micro- as well as macro-social levels are considered a part of the strategy of sustainable social development (Dale Avers 2020; Aspalter 2020; Ribeiro, da Silva Borges, Cavalcanti Ferreira de Araujo, dos Santos Souza 2017).

Intending to explain the aforementioned processes and their consequences, the present study aims to provide a review of selected theories in the field of social security and the socio-demographic issues determining this problem, to analyze the existing data and the most important indicators illustrating the process and the course of demographic changes in Europe, to point to the mechanisms of coordinating social security within the European Union and, finally, to present the prognoses and effects of population ageing in the European Union.

2. Demographic processes and prognoses referring to the European Union societies

The process of increased participation of the elderly in the total population of the European Union countries has been observed for decades (Eurostat 2015). This happens as a result of longer life expectancy, civilization progress and better quality of life. In the 20th century ageing became a common phenomenon, and the societies of the European Union countries and other highly developed countries passed from the stage of ageing to the stage of old societies. This process consists in an increase in the percentage of people aged 65 plus within the total population. According to the most popular scale of demographic old age established by UNO:

1. The population with less than 4% of people aged 65 and more is considered young;
2. Adult population is the population where the persons aged 65 and more constitute from 4 to 7% of the total population;

3. Old population is the population where the persons aged 65 and more constitute more than 7% of the total population (UN 1956).

Basing on the statistical data presented by Statistics Poland (Statistics Poland) it can be stated that the population of Poland entered the stage of late old age as early as in 2004. The ratio exceeded 13% then, whereas in 2016 it reached the value of 16.4% (Statistics Poland 2017). At present one third of the world countries have the population in the phase of demographic old age (while nearly one fourth – in the phase of markedly advanced state of old age), and the next 19% are in the transitory phase. Importantly, these results clearly show that population ageing is of global character since increasingly more countries of the world are in the phase of demographic old age. It can be expected that in 2050, 80% of countries will reach this phase, 65% of which will be in a considerably advanced state of old age (UN 2009: 12).

Independently of the method of description or measurement, the ageing process is reflected in a decisive majority of population in the productive and post-productive age and a small percentage of people in the pre-productive age. The United Nations Organization considers the old age threshold to be 65 (World Population Prospects 2006); however, this threshold might be shifted as a consequence of changes in the course of ageing, i.e. not only longer life expectancy of an average inhabitant of the European Union, but – what is important – owing to longer life expectancy in good health and relative functional fitness. According to Eurostat data from 2023, life expectancy at birth in EU was 81.5, which means an increase by 0.9 compared to 2022, and by 0.2 compared to the level before the pandemic in 2019. In 15 countries life expectancy exceeded the EU means, with the highest in Spain (84.0 years), Italy (83.8) and Malta (83.6). The lowest life expectancy, on the other hand, was observed in Bulgaria (75.8), Latvia (75.9) and Romania (76.6) (Eurostat 2024 a).

Eurostat prognoses show that by 2080 the population of 28 EU countries aged 65 and more will have increased and will make up 30% of the whole population of European Union, while the percentage of the oldest population (80+) will then reach the level 12.3% (Eurostat 2023 a). The progressing process of double ageing, which means a fast rise of the percentage of people aged 75 and an increased age median of Europeans, will have significant consequences for the social security system, and thus for the level of social security of the EU inhabitants. Eurostat data from 2022 show that the age median of the European union population was 44.4, which is by 0.3 year more than in 2021 (Eurostat 2024 b). During the last decade the median rose from 41.9 by 0.25 yearly, on average. This means that half of the population of the European community was more than 44.4 years old. It is not only an increase in the age median of Europeans but also a number of other factors such as the aforementioned increased life expectancy, decreased birth rate, and migrations that contribute to the ageing of Europe's population and an increase in the age dependency ratio in particular countries of the EU. This ratio – which is the proportion between the number of children (aged 0-14) and elderly people (aged 65 and more) on the one hand, and the number of people aged 15-64, on the other – can also be calculated in

reference to the economic age groups and it is the proportion between the number of people in the non-productive age and the number of people in the productive age. This is significant because an important consequence of demographic changes taking place in Europe in recent decades is a constantly decreasing percentage of the productive age population, with a simultaneous increase in the number of retired people. It was estimated in 2022 that within the EU population of 446.7 million, young people in the pre-productive age, which means aged from 0 to 14, constitute 15.0%. In the same period the production age population (15-64) made up 63.9%. The percentage of elderly people (aged 65 or older) was 21.1 %. As a comparison, in 2021 those three groups of people constituted, respectively, 15.1 %, 64.1 % and 20.8 % of the EU population, which clearly indicates the ongoing changes (Eurostat 2024 a).

In 2022 the highest percentage of young people in the total population in the EU member states was found for Ireland (19.7 %), Sweden (17.6 %) and in France (17.5 %). The lowest percentage was observed in Italy (12.7 %), Portugal (12.8 %) and in Malta (13.4 %). Concerning the percentage of people aged 65 or older in the total population, the highest ones were for Italy (23.8 %), Portugal (23.7 %), Finland (23.1 %), Greece (23.7 %) and Croatia (22.5 %), while the lowest for Luxemburg (14.8 %) and Ireland (15.0 %). In 2022, as compared to 2021, the percentage of people aged 65 and older grew in all member states, except Bulgaria, where it remained unchanged (Eurostat 2024 b).

It is expected that in the decades to come the share of elderly people in the total population will increase considerably. This may lead to a greater burden for people in the productive age aimed to ensure social spending on a lot of associated services required by the ageing population. However, this is only one of the consequences of demographic changes. A constantly growing group of elderly people is a group of consumers of social services within the areas of care, medicine, education and technology (Adamczyk 2021).

4. Social security in the integrated order

The process of ageing of the EU societies is strongly connected with the issue of social security, which should be viewed as the state's ability to ensure the social order which – based on a coherent system of laws in case of the citizens' difficult life situation and in case of a threat to their lives – will guarantee care to them (Marczuk 2012; Goryń 2020).

Viewing the category of the concept of social security in the context of demographic processes going on in Europe, one should start with precisely defining its importance. A constitutive element of social security are the institutions ensuring security, and the system of law. These two elements are necessary in the situation of social threat which triggers the social system (these threats include, for example, old age, disease, disability,

poverty etc.). Ensuring the security is one of the most important spheres of the state's activity and one of the fundamental guarantees to maintain the socio-economic order. The definition of social security can be found for instance in the documents of the International Labour Organization, which places emphasis on the prevention of economic and social poverty. According to ILO, social security is the protection ensured by the society for individuals and households with the aim of securing access to health care and guaranteeing the security of incomes, especially in case of old age, unemployment, illness, disability, accident at work, maternity, loss of work or loss of the breadwinner. (ILO 2016: 2).

While analyzing social security, two principal perspectives can be adopted, namely macro social or micro social ones. The macro social perspective refers to a broader, systemic approach which encompasses the whole society or its big segments. In this view the issues related to the functioning of institutions, social policies, economy or social processes affecting security, stability and welfare of the whole population are considered (Scherer, Palazzo 2011; Standing 2011). The elements studied from the macro social perspective include:

- social policies – e.g. systems of social insurances, pensions, health care, education:
- social institutions – such as governments, non-governmental organizations, international organizations, which have influence on social life and security of the citizens;
- social problems – such as poverty, inequalities, unemployment, migrations, population ageing, which can affect social stability and security;
- labour market – stability and level of employment, working conditions, which affect the feeling of financial and social security of the citizens   (Gough 2003; Golinowska 2009; Barr 2012)

Therefore, the macro social perspective analyzes social security in the context of whole societies, without focusing on individuals but concentrating on the systems, processes and structures which shape the social life and security conditions.

In the case of the other perspective, social security should be analyzed in the light of unsatisfied needs. This approach follows from the assumption that unsatisfied needs cause the state of lack/threat, which may become a factor in the accumulation of difficult situations in the lives of individuals and their families (Gerber, et al. 2017; Adamczyk, Betlej 2021; Adamczyk, Majewicz, Wolny 2023).

The diagram below presents the spheres susceptible to a threatened sense of social security resulting from unsatisfied needs in reference to the hierarchy of needs as proposed by A. Maslow (Maslow 1954).

Diagram 1: Matching the needs (in accordance with Abraham Maslow's hierarchy of needs) with specific threats to social security
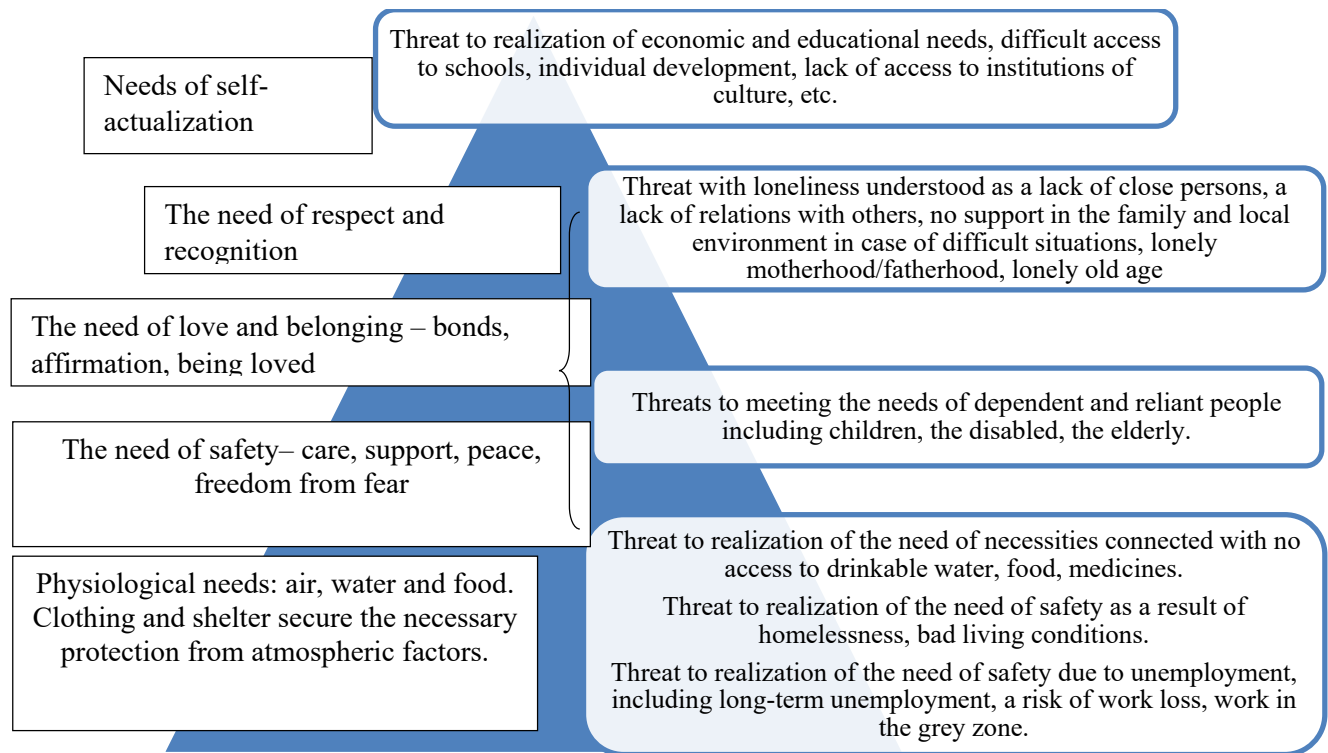
Source: Author's own study.

As follows from the diagram presented above, threats to realization of individual needs from the area of social security are directly related to a lack of satisfaction of a person's basic needs. From the perspective of sustainable social development and the corresponding social order, a lack of satisfaction of individual needs and thus a shaken sense of security of an individual – if it is due to the system defects such as lack of health infrastructure, inequalities in the access to goods and information, purposeful disregard or exclusion from financial transfers – may lead to social destabilization. That is why, in accordance with The ILO Social Protection Floors Recommendation, 2012 (ILO 2012), social security understood as the right to social protection is a human right and all people, irrespective of the place of residence, should have the guarantee of at least minimum basic social protection. Ensuring social security is a social and economic necessity aimed at combating poverty and social exclusion (ILO 2008). In order to guarantee the minimum level of social security, the level of social protection should be composed of at least four basic guarantees of social protection: basic health care; basic income security in childhood, adulthood and old age for all inhabitants and all children (ILO

2012: 4). This is why permanent social protection in old age should be one of the priority activities both in the social and individual dimensions.

Permanent social protection in old age is the foundation of public programs in a number of European countries which include the whole range of variables considered significant for social integration on the general level (Adamczyk, Betlej 2021; Cox 2020) . Social protection is an interdisciplinary category. The theoretical approaches are divided into three groups: political, effectiveness-oriented and narrative ones. Political theories view the models of the relation of power towards what is considered to be the social resources of elderly people on the market. The effectiveness-oriented approach discusses the function of social protection in building the welfare of the elderly on the basis of increased productivity of managing their social capital. The considerations can also include the theories of chain and capitalism (Stopka 2020; Angresano 2007)). The theory of the ageing society highlights the aspect of social and environmental conditions in reference to the whole system of social organization. A stable development of social systems is possible only in the situation when a relative balance is maintained on the level of different social forces. The analysis of this concept directs our attention to the issues of common accessibility, normative level of social protection of elderly people and its individual, social and axiological conditions. The term "social" refers to the basic existential needs of each individual. This concept can also be viewed in a broader perspective as a versatile physical and spiritual development of a person (Marczuk 2012; Kwan, Walsh 2018).

Independently of the adopted definitions, the major goals of social protection are considered to be, among other things:

- decreasing the instability of incomes, including elimination of poverty and improvement of access to health services for all people with the aim of ensuring decent work and life to them;

- decreasing inequalities and injustice;

-ensuring adequate benefits as a right guaranteed by law. (Zieliński 2008; International Labour Office 2011)

Social security is defined as the state of freedom from threats the effect of which is a lack or insufficiency of the means of support. Insufficiency of the means of support is understood in this context both as an insufficient level of financial means or goods at the disposal of a given individual or family and a lack of proper care when the health condition or the situation in which a given person found themselves require providing help in such a form. These threats are above all social risks such as illness, accident at work, disability or old age, the latter interesting from the point of view of the problems studied here. (Rysz-Kowalczyk 2001). A study of social security, including its narrower range of social security in ageing societies, should definitely consider the social context of changes.

5. **Coordination of social protection of the European Union citizens**

The primacy of social security is emphasized in a lot of documents of the European Union, whose role consists in taking care of its member states' common interests. The law of coordination of social security has been the fundamental pillar of free movement of residents since the European process of integration began. The corresponding entries were already found in the Treaty establishing the European Coal and Steel Community signed in Paris in 1951. A complex system of coordination of the national systems of social protection was established as early as in 1958 on the basis of the fundamental regulations of the European Economic Community. Since then, the law on coordination of social protection in the EU has been developing in agreement with the deepening of the integration process as well as with its extension and gradual accession of new member states until its enlargement in the years 2004-2007.

An instrument of the EU social policy are the regulations concerning the social security coordination referring to the employees and their families moving within the EU (EC) 883/2004 (Regulation (EC) 2004) together with its implementing regulation (Regulations (EC) 2009). They are derived from the principles of economic freedoms: the movement of capital, goods, services and labour force aimed to guarantee economic integration. While facilitating realization of one of the economic freedoms, coordination regulations have social consequences. They ensure employee benefits in the state and they protect the benefits acquired earlier, for example in the sphere of retirement benefits.

Thanks to social security coordination, elderly people who worked in different member states and now retire have guaranteed benefits in the amount corresponding to those in particular countries. Thus, elderly people who left the labour market obtain special social protection thanks to coordination regulations. Coordination of social protection systems is the law binding in all member states by virtue of the EU law which has priority over national law. In practice, the regulations led to the corrections of the national systems of social security (Regulation (EC) 2004).

The principles of social policy coordination in the EU underwent evolution as early as in the 1990's towards a greater range of systems under coordination. The Union used a new approach to social policy, in the field of employment policy, by introducing the so-called Employment Strategy in 1997. Then, together with the Lisbon Strategy, the European Social Model appeared as a category the aim of which was not only to introduce economic goals but also a new participation method of management such as the Open Method of Coordination (Czapulis-Rutkowska 2013). Initially, it was used for the policy of combating poverty, then protecting the elderly and then in 2004 – of health protection and long-term care – Open Coordination in the Field of Protection of Older People (European Commission 2004).

In successive years the promotion and protection of social security by the EU were reflected, for example, by the establishment of an instrument called the European Pillar of Social Rights from 2017. Coordination of the systems of social protection in EU is aimed to ensure that each citizen of the EU and of another country but residing in the territory of the former has equal access to social protection, regardless of the state where they are staying.

This pillar plays the role of frameworks used to monitor the effectiveness of the employment policy and the social policies of the EU member states. It also considers a new approach to the inclusion of social priorities within all areas of the EU policy. With the aim of realizing this assumption, in 2021 the Commission adopted a plant of activities for the European pillar of social rights (European Commission 2021). The plan comprises three major goals, which are supposed to be realized by 2030.

- at least 78% of the population aged from 20 to 64 should find employment;
- at least 60% of all adults should participate in trainings every year;
- the number of people threatened with poverty or social exclusion should undergo a decrease by at least 15 million.

The European Pillar of Social Rights is a part of the EU's efforts for the process of convergence within the Economic and Monetary Union. Its basis is the conviction that convergence towards better social and economic results, social resilience and justice are a necessary foundation of more integrated and stable Europe, and that this is an urgent need for sustainable development of the Economic and Monetary Union. Looking into the future, the success of the Euro zone largely depends on the efficiency of the national labour markets and systems of health care as well as on the ability of the economy to absorb and adjust itself to the upheavals and to effectively cope with their social consequences. This also depends on the ability of national economies to improve life standards and growth potential. Some of the rules and laws established in the Pillar can serve to be more binding standards in accordance with the process of the deepening of EMU (European Commission 2017).

The Union ensures financial support to implement the European pillar of social rights by allocating the EU funds, especially the European Social Fund. In particular, those were operation programs for the years 2014-2020 within the European structural and investment funds as well as other key financial programs, but the European Social Fund was also the reference point to plan the period of the EU financial programming after 2020 (European Commission 2017).

The principles of coordination do not remove significant differences between the national systems, for example the possible negative effects of crossing the borders, due to different levels and standards of social protection in each country. They do not compensate for such effects, either. The EU ensures common rules of protection of its laws of social security when people move around Europe (EU 27 + Island, Liechtenstein,

Norway and Switzerland). Special rules of coordination occur in reference to Great Britain. It needs to be emphasized that the rules of coordination of social protection do not replace the national systems with one European one. All countries can decide who is to be insured by virtue of their regulations, which benefits are awarded and on what conditions (European Commission 2016).

According to the report *European Commission Report on Impact of Demographic Change,* Europeans generally live longer and more safely, and the European systems of social protection and health care are the most advanced in the whole world (European Commission, 2020a). However, Europe's population is getting older, and the age median (12) of the EU population EU-27 has been growing for years. It is predicted that it will continue to grow at a similar pace throughout the next two decades. The age median might reach 49 in 2070, which is about 5 years more than at present.

The increase of the median is accompanied by a growing number and proportion of people in older age groups. It is estimated that by 2070, 30% of the population in Europe will have reached the age of 65 and more as compared to about 20% now. It is predicted that in the period between 2019 and 2070 the proportion of people aged 80 or more will increase more than twice and reach 13%. At the same time, a decrease of the population in the working age (20-64) is anticipated (14). In 2019 it was 59% of the whole population. It is predicted that by 2070 this percentage will have dropped to 51% while at the same time the number of children and youth (aged 0-19) will have decreased by 12.6 million (European Commission 2020a). During the World Health Assembly in May 2016 the majority of countries in the world recognized the need of a national system of long-term care. On the sub-regional level this function is performed by the European Union, which is monitoring ageing in its member states and supervising the budgetary differences in this area (European Commission 2020). In 2021 the European Commission, or more exactly the European Commission's Directorate General for Economic and Financial Affairs - DG ECOFIN, was authorized to accept the report "The 2021 Ageing Report Economic and Budgetary Projections For The EU Member States (2019-2070)" aimed to prepare a new set of long-term prognoses of expenditures connected with the population ageing by 2021 on the basis of the new demographic prognoses provided by Eurostat. Long-term prognoses show where (in which countries), when and to what extent the pressure connected with the population ageing will accelerate since the generations of the population boom is retiring and it is expected that the EU population will live longer in the future.

Therefore, prognoses are helpful in emphasizing the direct and future political challenges for the governments following from the anticipated demographic trends. The report ensures a very rich set of information on the level of particular countries covering a long period (up to 2070) prepared in a comparable and clear way. Prognoses of the Ageing Report are a contribution to a number of debates and political processes on the level of the EU. In particular, they are used in the context of coordination of economic and social policies.

Social issues are taken into consideration and strengthened in the European Semester for coordination

of economic policy in the term-of-office of the previous Commission. The comparative analysis and the exchange of the best practices were conducted in a number of areas such as the regulations concerning employment protection, unemployment benefits, minimum salaries, minimum income and skills. Monitoring the progress will be supported by the new table of social outcomes, which is composed of a limited number of existing indicators significant for the estimation of employment and social tendencies, which might become a reference point of the efforts undertaken in the field of the social dimension of the Euro zone and Europe in general.
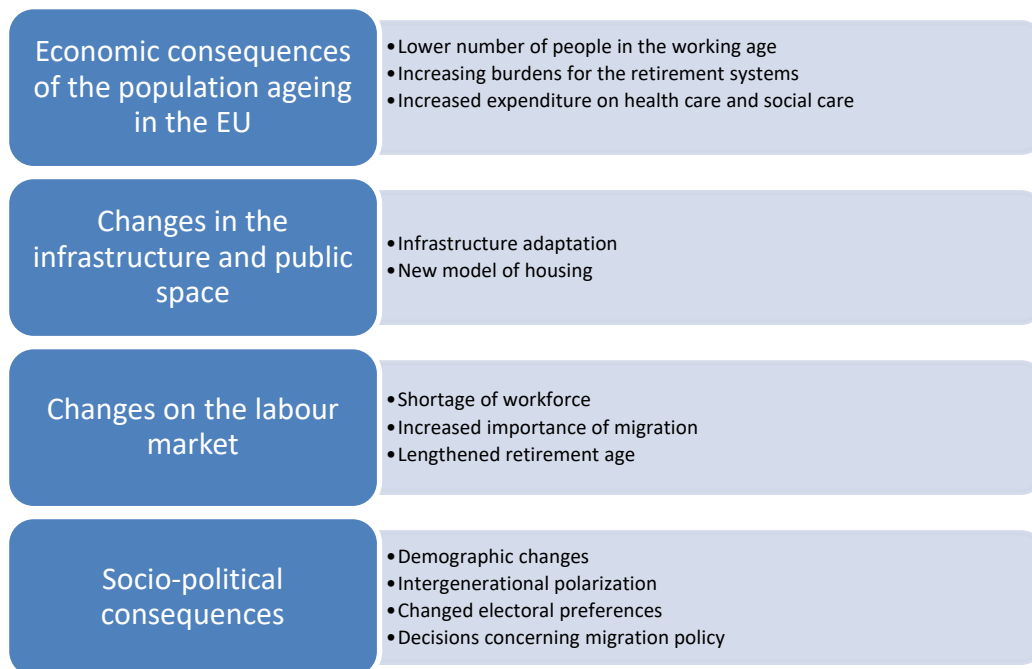
6. Consequences of population ageing for the European Union

The ageing of the European Union societies is the phenomenon with far-reaching consequences, not only of socio-economic but also political character. As was described above, this process is related to a growing percentage of elderly people in the population, which follows from two main trends, namely lengthening of life expectancy and decrease of birth rates (e.g. lifetime fertility, live births, total fertility rate). The key fertility rate is defined as the mean number of children that a woman would give birth to on average throughout her reproductive years (15-49 years of age) with the assumption that in particular phases she would give birth with the intensity observed in a given year. It is assumed that only the fertility rate above 2.10 is the value ensuring simple generation replacement (Statistics Poland 2024a).

Increasingly fewer children have been born in the European Union for years. The lasting low levels of the fertility rate over the years contributed to the ageing of the society while a lower number of births led to a decreased share of young people in the total number of population. The level of the fertility rate in Europe has been decreasing for decades and at present it is twice as low as six decades ago. According to Eurostat, 6.8 million children were born in Europe in 1964, while in 2019 – 4.17 million and in 2022 – 3.88 million. These data show the continuation of a decreasing trend started after 2008, when 4.68 children were born in the EU. The total fertility rate was then 1.46 live births for one woman, while in 2019 it was 1.53 (Eurostat 2024 b).

The second key element, besides the fertility rate, which has influence on the process of population ageing in the European Union is increasingly longer life expectancy of an average inhabitant of Europe. In 2020 the means for the whole European Union was 80.4 years of age. An average male citizen of the EU lives 77.5 years, and a female citizen 83.2 years, with the difference between men and women being 5.7 years. The consequences of a drop in the number of births are felt on the market with an obvious delay (about 18-25 years), whereas the consequences of the record speed of the population ageing strike the European economies much earlier (Eurostat 2023 b).

Diagram 2: Consequences of the ageing of the European Union societies

Economic consequences of the population ageing in the EU	• Lower number of people in the working age • Increasing burdens for the retirement systems • Increased expenditure on health care and social care
Changes in the infrastructure and public space	• Infrastructure adaptation • New model of housing
Changes on the labour market	• Shortage of workforce • Increased importance of migration • Lengthened retirement age
Socio-political consequences	• Demographic changes • Intergenerational polarization • Changed electoral preferences • Decisions concerning migration policy

Source: Author's own analysis based on the literature of the subject

Ageing of the society in the countries of the European Union brings far-reaching changes both on the labour market, in social structures and in the sphere of political and infrastructural policies. An increase in the number of elderly people in the population requires adequate reactions on the level of public policies as well as a change in the functioning of different sectors of economy. The list presented above and concerning the consequences of the ageing process in European societies is not finished or exhausted; however, it refers to the basic problems that the Union has to face already now.

One of the most direct effects of the population ageing is a shortage of workforce, especially in the sectors requiring physical work. A shortage of young workers places challenges before employees, who will be forced to adjust the structures of employment. Responding to these changes, companies will have to increase work efficiency through automation and robotization of the production processes, which will decrease dependence on physical labour (Statistics Poland 2024b). In order to supplement staff shortages, the European Union may intensify migration policies by opening itself up to a greater number of younger immigrants. The EU countries will be forced to pursue a more liberal policy towards migration, will make it possible to fill the gap of the labour market. However, this can lead to challenges connected with the integration of migrants. At the same time, a lot of countries are considering lengthening the retirement age with the aim to decrease the

pressure on the retirement systems and keep a greater number of people in the working age on the labour market. Thanks to this, the problem of a lack of the workforce might be alleviated (OECD 2021).

Population ageing also affects demographic changes such as increase in the average age of the population and a greater share of older people. This changes social priorities by increasing the demand for services aimed at the elderly such as health care and social care (Adamczyk 2021). A rise of the number of elderly people can also lead to intergenerational polarization. Tensions might follow from an unequal division of public resources, especially retirement benefits and health benefits, which might give rise to frustration of younger generations, which will feel greater burdens because of the necessity to support older people (Henry et al. 2024).

The ageing of societies does not only influence their economies. By increasing the share of people older than 65 in the total population, this process will also affect electoral preferences. Older voters might have other political priorities compared to the younger generations, which will result in shifting the political agenda towards the issues connected with health care, pensions and financial stability. Political parties will have to adjust their programs to meet the expectations of the growing electorate in retirement age. Additionally, decisions concerning migration policy will increase in importance. The EU countries can be more willing to accept immigrants in order to mitigate the consequences of the population ageing. However, such activities might lead to political controversies, especially in the context of the growing fears concerning integration of migrants (Adamczyk, Sakson, Trosiak (2019).

In the face of the ageing of society it will be necessary to adjust the infrastructure of cities and smaller localities to the needs of elderly people (Szatur-Jaworska, Błedowski 2017). Adaptation of infrastructure means, among other things, the development of solutions adjusted to people with limited mobility, such as installation of lifts, widening of pavements or improvement of public transport. Investment in health infrastructure and social infrastructure will also be necessary to satisfy the growing needs connected with caring for elderly people. Demographic changes will also enforce the development of new models of housing which will be adapted to the needs of the elderly. Protected apartments, senior housing estates and nursing homes, which will enable good and comfortable life in old age, will enjoy increasing interest (Jarzebski, Elmqvist, Gasparatos et al. 2021).

7. Conclusions — Europe's demographic challenges

1. The Dynamics of Population Ageing

Population ageing is one of the key demographic challenges of the European Union. In 2020, individuals aged 65 and over will account for 20.6% of the EU population, and 18.2% in Poland. Over the decade, Poland saw a 4.6 percentage point increase in this age group, making it one of the fastest ageing societies in the Union (Eurostat, 2025). The highest proportion of seniors in 2020 is recorded in Italy (23.2%), Greece and Finland (22.3% each), and the lowest in Ireland (14.4%) and Luxembourg (14.5%). Demographic projections show a further increase in this process. It is estimated that by 2080, people aged 65+ will account for 32.3% of the population in Poland and seniors aged 80+ will account for 14.9%. Similar trends are observed across the EU, with an increased burden on pension, health and social care systems (Eurostat, 2023).

2. The Challenges of Long-Term Care

The increasing proportion of seniors is exerting pressure on the long-term care system, the funding of which remains inadequate in many countries. Poland allocates less than 0.5 per cent of GDP for this purpose, one of the lowest rates among OECD countries (OECD, 2023). In 2019, 37.2% of the elderly received cash benefits and 431 thousand people received institutional residential care. Home-based care services were provided to 572 thousand seniors (Statistics Poland, 2021). The European Commission forecasts that, by 2070, total public spending on health care, long-term care and the pension system could rise to 26.7% of GDP, posing a major fiscal challenge for Member States (European Commission, 2018). In response to these changes, comprehensive reforms need to be implemented, including the development of care services, support for family carers and the digitalisation and automation of health services.

3. Declining Fertility Rates and Their Consequences

Europe is experiencing record-low birth rates. In 2023, 3.67 million children were born in the EU — the fewest since comparable statistics began in 1961. The average fertility rate was 1.38, with a replacement level of 2.1 (Eurostat, 2025). In Poland, the fertility rate increased from 1.29 to 1.419 between 2015 and 2019, but began to decline again in 2020, reaching 1.38 in 2023 (Statistics Poland). In response to these trends, European countries are implementing pronatalist policies including tax credits, cash benefits and the development of childcare facilities. France, thanks to its extensive family support system, has achieved one of the highest fertility rates in Europe (OECD, 2023).
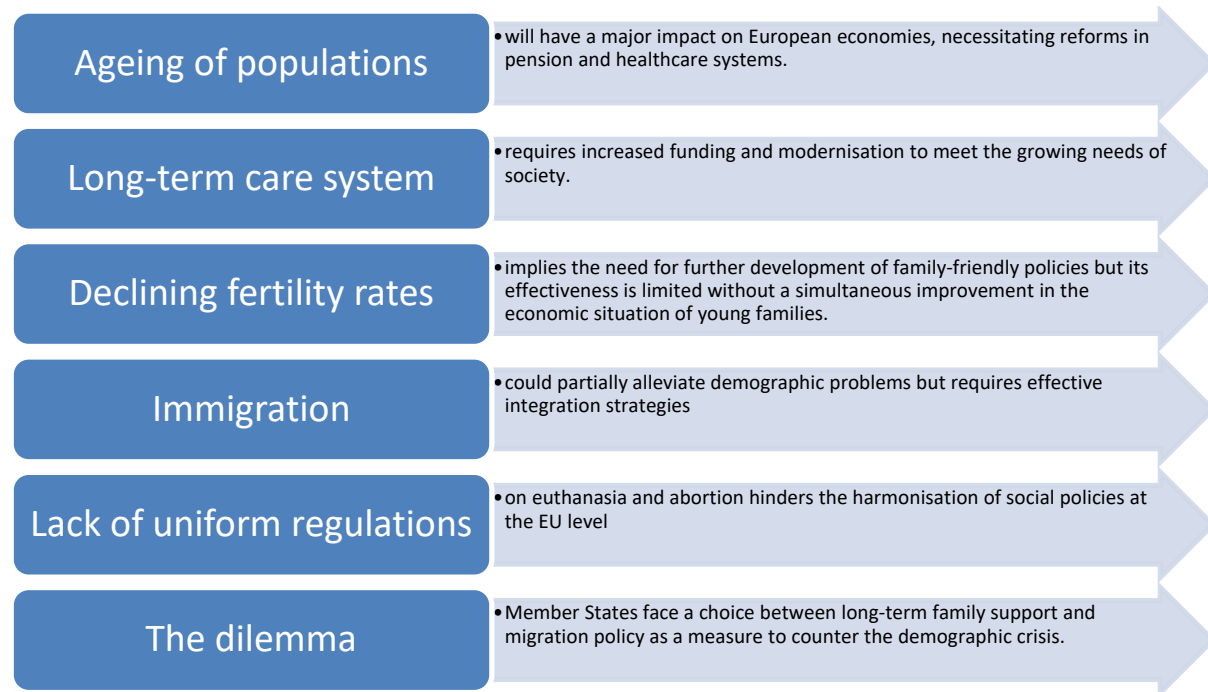
4. Social Policy: Family Support vs. Integration of Migrants

European countries face a dilemma regarding the priority direction of demographic policy — increasing fertility rates or integrating migrants as a response to ageing populations. The average expenditure of EU countries on family benefits is 8.3% of the total expenditure on social protection, while in Poland this figure is 15%, which ranks first in the EU (Eurostat, 2024). At the same time, EU countries incur significant expenditure on the integration of migrants, covering education, labour market and social support. Germany allocates significant resources to this purpose — for example through the Hertie Foundation, which has an annual budget of €800 million for migrant integration (European Commission, 2023). In Poland, integration activities include language courses, vocational training and assistance in social adaptation, but their scale is smaller than in Western European countries. An optimal demographic strategy requires a balanced approach — both intensification of family-friendly policies and effective integration of migrants, which can contribute to mitigating deficits in the labour market and support the sustainability of the social security system.

5. Social Policy Divergences — Ethical and Legal Issues

Differences in social policies between the EU countries result, among other things, from different regulations on assisted dying and abortion. Euthanasia and assisted suicide are legal in Austria, Belgium, Luxembourg, the Netherlands, Spain and Switzerland. In countries that have legalised these procedures, the number of people opting for this solution is increasing. Similar disparities exist regarding access to abortion, which is legal in Belgium, France, Germany, the Netherlands, Spain and Sweden, among others. In Poland, the right to abortion was significantly curtailed following a Constitutional Court ruling in 2020, and work is currently underway to liberalise the law (Amnesty International, 2024). At the EU level, the European Parliament in 2024 adopted a resolution calling for the right to abortion to be enshrined in the EU Charter of Fundamental Rights (European Parliament, 2024).

Figure: EU demographic challenges: key dilemmas and strategies

Ageing of populations	• will have a major impact on European economies, necessitating reforms in pension and healthcare systems.
Long-term care system	• requires increased funding and modernisation to meet the growing needs of society.
Declining fertility rates	• implies the need for further development of family-friendly policies but its effectiveness is limited without a simultaneous improvement in the economic situation of young families.
Immigration	• could partially alleviate demographic problems but requires effective integration strategies
Lack of uniform regulations	• on euthanasia and abortion hinders the harmonisation of social policies at the EU level
The dilemma	• Member States face a choice between long-term family support and migration policy as a measure to counter the demographic crisis.

Source: Author's compilation.

The strategic decisions taken in the coming decades will determine Europe's social and economic stability. In order to meet the demographic challenges, new legal and policy instruments need to be developed at national and EU level. Key areas for reform are:

- **Labour market** — extending the working age and liberalising migration policies in response to labour shortages.
- **Pension systems and healthcare** – adapting financing structures and the organisation of long-term care to the growing number of seniors.
- **Social policy** – promoting active ageing and integrating seniors into social and economic life.

Demographic pressures will increase as the baby boom generation retires and lives continue to lengthen. Demographic projections highlight the need for long-term planning and better coordination of social and economic policies in the EU. Responding appropriately to these changes requires both national reforms and the strengthening of EU cooperation in social security, employment and the sustainability of public finances.

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THE ROLE OF SOCIAL NETWORKS IN THE CREATION OF DEMOCRATIC OPINION

ABSTRACT: *The importance of "virtual" publics is growing in the age of the ubiquitous Internet. This is a new space for democratic debate, and it provides new channels for content dissemination for all actors. It also applies to the "average citizen," who, regardless of time or place, has the ability to influence public opinion formation at the micro level through social networks and the personal public sphere. As a result, social networks create a virtual space in which individuals can grow socially and communicatively, as well as participate in democratic opinion formation. However, there are risks associated with such a broad range of potential. In addition to government intervention, measures taken by social network providers ("platform operators") can limit an individual's freedom of communication. The following article is intended to provide a look on the Internet's new structural change in the public sphere and social networks. Therefore, the issue of whether and to what extent a platform operator may enforce communication standards in "his" social network in a democratic social order is addressed. The article concludes with a summary of the viewpoints supported by the arguments presented in the previous parts of the paper.*

KEYWORDS: democratic opinion; platform operators; social networks.

1. Introduction

In a digital society, social networks are among the most important communication channels. Every day, over a billion people exchange information through platforms like Facebook, Google and X/Twitter (Funta, 2019). Communication is becoming more prevalent within the (partially) public spheres of social networks. Social networks create a virtual space in which individuals can grow socially and communicatively, as well as participate in democratic opinion formation. As a result, it is easy to view the platforms as one of the many advantages of digitization. However, the diverse potential also carries concerns. In addition to government interference, such as the temporary blockage of platforms in Turkey (restriction of X/Twitter after the prime minister slams the social media site) or Iraq (restriction of Facebook and X/Twitter in an effort to contain Isis), measures imposed by social network providers ("platform operators") can limit users' freedom of communication. In view of the importance of social networks in the digitalised world, this practice appears questionable and inevitably raises the question of whether, in a democratic society, a private, mostly profit-

oriented operator of social networks can act as a guardian of the limits of freedom of expression on its platform. On the other hand, the operator does not see himself as a "censor" who watches over the "proper" exercise of freedom of expression of his users, but as a provider of a platform that is intended to serve the individual for free social and communicative development (Sfetcu, 2024). A closer look reveals a differentiated picture. From the perspective of a platform operator, the establishment of communication rules ("communication standards") is by no means an end in itself, but rather an attempt to balance the diverse interests of different stakeholders by establishing certain rules and thereby ensure a certain degree of coexistence within the respective social network. In doing so, the platform operator is faced with the task to balance the interests of different stakeholders from different cultures in an offer that is mostly aimed at a global market. Until CJEU joined decision in the LF v Google LLC, YouTube & Ors (C-682/18) and Elsevier v Cyando (C-683/18) it has not been clear whether and to what extent the platform operator can be held liable for the content of its users. Here, the CJEU decided that an online platform cannot rely on the e-Commerce Directive's article 14 exemption from liability if it sends a "communication to the public." Online platforms can only be held liable if they act with "full knowledge" that their services are being used to distribute illegal content. When a platform legitimately and successfully takes action to prevent such violations, such putting in place the proper technological safeguards, it does not have "full knowledge."

2. Objective and methodology

The ongoing process of democratic opinion formation is a critical component of democracy (Ondria, Šimoňák, 2011). Thus, our article is structured around the hypothesis that platform operators have the capacity to standardize and enforce communication standards, within the constraints of democratic legitimacy and commercial interests. We attempted to investigate whether the platform operator - the democratically legitimate state or the primarily commercially focused platform operator - is allowed to self-standardize and enforce communication rules, as well as how much of the user's guaranteed freedom of communication can be taken away, and how may these guarantees be revoked in a way that still serves the platform operator's interests? The research is exploratory and analytical in nature, seeking to understand the dynamics between freedom of communication, platform regulations, and democratic principles. We conducted an extensive review of scientific literature, focusing on existing theories and studies related to platform regulation, democratic communication standards, and the role of social media in the public sphere. We used an analytical approach to investigate the structural changes brought about by the internet and social networks in the public sphere. The synthesis method allowed us to combine information from various sources into a cohesive

understanding. By integrating data from literature amd case law we created a comprehensive view of the regulatory landscape and its implications for platform operators. We applied critical analysis to review the legal and regulatory situation, identifying gaps and inconsistencies in the current frameworks. This helped us understand the challenges faced by platform operators and the potential impact on user communication freedoms. The comparative method was used to analyze different perspectives on the role of social networks in shaping democratic opinion. These methods enabled us to thoroughly explore the research questions and provide a detailed examination of the hypothesis.

3. Social networks in the process of democratic opinion formation

The constant intellectual confrontation between encountering social forces, interests, and ideas clarifies and transforms political goals that shape public opinion and form political will (Bakkar, Ögcem 2019). The formation of opinion that is free, open, and unregulated is a direct expression of sovereignty and gives every citizen a permanent influence on democratic decision-making even when elections are not held. Freedom of speech or expression, as well as the right to information, are fundamental political rights and an important pillar of a democratic society. They are the expression of the right to freely express and disseminate one's own opinion in a variety of ways (i.e. the right to freedom of expression), as well as the right to freely seek, receive and disseminate information regardless of national borders (i.e. the right to information) (Kováčová, 2018). The primary source of democratic opinion formation is the public spheres, which have various contours. This is where the various social elements collide, exchange positions, and compete for common ground. The importance of "virtual" publics is growing in the age of the ubiquitous Internet. They are a new space for democratic debate and provide new channels for the dissemination of content to all actors in the opinion market. This also applies to the average citizen, who, regardless of time or place, has the ability to influence public opinion formation at the micro level via social networks and the personal public sphere that exists within them.

4. New public-sector structural changes

In addition to being tools, new technologies are a topic of political discussion. A cultural-historical new structural change in the public sphere began with the spread of the Internet and its further development into Web 2.0, against the backdrop of a democratic public sphere shaped by mass media (Berg, Hofmann,

2021). A network publicity emerged, which has provided new opportunities for every citizen to participate in the democratic decision-making process. This shift in the public sphere will be outlined below, along with any side effects such as the digital divide and any signs of convergence.

The democratic public sphere is a complex structure comprised of various interconnected public sphere components (Machowicz, 2022). The mass media public, in addition to presence publics created by parties and social interest groups, is particularly important. Media in democratic societies always possess sufficient capacity to persuade the public about priorities and to focus attention on selected issues, phenomena, and events. In doing so, they at least guide public policy actors, individuals, and groups toward what is considered socially important (Kováčová, N., Králik, 2017). Overall, few have the privilege and capacity to influence the public realm via the mass media. The freedom of the press is the freedom of several wealthy people to express themselves (Kováčik, 2012). The "average" citizen, on the other hand, is largely excluded from active participation and is limited to a passive consumer attitude. To participate in the process of democratic opinion formation, it is necessary to organize in parties and interest groups, as well as shape public opinion about actions in public space, particularly through meetings, information stands, and leaflet distribution (Hale, John, Margetts, Yasseri, 2018). The Internet and its transformation into Web 2.0 have caused yet another noticeable structural change in the democratic public (Buttler, Schultz. 2023). Since then, a new public sphere has been formed on the "virtual" Internet platform, which allows any Internet user to post their own topics, content, and opinions, regardless of time, place, national borders, educational level, or ownership, to spread to a large audience in order to influence the democratic opinion (Fedushko, Mastykash, Syerov, Peráček, 2020). This is accompanied by a softening of the long-held mass media information and opinion-forming monopoly, as well as a widening of the mass media information and opinion-forming monopoly (Saliu, 2022). This groundbreaking development, associated with the emergence of the "www public", was once again spurred on by the participatory, cooperative and interactive elements of Web 2.0. The introduction of Web 2.0 formats triggered a kind of journalistic unleashing, particularly among a broadcast-conscious group of Internet users. In addition to the rapid growth of media content on platforms such as YouTube, a diverse range of blogs emerged in a short period of time, which increasingly addressed current events in society, politics, business, science, sport, and culture. A new type of amateur or citizen journalism emerged, resulting in timely and high-quality offers. In terms of content, many of the new "amateur journalists" focused their blogs on personal experiences or niche topics. Overall, the online public is extremely diverse in terms of the actors involved, the topics addressed, and the variety of offers. To some extent, the flood of information that has come on the Internet, which individual Internet users find difficult to penetrate, is the other side of the coin of the wide range of information offers (Gregušová, Dulak, Chlipala, Susko, 2005). Aside from professional journalistic offerings, only a few contents reach a large audience. On the other hand,

a large portion of the offers are only seen by a small group of people. However, because of the Internet's extraordinary permeability, certain content can quickly reach a large audience. If, for example, content is "clicked" by a large number of Internet users and shared via social networks, the content in question can spread like a highly infectious virus due to the Internet's network-like linked structure and reach a large network public in an instant. The algorithms of information intermediaries such as search engines and social networks amplify this effect. Because these give priority to frequently clicked content, so that other groups are primarily informed of this content and can in turn act as a multiplier. If the level of interest exceeds a critical mass, the content may even reach the general public through the mass media. As "gate watchers," the news media monitors the topics and developments on the internet (Jakab, Könczöl, Menyhárd, Sulyok, 2021). They then select relevant content and streams of opinion from this and prepare them for the general public in the mass media public. Following a media report about an allegedly sexist statement made by a top politician, the topic of "sexism in society" made its way into the mass media public through the active participation of the network community, resulting in a public debate about sexism. This example is one of many that demonstrate how quickly and decisively opinions and topics spread through social networks can influence public opinion formation. Individuals will not be able to set the agenda of the (network) public or even the mass media public on a permanent basis due to the vast number of websites and the limited capacity to receive information from the (network) public. Rather, every content provider is constantly competing for perception and resonance. Despite all of the criticism leveled at the debate culture in social networks, it should be emphasized that the opportunities for participation made available by the Internet and social media represent a tremendous benefit to the democratic social order. Every citizen has the opportunity to express his or her opinion unfiltered to a large number of people, thereby influencing the democratic opinion-forming process in his or her favor (Gayo-Avello, 2015).

The online public is by no means purely made up of users influenced by content generated by individual users or even a public that crowds out the mass media public, but a product of professional-journalistic and user-generated content, which are connected to each other on different communication levels. In addition, it should be considered that the traditional media companies have a certain "perception or reputation advantage" that is also transferred to their broad-based network formats. This is precisely what strengthens their key position as gatekeepers and agenda-setters, since both blogs and other media formats use the content of traditional media providers as a source or starting point for their content. The same can also be stated for the discussions in social networks, which are often based on the content prepared by the mass media. Unlike before, however, users do not remain in their passive-consuming attitude but can actively deal with the content and enter into an open discourse with the author or with other Internet users.

5. The public internet as a result of the digital divide

The Internet and the various Web 2.0 offerings are technologies whose functions and potential have not yet penetrated society as a whole. The democratic formation of opinion in the Internet public is also influenced by society's shared participation on the Internet in general, and in social networks in particular. For the time being, large parts of society are avoiding online advertising. In this regard, online publicity, including social media, has so far only represented a subset of the population. This not only jeopardizes the plurality of topics, ideas and opinions brought forward, but can also lead to a distorted focus, a narrowing of the range of opinions or a disproportionate perception of certain content, including extremist content. All of the potential dangers arising from this should not be overestimated, however, since the broad impact of professional journalistic offers on the Internet in particular should counteract a narrowing of the view. One of the most visible structural changes associated with the Internet is described with the term of "convergence". This involves several, quite complex phenomena, which are presented below as convergence of technology (a), convergence of offers (b) and convergence in user behavior (c), in line with the differentiation that is common in scientific discourse. In addition, the convergence in social networks is examined as well (d).

a) technology convergence

The phenomenon of "technology convergence" is rooted in the information technology process of digitization. Data, whether image, sound, text, or video, is transmitted as a uniform binary code and transformed into the appropriate output format. As a result, regardless of the hosting service, all content can be transmitted using the same transmission networks (radio, television, telephone, Internet). Unlike in the past, radio, television, and telephone cannot be distinguished based on transmission infrastructure because all services can be delivered via the same digital networks. In addition to this "convergence of transmission paths," there is also a "convergence of end devices." (Šramel, Horváth, 2021) Smartphones and tablets, which easily enable telephone, television, radio, and the consumption of press-like Internet offerings via an output device, can be used to illustrate this point.

b) convergence of offers

The "technology convergence" encouraged the "convergence of offers." Because a large portion of the content is processed in a combination of texts, images, videos, or audios, the exact contours between traditional print providers' and broadcasters' offers are becoming increasingly blurred, particularly on the Internet as a multimedia platform (Funta, 2019).

c) convergence of use

The convergence of use considers the effects of convergence from the user's point of view and

describes a development that works in tandem with the convergence of end devices and the convergence of offers, allowing the consuming Internet user to query all multimedia services without having to choose or switch between media. Given the recent but very successful history of smartphones and tablets, as well as the widespread use of converged services, the previously only assumed convergence of use now appears to be increasingly coming true.

d) convergence and social networks

Social networks are convergent services that can be used on a number of devices from a technology standpoint (PC, tablet, smartphone). Social networks also serve as a platform for convergent services that enable the interchange of any type of content, including text, images, and videos. Additionally, the example of social networks can be used to illustrate the convergence, or to put it more figuratively, the blurring of the precise contours of individual and mass communication. Users within social networks can also transmit information, which is different from the previously known modes of individual and mass communication. Until recently, these new modes of communication were virtually impossible, but they are now causing more and more difficulties for the conventional categorisation.

6. Social networks in the changing public sphere

Social networks play an important role in today's changing public. They are havens for newly formed "personal publics" and, not least, a centre for virtual gatherings due to their widespread use. The various functions of social networks provide users with a variety of communication channels and spaces for discourse, which can eventually be significant as a site for virtual protest marches. However, as with any innovation, social networks can be abused to cause harm to others (Benton, Schmidt, 2024). The platforms are not only a place for critical discursive debate, but also a platform for spreading false reports and hatred, as well as extremist and terrorist content.

7. "Personal public" as a new element of the democratic public

Social networks are communication platforms that allow users to communicate not only privately via chat, but also within a personal public. This qualitatively new (partial) public is primarily composed of the user's circle of contacts, but it varies depending on a variety of factors, including the user's contact management (contact policy, list grouping, etc.), the adjustment of privacy settings (public access), the communication

function used (commenting, sharing), the platform algorithm, or the settings of potential addressees (blocking of certain contacts). (Šmejkal, 2019) In a nutshell, the "personal public" is a (partially) public sphere that has been pre-contoured by the user's contact management and fine-tuned by the platform operator's "code." The exchange via the news feed is an example of communication in a "personal public." In contrast, communication via chats and within closed or secret groups, where the communicated content is only accessible to the members of the respective group, is usually just private communication. Within the personal public, users can communicate by, among other things, writing posts or commenting, sharing, and liking third-party actions. Every action taken by a user is linked to his profile and displayed in the news feed of the confirmed contacts based on the (privacy) settings. They can then comment, share, or like the action again. Because this action is linked to the respondent's profile, content rarely remains in the communicator's personal public sphere, but rather spreads out into different personal public spheres. This functional link is the reason why content spreads "virally" on social networks: if user A comments on a post, the post is no longer only in A's personal public, but also visible to B. If C likes this post, the range expands to C's personal public, and so on. With each action, another member of the general public is "infected." Because of this functional link, a post within social networks that is promoted by the algorithm can reach a large number of addressees in a very short period of time. A constant role change of the user between communicator and recipient, similar to other Internet formats, is also typical for communication in the personal public sphere. When communicating in the personal public sphere, the traditionally drawn boundaries between individual and mass communication are blurred even more than with other Internet offerings. It appears as if a new, hybrid form of communication has crystallized, containing elements of both individual and mass communication but differing from communication in the purely private environment and communication in the mass media public. Users typically address their more or less large social environment, rather than a small, selected private circle or a completely anonymous and unspecific audience. The possibilities for communication in the "personal public" expand every citizen's ability to participate in the process of democratic opinion formation (Sitek, 2017). Away from the constraints of space, time, and personnel, each individual can now sensitize their personal public to specific topics, promote their positions, or simply question other content, regardless of time, place, education, or economic prosperity. The range of individual content can be far greater through the network-like linking of countless personal public spheres and the associated exchange between the personal public spheres, even to the point of viral infection of the network and reception by the mass media. A look at the numerous freedom movements in recent years in the world demonstrates the potential to promote or preserve democracy inherent in these seemingly banal statements (Smuk, 2014). Every citizen can use social media to publish content that expresses freedom or to spread images of allegedly disproportionate state power. It is no longer necessary to rely on the mass media, which is frequently easier for the government to monitor (Tucker, Theocharis, Roberts,

Barberá, 2017). Rather, every citizen is free to report on demonstrations, reveal their own ideas, or act as a filter and multiplier.

8. Social networks as a center of communicative gathering

Social networks serve as a digital meeting place. The importance of platforms is demonstrated not least by the increased activity of all players in the opinion market over the years. Governments, mass media, associations, and businesses have long been active in social networks because a large portion of the population communicates there (Klein, Šebesta, 2024). Thus, in the digital age, social networks have evolved into an important communication forum where citizens and social interest groups can meet and communicate with one another. They play an important role not only in the individual's communicative development, but also in democratic opinion formation. The central position of social networks is further strengthened by versatile interlocking between the platforms and the other offers on the web. Because social networks are not only the central platform for the exchange of web content, but also – beyond their own platform – a large number of components of third-party websites. Examples of this are the "Like" and "Share" buttons or the "Comment field", which are already widespread on the web. Such "social plugins" are regularly provided free of charge by the platform operators and can be easily integrated into their own websites and thus linked to the social network. For example, if a user clicks on the "Like" button embedded in a third-party website, the third-party website and the "Like" action are displayed as a new status message in the news feed of the confirmed contacts. Opinion formation within social network (sub-)publics is not isolated or even limited to the platform. Rather, the topics, content, and positions discussed find their way into the next stage of democratic opinion formation through the users. Politicians, for example, use social media to not only express their views on specific issues, but also to solicit feedback from interested citizens. The media not only distributes their own content through social networks, but they also act as gatekeepers, observing dynamic discussion processes and drawing conclusions about the relevance of topics. How lively the exchange between the (partial) publics of social networks and the other (partial) publics of the democratic public is also shown by the use of social networks at meetings. The enormous importance of social networks in democratic public and opinion formation is also reflected in the way restrictive states treat their operators (Kovalenko, 2022).

9. Communication channels and discourse spaces in social networks

Social networks serve as central information intermediaries for the internet public, connecting information supply and demand through a variety of mechanisms. The news feed, the (fan) profile, and social search are the primary intermediary functions. These provide users with important distribution and information channels to the online public, as well as versatile "virtual" spaces for discourse, which is why social networks can be viewed as a type of "communication apparatus".

a) The news feed

In the centre of the home page of many social networks, the user is presented with a backwards chronological "news overview". This "news feed" is a summary of the most recent events from the personal public, which is increasingly peppered with advertising. However, due to the large amount of information this news overview also necessitates a decision. Depending on the platform, the user is given "manual" selection options (e.g. blocking or highlighting certain profiles). Furthermore, the platform's algorithm performs a significant portion of the selection automatically. On Facebook, this is done by the so-called EdgeRank algorithm, which selects based on the factors of topicality, affinity, and weighting (Peráček, 2022). Individual criteria and their relationships to one another, on the other hand, are largely hidden and differ from other social networks. The newsfeed, from the standpoint of a communicator, is an important distribution channel through which the one can convey his own content, opinions, or offers to the public. To achieve the best possible perception, the time and duration of the display, as well as the placement within the news feed, are all important, in addition to reaching as many users as possible. Because the display is controlled centrally by the platform operator's algorithm, the communicator can usually only have a minor influence on all of this. The news feed, on the other hand, is a new type of information channel that provides the receiving user with an up-to-date overview of the events, topics, and opinions that are considered relevant in their personal public. In addition to this intermediary service, interactive elements such as the comment field or the share and like button encourage users in the personal public to engage in direct follow-up communication (Sararu, 2019). In this regard, the news overview creates a virtual discourse space in which users can exchange information about their topics and points of view.

b) Profile or fan page

Every user has its own profile page where it can present themselves to the personal public or the entire online public. Platform providers provide a variety of versatile functions for the individual design of your own profile page for this purpose. In addition to personal profiles reserved for non-commercial natural persons,

companies, organizations, or public figures can maintain a "fan page." Away from their own website, this user group has a channel within social networks through which they can present themselves to their own target group in a "more personal" setting. The supposedly familiar environment in particular makes it possible to address the addressees directly, far removed from the anonymity of the Internet. However, the personal profile and the fan page are much more than a simple platform for self-portrayal. They enable the interested public to access an information page that is maintained by the respective user himself and is therefore authentic. In addition, by "following" a profile or a fan page, users can be continuously informed about current developments and activities of the profile owner on their news overview. Depending on the perspective, the profile or the fan page is an important distribution channel or a meaningful source of information. Depending on the (privacy) settings of the profile owner, users can make a (partially) public statement in the form of posts, likes or comments on the fan page.

c) Social Search

"Social Search" is a search function. Unlike the previously established search engines, the search algorithm when answering the search query is not based on a presumed relevance based on general or user-specific criteria, but also includes the content, recommendations and ratings of network contacts in addition to user interests. The hit list is thus significantly influenced by the social environment of the user.

10. Social networks as a platform for virtual protest marches and socially harmful statements

Social networks have established themselves as a significant communicative center in the changed democratic public. Given the widespread usage, particularly among the younger generation, and the growing familiarity with the various functions, this position is likely to become more permanent in the future. However, the opportunities for greater individual participation in the process of democratic opinion formation are accompanied by risks. The following sections will concentrate on addressing the risks to a more open and undistorted democratic opinion-forming process that can arise from the establishment of communication standards, the design of codes, and the ubiquitous data collection.

The phenomenon of the so-called "private-public space" is a problem area that has been known to legal science and practice for decades and is highly controversial in terms of legal policy. This means cases in which a private legal entity is the owner of a space that has been opened up to the general public and is therefore "public". In this respect, private shopping centers or marketplaces are prime examples. These are basically freely accessible to everyone and therefore sometimes develop into the central meeting place.

Individuals meet so that an open network of communication similar to the public street space is created. As a place of general communication, they can also gain importance as centers for democratic opinion-forming. This has the potential for conflict, as evidenced by the legal-historical case Marsh v. Alabama (Marsh v. Alabama - 1946) decided by the United States Supreme Court. In this instance, the private owner of a business settlement prohibited an activist from distributing religious literature in "his" public street space. This implicitly raised the question of whether and to what extent the private owner of a generally accessible space may restrict the exercise of freedom of communication in these "private-public spheres". Far away from the physical space, a large number of private-public spaces have also developed in the virtual spheres of the World Wide Web, albeit still largely unnoticed by jurisprudence ("asleep"). This means all those privately operated web offerings that are basically made available to every internet user and enable them to engage in a (partially) public exchange. In addition to internet forums and media share platforms such as YouTube, social networks can also be cited as examples of this. However, the latter should be of particular importance due to the high level of user activity and the opportunity for social development. Although the "virtual" private-public spaces that comprise a social network differ from the physical public spaces, certain similarities can be identified. For example, on the "virtual" meeting place "Newsfeed," different users and user groups can meet at random and publicly discuss (partially) the content of a "shared" (media) post or the photo of one mutual friend.

11. Potential risks in the changing public sphere

In the changing democratic public sphere, social networks have established themselves as an important communicative center. Given their high prevalence, especially among the younger generation, and increasing habituation with their diverse functions, this position is likely to continue to consolidate in the future. However, the opportunities this offers, including greater participation by individuals in the process of democratic opinion-forming, are associated with risks. In practice we no longer only identifies the state or content providers as a source of danger for a free market of opinion, but also the operators of search engines and other "gatekeepers" such as social networks. The latter in particular are increasingly under observation. Aside from the debates about how to deal with hate speech and fake news, the most popular platform operator Facebook, for example, was confronted with the suspicion that some Facebook editors on the "Trending Topic Team" deliberately influenced the "Trending Topics" to the detriment of conservatives - during the US primary campaign (Vaidhyanathan, 2018). Although Facebook founder Marc Zuckerberg immediately rejected this accusation and Facebook later changed its practice, this example clearly shows the way in which social networks can influence democratic opinion-forming.

In practice, all operators of major social networks have codified communication standards for their platform. The "private-public space" of social networks is therefore by no means a "lawless" space in which information and opinions can be exchanged without restrictions. However, the establishment of communication standards takes place in a conflict-prone area of tension in which the sometimes conflicting interests of platform operators, users and nation states come together (Woosub, Seong-Gyu, Beom Jun, 2022). Here are some examples. First, after a critical, or at least insensitive, comment by the US film critic Roger Ebert on the occasion of Ryan Dunn's death, Facebook temporarily blocked his profile due to numerous negative feedback on the alleged misconduct. In 2011, a post by Ebert was also blocked due to alleged "abusive content", although the post only contained information and pictures after his thyroid surgery. Second, the organizers of a meeting against the US surveillance program "PRISM" created a Facebook event page to draw the attention of broad population to the event and thus achieve the greatest possible mobilization. A few days before the planned meeting, the organizer had to identify himself separately on Facebook. He then received a notice that the page in question had been deleted for violating Facebook's principles. Third, in the run-up to the Turkish local elections in 2014, a number of government-critical profiles published telephone recordings of Turkish Prime Minister Recep Tayyip Erdoğan, which were intended to expose him to accusations of corruption. After the platform operator X/Twitter had previously refused to "cooperate" with the Turkish authorities, the Turkish government blocked the service in the middle of the election campaign. This was later overturned by the Turkish Constitutional Court. X/Twitter later blocked government-critical profiles within Turkey, including that of RedHack with more than 750.000 followers. Because the blocking was only carried out as a "local take down", it can be assumed that X/Twitter did not view this as a violation of its own terms of use, as otherwise they would have removed the content or profile entirely. In this respect, it can be assumed that the blocking was carried out on the instructions of Turkish government authorities.

12. Public internet communication channels managed by private providers

The Internet offers every Internet user free access to information of any interest and opens up various publication channels. The resulting dependency can endanger the free communicative development of the individual and his or her participation in the process of democratic opinion-forming (Sawicka, 2019). The flood of information is not only problematic for the publishing internet user. From the point of view of the recipients, too, the benefit of the mass of offers can at best be assessed as ambivalent. The flood of information, which is difficult to cope with, promotes the feeling of being overwhelmed and at the same time increases dependence on information intermediaries. These services have a key position in the online public sphere by

combining the enormous information supply with the corresponding information demand. Depending on the respective service, the core activity is the independent or user-based finding, selecting, structuring and/or presenting of Internet offers. A wide range of intermediary services can be found on the Internet. In addition to search engines (Google, Bing, Yahoo), social networks in particular are becoming increasingly important as social filters. Media portals (YouTube), micro-blogging services (X/Twitter) and common web catalogues should also be mentioned. In addition, topic-specific discussion and evaluation portals can become very important in the long tail of the internet public.

However, the lack of state influence should not lead to the conclusion that freedom on the Internet is not guaranteed without limits. On closer inspection, one can see that the freedom on the Internet is most likely a borrowed one. Private organizations decide to a large extent on the architecture of the "space of freedom" of the Internet. They determine the existence, structure, and opportunities for participation in the public and private realms. The web stream recording can help the user or customer understand how data anonymization and non-collection can both ensure privacy on the Internet. The type and scope of freedom that can be exercised are thus largely determined by the design of the specific offer and, as a result, by the will of the respective provider. However, unlike a law, its code operates on a "can" rather than a "should" basis. As a result, individuals have no choice but to comply with the regulations or even to oppose them. Rather, the "code" establishes factual boundaries that individuals cannot overcome. The "freedom" of the Internet is largely defined by the software of the providers, which is built on the physical foundation of the hardware. Computer knowledge is thus required to help shape the Internet by programming own functions on the one hand, and to understand and control the operation of the programs used on the other. However, in a highly specialized society, only a few have these skills, while large part of the population have only rudimentary computer skills. As a result, the average Internet user and citizen is limited to the formats available. From a global standpoint, this "master knowledge" is primarily in the hands of various private companies. Some players are particularly significant due to the breadth of their product offering and the market position they have attained. This is especially true for the five largest US corporations: Apple, Facebook, Google, Amazon, and Microsoft. These characterize elementary computer and internet offers in many segments, sometimes across several levels (server, end device, operating system, browser, website). In many respects, computer science "master knowledge" is concentrated in these companies. This power structure is manifested by the fact that the corresponding source codes are protected as business and trade secrets and, as a result, are largely removed from public control. With regard to social networks, the problem of the "code is law" can be illustrated using the example of the "dislike button" on Facebook, which has not been implemented to date. Because although many users have been calling for the introduction of a "dislike button" for a long time, the only option on the Facebook platform is to position yourself favorably by clicking the "like button" or by

selecting a specific emoticon to express emotion. However, there is no "dislike button" to express a negative attitude. This example illustrates the problem of the "code is law" in social networks in miniature format: the platform operator decides on the options for action available to the user through the design of the "code".

The broad impact of information in social networks, like the search engine hit list, is primarily dependent on the placement of the post inside the news feed. In addition, other factors such as the number of users to whom the content is displayed, the length of time or the point in time are important. All of these variables, as previously stated, are influenced by Facebook's algorithm. The social relevance of the post is decisive for the listing within the news feed, which depends, among other things, on the topicality of the content, the affinity of the user to the communicating profile and the weighting of the post. However, the relationship between these factors and the further functioning of the algorithm are largely secret. The individual factors could certainly be subjected to detailed criticism. For example, the "weight" factor seems to give an advantage to content from already known profile owners, such as members of the public or traditional media outlets. This is precisely how the dominance of some players is strengthened, instead of breaking up the opinion-forming process in favor of smaller providers (Šmejkal, 2021). Since neither the individual user nor the democratic public are aware of "filtered out" content, it is not even possible to estimate the extent of the problem. Although the "accusation of censorship" sometimes brought forward in this respect seems premature, especially if it is raised without further evidence. With the increased importance of the newsfeed as an information and distribution channel, the interest of all those involved in democratic opinion-forming to be represented with their content in a central position in the newsfeed has also grown. In order to guarantee this, there is the possibility on almost all platforms to place advertising in a central place in the newsfeed (Funta, Horváth, 2024). Their effectiveness can be increased by target group-specific advertising. Aside from this fee-based variant, the profile owner can also design content in such a way that the Facebook algorithm displays it in a privileged manner. In this way, the profile owner can generate a high level of affinity through targeted interaction with many different users. In addition, a higher weighting of the post can be achieved, for example, by clicking or liking certain content in a targeted manner. The algorithm-based information filtering of social networks also harbors the risk that individuals through abusive behavior – such as buying clicks and likes or using social bots – will have a broader impact in order to influence or manipulate the democratic opinion-forming process in their favor.

13. Conclusions

In a constantly digitizing society, social networks are critical communication platforms. Thus, social

networks serve as a central location for virtual gatherings, where individuals can develop socially and communicatively and influence the democratic opinion-forming process in their own unique way. Unlike in the early days of the Internet, when content distribution was limited to privileged circles with (access to) basic IT knowledge, anyone can now communicate with an almost infinite number of addressees, regardless of education, financial strength, or social background. The media, which has traditionally served as "gatekeepers" to the public, is no longer required. Rather, any actor in the opinion market, whether a party, a government, or an individual citizen, can communicate content to an unfiltered and borderless audience. As a result, social networks create a virtual sphere that provides new opportunities for personal development and participation in the democratic opinion-formation process. The change in communication culture within society that comes with the use of social networks creates both opportunities and risks for the individual and the democratic social order. In addition to individual users disseminating so-called hate speech or fake news, the algorithm-based information section can, for example, encourage fragmentation of personal perception and the democratic public sphere (Zakharchenko, Peráček, Fedushko, Syerov, Trach, 2021). The question is whether and to what extent a social network operator could infringe on the user's constitutionally guaranteed freedom of communication through self-determined standardized communication standards. Or in another words, can a private, mostly profit-driven operator of a central (opinion) forum regulate the content discussed? In essence, this revealed a fundamental rights conflict between the user's right to free communicative development and participation in the process of democratic opinion formation and the platform operator's right to design "its" social network. Because fundamental rights have an indirect third-party effect and the state has an obligation to protect fundamental rights, resolving the conflict of fundamental rights situation is also relevant in the private-law relationship between platform operator and user. Platform operator must always give the user the opportunity to comment when examining a possible violation. Platform operator is constrained in enforcing communication standards by the requirement to be considerate, the prohibition on contradictory behavior, and the prohibition on discrimination under civil law. An arbitrary and disproportionate enforcement of communication standards is thwarted by the commandment of consideration that flows from the special relationship of loyalty. In addition to providing factual justification for any measures, the platform operator must, in general, choose the means that have the least impact on the user, provided that this is reasonable and sufficient to protect his own interests. As a result, removing a user profile for a single minor violation is not permissible if the platform operator can simply remove the problematic content. Termination may also occur only as a last resort and, in general, only after prior notice. If only a suspicion of a violation exists, the platform operator is generally limited to taking temporary measures such as blocking the user content or profile. After considering the above interim results, it can be stated that the area of tension can be appropriately resolved by applying the applicable law. If the preceding considerations are followed, there is no risk of an excessive

restriction of free expression or even a "power" of the democratic opinion-forming process, neither in the context of contract formation nor during contract implementation or termination. This results in new possibilities for the free communicative development of the individual as well as its participation in the process of democratic opinion-forming. The change in the public sphere not only harbors opportunities, but also dangers. With a focus on social networks, the enforcement of communication standards and the filtering of content by the "code" of the platform operators can be identified as sources of danger. Furthermore, the ubiquitous data processing of the operators of social networks can impair the uninhibited and thus free communicative development of the individual. Aside from that, it's critical to keep in mind that platform operators are working in a highly contentious area of tension when it comes to maintaining communication standards, which requires challenging, perhaps hardly universally acceptable, individual decisions.

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SOCIAL AND POLITICAL UPHEAVALS IN SOCIALIST STATES (THE CASE OF YUGOSLAVIA AND POLAND AT THE TURN OF THE 1960s AND 1970s)

ABSTRACT: *The aim of this article is to compare the socio-political upheavals that occurred in the People's Republic of Poland and the Socialist Federal Republic of Yugoslavia in the late 1960s and early 1970s. This period witnessed events that were to some extent part of the general social unrest which also affected capitalist countries (the student protests of 1968), as well as events that were entirely specific to the countries included in this analysis, such as the post-March anti-intellectual and anti-Semitic campaign in the People's Republic of Poland, the December 1970 workers' protests on the Polish coast, and the so-called 'Croatian Spring' in Yugoslavia. Relying primarily on the comparative method, the authors analyse the influence of systemic factors (the system of government, the ruling elites, reform attempts or failures), social factors (the social structure, the sense of national distinctiveness), and cultural factors (efforts to preserve national culture and language, opposition to actions of the censorship apparatus) on the emergence and progress of events that took place in both countries in the late 1960s and early 1970s. The article also looks at how the governments reacted during these 'upheavals', what methods they adopted to end/suppress them and what political consequences followed.*

KEYWORDS: Croatian spring; students; 1968; workers' protests; mass movement; comparison.

1. Introduction

Scientific publications on the socio-political unrest of the late 1960s and early 1970s typically adopt one of two perspectives. The first approach, grounded in national historiography, examines these events within the context of a single country (e.g., Eisler, 2006; Friszke, 2011; Fichter, 2016; Cuvalo, 2019). The second perspective, comparative in nature, analyzes simultaneous upheavals across different nations, highlighting similarities, differences, and interwoven causes and consequences (e.g., Pittaway, 2005, on specific social groups). Within Cold War studies, however, such comparative analyses often reinforce a simplified division between socio-political developments in capitalist and socialist states.

This study aims to compare the socio-political upheavals that took place in the People's Republic of Poland (PRL) and the Socialist Federal Republic of Yugoslavia (SFRY) during the late 1960s and early 1970s. It adopts a historical-comparative perspective to examine the political and systemic forces shaping these events. While acknowledging protest dynamics, it does not engage deeply with social movement theory. Although frameworks such as resource mobilization (McCarthy & Zald, 1977), political process theory (Tilly, 1978; McAdam, 1982), and framing theory (Snow & Benford, 1988) provide valuable insights into collective action, they fall beyond this study's primary focus. Instead, this research explores the structural, political, and ideological factors that influenced state responses to unrest in socialist regimes.

This article contributes to existing literature by offering a comparative perspective on social unrest in socialist states—an area often overlooked in social movement studies. While much research focuses on opposition within the Soviet bloc or Western student movements, this study highlights the nuances of dissent in Poland and Yugoslavia. By integrating Polish and Balkan historiography, it provides a deeper understanding of how different socialist regimes navigated political crises, emphasizing systemic and geopolitical factors that shaped their responses.

Both Poland and Yugoslavia operated under socialist political systems—authoritarian, non-market economies—giving them certain structural similarities. However, significant differences also defined their political and social landscapes. The functioning of the Yugoslav federation contrasted with the centralized governance model of the PRL. Geopolitically, Poland was entirely dependent on the Soviet Union, while Yugoslavia maintained a more autonomous position. Socially, Poland's largely homogeneous population, in terms of ethnicity and religion (despite state opposition to religious influences), stood in contrast to Yugoslavia's diverse and multi-ethnic society. Additionally, the SFRY implemented economic reforms toward "self-governing socialism," a model that diverged sharply from Poland's centralized economy. Unlike Poland, Yugoslavia also permitted large-scale economic emigration to capitalist countries, a trend that began in the 1960s.

Taking these similarities and differences into account, the authors compare key episodes of unrest: the Polish student protests of March and June 1968, the so-called "Croatian Spring" (which followed the Polish protests), and the December 1970 demonstrations on the Polish coast. These events led to significant political shifts, including the removal of a new generation of Croatian politicians in Yugoslavia and the downfall of Władysław Gomułka in Poland. While these protests were part of the broader global phenomenon of the 1968 student movement, they were also shaped by specific regional developments, such as the crisis in Czechoslovakia and the aftermath of the Six-Day War. However, as this article primarily focuses on Poland and Yugoslavia, these broader influences are only briefly addressed.

Given the substantial progress made by Polish and Balkan historians in studying these events, this article does not engage in additional archival research. Instead, it draws on existing monographs, scholarly articles, statistical yearbooks, and press materials. The study employs historical-descriptive analysis, decision-making analysis, and comparative methods to examine the political and systemic factors shaping social unrest in both states.

2. The system of power

After World War II, Poland and Yugoslavia found themselves in the so-called Soviet sphere of influence. This geopolitical and strategic fact determined the formation of a new socio-economic and political system. Political power in both countries was seized by communist parties (the Polish Workers' Party, in Polish: PPR[1]; the Communist Party of Yugoslavia), which marginalized and gradually eliminated other parties from legal political life (Wiatr, 1970: 1239-1240). . The system was based on the police and security services, which targeted both real and imagined enemies of the system in both countries (Tomaszewski, 1992: 40-64; Brzeziński, 1964: 3-51; Fejtö, 1979: 5-20)

A significant difference occurred after 1948, when the Yugoslav leaders gathered around Josip Broz Tito decided to break free from Joseph Stalin and other Soviet politicians. Consequently, they opted for an independent way of shaping the system of people's democracy, which, however, retained the core elements of the previous system - it was based on the domination of the communist faction. Some systemic corrections began to be gradually introduced, initially in the social and economic spheres (the creation of the so-called self-governing socialism). Another important factor differentiating the Polish and Yugoslavian cases was the issue of an ethnic mosaic in the South Slavic country, which resulted in the formation of a federal state model with six union republics (Croatia was one of them from 1945 to 1991 with a considerable social and economic potential). (Bilandžić, 1985: 150-210; Zacharias, 2004: 105-156; Walkiewicz, 2000: 201-216; Wilson, 1979: 60-72)

Although Poland remained under the dominant geopolitical influence of the Soviet Union after 1948, the idea of the so-called „Polish road to socialism" championed by the long-time communist leader Władysław Gomułka (called also Comrade Wiesław) should not be forgotten. In many respects, this brought the search for a new model of a socialist state closer in both the Polish and Yugoslavian cases. It should also be mentioned that after the Tito-Stalin conflict broke out, the Polish communist leader acted as an arbitrator, attempting to

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[1] Polish Workers` Party was a communist party in Poland from 1942 to 1948. In December 1948 the Polish United Workers` Party (Polish: PZPR) was founded through "unification of the Polish Workers` Party and the Polish Socialist Party".

engage in reconciliation efforts. After Gomułka was ousted from power by the pro-Soviet faction in the PPR centred around Bierut, one of the most serious accusations against the ousted leader was that he was following the Yugoslavian path and exhibited a rightwing nationalist deviation (Paczkowski, 1995: 213-223; Friszke, 2003: 152-162; Werblan, 2009: 53-63; Kemp-Welch, 2008: 35-42).

By the mid-1960s, both the Central and Eastern European countries had experienced more than twenty years of communist rule. In the case of Yugoslavia, it was symbolised by the leadership of Marshal Josip Broz Tito and his closest camarilla. In Poland, in turn, the era of communist leadership was bisected by the period of Stalinism, symbolised to a great extent by the Bierut-Berman-Minc faction (1948-1956), while in the preceding and following periods (after 1956) the party was headed by Comrade Wiesław, as Zenon Kliszko (his closest associate from the period of the German occupation, who did not renounce Gomułka after 1948) emerged as the number two person in the system of power. (Čavoski, 1990: 13-30; Eisler, 2014: 215-227; Prażmowska, 2016: 198-220; Bethell, 1969: 225-252; Lipiński, 2019: 129-149).

3. The first unrest

The main problems of the Yugoslav system stemmed from the prerequisites of failure of the (constantly reformed) economic system and growing ethnic conflicts (among which the Serbo-Croatian disputes, dating back to the Kingdom period, should be considered as pre-eminent). In Poland, in turn, the mid-1960s were symbolised by dashed public hopes related to the reformist programme of October 1956 defined as the Polish way out of Stalinism, offered by Gomułka as he returned to power after eight years. The agenda of the Polish October included the issues of greater internal autonomy from the Kremlin, regulating the stationing of the Soviet Army in Poland, accepting the dominant model of individual ownership in agriculture, services and crafts, developing a model for the presence of the Roman Catholic Church in social life, a certain degree of autonomy in the areas of culture and science. At the same time, Gomułka remained reluctant to carry out bolder economic reforms, even ones comparable to Hungarian managerialism or the Yugoslav self-government model. Hence, the 1960s were regarded as a period of „little stabilisation" in Poland's recent socio-economic history. Against this background, the solutions for economic reforms adopted in Yugoslavia in 1965 appeared to be more far-reaching and heading towards quasi-market solutions. (Jelavich, 2005: 397-413; Tanty, 2003: 315-316; Wilson, 1979: 107-117; Piasecki, Michalak, 2003: 45-51; Persak, Machcewicz, 2010).

The first signs of public discontent in Poland were symbolised by a letter from 34 writers addressed to Prime Minister Józef Cyrankiewicz, which raised the issue of paper supply for books and censorship. What outraged the communist authorities the most was not even the prominent names of the writers who signed the letter, but the fact that information about its submission to the Office of the Council of Ministers was quickly

made public by Western broadcasters, including Radio Free Europe. The response of the authorities to the Letter was rather disorderly. On the one hand, the Prime Minister received a delegation of literati and writers, promising to respond to the postulates submitted. On the other hand, however, a campaign was organised to promote the so-called Anti-Letter by a part of the literary community that was more favourably inclined towards the existing political system and the ruling elite. The inspirers of the letter, alleged or real, were put under pressure to withdraw their signatures, the circulation of their books was reduced and they were excluded from the state media (there were no private media then). And Melchior Wańkowicz, a pre-war writer and politician who decided to return to Poland in 1956, was even sentenced in court to several years in prison (although he was later pardoned due to his old age and poor health). The case was the first significant sign of a growing rift between the society and the ruling camp. (Eisler, 1993; Ziółkowska 1990; Kemp-Welch, 2008: 156-162).

The year 1966 symbolised the millennium of statehood, counted from the baptism of Mieszko I and his Czech wife Dobrawa. The solemn celebrations radically divided the communist authorities and the leadership of the Polish Episcopate with Cardinal Stefan Wyszyński as the then Primate[2]. The ruling camp emphasized a special place of the People's Republic of Poland (PRL) in the 1,000 years of statehood and a ceremonial session of parliament with a commemorative address by Gomułka was scheduled for 22 July – the Day of the Rebirth, the main holiday of the Polish People`s Republic (Polish: PRL). Official propaganda emphasized Poland's socio-economic successes, contrasting them with the Nobles' Republic and interwar Poland symbolised by Marshal Józef Piłsudski. Moreover, the geopolitical achievements associated with Poland's westward shift and its 500-kilometre-long access to the Baltic Sea were highlighted. The representatives of the clergy, on the other hand, placed a special emphasis on strengthening the Catholic faith in the nation through the nine-year Novena programme (1957-66) as a special period of spiritual preparation for the celebrations. Another serious point of contention was a planned visit of Pope Paul VI to Częstochowa, which the state authorities decided not to allow. (Dudek, 1995: 149-180; Zieliński, 2003; Żaryn, 2004; Micewski, 1994; Raina, 2000; Dudek, 1998).

4. The ruling elite

Political power in both countries formally belonged to parties (PZPR and SKJ respectively) as well as state authorities – the parliament and the government. The dominant position, however, was held by party

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[2] In the background, there was also the issue of the November 1965 letter from the Polish Episcopate to the German Episcopate with its message of mutual forgiveness, which was severely criticised by the state authorities as interference in foreign policy matters.

institutions – central and voivodeship ones in Poland, federal and republican ones in Yugoslavia. Real power remained in the hands of the 100-plus-member Central Committee, which met several times a year and constituted the „party" equivalent of a legislative body. The day-to-day executive body, which took the most important decisions in the country, was the Political Bureau of a dozen or so members, which met several times a month. In addition, in Yugoslavia, a federal state, the importance of the republican elites should be taken into consideration – both in party institutions and organs of power. (Rokicki, Spałek, 2011: 27-61; Stola, Persak, 2012: 11-24; Zacharias, 2004: 259-274; Rakowski, 2000, 31-64).

Supreme power in the country was in the hands of the closest circles of Władysław Gomułka and Josip Broz Tito. In the case of the former, it included associates from the wartime conspiracy who did not dissociate themselves from him after his removal from power in 1948. For many years, the number two person was Zenon Kliszko, who held party positions (secretary of the Central Committee for ideology and culture) and parliamentary positions (deputy speaker of the Sejm, head of the PZPR parliamentary fraction). The closest associates of Comrade Wiesław also included Marian Spychalski, the head of the Ministry of Defence for many years, from 1968 the head of the collegiate presidency in the form of the Council of State, and Ignacy Loga-Sowiński, a long-time head of the trade unions (CRZZ). The influence of Bolesław Jaszczuk in the economic sphere and Ryszard Strzelecki in internal party affairs was growing from 1963 onwards. From 1968, the party leader looked for a successor by grooming the young faction – Józef Tejchma, Stanisław Kociołek, activists under 40 who had gained experience in youth organizations. It is worth noting that among the key politicians, little attention is paid to the then long-serving head of government – for 23 years from 1947 to 1970 – Józef Cyrankiewicz, who confined himself to diplomatic and administrative activities. (Raina, 1969: 122-126; Spałek, 2020: 469-477; Modzelewski, Werblan, 2017: 211-216; Siemiątkowski, 2018: 231-319; Widawska, 2007: 177-179; Lipiński, 2016; 158-168).

The party elite was officially a monolith, in line with the tenets of democratic centralism and principled obedience to the party leader. However, informal coteries started to form in the mid-1960s – factions aiming to create future leadership elites after Comrade Wiesław would leave office. The first coterie was centred around Mieczysław Moczar and dubbed the „partisan group". It referred to the partisan tradition of fighting the Germans in World War II in the People's Army, pragmatic relations with Home Army units. In the mid-1960s, it proclaimed the need to include the national elements of state tradition, it highlighted the saturation of the party apparatus with activists of Jewish nationality after 1944. It indirectly followed the Romanian strategy of forming national communism, initiated by Gheorghiu Gh. Dej and later continued by Nicolae Ceaușescu. This manifested itself in anti-Semitic slogans that erupted in the official propaganda language after the outbreak of the so-called Six-Day War between Israel and the Arab states (June 1967) and during the March 1968 student strikes. We write about these issues in another part of the article. The faction

included Franciszek Szlachcic and Grzegorz Korczyński. Wojciech Jaruzelski and Stanisław Kania also maintained close ties to the group. Another coterie was centred around the voivodeship party leader in Silesia, Edward Gierek, and was referred to as the „Silesian group". It was made up of middle-aged party and state activists, with a technocratic view of the country's socio-economic development. They started their party and state careers after 1945 in youth organizations, followed by the party and government apparatus. (Lesiakowski, 1998: 320-352; Ważniewski, 1991: 151-168; Rolicki, 2002: 145-151; Gajdziński, 2014: 110-122).

In Yugoslavia, Marshal Tito's closest entourage consisted of his comrades from the time of partisan warfare. The number two person for many years was Slovenian Edward Kardelj, responsible for the issues of the ideological basis of the post-war Yugoslav system, an important position was held by Serb Aleksander Ranković (until his dismissal in 1966), who supervised the security and police services. Croat Vladimir Bakarić was in charge of economic affairs, drawing up plans for economic reforms in Yugoslavia. Important posts in the federal administration were also held by Serb Petar Stambolić (head of the federal government during this period), Macedonians Lazar Koliševski and Kiro Gligorov. As Yugoslavia was a federal state, it is worth mentioning the republican elites. In the example of Croatia, a reform-minded republican leadership was formed in the late 1960s. In 1967, Savka Dabčević-Kučar became head of the republican government and Miko Tripalo was the party leader. They implemented the policy of the so-called Croatian Spring, which has been compared to similar socio-political processes taking place in Czechoslovakia at the time (the so-called Prague Spring). This is analysed in another part of this article. (Simić, 2011: 215-218; Woydyłło, 1991: 156-158; Pirjevec, 2018: 555-569; Bilandžić, 1985: 320-326; Matković, 2003: 345-351).

5. The social basis of student protests in 1968

The events which took place in 1968 in several countries with different political systems are often reduced to a common denominator – student protests against the established social and political order. The obvious fact of vigorous political activity by the generation born after the end of World War II obscures significant differences in the background, course and consequences of the 1968 events. These differences not only exist – obviously – between countries which functioned under different political systems (socialist vs. capitalist states), but also in countries which shared the same systemic foundations. In this context, it is interesting to compare the events in Poland and Yugoslavia. Both countries – as noted in the section of the article about the political system – were classified as socialist, although in practice they functioned in very different ways, not only in terms of Poland's dependence on the Soviet Union and the SFRY's different geopolitical

position. The social (and ethnic) structure and living standards of the population were different as well. According to Statistical Yearbook – Socialist Federal Republic of Yugoslavia had a population of about 18,5 million citizens at the beginning of the sixties. According to the 1961 census, Yugoslavia's ethnic make-up was as follows: Serbs – 7.8 million, Croats – 4.29 million, Slovenes – 1.58 million, Macedonians – 1.04 million, the Muslim population (mostly living in Bosnia) – 0.9 million, Montenegrins – 0.51 million people. In addition, 0.9 million Albanians, 0.5 million Hungarians, 0.18 million Turks lived within the borders of Yugoslavia and there were also much smaller numbers of Slovaks, Romanians, Bulgarians, Czechs and Italians. (Statistički godišnjak Jugoslavije, 1970: 77). The mosaic of nationalities was complemented by religious differences overlapping the ethnic divisions (Muslims, Catholics, Orthodox). The dominance of the Serb population in the SFRY at various times generated fears of marginalisation of other ethnicities, also in economic and political terms. Such sentiments were also present in the Socialist Republic of Croatia, for example in the 1960s and 1970s, during the so-called „Croatian Spring".

The ethnic structure of the People's Republic of Poland was completely different. Before World War II, Poland was a multi-national and multi-ethnic country. According to the censuses conducted in 1921 and 1931 (the next one was scheduled for 1941), national minorities constituted 35% of the total population of Poland. The population losses during the war, the post-war change of borders, the shift of the western border (and the accompanying expulsions of the German population) and the loss of the so-called Eastern Borderlands to several Soviet Union republics made Poland an ethnically unitary state. Roman Catholicism was the overwhelmingly dominant religion (Bojar, 1997: 404-406).

In the mid-1960s, the generation brought up already in the socialist system was entering adult life in both countries, with no experience of conscious life in a different reality. In the case of Poland, the generation had lived as children through the Stalinism period (dated 1948-1956 in Poland), its last outburst in the form of a violent suppression of workers' protests in Poznań (in June 1956), as well as Władysław Gomułka's return to power in October 1956 and a gradual curtailment of the „achievements of the October thaw". Their experience differed from the so-called „broken flight" which was characteristic for people born in pre-war Poland, who managed to partially anchor their worldview in pre-war values and then had to adapt to a completely different reality, hostile to the previous system. (Świda-Ziemba, 2003: 13-15). Neither were they affected by the enthusiasm for building the new system, typical for some slightly older people, which in the Stalinist period was generated by mass participation, at one stage compulsory, in youth organizations controlled by the PZPR. They spent their teenage years and early adulthood in conditions described as Gomułka's „little stabilisation". For them, politics was above all ritualistic. They approached the issue of party membership in a pragmatic way, seeing it as a necessary condition for career development. Faced with no alternative to the party rule, or even the same ruling team, they mostly did not attempt to act outside the system. Retreat into

privacy and acceptance of the lifestyle imposed by the system were characteristic for this period. Interestingly, despite its political indifference, the generation showed its acceptance of socialism, probably also due to the lack of any alternative. (Kosiński, 2012: 189).

A common feature of both the societies was a steadily rising number of students between 1960 and 1980. According to the assumptions of the socialist system, university education was to be available to every-one, regardless of their social background, which contrasted with the elitism of higher education in the pre-war period (Mazur, 2009: 328; Šoljan, 1991: 132).

Data for Yugoslavia show that there were over 140,000 students in 1960, over 261,000 in 1970, almost 395,000 in 1975, and five years later the Yugoslav all-time high of almost 412,000 students was reached. Relative to the population of the Yugoslav state, it was one of the highest ratios in the world (Šoljan, 1991: 137).

In the People's Republic of Poland, there was also a huge increase in the number of students enrolled, although the total number of students never reached such a level relative to the total population as in the other country. In the period in question, the number of students in Poland was 165,000 in 1960, almost double that in 1975 (330,000), and the following years were marked by a steady upward trend (1975 – 468,000; 1980 – 466,000). The rising number of students was not matched by changes in the infrastructure related to higher education. In Yugoslavia, this was already evident in the late 1950s, when "several thousand students battled security forces in Zagreb over insufficient food at the university canteens" (Fichter, 2016: 102)

Other nuisances included "cramped dorms, insufficient scholarship funding, inadequate health-care, lack of heating, damp and damaged accommodations, meagre food, and crowded libraries" (Ibidem). In both countries, the basis of protests was different, although some similarities can be discerned. In Yugoslavia, the background for protests was created by reforms of the economic and political system initiated in the mid-1960s. This period is characterised as a controlled liberalisation of the system, accompanied by the previously limited possibility of formulating critical comments, greater freedom of print and expression, as well as the emergence of social and economic organisations. Not without significance was also the process of temporary trips for work to capitalist countries, which expanded the contacts of Yugoslav citizens with foreign countries. (Zacharias, 2000: 99) Such a situation could not take place in other socialist countries, including Poland. In individual Yugoslav republics (Croatian and Slovenian), conflicts stemming from economic issues were also brewing. The inhabitants of the wealthier republics, due to well-developed tourism and the aforementioned trips abroad for work, were able to generate more foreign currency inflows. The problem, however, was their accumulation by central banks, mainly located in Belgrade, and the policy of using these funds for the development of other republics (Ibidem; Pavković, 2000: 62).

The background for Polish protests were issues related to cultural policy, restrictions on creative work

and freedom of expression. After Władysław Gomułka halted the post-October 1956 changes, a small group of students and academics at the University of Warsaw (UW) organized the Political Discussion Club at the Socialist Youth Union of the UW in 1962. The initiators of the undertaking were Karol Modzelewski, a historian employed at the University, and Jacek Kuroń, an activist with the Polish Scouting Association. Meetings of the Club, which involved discussions on the political and social situation of the PRL by applying Marxist theory for analysis, turned into a forum for criticism of the absence of systemic reforms. Consequently, the club was dissolved in autumn 1963 and its initiators were subjected to surveillance by the security services. As a direct result of this initiative, Jacek Kuroń and Karol Modzelewski circulated the „Open letter to the Party" in March 1965, in which they criticised, from the Marxist perspective, the way the state was governed at the time. As it criticised the „party bureaucracy" which, according to the authors of the Letter, exercised power in the country rather than the working class, the document was seen as similar to the observations of Milovan Đilas (Friszke, 2011: 82-84, 203-222; Eisler, 1991: 97). The letter elicited a strong reaction from the authorities. Jacek Kuroń and Karol Modzelewski were sentenced to 3.5 and 3 years in prison respectively for its distribution. Another consequence of the initiatives developing around Kuroń and Modzelewski was the emergence of the so-called „Commando" group. The name was given to an informal community of students from Warsaw who attended meetings and lectures conducted mainly at the University of Warsaw and shattered the propaganda narrative of the organizers by asking inconvenient questions concerning historical and socio-political issues (Eisler, 1992:104).

Its leading representatives were Adam Michnik, Jan Lityński, Jan Tomasz Gross, Barbara Toruńczyk, Irena Grudzińska, Henryk Szlajfer, Teresa Bogucka. Some of the „Commandos" came from communist families, their parents had held positions in the party apparatus in the past, some were of Jewish descent, which was later exploited by the party propaganda.

Even before the main events of 1968 began, there were some links between the circles in Poland and Yugoslavia involved in the subsequent protests. Leszek Kołakowski and Zygmunt Bauman, academics at the University of Warsaw, were members of the board at the journal Praxis „edited by university professors in Belgrade and Zagreb, which provided a platform for the discourses of the New Left". Kołakowski, as well as Herbert Marcuse, Erich Fromm and Ernest Mandel, was also a frequent guest „at a summer school on the Croatian island of Korčula near Dubrovnik, where „hundreds of Yugoslav students were able to participate in discussions with them" (Kanzleiter, 2013: 84-100).

6. **Major student protests in 1968 in Poland and Yugoslavia**

The immediate trigger for launching student protests in Poland was the decision to remove the play „Dziady", a staging of a drama by Adam Mickiewicz, from the stage of the National Theatre in Warsaw. Paradoxically, the play was prepared as part of the celebrations of the 50th anniversary of the outbreak of the October Revolution, but because of enthusiastic reactions of the audience during scenes with anti-tsarist overtones, the representatives of the Department of Culture of the Central Committee of the PZPR perceived the play as essentially anti-Soviet. After the decision taken by the authorities, the last performance on 30 January 1968 was followed by a demonstration of students at the Adam Mickiewicz monument, which was dispersed by the police. Reports about the events were broadcast to Poland by Radio Free Europe and articles about the incidents were published in the Western press (Friszke, 2011: 526). The „Commando" community also collected 75 lists with signatures of 3,145 people protesting against the removal of „Dziady". The student protest was also joined by the Warsaw branch of the Polish Writers' Union, which at an extraordinary meeting adopted a resolution condemning the decision of the authorities, stating that it was one of the examples of „arbitrary and hidden censorship (...) threatening national culture" (Fik, 1989: 523-524).

On 8 March 1968, a rally was held at the University of Warsaw, during which slogans against censorship were interspersed with demands to stop repressions against students and reinstate student rights to Adam Michnik and Henryk Szlajfer, who had been expelled from the university following a decision by the Minister of Education and Universities Henryk Jabłoński (Friszke, 2011: 553). The protest was broken up by police units and so-called „worker activists" – in reality plainclothes officers of various services who beat students and detained them on the University grounds. The following days saw a series of student demonstrations in most academic centres in Poland, including fresh rallies in Warsaw (at the University of Warsaw and the Warsaw University of Technology). (Na Antenie, 1968: 1-2)

In response to the events, the authorities refused to enter into any dialogue with the protesting students. Academic staff supporting the students' demands were dismissed from the universities (Eisler, 2006: 439-440).

Some academics decided to leave Poland, including Leszek Kołakowski, Włodzimierz Brus, Bronisław Baczko, Zygmunt Bauman, Jan Kott, Krzysztof Pomian, Paweł Korez. (Hillebrandt, 1986: 67). According to data quoted by Andrzej Friszke, from 8 March „2,634 people were detained across the country, including 625 university students, 380 school students, 200 unemployed, 960 workers and 330 white-collar workers" (Friszke, 2011: 64).

In Yugoslavia, the 1968 student demonstrations began on 2 June. The trigger was a police intervention during a rock concert that was taking place near dormitories in Belgrade. The events escalated after a rumour

spread that one of the students had been shot by the police. On 2 and 3 June, gatherings involving thousands of people took place in Belgrade, which were broken up by security forces. In response to the clashes, the University Committee of the Communist League decided to proclaim a seven-day strike. On the grounds of the Faculty of Philosophy, the strike leaders made speeches, lively discussions were held and demands to the authorities were formulated. From 4 June, in a gesture of solidarity, students in Sarajevo, Zagreb and Ljubljana started protests. (Fichter, 2016: 107; Zubak, 2013: 124).

As in Belgrade, discussions were held and demands were formulated at universities in these cities. As in Poland, the slogans proclaimed were not directed against socialism, but rather constituted an attempt to broaden the scope of freedom in expressing opinions about the situation in the country. There were clear references to Marxism and students in Belgrade even announced the establishment of „the Red University of Karl Marx", echoing the actions of Frankfurt students in May 1968 (Kanzleiter, 2013: 84).

Yugoslav students put more emphasis on the issue of „deformation of socialism" which aggravated inequalities instead of reducing them, leading to „unfair distributions of wealth and privilege; an overly bureaucratic repressive state" (Fichter, 2016: 110; Zubak, 2013: 32). Therefore, protests in both countries were not just an attempt to secure the interests of their own communities. Of course, as a result of the actions of security forces, condemnation of aggressive police behaviour was an important part of the slogans voiced by the strikers. The students also expressed their distrust of the media subordinated to the authorities. Another similarity between the two events were efforts to include the working class in the protests. In the case of Poland, some workers, especially young ones, sympathized with the students and even took part in demonstrations, as can be seen from the social profile of those detained. For the most part, however, workers remained passive and the authorities even took steps to include this group in propaganda actions against the „troublemakers" (e.g. by organizing so-called mass meetings in factories) (Eisler, 1991:401-403). In Yugoslavia, students also attempted to establish contacts with workers in order to get them involved in the protest (Fichter, 2016: 110).

The reaction of the Yugoslav authorities to the student protests in 1968 was different from that in Poland. The 1968 strikes in Yugoslavia ended after a public speech by Josip Broz Tito, who said that internal problems and a slow implementation of previously planned reforms were the reasons behind the protests. At the same time, he expressed the view that student demonstrations had also been joined by groups who wanted to exploit the situation for their own particular purposes. The situation was calmed down by Tito's assurance that the students' demands would be implemented and that he would personally resign if he failed to implement the reforms" (Ibidem: 109; Kanzleiter, 2013: 91).

7. Another dimension of the 1968 revolt

The 1968 student protests in Poland and Yugoslavia took place in March and June respectively. With regard to Poland, however, we can identify another process which was directly linked to the student revolt. It was an internal struggle within the PZPR that eventually turned into an anti-Semitic campaign. In Yugoslavia, another experience of 1968 was the awakening of nationalist attitudes in the Socialist Republic of Croatia, which evolved into a longer process called the „Croatian Spring". The main causes of this development were the same as those of the student revolt (liberalisation of the system, economic reform, limited opening to the West), but in Croatian conditions it was combined with a sense of marginalisation of Croats in the cultural sphere and the previously mentioned political and economic sphere (Zacharias, 1998: 139). This meant that, as Michal J. Zacharias emphasises, „the pro-Yugoslav attitude of students in Belgrade did not meet with much appreciation in Croatia" where „representatives of the intelligentsia and many members of the Croatian ruling apparatus emphasized the importance of national, i.e. Croatian issues, rather than social or all-Yugoslav questions" (Zacharias, 2001: 140).

As far as culture was concerned, this was reflected, for example, in efforts to preserve the distinctiveness of the Croatian language. On 16 March 1967, more than a dozen Croatian institutions and 130 representatives of the intelligentsia issued the Declaration on the Name and Position of the Croatian Literary Language (org. *Deklaracija o nazivu i položaju hrvatskog književnog jezika*), challenging the 1954 agreement which de facto recognised the existence of a common Serbo-Croatian language (Walkiewicz, 2017: 191-192). It was one of the harbingers of repeated efforts in the later period to highlight the distinctiveness of the Croatian culture, combined with accusations against cultural unification pushed by the Serbs as well as the „Croatian Yugoslavs" (Zacharias, 2000: 101). Another example was the question of how Croatian heritage was presented in Yugoslav textbooks. During this period, Croats felt that with regard to literature, the Yugoslav educational system gave more prominence to foreign than Croatian writers (Cuvalo 2019: 146, 162). In this respect, there was a visible similarity between the concerns of Polish intellectuals about the threat posed by communist censorship to Polish national culture and the Croatian efforts to preserve their national heritage.

Another significant threat articulated during the „Croatian spring" was the problem of temporary mass emigration of Croats. It was part of a broader trend of temporary trips for work made by Yugoslav citizens following economic reforms, but in the case of Croats it was of massive proportions. It is estimated that up to one million people could have left the SFRY for work in the early 1970s. Most of them were aged between 20 and 40, 70% of them were men. Of all Yugoslav nationalities, Croats were significantly over-represented, accounting for around 50% of the total number of the so-called Gastarbeiters (Ibidem, 138-139). Officially,

residents leaving for work in other countries (mainly Austria and West Germany) were not considered to be emigrants, as it was assumed that their trips were temporary. The Yugoslav state propaganda portrayed the trips as a sign of „liberalisation" of the system. In reality, it was supposed to solve the problem of unemployment resulting from economic stagnation, and also to increase the inflow of foreign currency into the country. However, the Gastarbeiters included not only lower-skilled workers from the poorer republics, but also better educated residents of the wealthier parts of Yugoslavia (Gregurović, Mlinarić, 2012: 101-102). With regard to the Socialist Republic of Croatia, data from 1970 indicated that „skilled and highly skilled workers accounted for 33,2% of all external migrants from Croatia, and workers with full secondary education for 5,7%" (Baućić, 1972: 16). Moreover „more than one half of the emigrants decided to take up employment abroad because they were dissatisfied with the living and working conditions within their own country" (Ibidem). These problems were a source of concern for Croats, who saw it as yet another proof of the „political and national disempowerment of the Croatian population" in the Yugoslav state (Zacharias, 2000: 105). They also feared the long-term social consequences of the trips, e.g. in the form of „a breakdown of traditional forms of family life" (Ibidem).

The turn of the 1960s and 1970s was marked by dynamic activity of social, educational and cultural organizations in the Socialist Republic of Croatia, including Matica hrvatska with its historical roots dating back to the first half of the 19th century (Damjanović, 2015: 3). These organizations did not represent a uniform political current; while advocating for national issues, they differed in the extent to which they supported liberal, democratic or nationalist ideas, including chauvinistic ones. The scope of their activity and broad public support made them known as the „maspok" mass movement (hrv. „masovni pokret"). (Zacharias, 2000: 100). As Wiesław Walkiewicz notes, the group of those who contested the existing order in the Socialist Republic of Croatia was also joined by „radio, television, the editors of the daily newspaper Vjesnik, as well as the Writers' Association" (Walkiewicz, 2017: 197).

Students also left their mark on the shape of the „Croatian Spring". From 1970, people who were elected to university bodies at the University of Zagreb not only did not have the support of the authorities, but also took up their positions despite no approval from the federal authorities. Thus, Dražen Budiša, Ante Paradžik, Ivan Zvonimir Čičak were elected to various student bodies. The election of Ivan Supek as Rector was seen in a similar way. These personnel changes were a clear political signal from the academic community. It was consistent with the „maspok" activities and made it clear to the authorities that students and the academic staff were in favour of actual implementation of the previously announced reforms (Cuvalo, 2019: 204-205). The federal authorities also did not accept unannounced mass meetings at the University (e.g. on 27 March 1971) and a November 1971 strike (Rusinow, 1972: 8).

The changes in the Croatian party leadership that came in the late 1960s were beneficial to the moderate part of the „maspok". Savka Dabčevic Kućar became the chairperson of the Central Committee of the League of Communists of Croatia, Pero Pirker became the secretary of the Executive Committee of the Central Committee, and Miko Tripalo was appointed as a member of the Executive Bureau and then of the Presidium of the SKJ. They belonged to the young generation of party members who supported a decentralisation of the political system. As Michal Zacharias notes, the leadership of the SKH was sympathetic to some of the national postulates expressed by the „maspok", while using „party, communist phraseology" when formulating their own, similar opinions (Zacharias, 1999: 94; Zacharias 2000: 108). Kućar, Pirker and Tripalo gained significant public support in Croatia but had no influence on the military, police or security service. Over time, Josip Broz Tito's attitude to their activities also changed, which ultimately proved to be a decisive factor (Zacharias, 1999: 114).

Data relating only to Matica hrvatska points to a rapid growth of this organization. At the end of 1970, it had about 23,000 members, in 1971 – already 41,000 (Zacharias, 2000: 100). In spring 1971, the association was publishing two magazines, „Hrvatski Tjednik" and „Hrvatski Gospodarski Glasnik". The former dealt mainly with cultural, social and political issues, the latter with economic issues (Rusinow, 1972: 3). Other magazines published by the association during the entire „Croatian Spring" period included „Kritika", „Kolo" and „Dubrovnik" (Branđolica, Šegvić, 2019: 719).

Matica hrvatska undertook various types of activities, suggesting e.g. new economic concepts. The then member of the presidency and economic secretary of Matica hrvatska Šime Đodan "proposed changes that were considered incomprehensible at the time: the break-up of all federal finance and foreign trade institutions, the formation of all separate financial systems of federal units, the formation of central banks units and co-ordination anticyclical economic policy and protection measures with appropriate (but not defined) central organs of the SFRJ" (Borak, 2004: 328; Pavković, 2000: 62). The proposed changes were part of a wider and previously exposed dispute over the development model of Yugoslavia. Croats favoured The Adriatic development concept, which prioritised the expansion of transport infrastructure to broaden the scope of cooperation with the West via the Adriatic and bring greater economic openness to the world. Due to the geographical location of the Yugoslav republics, the main part of the project would be situated in the Socialist Republic of Croatia. The main competing model was The Donava development concept promoted by Serbian economists. It would favour the development of "production of electricity, basic chemicals, basic iron and steel, basic non-ferrous metals, machinery and equipment, agriculture and food industry". This would lead to support primarily for the central regions of Yugoslavia. (Borak, 2004: 325-326).

8. Political solutions

The process known as the „Croatian Spring" was terminated on the initiative of Josip Broz Tito using the police, military and special services. The action was taken in response to a week-long strike by students at the University of Zagreb, which began on 22 November 1971 and was also supported at other Croatian universities. The demands of the protesters mirrored those previously put forward by the „maspok" (Kanzleiter, 2013: 92). Tito first decided to get the Croatian leadership (Savka Dabčevic Kućar, Pero Pirker, Miko Tripalo) to resign, which happened in December 1971, and then ordered a purge in the SKH, as a result of which „by April 1972, 741 members had been excluded, 131 had been removed from office, while 280 activists had resigned" (Walkiewicz, 2015: 243.) On 12 December, arrests of protesters began, involving more than 500 people (Kanzleiter, 2013: 92). As Michał Zacharias reports citing data from Marek Veselica – a „maspok" activist – a total of about 32,000 people were subjected to various types of repression (arrests, loss of work, interrogations). Matica hrvatska, as well as its publications, were closed down (Zacharias, 1999: 120).

In Poland, the repercussions of the 1968 student protests, due to their scope and significance, can also be considered as separate processes. In this context, Jerzy Eisler mentions the following in addition to the student events: „the struggle of the party leadership against »revisionism« in the intellectual circles, as well as actions dismantling the last achievements of October in the field of culture, science and art"; „factional struggles in the leadership of the PZPR: the fight of the »partisans«, under the patronage of Mieczysław Moczar, against the group of Władysław Gomułka and the »Silesians« led by Edward Gierek"; „the anti-Semitic campaign, its consequences and political and social costs" (Eisler,1991: 9). The anti-Semitic campaign itself (called „anti-Zionist" in the official press) had a dual purpose. On the one hand, it was aimed at some of the „Commandos" and intellectuals who had become involved in the March events, on the other hand it was a pretext for carrying out purges in the PZPR, government offices, editorial offices and the military. The situation that emerged inside the party had all the hallmarks of a struggle for influence between different informal factions in the PZPR (Stola, 2000: 7-9, 186-187; Nowak-Jeziorański, 1968: 1-2).

The propaganda cliché used for public protests against the PRL authorities was again employed against the opposition, as it was claimed that the protests were usually inspired by agents of foreign countries. The media onslaught unleashed in Poland in 1968 caused thousands of people of Jewish origin, party activists and officials as well as intellectuals to flee Poland (Osęka, Zaremba, 1999: 205).

There is no such clear link between the 1968 events in Poland and the turn of 1970/1971 as there was between the 1968 student protests in Yugoslavia (including primarily the SRC) and the „Croatian Spring". A

serious socio-political crisis occurred in December 1970, but with a different background than in 1968. An increase in food prices, announced shortly before Christmas, triggered a wave of workers' strikes and demonstrations in the Tri-City and other coastal centres – Szczecin, Elbląg, and then in other regions of the country. The political authorities led by W. Gomułka decided – on the basis of information about a threat to the lives of intervening policemen and soldiers and the looting of shops – to use police and military force. At the same time, heavy military equipment – tanks, amphibious vehicles – was sent to the Tri-City and Szczecin. Demonstrations gained in strength in the subsequent December days (starting from 14 December). Demonstrators set fire to the buildings of local party committees in Gdańsk and Szczecin. There were regular fights in city streets. According to official data, from 14 to 20 December 1970, 45 people were killed and more than 1,100 injured on the Coast. An initiative was launched among middle-level activists (S. Kania, E. Babiuch, F. Szlachcic) to force the resignation of the then party leader and his closest associates, responsible for the crisis. They were supported by J. Tejchma, W. Jaruzelski and J. Cyrankiewicz. The PZPR party authorities were encouraged to take radical political action by politicians from the Kremlin. A special letter sent to the PZPR Central Committee urged bold political decisions to end the ongoing fighting and street demonstrations. At the same time, it was suggested in informal talks – for example, between Soviet Prime Minister A.Kosygin and Deputy Prime Minister P. Jaroszewicz – that the Soviet authorities would not agree to a party nomination of Mieczysław Moczar, who was considered too nationalistic (Eisler, 2000: 50-92; Dudek, Marszałkowski, 1999: 169-217; Głowacki, 1990: 17-77).

Internal and geopolitical circumstances favoured the candidacy of another contender for the leadership of the PZPR – Edward Gierek, who was elected new party leader at a meeting of the Central Committee on 20 December 1970. He made changes to the top party and state leadership – Piotr Jaroszewicz became the new head of government. The state's previous social and economic policy was criticised. Promises were made to improve the living conditions and adopt a more dynamic strategy for the social and economic development of the country. A new generation of party activists came to power in Poland, with no experience in the pre-war KPP, having started their careers in the post-war reality in youth organizations and the PPR apparatus (Tejchma, 2006: 9-26; Eisler, 1991: 289-336).

In view of the above, the long-term effects of Poland's 1968 should rather be sought in the later period. Some of the actors of the March events, then students or young academics, became involved in opposition organizations in the second half of the 1970s (the Workers' Defence Committee, the Committee for Social Self-Defence „KOR") and in the early 1980s participated in the formation of what was officially a trade union, but in reality a huge social and political movement – „Solidarity" (Eisler, 1991: 441-443). The impact of March 1968 on the subsequent views and activities of many of its participants in the public sphere was so

significant that Polish historians point to the emergence of a distinctive category of the „March 1968 genera-tion" (Ibidem: 441; Osęka, 1999).

9. Conclusions

The aim of the article was to compare the causes, course and political consequences of the socio-political upheavals that took place in the People's Republic of Poland and the Socialist Federal Republic of Yugoslavia in the late 1960s and early 1970s. Even though both countries belonged to the group of socialist states, they differed significantly. The differences resulted from the adopted model of economic system (Polish centralism - Yugoslav socialist self-governance), the structure of the countries (unitary - federal state), a diverse social structure (ethnic and religious unification - multi-nationality and multi-religiousness), the possibility of travelling abroad (Yugoslav guest workers), the scope of Soviet influence on foreign and domestic policy (the PRL's dependence), efforts of some in the party apparatus to bring about a controlled change of the system (in Yugoslavia).

The events of 1968 in both countries (in Poland in March, in Yugoslavia in June) were to some extent part of the general stream of student protests that took place in many cities around the world. In the case of Poland and Yugoslavia, due to their political system, also important were students' efforts to expand the scope of freedom of speech, care for national culture, expressions of the need to reform the system. Significantly, the slogans that appeared in both countries in 1968 were not directed against socialism, they should rather be seen as calls for the creation of a non-bureaucratic form of the socialist system. They came from the academic communities of young Marxist scholars, which intermingled in both countries through such initiatives as the Korčula summer school. The reaction of the authorities to the 1968 student protests in the countries covered in this article was different. In the PRL, the authorities decided to violently break up the demonstrations, arrest and convict the initiators, expel them from universities. A further consequence was an anti-intelligentsia campaign laced with anti-Semitism, which also resulted from factional infighting inside the party. In Yugoslavia, the events of 1968 alone did not lead to such dramatic consequences. The so-called „Croatian Spring" left a greater mark on internal relations in that country. Reforms initiated in the mid-1960s, changes in the Croatian party leadership to bring in younger and pro-decentralisation activists, extensive contacts with the capitalist world (Gastarbeiters) and an underlying conviction among the Croats that they were discriminated against economically, culturally and politically led to the emergence of a mass movement seeking greater freedom for the republics within the federation. In this case, however, the movement was crushed by Josip Broz Tito, the

reformist leadership was dismissed, and activists from social and student organizations were subjected to various forms of repression.

The 1968 student protests in Yugoslavia and the „Croatian Spring" were possible because of the controlled „liberalisation" of the system initiated in the 1960s. In the PRL, the authorities did not take such action. There is no direct link between the 1968 student protests and December 1970 in the PRL. The workers' protests on the coast, brutally suppressed by the authorities, had an economic background (an increase in food prices). These events eventually led to the ruling team being replaced, with Edward Gierek taking over at the helm of the communist party.

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THE EU RESPONSE TOWARDS SECESSION OF SUB-STATE NATIONS: A COMPARA TIVE ANALYSIS OF THE CASES OF CATALONIA AND SCOTLAND

ABSTRACT: *The study aims to examine the EU attitude towards secession resulted from the rise of nationalism at the sub-state level by focusing on the rising of nationalist secessionist tendencies in the sub-state nations, namely the cases of Catalonia and Scotland. The study relies on the comparative case study approach, which helps to observe, describe, and interpret different statuses through its application to specific models. This study depends on reviewing the diverse literature, EU treaties, documents, and political statements regarding the secession of sub-state nations. Also, this study contributes significantly to stress on the differences between the two case studies and presents an important analysis of the EU attitude towards the nationalist calls for secession in both cases. This study seeks to clarify that the EU response towards the secessionist cases of Scotland and Catalonia differs based on the situation of each case, which represents a challenge to the EU attitude while dealing with the sub-state nations.*

KEYWORDS: nationalism; sub-state nations; secession; Catalonia; Scotland.

1. Introduction

Nationalism has very deep roots in recent Europe, and it is linked with the evolution of the nation-state in Europe (Mansbach and Rafferty 2008). The establishment of the nation-state structure followed a gradual process**.** The most significant event in the process of the establishment of the nation-state was the French Revolution (1789-1799). Prior to the Revolution, sovereignty was dominated by the king's authority and was justified by religious and dynastic purposes. Following the Revolution, people or the nation gained authority, a concept known as national or popular sovereignty. During the nineteenth century, the dynastic rule in Europe was challenged by a growing spread of nationalism and a prominent national aspiration. (Mansbach and Rafferty 2008: 63-69).

After the Second World War, a new feature of world politics has appeared. There was an increasing growth in the numbers of supranational or multinational organizations and regional institutions. Europe has been oriented to establish a supranational system that maintains peace and security since the creation of the European Coal and Steel Community (ECSC) in 1951. After the foundation of ECSC, Europe has gone through a long process of integration that led to the formation of the European Union (EU) in 1993 and the

joining of more European countries to the EU (Reinisch 2009: 1). The evolution of the EU has been founded on encouraging economic collaboration and boosting civil rights and human values to support the emerging political identity (Grimm 2021: 35).

Nevertheless, recently Europe's political spectrum witnessed an increase in the votes supporting the nationalist and populist parties. In part, voters are disappointed with the political atmosphere, but they are also concerned with various issues such as immigration, globalization, and threats to national identity (*BBC News* 2019).

The objective of this study is to discuss the EU attitude towards secession resulted from the rise of nationalism at the sub-state level. Nationalism at the sub-state level can be demonstrated as nationalism in "nations without states". According to Montserrat Guibernau, "nations without states" means nations that feel they hold distinct national identity that involves common culture and history, are attached to certain territory, and seek to develop an independent state. These nations do not have the state, which is the political component upon which the nation should be formed and identified (Guibernau 2004: 1254-1255).

The article aims to discuss ***"How the rise of nationalist secession at the sub-state level impacts the EU attitude?"*** by analyzing the rising of nationalist secessionist tendencies in the sub-state nations (the cases of Scotland in the United Kingdom and Catalonia in Spain). In this respect, the article, on the one hand, will analyze the relationship between the EU and sub-state secession, and the role of the EU in the sub-state secession process. On the other hand, it is worthy to discuss the issue of sub-state secession in the EU legal context, focusing on the difference between the two cases.

2. The literature review

The objective of this study is to investigate the impact of rising nationalist secession on the EU attitude at the sub-state level. In this context, the scholarly literature has focused on two main perspectives: The first one analyzes secession and its reasons, and the second perspective discusses the evolution of nationalism.

The first perspective analyzes secession and its reasons. The concept of **Secession** can be understood as "the unilateral withdrawal of territory and people from a state for the creation of a new and separate state." According to this definition, it is considered that secession is always viewed as illegitimate by the parent state. Also, undisputed separations and colonial interdependence actions are not counted as real cases of secession (Bishai 1999: 43). Secession could be considered as one of the few options for the creation of new states in the international system; so, it seems to be an important issue for the theory and study of international relations. If the study of international relations can be interpreted as focusing on either the analysis of relations between

states, or of the existence of a global system or society among states, or the relations between diverse state and non-state actors in the international system, or a mix of all of these issues, then secession — as an incident that embraces and impacts all these forms of relations — must be viewed as a significant relevant characteristic of the modern international system. Secessionist movements strongly influence relations between states. It makes all the states in the system confront the challenge of whether to recognize these secessionist states, and whether to grant them the legal status of sovereignty and consequently create international relations with them (Bishai 1999: 11).

> ➤ Consequently, secession is a considerable factor that might impact the relation between the EU and other states, whether member states like Spain (case of Catalonia) or non-member states like the UK (case of Scotland).

This perspective includes two groups of studies: studies that focus on secession in general, its definition, and its causes, while the other group of studies is more concerned with the state of secession in Europe in particular.

One of the studies of the first that focus on the positive theory of secession and secessionism, the causes that drive people to ask for self-government and its consequences is "*Secessionism: identity, interest, and strategy*" (Sorens 2012). This study supports that identity and cultural variations are motives for secession. However, this study findings clarify that political and economic considerations play an important role in the evolution of secessionism; mere cultural variation is not enough. Furthermore, allowing secession might also decrease ethnic violence indirectly by raising the number of newly independent states, although border modifications may lead to other forms of ethnic struggles, such as intercommunal riots.

With respect to the group of studies that focus on secession in Europe, there is a study entitled "*Independence in Europe: Secession, Sovereignty, and the European Union*" (Connolly 2013). It analyzes basically the relationship between nationalism, secession, the rising of the separatist tendencies in Europe, the right to self-determination, and the European integration in the context of these secessionist movements.

Under this group, there are some studies that focus on specific cases within Europe that witness the rise of sub-state loyalties and pursue secession from the European states. A study entitled *"Scotland, Secession, and the European Union"* (Douglas-Scott 2019) that analyzes Scotland's relationship with the EU with respect to two different secession events. The first argues about an independent Scotland's EU membership in the case of Scotland's secession from the UK. The second discusses the position of Scotland from the UK in-out referendum on EU membership. This study showed that in neither case should Scotland be obliged to leave the EU against its desire.

There is also an important study that discusses the case of Catalonia entitled*"Secession from a Member State and EU Membership: the View from the Union"* (Closa 2016). This study analyzes the legal and political implications of a region within an EU Member State seeking independence, particularly regarding its

continued EU membership status. The authors examine the EU's legal framework, including the Lisbon Treaty, which does not explicitly address scenarios where part of a Member State secedes. This ambiguity has led to debates about whether an independent state emerging from secession would automatically inherit EU membership or need to apply anew.

The paper generally suggests that the EU would likely treat a newly independent state as a non-Member, requiring it to undergo the standard accession process to join the Union. This position aligns with the EU's commitment to respecting existing treaties and Member States' integrity, thus avoiding a precedent that could destabilize other regions within the EU with secessionist aspirations. The paper concludes that while the EU is likely to require a reapplication, there may be room for tailored pathways or negotiations, depending on the context and political dynamics of the secession.

Literature in this group of studies is helpful to understand the discussion of this article that focuses on the relationship between the secession of sub-state nations and the EU. These readings analyze the EU position on sub-state secession and the issue of sub-state secession in the EU legal context.

Under the second perspective, there are many studies that illustrate the definition of nationalism, the evolution of nationalism in Europe, the reasons behind the increasing sense of nationalism, and its effect.

One of the significant articles that focuses on the definition of nationalism and the relation between nationalism and ethnicity is "*Ethnonationalism, ethnic nationalism, and mini nationalism: A comparison of Connor, Smith and Snyder*" (Yun 1990). In this context, the definition of **nationalism** according to Synder is "a condition of mind, feeling, or sentiment of a group of people living in a well-defined geographical area, speaking a common language, professing a literature in which the aspirations of the nation have been expressed, being attached to the common traditions, and, in some cases, having a common origin" (Snyder (ed.) 1964).

 Also, there is a study that discusses the rise of nationalism in the EU *is "The Resurgence of Nationalism in the European Union"* (Calance 2012). It focuses on the meanings and dimensions of nationalism. Also, it illustrates the impact of nationalist thoughts in the European Union, stressing the times of recession. The study demonstrated that there are some perspectives of the EU that challenge national economies and national sovereignty.

As mentioned above, the studies of this perspective focus on the conceptualization of nationalism, its forms, and the rise of nationalism across Europe. However, each study focuses on different interpretations or aspects behind the increasing sense of nationalism and nationalist trends. The studies under this perspective support the article in understanding the evolution of nationalism and the factors that led to the rise of nationalist attitudes.

So, the literature review presents the various perspectives in literature that discuss nationalism and its forms, secession and the way it is affected by nationalist trends, and particularly the cases of European countries that witness secessionist tendencies. In the European Union, the relationship between nationalism and secession is complex and intertwined, especially as member states grapple with regional identity, sovereignty, and EU integration. Within the EU, several regions (like Catalonia in Spain and Scotland in the UK) have seen a surge in nationalist movements that seek greater autonomy or outright independence. These movements often promote the distinct cultural, linguistic, and historical identities of these regions, positioning them as unique "nations" within the larger EU framework. Regional nationalists view that they should govern themselves to better serve their communities, with control over local resources and policies. The EU's support for minority rights and regional identities often fuels their confidence, making independence seem more feasible.

The EU's emphasis on self-determination, minority rights, and democratic values boosts peaceful expressions of regional identity and can provide a platform for marginalized voices. The EU's stance, however, is careful: it generally promotes the territorial integrity of member states and avoids taking a side in secessionist disputes. This ambiguity fuels tension, as regional nationalists consider the EU as a potential partner in achieving autonomy, while the EU remains cautious about setting precedents that might encourage fragmentation.

Consequently, this article will give more concern to the EU attitude towards the rise of nationalist secession at the sub-states' level- in the context of rising pressures from secessionist tendencies. The importance of this article is related to the following considerations:

➢ It presents a deeper understanding of the relationship between EU and nationalist secession at the sub-state level.

➢ The influence of the EU legal context on the EU's strategies towards the secessionist call in Scotland and Catalonia.

➢ Consequently, this article emphasizes the difference between the EU responses towards both cases.

3. Methodology

This article depends on the qualitative content analysis of the articles of the EU treaties, and speeches of elites. There are significant surveys such as the Scottish Social Attitudes Survey[i] keen on analyzing the support towards the EU. Also, it examines the declarations of the representatives of the EU institutions, such as the European Commission, in the light of growing secessionist tendencies.

The article employs qualitative methods (the case study analysis and the comparative method). The case study analysis discusses the cases of Catalonia and Scotland. The rationale for choosing the two cases is that, currently, independence arguments in Scotland and Catalonia are the highest profile cases of secession movements in Europe. Both cases share similarities, such as pursuing immediate EU membership. The Catalan and the Scottish cases, as Guibernau believes, are a 'democratic type of nationalism […] defending the nation's right to decide upon its political future by democratic means'. Calls for independence have followed democratic steps, like the electoral triumph of minority nationalist parties and campaigns for holding independence referenda. Thus, the public domain and democratic process of deliberation therein have played a significant role in which secession results are negotiated (Bourne 2014: 96).

In both cases, political elites and political parties play a significant role in the rise of nationalism at the sub-state level. Also, the EU represented in its institutions and its political actors issued several reports, statements, and documents. Consequently, this article analyzes the elite discourses and provisions of the Spanish constitution, depending on some readings like *"The evolution of the political discourse in Catalonia 2003-2014: From Self-government to Self-determination"* (Serrano 2014). In the case of Scotland, the article clarifies the position of the largest three parties in Scotland from secession, the Scottish National Party (SNP), the Labor Party, and the Conservative Party, by focusing on some studies like *"Nationalism, party political discourse and Scottish independence: comparing discursive visions of Scotland's constitutional status"* (Whigham 2019).

With respect to the comparative method, it relies on comparing between the mentioned two cases in the sub-state level by analyzing the EU response towards each case in the light of rising nationalist secessionist tendencies.

4. Discussion

1) The relationship between the secession of sub-state nations and the EU

The analysis of the relationship between the sub-state nationalism and the EU is complex and reveals contradiction. The role of the EU is indefinite and ambiguous, as it sometimes permits the pursuit of nationalist aims, while at other times it restricts national ambitions towards secession. However, the EU showed to be a significant actor for the sub-state nationalist aspirations. Thus, the legal and political arena of the EU, such as the position of states in the institutional structure of the EU and the requirements of the EU membership, impact the sub-state nationalist potentials (Connolly 2013: 54). The arguments about the EU position from sub-state secession are founded on three main ideas (Closa 2016: 241).

a) The EU role in the nationalist sub-state secession process

The intentions from the calls for secession have changed over time. In the past, the claims for independence were associated with oppression, colonial status, or exploitation. Such conditions are dismissed by the EU and conceived as inconsistent with the EU membership demands, which rely on honoring human rights, the rule of law, and democracy. In recent times, demands for secession within the EU show other claims than the traditional ones. The EU existence and the probability of requesting membership after the secession from a member state constitute a remarkable concern for territories seeking secession. These territories aiming to secede suppose that independence will give them the chance to perform better than belonging to a member state. Consequently, in the condition of seceding from a member state, newly independent states pursue to preserve its situation within the EU and to maintain the EU membership (Closa 2016: 242).

Thus, the existence of the EU impacts the independence calculus. To transform from a sub-national unit into a new independent state within the EU encompasses costs and benefits. However, the EU demands particular standards for governance to be remodeled to the supranational sphere; the EU guarantees stability and security to face the waves of globalization, which are viewed as a serious challenge for a newly independent state (Closa 2016: 243).

b) The impact of sub-state secession on the EU

There is an argument centered on the effect of secession from a member state on the EU. Taking into account the willingness of the new independent state to obtain the EU membership, this requires an EU membership enlargement, which necessitates institutional, structural, decision-making, and policy modifications. This incorporates new EU adjustments or policies, amendments in the seats of the European Parliament, changes in the structure of the Commission, and votes in the Council, which affect the coalition and the distribution of power among states. Moreover, the decision of secession includes many doubts and debates about the status and the rights of the individuals in the seceding entities. Thus, the impact of secession exceeds being an operation of territorial borders. In a supranational institution like the EU where spillover effects are likely to occur, it is important to realize that disregarding the consequences of secession will impact the image of the EU (Closa 2016: 244).

c) The effect of sub-state secession on the applicant states

There is a considerable debate about the impact of secession on countries that pursue the EU membership. Comprising new EU states is associated with the expression "absorption capacity" which refers to the impact of the enlargement on the decision-making process and the ability to implement the policies. Thus, the Commission President in 2014 clearly and officially declared that there are no EU enlargements during the term (2014- 2019). Furthermore, if the EU agreed to accept the newly independent states, this might lead to unequal treatment among states aiming for EU membership (Closa 2016: 244-245).

The above-mentioned discussions emphasize the importance of being aware of the legal status of the EU in the light of dealing with secession. In the EU multi-level legal order, debates about secession are controversial. As indicated by Joseph Weiler, secession challenges the EU Treaty obligations of fostering European integration by creating "an ever-closer union among the peoples of Europe" (Weiler 2012: 910). Contrary to this perspective, it is argued that secession does not contradict the EU basic principles at any constitutional level. This perspective rests on three assumptions; the first argument relies on Article 4.2 (TEU)[ii] that the EU does not reject the secessionist attitude. The second assumption counts on Article 2 (TEU)[iii] which ensures the compatibility of the EU norms and standards with international law to accept the right to self-determination. The third argument is associated with the EU's raison d'être as a peace scheme rather than a process to eliminate nationalism. Since the establishment of the EU, it has been perceived as a political, economic, and legal institution where several nationalisms coexist, negotiate, and cooperate. Thus, the agreed secession does not contrast with the EU legal norms (Skoutaris 2023).

Nevertheless, the preceding claims were opposed by the argument that the EU Treaties did not refer explicitly to the rejection of secession, as it can be deduced implicitly such refusal according to the norms and values of the EU as mentioned in Articles 2, 3, and 4 of the (TEU). Consequently, the EU's Treaties' silence with respect to secession resulted in several and even contradictory understandings. Moreover, taking into account that states are perceived as "masters of the Treaties", it is reasonable that they are not interested in adopting decisions or laws at the supranational level that might contrast with their national constitutions (Tejada 2014: 3-4).

Thus, it is noteworthy that the compatibility of secession with the EU legal standards relies on whether the act of secession is unilateral (without consensus) or it is a consensual act that stems from an accord between the parent state and the seceding entity (Bárcenas 2014: 228).

a) Unilateral secession

The unilateral secession is accepted if it is a response to improve a condition of repression, colonialism, or suppression. This remedial secession is compatible with EU standards and values. There are three particular provisions that clarify the EU position in law: the responsibility of respecting the territorial integrity of the member states (Article 4.2 TEU), the beliefs and principles of the EU (Article 2 TEU), and the rule of sincere cooperation (Article 4.3 TEU)[iv] (Closa 2016: 248).

I. The commitment to respect the territorial integrity of the member states (Article 4.2 TEU)

Based on this Article, the EU recognizes that the member states can exclusively decide on their legal and political arrangements and provisions correlated with autonomy, in particular the state's territorial integrity. So, it is concluded that member states are the main players ruling their territorial and legal frameworks, while the EU role at that level is excluded. So, member states are the masters in admitting or rejecting any

territorial and structural modifications, and developments must be grounded on the state's consent (Closa 2016: 248-249).

II. The norms and values of the EU (Article 2 TEU)

This article contradicts the automatic EU membership after secession of a territory. This perspective supports the shallow signification of the definition of democracy, which relies solely on the majority voting principle. An inclusive explanation of democracy comprises following the rule of law and honoring the fundamental human rights. In this framework, democracy is much more than concentrating on the majority's choices. And these principles of democracy are basic standards to access the EU. Thus, unilateral secession does not follow the rule of law of the parent state, violates Article 2 (TEU), and could be seen as illegitimate (Closa 2016, pp.249&250).

III. The principle of sincere cooperation (Article 4.3 TEU)

The norm of sincere cooperation is centered on combining the EU and the member states decisions. As the unilateral secession violates Article 2 (TEU), the EU and its member states should not approve any territorial secession that is legally under the authority of a member state because it is unilateral secession. Also, this rule imposes some restrictions on the actions of the member states to avoid any strategies that might conflict with the EU ambitions, like procedures against the interest of the single market (Closa 2016: 250-251).

b) Consensual secession

The acceptance of a member state on the secession of an area of its lands neutralizes the three discussed perspectives that the EU would present to the cases of unilateral secession. Furthermore, this acceptance allows us to ask hypothetically about the chance of achieving independence and an automatic EU membership at the same time (Closa 2016: 250-251).

Based on Article 4ᵛ of the Vienna Convention in 1978 concerning the succession of states in terms of treaties, the membership of an international organization is centered on the standards and norms of this organization (Connolly 2013, p.85). The EU institutions favored this position adopted by international law. In 2004, Romano Prodi, the Commission President, announced that lands seceded from member states will no longer follow the Treaties, and these newly independent states must ask for new membership, according to Article 49 (TEU) (*Official Journal of the European Union* 2004). In 2012, President Barroso adopted this perspective (UK Parliament (2012). and later in 2017, President Juncker has followed the same path, while perceiving the independence vote in Catalonia as illegal (European Commission 2017). Some EU institutions consolidated the Commission's stance, like the President of the European Council, Herman Van Rompuy (European Council 2013), and the Committee of Regions (*Official Journal of the European Union* 2013). Furthermore, the European Court of Justice has illustrated that the EU should not encompass a larger number

of member states than that between which the Treaties were grounded (European Court of Justice 1997). In this regard, the EU institutions adopt a coherent approach towards the newly independent state as it transformed into a third country, so treaties are not applicable anymore on its territories. Although some debates emphasize that seceding territories will not be allowed for automatic membership, direct expulsion is incompatible with the EU principles and treaties (Graham 2014).

The cornerstone argument for the implementation of automatic accession at the same time of independence is centered on Article 2 (TEU), which relies on EU standards, in particular democracy. Secession is obtained through democratic measures. Thus, the EU- whether its member states or its institutions- should recognize this democratic route; otherwise, it would be breaching the EU norms. So, the abstention to give an automatic EU membership to the seceding territories clarifies the non-recognition of the democratic rights of the individuals in these territories by the EU law (Closa 2016: 254).

Consequently, in such discussion, it is important to concentrate on two main points. On the one hand, the right to secede through democratic tools does not contrast with the EU principles. On the other hand, the acceptance of the results of secession by the EU and its member states, even if it is a democratic decision, might impose externalities on them. So, it is worthy to notice that democratic theory does not oblige those outside the demos to accept the implications of the decisions within the demos. The respect of democratic decisions must involve that the outsiders admit the legitimacy of such decisions. However, the acknowledgement of the legitimacy of the decisions within a demo suggests that this demo can project the impact of its decisions. Sometimes democracies might impact other states through unintended consequences (externalities). Thus, the argument on automatic membership includes the result of the decision of secession on third parties like the EU and its member states, because externalities are not compatible with the objectives of the EU project (Closa 2016: 255).

2) The Catalan independence referendum and the EU reaction

There are many elements that distinguish Catalan national identity, such as the Catalan language, the special national character, the distinctive flags (*senyera* and *estelada*), festivals, and celebrations like the *sardana* dance (Johannes 2019: 23).

At the beginning of Catalan nationalism, Catalans do not consider developing a "state" as a default historical fact. According to them, the most significant issue is the process of building national consciousness, which consolidates cultural bonds and national identity. The Spanish transition from authoritarianism to a

democratic system, followed by integration with the European Communities, helped to raise the national consciousness of Catalans (Llanos-Antczak 2021, p.15). Transformation of Catalan nationalism towards independence based on several social, economic, and political reasons (Madaula 2012: 39-40).

The social factor plays an important role. Catalonia started to involve a new generation that was raised in a democratic atmosphere. This generation is aware of their rights, like the "right to decide". This new generation calls for the use of democratic mechanisms like the development of referendums.

In 2008, the global financial crisis influenced the national debate in Catalonia. The economic crisis stressed the link between a taxation system that was considered unfair and the problems that resulted from the crisis. Between 2010 and 2015, the CiU government implemented some cuts to Catalan public services. Artur Mas, the president of the Catalan government, asked for creating an independent Catalan taxation system in 2012 and called for new fiscal agreements between Catalonia and the Spanish government. Nevertheless, the Spanish government did not adopt a positive action and the right-wing Catalanists participated in the pro-independence movement (Madaula 2012).

The political tensions started with the 2006 Statute of Autonomy. The Statute marked the main source of disagreements between the Catalan and Spanish governments. In 2005, the Catalan government presented a reform to the 1979 Statute of Autonomy, seeking greater self-government. In 2006, the Catalans voted for the approval of the Statute. Nevertheless, the central government, led by Mariano Rajoy, leader of the right-wing People's Party (PP), rejected the reform and had to resort to the constitutional court. In 2010, the constitutional court ruled in favor of the cancellation because certain articles of the Statute of Autonomy were unconstitutional. This led to an increase in pro-independence votes, from 14% in 2006 to around 30% in 2011, following the cancellation of the Statute, to 47% in 2017, based on a survey conducted by *Podemos* (*Marini* 2017).

In 2013, Artur Mas, the President of Catalonia, declared the intention of running an independence referendum with the EU leaders' support. Artur Mas requested from the European powers to show solidarity to the democratic procedure, which the centre-right government of Spain presided over by Mariano Rajoy described as an unconstitutional action (*Reuters* 2014). But, later in 2016, Mr. Mas announced to quit the regional presidency after many disputes with parties. That in turn has brought on the presidency of Carles Puigdemont[vi] (*BBC News* 2016).

Carles Puigdemont announced on the 1st of October 2017 that Catalonia will carry out an independence referendum. The results of this referendum showed that 90.18% of the Catalans voted for independence. Nevertheless, this percentage only constituted 2.3 million citizens, representing 43% of the registered voters (*Reuters* 2017).

As a consequence of this referendum, Carles Puigdemont and some Catalan politicians encountered many charges (Sanz 2017). The Spanish government proclaimed the illegality of the referendum and considered it violating three articles of the Spanish constitution. As stated in Article 2[vii] of the Spanish Constitution, the integrity of the Spanish territory is indissoluble. Spain is a nation of all Spaniards, respects the right to autonomy of the nationalities and regions within the country, and is keen on the coherence and consistency amongst them all (*Marini* 2017).

Based on this article, a nation of indissoluble unity indicates the involvement of diverse nationalities. Constitutionally, this nation should not allow the execution of a pro-independence referendum. This is the main discussion about the Catalan position. Even so, this article, which highlights the "plurality of nationalities" is confusing in the context of the right to self-determination (*Marini* 2017).

With regard to Article 92, it shows that the referendum should be suggested by the government and necessitates the ratification of the Congress and to be invoked by the king. While Article No. 155 gives the central government the authorization to rule regional institutions if autonomy is contradictory with the Central State policy. As a result, Spain reacted unprecedentedly with the suspension of Catalonia's status of autonomy, applied the direct rule, dissolved the Catalan parliament, and requested new regional elections in December 2017 (*Marini* 2017).

In May 2018, Quim Torra presided over the *Generalitat.* He is regarded as a separatist. Concurrently, Mariano Rajoy, the leader of the Spanish government, was accused of political corruption and mismanaging the Catalan crisis. The scenario resulted in a vote of no confidence from other parties. Then, the socialist Pedro Sànchez took control, who was believed to be more receptive to better autonomous status for Catalonia (Johannes 2019: 21).

At the European level, the European Commission issued a statement declaring that, in accordance with the Spanish Constitution, the vote in Catalonia was unconstitutional. In the opinion of the European Commission, this is an internal affair for Spain that must be handled in consistency with the constitutional order of Spain (European Commission 2017).

Carles Puigdemont criticized the EU approach towards the Catalan conflict, and even with the continuous efforts from the independentists to obtain EU support, the EU has strongly consolidated the central government in Spain. Thus, the EU has been a considerable actor in framing the political positions of the independentists and the unionists, as well, in Catalonia. For the central government, there is a need for EU support to legitimize its actions, while for the secessionists, the EU backing assures the internationalizing of the issue and guarantees protection of the fundamental rights (Aumaitre 2017).

Recently, the European Parliament released a report in February 2021 to deprive three Catalan Members of the EP from parliamentary immunity- Carles Puigdemont and two other Catalan separatist lawmakers.

All are constrained by European arrest warrants declared by Spain for their role in arranging an independence referendum in 2017 which is regarded as illegal by the Spanish court (European Parliament 2021). Nevertheless, Puigdemont described the EP's voting to strip the parliamentary immunity as "a sad day for the European Parliament", commenting it was "a clear case of political persecution". He stated that "We have lost our immunity, but the European Parliament has lost something more: European democracy" (Herszenhorn 2021).

In this regard, the Council of Europe issued a report in June 2021 focusing on respect for the legal order of Spain. Also, it ensured the importance of providing a democratic sphere where politicians can practice their mandates and enjoy freedom of expression (Council of Europe, Parliamentary Assembly 2021).

3) The Scottish independence referendum and the EU response

The Scottish people depended on manifesting their national distinctiveness through different symbols. These symbols of Scottish nationalism helped to justify their desire for the right to self-determination. There are many manifestations that distinguish Scottish national identity, such as the Scottish language, the special national symbols like the thistle and the kilt, and the distinctive flags (the Saltire and the Lion Rampant) (Duncan 2012).

To understand the shift towards independence that took place in Scotland, there is a need to highlight three main constitutional traditions: unionism, home rule or devolution, and the independentist tradition (Keaing 2015: 74-75).

a. Unionism

It is a British doctrine that was developed because of the Act of the Union in 1707. According to the unionists, the United Kingdom should have a unitary parliament at Westminster, without any delegation of power to the nations of Ireland, Scotland, or Wales.

b. Home Rule or devolution

Devolution means the shift of power or the delegation of responsibilities from the central government to the local government.

The debate on devolution in the post-war period expanded. The UK suffered from an unstable economy and a decline in industry. During the 1960s, nationalist parties like the Plaid Cymru Party in Wales and the Scottish National Party (SNP) began to grow considerably in Scotland (Masetti 2019: 8-12).

After the oil and gas discoveries in the North Sea during the 1970s, the SNP did not want to share the revenues with England and adopted the "It's Scotland's oil" slogan. This campaign helped the SNP in the

1974 general election to become the second largest party in Scotland, behind the Labor Party, which won the election, and ahead of the Conservative Party (Masetti 2019: 14).

c. The independentist tradition

This tradition aims to have a separate nation-state. It was considered an insignificant tradition until the 1970ˢ, when the Scottish National Party (SNP) started to gain electoral progress (Masetti 2019: 20).

So, Scotland followed a devolution process, which resulted in two main tendencies: The first tendency is the Unionist, which seeks more devolved authorities, while the second tendency is the pro-independent, represented in the Scottish National Party (SNP). The Unionists are represented mainly by the Conservative, Labor, and Liberal Democrat Parties. These parties managed through the Calman Commission to reach an approval on the Scotland Act 2012, which provided more financial authorities for the Parliament of Scotland and attempted to prevent the possibility of carrying out an independence referendum. Nevertheless, in a quick response, the SNP's leader, Alex Salmond, succeeded in reaching an agreement with Westminster. The Edinburgh Agreement in 2012 concluded in implementing the Scottish independence referendum in 2014. Consequently, the SNP had the opportunity to implement a referendum on Scottish independence before 2014 ends. Thus, the Scottish Parliament was allowed to legislate for the referendum, devolving an affair that belonged to Westminster (Masetti 2019: 21).

The main question of the referendum was: "Should Scotland be an independent country?" Therefore, the SNP sustained independence with its "YES Scotland" campaign, while the Unionist Parties raised the slogan "Better Together" (Council of Europe, Parliamentary Assembly 2021).

The Scottish independence referendum in 2014 resulted in the highest voter registration in Scottish or British history, as 4,285,323 people were listed to vote and when the ballot was ended, 3,619,915 had truly voted. The outcome was 55% against the independence of Scotland with 2,001,926 votes for "No", while 45% of the votes were in favor of independence with 1,617,989 votes for "Yes" (Davidson 2014: 21).

At the European level, Europe was a significant actor in the Scottish referendum. Contrary to most of the regions in the UK, Eurosceptic parties witnessed a limited electoral backing in Scotland, although the UKIP (UK Independence Party) managed to have a seat for the first time in the May 2014 European election. Furthermore, the Conservative Party obtained the third place in Scotland, while the significant political parties in Scotland, like the SNP, Labor, and the Liberal Democrats, showed a pro-European position. Thus, the Scottish pro-independence supporters used the EU membership as a tool by highlighting the membership's economic and social benefits. Actually, the SNP has always demanded Scottish independence within Europe. The SNP has proclaimed that Europe would maintain the autonomy of Scotland better than belonging to the UK. Europe would mitigate the economic costs of secession by being included in a bigger single market and granting a substitutive sense of security other than that provided by the nation state (Schnapper 2015: 2-3).

This perspective was discussed by Michael Keating that the institutional framework of the EU allows the nonstate actors to interfere, achieve recognition, and guarantee protection. Also, it favors the claim that Scottish nationalism is inclusive and internationalist, contrary to the English Tory/UKIP, which appears to be anti-EU nationalism (Keating 2004: 17).

Moreover, the Scottish independence is considered an unprecedented action for the EU. No territory of an actual Member State that achieved independence while seeking to belong to the EU simultaneously. This might lead to turmoil with regard to the Scottish membership in the EU. In spite of this vague situation, the EU membership did not impact the voter's choices- neither the "Yes" nor the "No"- in the independence referendum (Jan Eichhorn and Daniel Kenealy 2014).

According to data formulated from the 2013 Scottish Social Attitudes Survey, it illustrates that 67% of 'Yes' electorate want an independent Scotland within the EU, while 70% of 'No' electorate have the same opinion. There is no prominent difference.

Such outcomes are centered on people's direct answers on issues that appear to be associated with their decision-making about the referendum. For example, based on a poll concluded in early 2014, only 3% of people viewed EU membership as the most important matter. This might be surprising for people who suppose that Scottish citizens are more concerned with the EU than people in England, where the UKIP is a remarkable force. Scottish citizens hold a positive view of the EU in contrast to their neighbors (Jan Eichhorn and Daniel Kenealy 2014).

Consequently, by comparing the Catalan and the Scottish cases, it can be deduced that both cases are clear examples of sub-state nationalism that hold distinguished symbols of identity. In both cases, the evolution of the historical and political events played a significant role in directing sub-state nationalism towards the calls for independence. Nevertheless, the most notable difference between the Catalan and the Scottish cases is the EU response towards both cases. In the next section, there is an illustration for the EU attitude based on its legal framework.

4) The Catalan and the Scottish secession in the EU legal context

According to the EU legal framework, the EU attitude towards processes of secession relies on the main principles, standards, and values founding the EU. Nevertheless, there are no explicit, decisive legal articles to define the EU position on sub-state secession. Thus, the EU attitude can hold various interpretations, sometimes contradictory, and differs relative to each case of secession, whether unilateral or consensual. In

this context, the Catalan and Scottish cases are two significant examples that clarify the EU response towards unilateral and consensual secessions.

The Catalan case represents an obvious example of unilateral secession, which is considered a notable challenge to the EU for many reasons: First, the EU and Catalonia are two divergent models. The EU model is centered on the gradual relocation of sovereignty from the national to the supranational level, while the nationalist model of Catalonia pursues to shift sovereignty from the national level to the regional level. Second, the anxiety of other member states from a domino effect in states that encompass diverse cultural clusters that might ask for establishing their own state following the example of Catalan nationalism. This clarifies the difficulties that confront the EU if it recognizes the new nation-based states (Ramiro, Troitiño & Kerikmäe 2021: 10).

Moreover, Catalan nationalism faces another hypothetical challenge if it achieves independence. The secession of Catalonia leads to the automatic exit from the EU. This move implies the beginning of a new EU enlargement process that most seemingly might face political barriers. According to the standards of the EU, enlargement processes rely on a unanimous consensus of all member states. In such a case of unilateral secession, not in favor of the central government, Spain might make use of veto to impede the Catalan membership in the EU. Also, other member states worry about the domino effect of the secession of Catalonia and its influence on the internal uniformity of these member states (Ramiro, Troitiño & Kerikmäe 2021: 11).

Consequently, the Catalan government submitted a proposition in 2019 to solicit carrying out some adjustments in the EU internal mechanism that allows the enlargement process. Despite the explicit ambition of the Catalan government to join the EU, this modification seems to be unrealistic because structural changes inside the EU demand the consensus of its member states (Ramiro, Troitiño & Kerikmäe 2021: 11).

With regard to the Scottish case, in contrast to the unilateral action of Catalonia, the 2014 referendum has abided by the UK constitutional law. The Edinburgh Agreement between the UK and the Scottish Governments affirmed that the outcome of the referendum is recognized by all parties and is regarded as legitimate, so it must be respected by the EU. Since the Scottish referendum is viewed as a fully legal process that constitutes the will of the Scottish citizens through a democratic procedure, it would be inconsistent with the EU norms and principles to oblige Scotland to exit the EU (Douglas-Scott 2019). As a result, the EU's principles and raison d'être are at issue here. This might undermine the EU's credibility as a supranational institution that consolidates democracy and respects fundamental human rights.

5. Conclusion

The article examines the EU response towards nationalism at the sub-state level by concentrating on the rise of nationalist secessionist tendencies in the sub-state nations, namely the cases of Scotland and Catlonia.

The article helped to answer the question, ***"How the rise of nationalist secession at the sub-state level impacts the EU attitude?"*** and concluded that, although the EU norms support the integration process, there was no obvious rejection in the EU treaty articles against secession. Even so, there is a significant factor that helps explain the consistency of secession with the EU legal norms. This factor relies on the type of secession, whether it is unilateral or consensual secession. Consequently, the EU response towards sub-state secession differs from case to case; this can be deduced from the EU response towards the secessionist cases of Scotland and Catalonia.

Catalan and Scottish nationalism are examples of sub-state nationalism that developed over the historical and political progress of Spain and the UK in general and these regions in particular. There are many elements that distinguish Catalan and Scottish identities. In both cases, there is a distinctive language (Catalan in Catalonia and Scottish in Scotland) and distinguished flags (the Seneyera and the Estelada in Catalonia and the Saltire and the Lion Rampant in Scotland). And there are privileged celebrations, festivals, and local events in Catalonia, while Scotland is characterized by special symbols like the thistle and the kilt. Thus, this article supports literature that identity and cultural variations are motives for secession.

The article illustrated that the diverse political, economic, and social events marked the shift in Catalan and Scottish attitudes towards pro-independence. And as mentioned in the methodology, the article analyzed the role of political parties and elites in the evolution of Catalan and Scottish nationalism by focusing on literature that clarifies that political and economic considerations play an important role in the evolution of secession.

The article showed that the EU attitude towards Catalan independence seems contradictory. However, the EU claims respect for civic elements such as democracy, integration of minorities, the rule of law, etc.; the EU response showed a double standard. The EU decided to respect the constitution of the Spanish state while ignoring the civic demands of Catalan nationalism. In the Scottish case, Europe played a significant role in the Scottish referendum. The EU perceived the Scottish referendum as a legal process. Thus, the EU attitude towards sub-state secession aligns with literature in distinguishing between unilateral and consensual secession.

Notes

[1] The Scottish Social Attitudes Survey is concerned with measuring and tracking citizens' social, moral and political views in Scotland.

[1] Article 4.2 (TEU) states that "The Union shall respect the equality of Member States before the Treaties as well as their national identities, inherent in their fundamental structures, political and constitutional, inclusive of regional and local self-government. It shall respect their essential State functions, including ensuring the territorial integrity of the State, maintaining law and order and safeguarding national security. In particular, national security remains the sole responsibility of each Member State."

[1] Article 2 (TEU) states that: "The Union is founded on the values of respect for human dignity, freedom, democracy, equality, the rule of law and respect for human rights, including the rights of persons belonging to minorities. These values are common to the Member States in a society in which pluralism, non-discrimination, tolerance, justice, solidarity and equality between women and men prevail."

[1] Article 4.3 (TEU) states that "Pursuant to the principle of sincere cooperation, the Union and the Member States shall, in full mutual respect, assist each other in carrying out tasks which flow from the Treaties".

[1] Article 4 of Vienna Convention states that "Non-retroactivity of the present Convention: Without prejudice to the application of any rules set forth in the present Convention to which treaties would be subject under international law independently of the Convention, the Convention applies only to treaties which are concluded by States after the entry into force of the present Convention with regard to such States."

[1] Carles Puigdemont was the president of Catalonia from 2016, but removed in 2017 by the Spanish government after the illegal declaration of the Catalan independence.

[1] Article 2 of the Spanish Constitution states: "The Constitution is based on the indissoluble unity of the Spanish nation, the common and indivisible country of all Spaniards; it recognizes and guarantees the right to autonomy of the nationalities and regions of which it is composed, and the solidarity amongst them all".

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EU GLOBAL LEADERSHIP IN TERMS OF CLIMATE CHALLENGES*

ABSTRACT: *The study of the global leadership of the EU considering the climate challenges is a relevant theme of research in view of the dynamism of modern international challenges and threats related to both the direct problems of climate change (being the consequence of industrial activity) and the purposeful creation of climate issues to achieve absurd goals, which we currently see in the context of the Russian-Ukrainian war, i.e., using the climate as a weapon, creating large-scale environmental problems, etc. It was found out that global leadership is interpreted as the efforts aimed at changing the limitations and opportunities obtained from social interaction, the direction by one subject of the behavior of others over a long period of time, and the social role formed in the process of interaction between the leader and the followers. The EU has recognized climate change as a global challenge and has shown global leadership precisely in solving climate change issues. This resulted in the adoption by the EC of the European Green Deal (EGD) course in 2019, the main objective of which is to achieve climate neutrality and the new European strategy Global Gateway in 2021, which is implemented through the projects in Latin America and the Caribbean, the Middle East, Asia and the Pacific region, as well as in sub-Saharan Africa. The aim of the Global Gateway is to unite the world via investment and partnership. The carried out studies showed that the EU has the potential for global leadership of a mixed type with a clearly expressed projection of the practical application of leadership, that is, via precise effective actions. The dominant types of the EU leadership are the exemplary (e.g. EGD) and the entrepreneurial (e.g. Global Gateway). The EU has the capacity, experience and legitimacy to influence the external players.*

KEYWORDS: global leadership, European Green Course, climate diplomacy, green diplomacy, environmental policy

1. Introduction

Modern determinants of the international political development set the EU in the situation which necessitates it to simultaneously manage internal crises, form economic stability, political significance, adapt to new threats and respond to them. In addition, these trends affect the modification of tools and mechanisms for implementing of the ambitions of the European Union's global leadership in climate change issues, which for many years have been a key area of its foreign policy activity and are of vital importance for the EU and many countries nowadays.

Therefore, the study of the EU global leadership in terms of climate challenges is a relevant topic of research in view of the dynamism of modern international challenges and threats related to both the direct issues of climate change (these being the consequence of industrial activity) and the purposeful creation of climate issues to achieve absurd goals, which we currently see in the context of the Russian-Ukrainian war, namely, using the climate as a weapon, creating large-scale environmental problems, etc.

It is worth noting, that in the context of new international trends, the European Union has adopted two key long-term environmental strategies, which are also aimed at solving climate problems, namely, the European Green Deal and its derivative, the Global Gateway. The ultimate goal of the European Green Deal is to achieve environmental transformation in the world, the search for ways of economic recovery, decarbonization (mitigation of the consequences of climate change) and the increase of the environmental friendliness of the economy in the EU and its partners. This is, just as though, setting parameters for changing the "rules of the game" in the EU climate diplomacy. The Global Gateway strategy, in their turn, is the result of the evolution of the European environmental policy, i.e., its transition from technical actions to a broader and more informed policy that involves the support of civil society, private investors led by the EU and positions it as the leader in the international community, as well as the recognition of the protection environment and combating climate change being the main objectives of the EU. Both strategies highlight the EU vision of the green economy and offer it to others. Given that 2023 was characterized by severe storms, floods, droughts and forest fires, and aiming to improve the ability of the management systems of the EU and its Member States to cope with these climate risks, on 12 March 2024 the Communiqué titled "Managing Climate Risks – Protecting People and Prosperity" was adopted by the EC. Thus, following its strategic goals regarding the climate challenges, the EU strengthens them according to the dynamics of the climate challenges themselves as well. These strategies represent the EU as the promoter and implementer of the climate values and outline the EU global leadership in terms of climate challenges.

The aim of the article is the necessity to study the global leadership of the EU on the example of solving the problems related to climate challenges. The article dwells upon the following parts of the research:

literature review; theoretical and methodological foundations of the research; the essence and the approaches to interpreting the global leadership of the EU; the particularities and priorities of the European Green Deal; the Global Gateway strategy and its projection on solving the problem of climate change; international cooperation of the EU regarding the implementation of the green diplomacy policy; the cooperation between Ukraine and the EU on climate challenges; the prospects for the realization of the EU global leadership in relation to climate change in terms of modern challenges.

1. **Literature review**

Scientific research analyzing the EU global leadership in the climate challenges is divided into five main groups. The first group of studies focuses on the scientific works devoted to the interpretation of the EU global leadership. Due attention is paid to clarifying the term "global leadership" (Michalski and Parker 2024; Ioannou, 2021; Ugur et al., 2016; Rondinelli and Heffron 2009) and the approaches to the leadership (Aggestam and Johansson 2017). The researchers Erik Brattberg and Mark Rhinard (2013) managed to single out four criteria for the EU global leadership.

The second group includes the studies that highlight the goal of the European Green Deal (Dixigroup 2020; Taydas 2023; Türkelli and Sego 2023) and their priorities (Shared green deal, n.d.). The main components of the EGD initiatives/documents on climate change are identified (SDSN, n.d.). Besides, the Global Gateway strategy (Walsh and Takhar 2023; E3G, 2021) and its priority sectors were considered (European Commission, n.d.c). The issue of private financing and its risks for Global Gateway has been studied (Türkelli and Sego 2023).

The third group is aimed at the analysis of the international cooperation of the EU regarding the implementation of the policy of green diplomacy (Council of the EU, 2024), where the main focus was on the analysis of cooperation with African countries (Habro, 2022; European Commission, n.d.a; Tagliapietra, 2024), Latin America (Averchenkova et al., 2023; Thiébaut, 2023; Dennison and Engström 2023; Europian Commission, n.d.b; Europian commission, n.d.d; O'Shea and Talvi 2024; Euroclima, n.d.) and Asia (Lazard and Jayaram 2023).

The fourth group of studies examines in detail the cooperation between Ukraine and the EU as to the climate challenges (European commission, 2023; Dixygroup, 2023). It is noted that Ukraine has joined the LIFE Program – the Environmental and Climate Action Program (Verkhovna Rada of Ukraine, 2022). The main aspects of the implementation of the goals of the EU green diplomacy in Ukraine are highlighted

(Razumkov Centre, 2022) and five initiatives of the Global Gateway strategy are identified (Turchyn and Lukachuk 2024).

Finally, the fifth group of studies sheds light on further prospects for the realization of the EU global leadership in relation to climate change in modern realities (Dennison and Engström 2023; Treyer, 2023; Fusiek, 2021; O'Shea and Esteban 2024).

2.   Theoretical and methodological foundations of the research

The study of leadership in international relations is, as a rule, based on the definition of the components of its typologies, which are based on different regimes or bases of power. Thus, Mitchell Young identified three types of leadership: structural, involving the use of political and economic power; an entrepreneurial stance, which is carried out through diplomacy and negotiation; and intellectual, which is necessary to involve other actors (Young and Ravinet 2022).

The issue of international climate leadership of the EU is raised in the work by Sebastian Oberteur and Claire Dupont (2021). In particular, they analyze the EU past achievements and current challenges in this area, mainly, the internal and external dimensions of EU leadership (exemplary and diplomatic leadership), the framework conditions or the extent to which the EU has adapted its leadership strategy to practice, the turbulent international context, which requires the EU to constantly increase its strategic capabilities etc.

Noteworthy scientific research was conducted by Andrew Sherriff and Pauline Veron (2024); there they analyze geopolitical and geoeconomic changes that affect the internal politics of the European countries, foreign policy priorities, and international cooperation. The authors pay considerable attention to the Global Gateway strategy and its ability to positively modify the emphases of the world politics.

To analyse the issue of global leadership of the EU regarding the climate challenges, general scientific (i.e., analysis, synthesis, generalization, induction, deduction), empirical and logical methods were used, which made it possible to study the scientific literature and source base on the specified topic, and to identify general patterns and features of the global leadership of the EU in the context of its solution to climate problems, especially in the interaction with the addressee countries of the implementation of green diplomacy.

In particular, the analysis method made it possible to single out the main theoretical approaches to the interpretation of the EU global leadership in the scientific literature; the synthesis method was used to clarify the features and priorities of the European Green Course, and to analyze the purpose and objectives of the Global Gateway strategy; the generalization method, provided the opportunity to focus on the important aspects of the research; the induction method was used to characterize certain aspects of the EU international

cooperation regarding the implementation of green diplomacy policy in Africa and Latin American countries; and the deduction method made it possible to analyze the influence of geopolitical factors, primarily the Russian-Ukrainian war and energy issues, on the dynamics of the EU climate policy.

In addition, the systemic method was used, sustaining the consideration of the EU global leadership on climate change in the context of modern geopolitical determinants; as well as the structural-functional method, which made it possible to find out and understand the relationship between the current environmental policy of the EU and a number of other spheres (political, economic, social), etc.

It should be noted that the concepts of global leadership and normative power are interrelated. Normative power is one of the tools of global leadership, which is achieved by the ability of an actor to establish norms that will have an impact on others. At the same time, normative power is manifested through the actions and scope of influence of a global leader.

A significant role in the study of normative power is played by Danish political scientist Ian Manners. He was the first to formulate the term "normative power of Europe", which would later become popular in the scientific community and be used to refer to the ability of the European Union to exert "ideological influence" on other international actors by disseminating the norms it formed. In this concept, the political scientist focuses on the legitimacy of the dissemination of such norms, persuasive actions, and socialisation as the desired normative effect. According to Ian Manners, "the most important factor that determines the role of the EU in the international arena is not what it does or says, but what it is" (Manners, 2002).

Ian Manners believes that the concept of normative power allows us to assume that the fundamental normative principles on which the European Union is based encourage it to function in a normative way in the system of international relations. Thus, the political scientist argues that the positivist dimension of the EU's normative power is manifested in the fact that the Union acts to spread its norms to the international system, and the normative dimension is that the EU is simply has to act in such a way as to spread these norms in the international space (Manners, 2002).

The implementation of the EU's global leadership in climate change management through the mechanisms of normative force is primarily based on the formation of an extensive legal framework regulating environmental issues. It defines the basic principles of environmental law that shape the "environmental behaviour" of the EU member states and serve as the fundamental basis for the member states' climate policies. Among these principles are the polluter pays principle, the principle of integrating environmental issues into EU policies and actions, and the principles of precaution, prevention, sustainable development of the planet, compensation for the damage caused by eliminating it at the beginning of its occurrence (Hutsaliuk, 2022).

Thus, the overarching question of the study is how real the normative power of the European Union is in practice. The study used a normative approach that allows us to analyse the practical dimension of the

EU's normative power through the prism of its ability to shape and establish values, rules and standards of climate policy in the international arena. This approach is intended to help identify the mechanisms through which the EU shapes global climate norms and assess their effectiveness.

In addition, the methodological basis of the study is the criteria of the EU's global leadership, defined by scholars Erik Brattberg and Mark Rhinard (see Table 1):

1. Context (conditions of recognition, opportunity, authority).
2. Capability (choice of tools to achieve goals, negotiations).
3. Coherence (coordination of priorities, values, procedures, results).
4. Consistency (unification of obligations between partners, practical legitimacy, quality of assistance) (Brattberg and Rhinard 2013).

Table 1 «Criteria for global leadership»

Effectiveness criteria	Functioning	Sub-indicators	Hypothetical impact on efficiency
1. **Context**	Favorable structural conditions	Recognition, Opportunity, Authority	Are there favorable structural conditions for action by the EU?
2. **Capability**	Ability to mobilize means to achieve policy goals	Tools, Negotiations	Does the EU use practical means to develop effective negotiations?
3. **Coherence**	Consistent political priorities in efforts to spread influence	Values, Preferences, Procedures, Strategies	Does the EU demonstrate coherent values, procedures and results of its activities?
4. **Consistency**	Clear commitments between policy discourse and practice	Legitimacy, Quality of assistance	Does the EU fulfill its obligations in a coherent manner within the framework of its political documents?

The analysis of these criteria is important not only for seeing the EU's current compliance with the "standards" of global leadership, but also for determining the potential prospects of the Union to remain a powerful global leader, despite climate threats and other challenges of the modern world.

3. The essence and the approaches to interpreting the global leadership of the EU

Fundamental changes in the international system over the last decade and the weakening of the traditional international order determined the EU to strengthen its global leadership. At the same time, geopolitical changes question the EU ability to lead in many areas of global governance and require the formation of the new approaches to its global leadership. Thus, the EU has to form new rules and norms of global governance. Nowadays, especially with the tension in the field of international security, there is an increasing urge for the change in the geopolitical role of the EU and how this role is compared with the treatment of the EU as the global leader, which is traditionally expressed as a Normative Power, a Market Power and a Security Power (Michalski and Parker 2024; Tsebenko and Ivasechko, 2023: 3).

Global leadership is interpreted as the effort aimed at changing the limitations and opportunities derived from the social interaction (Ioannou, 2021). According to Louise Underdahl, leadership refers to asymmetric influence, where one subject manages or directs the behavior of other subjects over a long period of time. It is, first and foremost, the relationship between the leader and the followers (Ugur et al., 2016: 289).

The approaches to leadership identified by the scientists Lisbeth Aggestam and Markus Johanson are as well worthy of attention, they focus on a) the role of individuals, b) the position of actors, c) the processes of implementing leadership, and d) the results created by the leadership. These approaches are based on the explanation of the EU leadership depending on the use of the power resources/credentials, i.e., material, institutional and ideological. These sources often further identify different types of leadership strategies. In addition, the scholars consider EU global leadership based on sociological approaches through the lens of conceptualizing leadership as a social role based on the interaction between the leaders and the followers (Aggestam and Johansson 2017).

Besides, it is appropriate to point out that the global leadership of the EU is explained through the normative prism of the role theory. According to the theory of roles, the leadership role of the EU is carried out through the social interaction between the partner countries. The EU executes an important normative role in cooperating with others to provide aid under the auspices of "humane internationalism". Meanwhile, it is often states that the development goals tend to be de-prioritised in the EU foreign policy thus leading to aid

selectivity. Therefore, the European Commission controls the provision of aid, emphasizing the need for the "policy isomorphism". To address these challenges, the EU has to restore its external effectiveness role.

The scholars Dennis A. Rondinelli and John M. Heffron believe that leadership is of key importance in the process of forming the actor identity of the EU. In this aspect, the fundamental theoretical model for explaining the external relations of the EU is the theory of actorness, which is defined as "the ability to behave actively and cautiously in relation to other subjects of the international system" (Rondinelli and Heffron 2009). This model provides the following criteria for global leadership: recognition (partnership and interaction); authority (legal competence to act); autonomy (institutional apparatus during negotiations); cohesion (success in forming a common policy); opportunity (external context determining EU actions); and presence (conceptualizes the EU ability to act globally) (Rondinelli and Heffron 2009; Ioannou 2021, p. 14).

Besides, according to the theory of acting, the scientists Erik Brattberg and Mark Rhinard singled out four criteria of the EU global leadership: context (recognition conditions, opportunity, authority); capability (choice of tools to achieve goals, negotiations); coherence (alignment of priorities, values, procedures, results); and consistency (unification of obligations between partners and practical legitimacy, quality of assistance) (Brattberg and Rhinard 2013).

For example, the context can be considered the concept of "development" to be no longer limited only to the provision of EU aid to other countries, since there have arisen numerous issues that go beyond these frameworks (migration, security problems, etc.), therefore the concept of "effectiveness of aid" was replaced by the "developmental efficiency". The ability can be viewed in terms of the EU tackling the issues in negotiations within the framework of the Paris Declaration by reaching a consensus on development. Regarding the coherence and consistency, these are quite complex criteria, as they touch on the analysis of joint actions in the EU (Ioannou, 2021).

The scholars Lisbeth Aggestam and Markus Johanson believe that the basis of the EU foreign policy is the paradox between the demand for leadership effectiveness (strategic actions) and the perception of legitimate leadership (adequate behavior). The demand for strategic leadership is a response to the issues of collective action in the EU foreign policy and the recognition of leadership as a necessary, though not sufficient, factor for international cooperation. Instead, the sources of legitimate leadership continue to be based at the national level of the member states (Aggestam and Johansson 2017).

Most theorists are convinced that the EU has the potential for global leadership, primarily due to the fact that it is a model of development. In this regard, one should highlight the following general approaches:

1. The EU has the opportunity to take the position of the world leader. This approach is based on the statement that global processes negatively affect the accumulation of power in one country, for instance, the United States being the superpower, as evidenced by the events of September 11.

2. For the EU to exercise its leadership, it should possess sufficient power. Here one should consider the importance of such dimensions of leadership as political, economic, sociological, technological and military.

3. Global leadership requires motivation and strategy as well. There ought to be consistency of words and actions in all EU institutions and actions. The EU values, namely, democracy, human rights, rule of law, multiculturalism and the protection of minority rights have to be consistently applied to win international trust. Protecting vested interests, alienating some through the use of the concept of the "other", shirking migration, worrying about innovations such as genetically modified food and protecting short working hours under the rubric of the welfare state will not safeguard the EU its existing level of prosperity, let alone achieve the position of world leader.

Traditionally, global leadership has been measured by the degree of participation in high politics via the solution of security problems and the implementation of external activities. Meanwhile, the environmental or climate policy issues were considered more peripheral. However, the EU has recognized climate change as a global issue that needs to be taken seriously. Therefore, the EU became an ambitious player in the international politics, more fully demonstrating its global leadership precisely in solving the problems of climate change that have gone far beyond national borders and are equally applied to all states (catastrophes, air pollution, acid rain, water pollution, deforestation, loss of biodiversity, etc.). This gave the EU the opportunity to establish themselves as the leader and prove their ability to be one. This was as well facilitated by the Earth Summit in Rio de Janeiro in 1992 and the withdrawal of the US from their obligations under the Kyoto Protocol, the EU used the moment to assert themselves (Ugur et al., 2016, p. 285).

4. The particularities and priorities of the European Green Deal

The EU climate policy involves the management of political measures to mitigate climate change and adapt to it both in the EU as a whole and in the individual member states. This climate policy is based on the UN Framework Convention on Climate Change, the Kyoto Protocol to the Convention and the Paris Agreement on Climate Change.

The important result of the EU climate policy was the adoption by the EC in 2019 of a new strategy, namely, the European Green Deal (EGD) or the European Green Course (EGC), which deals with the issues of sustainable development and climate neutrality. In a political sense, the EGD is a response to the challenges of the global issues of climate change, pollution, loss of biological diversity and, accordingly, the positioning of the EU as the global leader (Dixigroup 2020, p. 14).

The main goal of the EGD is to achieve climate neutrality, which was presented in the EU vision "A Clean Planet for All", published in 2018. EGD is an integral part of the implementation of the UN 2030 Agenda as well (Taydas 2023, p. 79).

EGD is considered to be: a) the strategy and program of actions of the highest executive body in the EU; b) a set of measures that determines EU policy for the coming years in such areas as climate, energy, biodiversity, industrial policy, trade, etc.; c) a long-term plan for the development of Europe and a road map for the creation of new policies and strategies both at the pan-European and national levels; d) a comprehensive strategy aimed at making the European continent a carbon-neutral, resource-efficient, innovative and socially just continent by 2050.

The EGD priorities are: clean energy (the supply of clean and safe energy); circular economy (clean closed cycle economy); efficient repair (construction by energy- and resource-saving methods); sustainable food (from "farm to fork" ecologically clean food system); sustainable mobility (acceleration of transition to permanent mobility); preservation of biodiversity (preservation and restoration of ecosystems and biodiversity); climate action (increasing the EU climate ambitions for 2030 and 2050); zero pollution (environment without toxic substances) (Shared green deal, n.d.).

It is worth dwelling in more detail on the issue of climate change outlined by this strategy. The main constituent initiatives/documents of the EGD on climate change are the following:

1. Enhancing Europe's climate ambitions by 2030 (September 2020) has been designed to address the challenge of reducing greenhouse gas emissions up to 55 per cent by 2030. The EU is convinced this step to contribute to the well-being of its residents, improving their health, air quality and reducing damage to the environment in particular. The EU seeks to achieve economic growth, employment and calls for educational reforms (appropriate education and professional training), as well as the formation of ecological production.

2. European Marine Renewable Energy Strategy (November 2020). The EU is known for their numerous sea basins, hence, it can develop renewable energy in the sea as well. Pilot projects specializing in determining the ecological benefits of wind and aquaculture are already being developed. These are the projects in Belgium, Germany, Spain, France, the Netherlands and Portugal on shellfish, algae and multifunctional marine platforms (e.g., Edulis, TROPOS, Wier en Wind).

3. European Climate Pact (December 2020), established by the EC as a Pan-European initiative aimed at encouraging people and organizations to participate in climate actions and the development of a more sustainable Europe. The pact provides for the activities of the following nature: exchange of information; dissemination of knowledge about climate; discussion of the implementation of decisions on climate measures, etc.

4. EU Climate Change Adaptation Strategy (February 2021). Its adoption is due to the fact that climate change disproportionately affects vulnerable people as well as the human rights. That is why the EU considers

it necessary to better understand the health threats caused by climate change. Therefore, an important component of the long-term EU budget for 2021–2027 is the adaptation, that can add to minimizing these threats. In addition, the EC aims to ensure the poorest communities, particularly in developing, unstable and conflict-affected countries, to receive appropriate funds for health restoration.

5. The Climate Act (2021/1119) strengthens the EU efforts and commitments to combat climate change. It operates within the framework of the EU Green Deal and contributes to the formation of the resilience of societies and ecosystems to climate change. Accordingly, eliminating the risks associated with climate change requires strengthening actions to guarantee safe water and food, and improving conditions in the affected regions.

6. Fit-for-55 package (July 2021), developed within the framework of EGD with the aim of achieving carbon neutrality by 2050. The EU tends to reduce greenhouse gas emissions over the next decades. The first step should be to reduce them by 55% by 2030. In particular, to this end, the EU is revising its climate, energy and transport legislation as part of the Fit-for-55 package to align it with the 2030 and 2050 targets.

7. The ReFuelEU aviation initiative is planned to force fuel suppliers to use green aviation fuel for the planes refueling at the EU airports. Similarly, the FuelEU maritime initiative will encourage the adoption of the green fuels in shipping. In addition, the review of the Energy Taxation Directive (ETD) is envisaged to align energy taxation with the EU energy and climate policy, the promotion of clean technologies, etc. (SDSN, n.d.).

The mentioned initiatives within the framework of the EGD consider the involvement of both private financing for solving the climate change issues and public financial resources. However, according to experts, attracting private funds can have a negative impact on sustainable development in the developing countries. After all, the reliance on the private sector in ensuring the development of state infrastructure and services provides for the profit for private investors, in particular through the guarantees of favorable contractual conditions. These steps can contribute to the undermining of the state control over certain industries in general. In addition, many EU partner countries consider the EGD to be the political framework.

Therefore, EGD aims to convince and support others in the fight against climate change and environmental challenges. This involves the implementation of appropriate diplomacy, trade policy, development support, etc. It is important for the EU to influence the choice of the green course of its partners and the developing countries, in particular in Africa. Hence, creating stronger partnerships with Africa is one of the main priorities of the EU (Türkelli and Sego 2023).

5. The Global Gateway strategy and its projection on solving the problem of climate change

The Global Gateway Strategy is the EC initiative that promotes the development of the markets of the developing countries that are partners of the EU, in particular in the areas of digital technologies, energy and the environment on the basis of attracting private investment. The Global Gateway was launched at the end of 2021 during the French Presidency of the EU and aims to accelerate digital, energy and environmental transitions in the markets of the developing countries.

Under the Global Gateway, the EU aims to mobilize EUR 300 billion in aid by 2027 to support the financing of high-quality, sustainable infrastructure that meets social and environmental standards. Global Gateway is implemented through the projects in Latin America and the Caribbean, the Middle East, Asia Pacific, and sub-Saharan Africa.

The Global Gateway brings together the EC, the EU Member States and their development agencies (including the Agence française de développement (AFD)) and the major European donors, namely, the European Investment Bank (EIB), the European Bank for Reconstruction and Development (EBRD) and other European development financial institutions (EDFIs).

Global Gateway is funded by the EU, the member states and the European Investment Bank. As already mentioned, it as well attracts private investments. It is worth noting that the key tool for implementing the Global Gateway strategy is the European Fund for Sustainable Development Plus (EFSD+), which provides guarantees and financing of investments in the sustainable development. It is to attract up to EUR 135 billion of investment in various sectors of the Global Gateway. This development fund is an innovative tool that helps generate investments through the guarantees that cover the risks of large and small projects, as well as grants that are combined with long-term loans.

The Global Gateway strategy focuses on 5 priority sectors:

1. Digital technologies (access to digital infrastructures, protective regulatory framework, skills development).

2. Climate and energy (renewable energy and critical minerals management, sustainable agro-food systems, water and sanitation, waste management and ecosystem conservation).

3. Transport (rail, road, port networks, logistics centers and multimodal platforms, regulatory convergence and agreements).

4. Health care (security of pharmaceutical supply chains and development of local production capacities).

5. Education and research (access to quality education and training, creation of academic and research networks) (European Commission, n.d.c).

The Global Gateway projection of climate change is motivated by the fact that the investment in infrastructure is a tangible way to put the goals of sustainable development into practice. Fighting climate change requires renewable energy stations, power grids and EV charging infrastructure, just as health requires hospitals, education needs schools, and communication depends upon ports.

The motivation behind the formation of Global Gateway is the realization of the need for large investments in global infrastructure. For example, the World Bank estimates that achieving the goals of climate and environmental protection, universal access to energy, water and sanitation, greater mobility, and improved food security requires the investment of approximately EUR 1.3 trillion per year in infrastructure.

The EUR 300 billion mentioned above is the total investment the initiative strives to mobilize between 2021 and 2027. The total amount consists of:

1. EUR 135 billion of investment is foreseen under the European Fund for Sustainable Development Plus (EFSD+), where the EU provides EUR 40 billion as a guarantee, of which EUR 26.7 billion through the EIB and EUR 13 billion through the EFSD+ new window dedicated to the Global Gateway, targeting national financing and development financing institutions.

2. EUR 18 billion to finance projects related to climate action, clean energy and communication in the EU partner countries.

3. EUR 145 billion of planned investments by financial institutions of the EU countries and the development financing.

4. The existing programs, i.e., Pre-Accession Assistance (IPA) III, Interreg, InvestEU and Horizon Europe will also be used to mobilize resources under the Global Gateway.

The EU requires the partner countries to observe the rule of law, to respect the high standards of human rights, social rights and labour rights, as well as to adhere to the international norms and standards of intellectual property. The investment programs will be implemented in the following main areas:

1. In the partnership with the EIB, the EU will provide a guarantee covering EUR 26.7 billion in financing to support investments in several sectors, namely, in clean energy, green infrastructure and health care. The EU guarantee will have maximum impact on Global Gateway investments in those partner countries where the sovereign and other public sector risks still remain unsettled. The EFSD+ partnership approach will ensure clear governance in line with Global Gateway priorities, promoting synergy and complementarity with all areas of the EU external action.

2. A special Global Gateway window will be opened, which, together with other thematic windows, i.e., the Sustainable Finance window, will focus on the sectors of sustainable energy, clean transport and digital technologies. A separate digital support window will as well be created with a country-level approach to strengthen convergence with the EU digital economy packages.

3. The EU will use EFSD+ blending mechanisms. These institutions use grants and loans to support non-bank investment projects in the EU partner countries, while increasing their sustainability, climate protection and development impact.

4. Besides, the EU is exploring the possibility of creating the European Export Credit Facility to complement the existing export credit agreements at the level of member states. The mechanism will provide a more level playing field for the EU companies in the third-country markets, where they increasingly have to compete with the foreign competitors who receive a lot of support from their governments, and thus facilitate their participation in the infrastructure projects.

On 28 April 2023, the EC and the European Investment Bank (EIB) announced their intention to jointly provide EUR 18 billion to finance the projects related to climate action, clean energy and communication in the EU partner countries (an unspecified list covers the new markets).

The initiative uses the "Team Europe" approach that brings together the EU, its Member States and their financial and development institutions. The climate-focused projects currently planned by Global Gateway include the partnership with Guyana and Suriname in the South American region, which will focus on the green transition through the initiative to end deforestation and strengthen climate and biodiversity protection; the Sustainable Connectivity initiative, which will support the interconnection of ASEAN electricity grids to improve access to renewable energy and promote environmentally, economically and socially sustainable value chains; and the Climate Change Adaptation and Resilience initiative, which will bring together the existing and new climate change adaptation programs in sub-Saharan Africa worth more than EUR 1 billion.

At COP27, the agreement was reached to establish a special "loss and damage" fund to help the developing countries respond to damages caused by the climate change. Recently, in March 2023, G20 finance ministers and central bank governors have committed to mobilizing $100 billion in climate finance by 2020 and annually through 2025 to meet the needs of the developing countries, and President Joe Biden pledged $1 billion dollars to the Green Climate Fund. A UN-led program to help the developing countries become more resilient to climate change and to adopt to clean energy (Walsh and Takhar 2023).

As noted by Jennifer Tollmann, the Senior Policy Advisor in E3G Climate Diplomacy and Geopolitics team: "We are still far from halving the emissions this decade. As the recovery from COVID-19 continues, the Global Gateway is the EU best chance to engage international partners in the transition to climate neutrality. Money flowing into the green and climate-resilient infrastructure in 2022 could change the curve. This can give confidence to the emerging economies considering a greener recovery. At the same time, it can offer

a better alternative to the low-income economies seeking to avoid increasingly risky fossil fuel-based development paths. This is a chance for the EU to be the "best offer" and set the bar for quality cooperation" (E3G, 2021).

It is the EGD and Global Gateway push for private finance and capital incentive policies that anticipates the situation where leveraging additional private finance and robust private sector investment will accelerate the path to climate neutrality and fill the existing infrastructure finance gap in the developing countries. At the same time, it is important that the powers of the states are not limited (Türkelli and Sego 2023).

Like EGD, Global Gateway involves attracting private investment, which potentially creates similar risks, namely: the lack of distinction between state development aid and financing from private funds, the lack of accountability of the latter; focusing on the profitability of private investments, their priority over the financing of projects most needed by the local communities in the EU partner countries; transformation of the EU mechanisms into financial instruments for promoting geopolitical tasks, etc (Türkelli and Sego 2023).

6.   **International cooperation of the EU regarding the implementation of the green diplomacy policy**

Recently, on 18 March 2024, the European Council has reaffirmed the EU commitment to promote a just and inclusive green transition to or the implementation of the green diplomacy objectives, and to support the implementation of global commitments in this regard in close cooperation with the partner countries around the world. Besides, the Council expressed serious concern about the climate and environmental damage in the countries where there occur hostilities. At the same time, the Council emphasized that Russia's illegal war of aggression against Ukraine has caused enormous damage to the environment, threatened nuclear safety, and caused the energy and food crisis in the world. The interrelationship between climate and security is evident here, therefore, the EU is committed to promoting solutions to the interrelated challenges of climate change, environmental degradation, peace and security with its partners (Council of the EU, 2024). We will further focus on the analysis of international cooperation of the EU in terms of climate challenges with the countries of Africa, Latin America and Asia.

An important tool for supporting the green transition in Africa is trade. For example, the EU concluded the Economic Partnership Agreement with Kenya, which contains ambitious provisions on sustainable development and climate protection. In addition, African trade in critical raw materials and green hydrogen represents a clear opportunity for the EU. At the same time, the environmental issues and climate change are important in the EU-Africa relations (Habro, 2022).

Africa is a key regional priority of the Global Gateway and the focus of the most important investment package provided by the EU for the Global Gateway strategy. The EU leadership is convinced that the Global Gateway will contribute to the elimination of the huge investment gap in Africa, which prevents the continent from using its economic potential and making the transition to net zero (European Commission, n.d.a). During the EU-African Union summit in February 2022, it was announced that Africa will receive half of the allocated funding from the entire strategy, and it was confirmed by the signing of the EU-Africa Global Investment Package, worth EUR 150 billion.

The package aims to support Africa for the strong, inclusive, digital and environmental recovery and transformation. The EU aims to implement this package via the Team Europe initiative through the precise and transformative projects in priority areas that include the green transition and sustainable growth. The EU and the member states will finance this package through aid, grants and loans.

For example, with the help of the initiatives of Team Europe, the EU aims to achieve five ambitious goals in Africa, namely, to accelerate the transition to a green environment, the digital transition, sustainable growth, improvement of working conditions, health care system, as well as education and training. The Team Europe initiative is directed to climate change adaptation and sustainability in Africa. It combines the re-sources from the EU, the Czech Republic, France, Germany, Denmark, the Netherlands, Spain and Sweden. This initiative is expected to strengthen cooperation with African partners to further respond to their needs for climate adaptation and climate risk reduction (European Commission, n.d.a).

Besides, the investment package for Africa focuses on promoting resilience by supporting climate change adaptation, effective response to natural disasters and more effective risk management. The Disaster Risk Reduction Program, launched in 2022, will reduce the impact of disasters, including those related to climate change and biological hazards, and increase resilience in the partner countries (Tagliapietra, 2024).

One prominent project aimed at Africa's green transition under the Africa-EU Energy Partnership is the production of clean hydrogen for both Africa and the EU to meet half of the EU estimated annual demand of 20 million tons of hydrogen by 2030. Additionally, these steps are targeted at compensating for Russian gas.

Another platform for cooperation with the EU in the framework of the implementation of climate diplomacy is the countries of Latin America and the Caribbean (LA, LAC (LAC)).

The EU and LAC cooperate in the framework of the EGD. However, according to some researchers, the implementation of EGD goals in some LA regions is limited (Averchenkova et al., 2023). Brazil has taken the lead in the EGD and will likely make continued efforts for the future projects (Thiébaut, 2023). Brazil has been an important player in green energy and its international advocate since the country hosted the Earth Summit in Rio de Janeiro in 1992.

Although Brazil accounts for nearly 7 per cent of the world renewable energy production, its reliance on hydropower is a cause for concern. The country is below the world average in the use of nuclear energy and natural gas for electricity generation, the fields that can be further explored in the partnership with the EU. In the early 2023, looking for an alternative to the energy crisis, the EU pledged to invest EUR 2 billion in the green hydrogen in Brazil. This shows that the EU is already seeking to strengthen cooperation with the home of the "lungs of the world" (Dennison and Engström 2023). It should be understood here that the LAC Region enjoys a special ecological and geographical diversity, which makes it the region with the largest share of the renewable energy sources in the world. Therefore, one of the main goals of the Investment Agenda is to accelerate a just green transition in the region.

The energy transition and strategic autonomy will be carried out through the development and deployment of the renewable energy sources (wind, solar, renewable hydrogen), improving energy efficiency and economy, as well as ensuring the availability and quality of the energy supply. Therefore, in accordance with the objectives of the Paris Agreement, LAC focuses on: 1) zero-emission mobility due to the development of electronic mobility and the modernization of public transport systems; 2) climate financing through the attraction of international investors and assistance to local capital markets in the transition to sustainable sources of financing; 3) investing in critical raw materials to meet the growing demand while ensuring reliable access to the resources and promoting high social and environmental standards (Europian Commission, n.d.b).

At the EU-LAC Summit, which took place on July 17-18, 2023 in Brussels, the Heads of States pinpointed that LAC are the potential suppliers of raw materials, energy and target markets against climate change. As part of the EU-LAC Global Investment Plan (GGIA), more sustainable investments are expected through the Global Gateway connectivity strategy. The GGIA is a roadmap of strategic priorities in which the EU has decided to invest together with its LAC partners (Europian Commission, n.d.d).

Although the budget allocated to this region under the NDICI-Global Europe is only EUR 3.4 billion (5.6 per cent of the budget allocated to geographical programs), in general, with the help of the investments, the EU aims to invest in this region up to EUR 45 billion (O'Shea and Talvi 2024). For example, the additional part of the Global Gateway strategy is the Euroclima program, which builds the partnership for a green and just transition between the EU and LAC. This is a EUR 105 million program jointly funded by the EU and the German federal government via the Federal Ministry for Economic Cooperation and Development (BMZ) to strengthen the resilience of ecosystems and vulnerable communities to climate change (Euroclima, n.d.).

In addition, the EU is actively developing cooperation between the EU and the Association of Southeast Asian Nations – ASEAN in combating climate change, reducing the risk of natural disasters, and implementing clean energy projects. The EU has been an official partner of ASEAN in the climate dialogue since

1977 and it takes into account the climate vulnerability of Southeast Asian countries. The EU mainly provides financial aid and climate change capacity building assistance to ASEAN.

The EU supports Just Energy Transition Partnerships (JETPs) in Indonesia and Vietnam, since these countries seek to decarbonize electricity sectors, expand renewable energy, move away from coal-dependent economies, and strengthen international support for key minerals and clean energy technologies (Lazard and Jayaram 2023).

In return, ASEAN seeks deeper cooperation with the EU to improve disaster resilience and the transition to clean energy in the region. As a result, ASEAN believes that the EU supports protectionism, falls prey to incoherence and increases fragmentation of the international market, which hinders economic growth and climate adaptation (Lazard and Jayaram 2023).

7. The cooperation between Ukraine and the EU on climate challenges

With the beginning of the Russian-Ukrainian war on February 24, 2022, that has particularly exacerbated the negative consequences of climate change, which, given their scale, threaten the global environment and climate on a global scale, the cooperation between Ukraine and the EU to overcome them has become particularly important for both parties (Buchyn, 2023, p.27). It goes without saying that the Russian invasion of Ukraine has devastating consequences, first of all, for the basic infrastructures, natural resources, critical ecosystems and people's health, means of livelihood and security.

The damage caused by the war to the environment and ecological infrastructure is estimated as follows: the total damage is more than EUR 52 billion; 497 water management facilities were damaged or destroyed; more than EUR 1.4 billion in losses in the forest sector; 20 per cent of the protected areas are under threat. There was also environmental destruction as a result of the destruction of the Kakhovka HPP, the worst man-made disaster since the accident at the Chornobyl NPP. Currently, Ukraine is the most mined country in the world (European Commission, 2023).

In general, the war in Ukraine poses a serious threat, in particular, to global environmental governance in terms of environmental protection and biodiversity conservation, it affects deforestation and ecosystem degradation, etc. (European Think Tanks Group (ETTG), 2022). Concurrently, the green restoration, to which the cooperation of Ukraine and the EU should be directed, is to eliminate this damage and lead Ukraine to the new path of environmental and social sustainability (European Commission, 2023).

Today, the EC is already helping Ukraine bring environmental legislation into line with the EU standards. Besides, the EC builds coalitions, working closely with international partners (i.e., UNEP, UNIDO,

World Bank) and support groups, e.g., the High-Level Working Group on the Environmental Consequences of War. In particular, in June 2023, the Mechanism for Ukraine worth EUR 50 billion was suggested for the period 2024-2027, due to which the EU will help restore Ukraine's infrastructure, while ensuring that environmental sustainability is taken into account in the future investments (European Commission, 2023).

It is of high importance, that the initiatives within the framework of the UN Conference on Climate Change (COP28) outlined new opportunities for cooperation between the EU and the partner countries, including Ukraine, which is enshrined in agreements on international investment projects with the participation of the EU funds (Dixygroup, 2023). For example, Ukraine has already joined the LIFE Program – the Environment and Climate Action Program, designed for 2021-2027. It should be noted that this is an EU financial instrument aimed exclusively at environmental protection and climate action. The program is with a total budget of EUR 5.4 billion. The aim of the Program is to restore and improve the quality of environmental components, including air, water and soil, as well as to preserve biodiversity and overcome the degradation of natural ecosystems (Verkhovna Rada of Ukraine, 2022).

It should be emphasized that the strengthening of cooperation between Ukraine and the EU within the framework of the EGD will play an important role in solving many of the consequences of the war in Ukraine in both the short-term and long-term perspectives. To achieve the main goals of EGD in this aspect, the researchers identify three general approaches, namely, ensuring policy coherence between sectors and institutions, developing appropriate social protection measures and advancing international cooperation.

We consider the following aspects of the implementation of the goals of the EU green diplomacy:

1. In accordance with the agreements signed with the EU, a number of legislative acts have already been adopted in Ukraine to improve energy efficiency in buildings, industry, transport and public utilities services.

2. Some definite goals were achieved in the implementation of energy-saving technologies, in particular, the transition to modern European practices in the field of energy audit, energy management and eco-design.

3. In accordance with the Law "On Energy Efficiency", the state programs to reduce energy consumption are being implemented; this is caused, in particular, by the huge destruction in the energy sector as the result of missile attacks on critical infrastructure, due to which the consumption of natural gas decreased by more than 40 per cent.

4. Ukraine has become a key partner of the European Clean Hydrogen Alliance and the research on the possibilities of low-carbon hydrogen production, its competitive price, the ways of its supply, etc. is being conducted here (Razumkov Centre, 2022, p. 28).

5. At the same time, the updated EU climate and energy goals came into force, in particular, in the development of renewable energy sources, which should as well be taken into account when approving future

national goals in Ukraine. In addition, a number of important debates took place and political decisions were made, in particular on the new legislation on the development of the hydrogen market, sustainable aviation transport, reduction of methane emissions in the energy sector, etc. (European Commission, 2023).

Regarding the cooperation between the EU and Ukraine within the framework of the Global Gateway strategy, five initiatives are singled out here:

1. Sustainable, innovative, "green" and competitive economy, the direct support of 100,000 small and medium-sized enterprises (the total amount of investments is up to EUR 1.5 billion).

2. Economic transformation of rural areas, the assistance to more than 10,000 small farms (the total amount of investments is up to EUR 100 million).

3. Modernization of the border crossing points with the countries of the European Union (the total amount of investments is up to EUR 30 million).

4. Acceleration of digitization, the modernization of the state IT infrastructure (the total amount of investments is up to EUR 200 million).

5. Increasing energy efficiency and supporting the transition to the renewable energy sources based on hydrogen (the total amount of investments is up to EUR 100 million) (Turchyn and Lukachuk 2024, p. 181-182).

The $750 billion recovery plan for Ukraine was announced in Lugano (Switzerland). In general, the cost of energy independence (with the emphasis on nuclear, renewable and hydropower, hydrogen and biofuel production, etc.) and the green transition of Ukraine is estimated at $130 billion. (Razumkov Centre, 2022, p. 27).

8. The prospects for the realization of the EU global leadership in relation to climate change in terms of modern challenges

One can for sure state that the European EGD and Global Gateway strategies are practical signs of the EU claims to global leadership in the face of modern climate challenges. The EU has already successfully implemented significant steps within their framework in many countries of the world and has no intention to stop. However, precisely by cause of the Russian-Ukrainian war, new and not only security risks arose, these are as well the risks related to the strengthening of the climate problems, which require the EU as a leader in this field to take more conscious and clear steps and reconsider some aspects of its climate policy in particular.

Importantly, the Russian-Ukrainian war expanded the understanding of the types of power that can be used as weapons, i.e., from technology and trade to energy and climate. Russia also holds hostage other global

goods, notably food security, and precisely because of this, as the scholars point out, there is every reason to believe that the international order will consider the cooperation on climate goals as part of agreements on positioning and power in the global system. (Dennison and Engström 2023).

However, despite the well-founded focus of the EU on the war in Ukraine, Europe must as well continue an extremely active dialogue with the least developed and most vulnerable countries of the South; this is to be done not only with the aim of countering China, but for the sake of rebuilding specific strategic partnerships, which will enable the EU and its partners to resist Chinese and Russian rivalry. In this regard, environmental multilateralism is an inevitable step (Treyer, 2023).

Analyzing the manifestations of the EU global leadership, the scholar Dawid A. Fusiek equates it to the so-called normative power. He explains it by the fact that, unlike other great powers, the EU forms the international system not based on the use of the principles of "hard power" (for example, military power or economic sanctions), but primarily due to the attractiveness of ideas, standards and values (peace, freedom, democracy, rule of law and human rights, social solidarity, anti-discrimination, sustainable development, etc.) (Fusiek, 2021).

In particular, he believes that the EU, as the leader of green regulatory diplomacy, is supposed to: a) to ensure smooth implementation of the Green Agreement at the European level; b) to use it to support the debate on climate change in the face of US-China hostility and diffuse European goals and values; c) to use it to form new bilateral and global alliances, to ease tensions arising from its implementation, and to establish its role in global climate governance as an environmental normative (Fusiek, 2021).

The foundations of the EU global leadership in this area are the following factors:

1. The EU has historically demonstrated that it can be a global player in the environmental diplomacy. A sound examples are the 1997 Kyoto Protocol and the Paris Conference Protocol and Strategy for the EU after the US withdrawal in 2016. In both cases, the EU proved to be able to fill the gap created by its American partners and helped to maintain not only political balances, but the incentive to support cooperation and progress in the field of environmental policy as well.

2. The EU has the tools and capabilities necessary to implement an effective environmental policy. For example, sustainable development is one of the defining norms of the EU. As Robert Faulkner emphasizes, ambitious environmental legislation embraces universal values that place the global common good above national interests.

3. By implementing its environmental policy, the EU has shown its ability to influence the third countries. This sets it apart from other global players and confirms its alignment as a normative force (Fusiek, 2021).

By promoting global leadership in the climate sphere, the European Union transmits its own climate principles (the polluter pays principle, the precautionary principle, etc.) to other international actors by using its normative influence. For this purpose, the EU uses various mechanisms, in particular, it can be analysed on the example of mechanisms aimed at achieving the normative effect (according to Ian Manners):

1. Mechanism of contagious spread (demonstration of climate-responsible behaviour by example).

2. Procedural dissemination (institutionalization of climate relations with international actors).

3. Informational dissemination (informing about the intention to involve other actors of international relations in climate initiatives through legal documents).

4. Open dissemination (holding diplomatic and public events on the EU climate policy by the EU Delegation in different countries).

5. Transfer (use of financing instruments to support European countries in implementing climate reforms).

6. Cultural filter (implementation of educational, scientific and innovative programs on climate issues).

Given the mechanisms used by the EU to promote its climate values, we can say that there has been progress in the manifestations of global leadership and the EU's normative power. In particular, this can be seen in Ukraine. There has been a significant intensification of relations between Ukraine and the EU in the area of climate change, mostly within the framework of the Eastern Partnership, where the EU and Ukraine can in practice join forces to address global challenges and achieve common goals (Hutsaliuk, 2022). By working together, the EU is committed to achieving Europe's climate-neutral status, and Ukraine is making efforts to fulfil the terms of the Association Agreement and become one step closer to full membership in the European Union. This underlines the fact that although each actor pursues its own goals and benefits, it is important to have a "symbiosis of goals" where each party finds mutual benefit.

It is worth noting that, in the opinion of Italian political scientist Nathalie Tocci, determining the impact of the normative power of an actor is a complex process. Since it requires determining when, how and to what extent the use of foreign policy instruments can "cause specific institutional, political or legal changes in a third country" (Tocci, 2008).

In our opinion, the EU's performance as a global leader and promoter of climate values can be best assessed by the Environmental Performance Index (EPI), which takes into account climate change, ecosystem viability, and environmental health indicators from 180 countries. According to the EPI 2024, the leading countries in terms of environmental performance are as follows: Estonia, Luxembourg, Germany, Finland, the United Kingdom, Sweden, Norway, Austria, Switzerland, and Denmark (EPI, 2024). To summarize, all of the above countries are geographically located in Europe, with 7 of them being EU member states.

The Global Gateway strategy we reviewed became an indisputable fact of the EU global leadership in solving climate challenges. However, according to the experts of the Royal Elcano Institute, the Global Gateway is a fairly new program that is still being formed and improved, nevertheless, it focuses on geostrategic potential, development impact, the ability to create innovative financing and closer alignment of initiatives and coordination between stakeholders, which proves the right of the EU to be the global leader in this issue (O'Shea and Esteban 2024).

The SDSN Europe experts' report on co-financing the implementation of the 2030 Agenda identifies certain recommendations for the realisation of the EU's global leadership: reform of the legal system is needed to ensure a holistic approach to reporting on losses and profits that cover the environmental transition; intensification of EU cooperation with EU governments and non-governmental organizations should become the basis for EU leadership in implementing innovative solutions; develop sustainability plans for member states and the EU itself; clear alignment of incentives and targets for climate impact is needed; reorient the capitalist system to a more responsible model that would better meet the challenges of combating climate change, etc. (SDSN, n.d.).

Since the methodological basis of the study is the criteria of global leadership proposed by Erik Brattberg and Mark Rhinard, it is worth determining how the European Union meets these conceptual parameters in the field of climate change management.

Firstly, we take into account the context, the sub-indicators of which are the conditions of recognition, opportunity, and authority. Assessment of the EU's actions according to this criterion provides an understanding of how influential the EU is, given its leading role as a global player in the geopolitical dimension; recognition of the EU among the states with which it has established diplomatic relations and among international organizations in which the EU has representation. It also refers to the ability of the Union to reaffirm its leadership through global initiatives. It is important for other states to recognize not only the EU as an Union, but also its norms, standards and policies in the field of climate change management; for international actors to adopt these norms in their policies; and for other states to use EU instruments in the fight against climate change. The European Union has several structural conditions in its arsenal that contribute to its leadership in international climate policy: strategic documents through which the EU can set the global agenda (the European Green Deal); financing instruments (Horizon Europe, Just Transition Fund, European Development Fund) that help other states improve their climate policies and ensure their implementation, while at the same time securing the EU's direct or indirect influence on these policies; adherence to the principles of the Paris Agreement, which is the foundation of the "revolution" in global climate policy.

Secondly, we consider capability as a sign of the EU's global leadership (choice of tools to achieve goals, negotiations). The key indicator here is the EU's capacity to implement climate policy and combat

climate change using various instruments and mechanisms, including negotiations and diplomacy. The European Union participates in the annual UN climate negotiations as a collective participant and has observer status, which allows it to represent its interests at the global climate conference. In addition, the EU's participation in high-level summits gives the Union a "voice" in addressing global issues, including setting standards to combat climate change. The EU uses many practical means to develop effective climate negotiations, one of which is the EU Emissions Trading System (EU ETS), which acts as an economic lever of the EU's influence on emissions management. In addition, the tools used by the EU contribute to the realization of normative power, in particular, the soft imposition of climate values and principles on other actors in international relations.

Thirdly, coherence is important, which is explained by the alignment of priorities, values, procedures, and results. The EU is characterized by coherence in climate values, standards, and rules among its member states, as well as with external partners and states. In shaping the "rules of the game" in the fight against climate change, the EU is also guided by the general principles of sustainable development, international law, and the principles of environmental responsibility, taking care to preserve the international order. The European Union, through its initiatives, demonstrates that the declared values and priorities are not only about promises, but also about real actions. This is evidenced by the EU's achievements in reducing greenhouse gas emissions, developing alternative energy, and progress in implementing the European Green Deal and the Fit for 55 program. However, we should not dismiss the fact that there are discrepancies between the climate ambitions of the Union and their practical implementation, which are caused by both external difficulties (international crises, global transformations) and institutional limitations of the EU's capability.

Fourthly, the unification of commitments between partners, practical legitimacy and quality of assistance, which form the consistency of global leadership, can be seen in the activities of the European Union. First of all, it is worth noting that the EU's consistency in implementing its climate policy means achieving its goals and providing long-term support to countries in bringing their policies closer to climate standards. Legally, it is important to have legitimate instruments for allocating aid, as well as accountability and transparency of this process. The unification of obligations between partners is controversial, as it often sets precedents for "climate injustice" (e.g., states that cause the least environmental damage should pay the same as states with the highest emissions); imposes different economic burdens on the budgets of states with different GDPs; and promotes bureaucratization. These challenges are currently difficult to regulate by the EU. In addition, the EU's fulfilment of its commitments under political documents is often criticized by representatives of environmental movements and international climate organizations. It is important to note that even achieving EU coherence and capability building will not matter much if the EU does not fulfil its commitments (Brattberg and Rhinard 2013).

Thus, the European Union meets the criteria for global leadership according to Erik Brattberg and Mark Rhinard due to its ability to promote climate values in the international arena, the consistency of its declared principles and actions, etc.

Taking into account the above analysis, the prospects for the implementation and consolidation of the EU global leadership, depend, in our opinion, on the following factors:

1. The EU's overcoming of significant discrepancies between its discourse (declared goals and aspirations) and practice, which often contradicts the main ideas in this area.

2. The ability of the EU to support its environmental policy in the countries with a lower level of development, in cooperation with which, in order to achieve the set goals, it is necessary to reduce the consequences of climate change, while taking into account new factors of both the environment and economic and political determinants.

3. Achieving international influence by conducting a dialogue to unite different types of activities and motivations, as well as the cooperation based on consensus and compromises with other participants (European Parliament), partners and recipient countries.

4. The ability of the EU to adjust the ambitions of climate diplomacy in accordance with the geopolitical realities of politics (for example, the Russian-Ukrainian war).

5. The creation of a "level playing field" for member states, the implementation of innovative, cost-effective solutions primarily with a social orientation in the recipient countries.

6. Solving the issue of the influence of the political and economic interests of individual member states on the EU climate diplomacy.

9.   Conclusions

Global leadership of the EU is a multifaceted, controversial and complex concept. The EU aims to remain a global standard-setter. By establishing global standards, the EU exports its values. The EU can achieve a global leadership position by setting an example with its shared values. However, to gain this legitimacy, the EU should apply these values both internally and externally in all its actions and reflect them in all its structures. Modern international transformations require the EU to reconsider the approaches to global leadership.

In general, the EGD is an ambitious long-term strategy of the EU, the goal of which is a kind of change in the "rules of the game" via ecological transformation in the world, finding ways of economic recovery, decarbonization and increasing the environmental friendliness of the economy in the EU and its partners. It is

based on the assertion that climate change and environmental degradation pose an existential threat to Europe and the world. In order to overcome these challenges, the EU should form an environmentally resource-efficient, competitive economy. It contains a set of initiatives aimed at solving more specific tasks of this goal.

It is worth pointing out that the EU Global Gateway external investment strategy is closely related to the EGD, which strategically allows the EU to continue to grow by turning its economy and energy sources into the "green" ones. In particular, one of the directions of the European Global Gateway strategy is also the issues of climate change.

The Global Gateway initiative aims to use EUR 300 billion between 2021 and 2027 for connectivity projects, namely, in the digital sector, climate and energy, transport, health, as well as in education and research. The EU considers the Global Gateway as a positive offer to other countries and a means of promoting green diplomacy through influence, expertise and financial resources in order to build global climate neutrality. Overall, EGD and Global Gateway highlight the EU vision of the green economy and offer it to others. The EU has long played a leading role in global efforts to tackle climate change issues.

The implementation of the aims and objectives of the EGD was one of the strategic priorities within the framework of climate cooperation between the EU and Ukraine even before the beginning of the Russian-Ukrainian war, and after the full-scale invasion it became even stronger. Ukraine seeks to closely cooperate with the EU in this aspect. Meanwhile, the EU-Ukraine cooperation within the framework of the Global Gateway strategy should focus on the formation of the EU investment strategy in clean and environmentally friendly energy that will protect Ukraine and Europe in the future, while expanding the influence of the latter for the benefit of the whole world and only contributing to global leadership.

To summarize, the EU is working to improve its global leadership qualities by choosing to combine different types of leadership. The EU, with its strong normative leadership traits, is strengthening it with enhanced exemplary (EGD) and entrepreneurial leadership (Global Gateway). At the same time, the EU's greenhouse gas emissions reductions compared to other international actors reduce its chances of being a structural leader, especially with the rising power of economies such as China.

In addition, according to the criteria of Erik Brattberg and Mark Rhinard, the European Union deserves the status of a global leader, formed by its achievements in the fight against climate change and environmental protection. Given that normative power is an effective tool of the Union, it is important to confirm the thesis that the normative approach is effective. In addition, the results of EU initiatives or strategic documents demonstrate the real impact of normative power in practice. Despite the existing challenges and criticism, the European Union remains an influential normative actor capable of transforming the global climate agenda by applying innovative approaches. Thus, the EU's normative power is becoming a real driver of climate change.

Thus, the EU has the capacity, experience and legitimacy to influence the external players in the field of environmental policy. We consider the prospects of the EU global leadership regarding the climate challenges of the modern world to be primarily the implementation of the EU climate diplomacy on the basis of internal coherence (its conformity both de jure and de facto) and its projection on the solution of the declared climate ambitions through international coherence, which in order to achieve results involves taking into account geopolitical, economic and social conditions. However, the implementation of the EU's global climate leadership has come at a time of crisis and turbulence, which both complicates the task and demonstrates the EU's true potential as a leader.

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THE LIBYAN CRISIS AND THE EUROPEAN UNION: CHARTING A PATH THROUGH INSTABILITY TOWARD LASTING PEACE

ABSTRACT: *The article provides an extensive review of the protracted crisis in Libya, triggered in 2011 by the overthrow of Muammar Gaddafi and meanwhile grown into a multi-faceted conflict with all the classic characteristic features: political disunity and foreign interventions. It traces the line of historical development from the autocratic rule of Gaddafi through the development of rival governments, subsequent civil wars, and how the country has retained a locus of instability. Key themes explored include the role of internal divisions and external actors in perpetuating the conflict, such as the involvement of countries like Turkey, Egypt, the US or Russia, alongside their various strategic interests in the region. The article also argues that despite the limited success of the UN and EU in resolving the crisis, recent geopolitical shifts— such as the reorientation of Libya's traditional backers towards the Middle East—offer a new potential window for stabilization. Accordingly, the article reviews the prospects of the EU in playing an important role in shaping Libya's future, assessing the opportunities and constraints it may face in the current geopolitical context and analysing the EU's options for promoting political stability, economic recovery, and institutional reforms.*

KEYWORDS: Libyan Civil War, European Union, foreign intervention, migration, instability

1. Introduction

The Libyan crisis, which has been ongoing since 2011, represents one of the most complex and challenging conflicts to manage in recent history. The overthrow of Gaddafi, initially regarded as the advent of a new democratic era, instead marked the inception of an enduring power struggle, characterised by internal divisions, external interventions and a lack of coherent governance. These factors collectively undermined the initial optimism following the establishment of the National Transitional Council (NTC), precipitating a rapid descent into chaos. The uncontrolled proliferation of armed factions, political fragmentation, and recurring conflicts have resulted in a perpetual state of instability, despite the population's desire for stability and peace.

The power vacuum that emerged following Gaddafi's demise provided an opportunity for various domestic and international actors to compete for influence (internally, this included the Libya Shield Force, Libyan National Army, and the Islamic State, while externally, it involved Russia, Turkey, the UAE, and

Egypt). The resurgence of Islamism (Glenn, 2017) within the transitional government—initially the Government of National Accord (GNA) and subsequently the General National Council (GNC)—facilitated the formation of a new government in eastern Libya: the House of Representatives (HoR) (who later transferred its governing power to Government of National Stability—GNS). This event resulted in the emergence of a dual system of governance, which has greatly contributed to the instability of the state and polarization of society. Additionally, the repeated postponement of national elections, the rise of extremist groups, and the entrenched tribal division have made nation-building such a challenging endeavour that the prospect of reconciliation appears to be a mere fantasy.

On the global stage, the situation has been marked by a complex and often contradictory approach. Despite the UN's efforts to broker ceasefires and mitigate political transitions, the effectiveness of these interventions has been constrained by either inadequate implementation or international distrust (Herța and Corpădean, 2020). Meanwhile, the EU, situated in close geographical proximity to the region and with significant interests therein, has been reluctant to assume a more proactive role, but tended to focus on managing the symptoms of the crisis, rather than addressing its underlying causes (Marcuzzi, 2022).

As a result, the possibility of a peaceful resolution seems remote at present, especially considering the recent intensification of hostilities, including the deployment of Libyan National Army (LNA) forces in southern and western Libya and the dispute over the Central Bank's leadership, which has prompted renewed concerns about the potential for a resurgence of open conflict (Megerisi, 2024). Though, fortunately for the general Libyan population, the regional geopolitical landscape has also undergone a serious shift that currently facilitates an undetermined fragile peace: the traditional backers of the Libyan factions, such as Turkey and Egypt or Qatar and the UAE, have diverted their attention towards the escalating hostilities in the Middle East (Abdeen, 2024).

In this context, the question of whether the EU can, or should, assume a more active role in stabilizing Libya is particularly pertinent. The EU's efforts to date have been primarily reactive, aimed at containing the negative spillover effects of the conflict, such as irregular migration and terrorism, rather than attaining a sustainable and functional peace between the two warring sides. However, the increasing complexity of the crisis, coupled with recent geopolitical shifts, presents an opportunity for the EU to reassess its strategy. The only remaining questions pertain to the potential actions of the EU and the likelihood of its acting on them.

Thus, this article seeks to explore the evolution of the Libyan conflict, the roles played by various international actors, and the potential pathways towards stabilization that could or cannot be facilitated by the EU. Also, it tries to discover if the EU may be in a position to prevent a renewed outbreak of a civil war and if it can play a pivotal role in laying the groundwork for a durable peace inside Libya.

2. Theoretical Framework

Before diving into the events which put the North African country in the current position and how several efforts to resolve the crisis were conducted, it is crucial to understand the scenario on a theoretical level: an infrastructure that clarifies both the core reason of the conflict as well as the rationale of the conduct of the global actors within the crisis. Instead of a standalone internal conflict, the Libyan crisis reflects a reconfiguration of power in the North African and Mediterranean region, driven by competing geopolitical, strategic and economic interests. Therefore, the Libyan situation can be best understood through the longstanding debate between neorealism and neoliberalism.

Neorealism (Waltz, 1979; Mearsheimer, 2001) contends that states behave mainly to maximize their power and security in a post-Westphalian anarchic world, while neoliberalism (Keohane, 1984) asserts that cooperation, interdependence, and institutions can mitigate conflict and foster stability. This theoretical divide is crucial in explaining both the nature of the Libyan crisis and its potential resolution: while the conflict itself is driven by power struggles in a neorealist framework, any viable stabilization effort must rely on neoliberal institutionalism.

When it comes to understanding why the conflict persists, offensive realism offers the most compelling theoretical lens, as it emphasizes that states exist in a constant competition for influence and security in an anarchic international system. In contrast to Kenneth Waltz's defensive realism, states are not only interested in conserving their survival and position, but are also in a continuous search for new opportunities to increase that power (power-maximization) by achieving different levels of hegemony. Moreover, for economic and perception-related reasons, great powers or regional hegemons usually tend to favour a more indirect involvement into a conflict (buck-passing) over the classic approach of balancing when it comes to cases of multipolarity (Mearsheimer, 2001). From this perspective, foreign intervention in Libya is driven not by stabilization or democratization needs alone but also by glaring strategic considerations. The United States, for example, has been continuing to back pro-open-market governments in order to continue accessing Libyan hydrocarbon resources, but also to hinder Russia's military buildup in the Mediterranean Sea. Additionally, the European Union also has some interests which go beyond the humanitarian elements and focus on continued hegemonic influence in the Mediterranean region, having access to oil and gas fields in North Africa and curbing irregular migrations from the area. Concurrently, local players such as Turkey and Egypt are racing, each with their own concept of power order among Arab and Muslim worlds, while others such as the United Arab Emirates and Qatar use the Libyan case as a type of laboratory experiment in their quest for strategic supremacy, each supporting differing sides with a desire to consolidate their place within regional politics. All

of these have resulted in a fragmented conflict in which no single actor can impose a definitive resolution.

Conversely, while neorealism explains the underlying dynamics of the conflict, certain instances of international cooperation regarding Libya's case exhibit elements of (neo)liberal institutionalism and a potential framework for stabilization. Institutionalism posits that even though the international system is anarchic, cooperation is not only possible, but also very prolific for mitigating anarchy and for peace. From Robert Keohane's perspective, interdependency is key to deterrence and essential for creating common objectives between great powers through intermediates such as rules, norms and values (Keohane, 1984). However, these elements remain largely overshadowed by power competition in the Libyan crisis (as predicted by neorealism), because interdependency seems to be less relevant in proxy wars and due to the fact that even though the EU was able to impose sanctions and dispatch observation missions, it has not yet been capable of offering an integrated and coordinated strategy in a serious attempt to stabilize Libya. Neorealist self-interests of the Member States have contributed to the inefficiency of collective action, and, as a result, initiatives such as EUNAVFOR MED IRINI or support to Libyan security institutions failed. There is, however, a success story: the system for the management of oil resources through the National Bank of Libya. Thanks to it, the institution has managed to remain an independent one, operating to the economic benefit of all the parties involved and demonstrating that, in some cases, multilateralism can deliver long-term dividends.

Thus, this article argues that the Libyan crisis perfectly exemplifies the ongoing debate between neorealism and neoliberalism. While neorealism explains the persistence of war through power struggles, neoliberalism presents a necessary – yet currently unfulfilled – framework for stabilization.

3. From Gaddafi to Chaos: The Evolution of the Libyan Crisis

Following the 1969 coup d'état, Libya was placed under the control of Colonel Muammar Gaddafi and the Free Officers Movement (FOM), an Arab nationalist group. Gaddafi seized power after the overthrow of King Idris I, a monarch who ruled a semi-democratic Libyan state that was heavily reliant on Western interests, particularly due to the inability of the administrative apparatus to effectively manage its oil resources. Subsequently, the 1951 constitution was promptly abolished on the grounds that it was a "neo-colonialist relic" and Libya then became an Arab Jamahiriya, a proclaimed "democratic" state, but one that was tightly controlled by Gaddafi and his acolytes.

In his initial years in power, Gaddafi endeavoured to enhance the country's industrial and oil extraction capabilities, achieving notable success in raising living standards and improving education and literacy, but in 1975, the publication of Gaddafi's "Green Book" signalled a pivotal shift in doctrinal orientation. Libya became a paralyzed state ran by a national congress, while in reality power remained concentrated in the hands

of Gaddafi and his loyalists. In theory, Gaddafi "revoked" his own political influence in 1977, but in practice he remained the dominant figure, retaining control over the main power structures.

In military terms, his regime has been extremely cautious, maintaining a relatively small army, composed largely of members of his tribe or loyalists, in order to avoid any form of foreign influence in the military ranks and to minimize the risk of him becoming the target of a coup.

General wealth related, despite Libya's substantial oil revenues and a growing economy, all that money was not equitably distributed due to widespread corruption (Emhemed et al., 2014), leading to a decline in living standards and public discontent. This issue is one of the key ones that slowly paved the way for the future uprisings.

Dissatisfaction with the Gaddafi regime began to emerge in the late 2000s, reaching a crescendo with the occurrence of extensive protests in 2011. The first major opposition movements commenced in August 2009 in the city of Az Zawiyah and gradually evolved until 2011 when, inspired by the revolutions in Tunisia and Egypt, protests rapidly proliferated to Al Bayda', Darnah and Benghazi. In the context of mounting discontent over the housing crisis, impoverishment, and pervasive corruption, the protests rapidly turned into a full-scale revolt.

The arrest of human rights lawyer Fathi Terbil in Benghazi on February 15, 2011, served to further exacerbate the situation, ultimately leading to a significant national uprising. The reaction of Gaddafi's regime was violent and the use of force against the demonstrators escalated the situation into open conflict between the government and the population. In the following weeks, several cities in eastern Libya fell under rebel control and by February 27, 2011, the National Transitional Council (NTC) had been formed, assuming the role of the primary political and diplomatic representative of the rebels.

Although the rebel movement was initially made up of civilians, an alliance was swiftly formed between them and Islamist groups, even though the latter did not necessarily espouse the same views, being united solely under the principle "the enemy of my enemy is my friend". Gaddafi, in an effort to manipulate public opinion, continued to portray himself as a victim, claiming that he was acting in the interests of the people, while his regime was secretly adopting a policy of brutal repression (Josua and Edel, 2021) against anyone who provided assistance to the rebels.

NATO's intervention in March 2011 on the basis of UN Resolution 1973 changed the dynamics of the conflict. Aerial bombardments and the arms embargo imposed on the Gaddafi regime saved the rebels from a crushing defeat (Garland, 2012) and allowed them to regain serious ground. Despite Gaddafi's offers of peace and promises to hold elections, the rebels remained unyielding in their stance and continued to advance towards Tripoli, seizing control of town after town.

On October 20, 2011, a few days after the rebels seized the capital, Gaddafi was captured and brutally

killed in Sirt, ending the first Libyan civil war. However, the fall of his regime did not bring the expected stability and freedom. The country continued to experience internal strife, with various armed factions and tribes engaged in ongoing conflicts, contributing to a state of political and military chaos.

In the aftermath of the regime's collapse, the cities of Bani Walid, Tripoli, and Benghazi became the site of intense clashes between the remaining loyalists and NTC forces. Nevertheless, the primary political objective remained to organize elections, and thus the inaugural elections following the fall of Gaddafi were held in July 2012. A total of 62% of eligible voters participated in the election, which saw the National Forces Alliance (NFC), a liberal and moderate grouping, emerge as the official winner, securing 39 of the 200 seats in the General National Congress (GNC). Still, the triumph was merely theoretical, as independents, predominantly tribal and Islamist representatives, exercised control over the majority.

The government's inability to effectively address both political challenges and the proliferation of arms resulted in territorial losses to different rebellious groups and a near-total paralysis of oil production. Libya became a fragmented state, with vast areas under the control of local militias, and to add more to the suffering, in 2013 the Islamists in the GNC formally took control of the legislature and imposed the Sharia law. As a result of the degrading situation and the imposition of Sharia, in May 2014, General Khalifa Haftar launched an offensive against the GNC and Islamist groups, kicking off the Second Civil War.

The start of the Second Civil War was marked by Haftar's military operation (backed by anti-Islamist organizations, including the NFA) against Islamist militias in Benghazi and Tripoli. A brief truce was observed in the context of the electoral process and despite attempts to facilitate mediation, the newly elected parliament, the House of Representatives (HoR), was perceived as illegitimate by Islamists, mainly due to the general turnout of less than 20%. Ultimately, the Islamists from GNC succeeded in assuming control of Tripoli through military force, compelling the HoR to relocate to Tobruk (it will move to Benghazi after 2020), accompanied by Haftar's military contingent.

From this point onward, the involvement of external powers has only served to exacerbate the conflict. On the one hand, Turkey and Qatar expressed support for the GNC, while the UAE, Egypt, and Russia indicated their backing for Haftar's forces, thus for the HoR. Besides, the Islamic State was also able to exploit the prevailing chaos and establish enclaves in regions such as Sirt and Darnah, thereby further complicating the situation. In 2015, the UN brokered the formation of a transitional government, the Government of National Accord (GNA), but this government faced strong opposition from the HoR and Haftar's forces, who refused to recognize it.

The ongoing conflict continued with little respite for nearly four years, and by 2019, supported by UAE-supplied aircraft and drones (The New Arab, 2020), Haftar had launched a major offensive on Tripoli. Despite massive military support for the LNA, the GNA managed to repel the attacks and maintain control of

the capital. However, the situation was becoming increasingly chaotic, especially given the involvement of mercenary groups, including Russia's Wagner Group (Al Bawaba, 2018) and Sudan's JEM (Howes-Ward, 2018), both of which have been accused of serious human rights violations.

In 2020, after years of violence, a permanent ceasefire was brokered by the UN, with support from Russia and Turkey, formally ending the Second Civil War. Yet, tensions remained high, and Libya continued to be a battleground for foreign interests.

Since the 2020 armistice, Libya has carried on as a state of chronic political instability. Although the UN successfully negotiated the formation of a new transitional government in 2021 (Government of National Unity—GNU), structural deficiencies persisted. The postponement of the December 2021 elections resulted in significant frustration among the population, and the lack of a clear constitutional framework led to the re-establishment of the dual system of government (HoR voted to create and recognize another government - GNS). In 2022, the tensions between the two rival governments led to violent clashes in Tripoli, though there was no official resumption of conflict.

From 2023 to October 2024, the situation was reminiscent of the interwar period between the first and second civil wars. Despite mounting international pressure, the two sides were unable to organize elections or reach a compromise. In August 2024, tensions over the control of the Central Bank and oil areas reached a temporary peak, thus, in September 2024, Khalifa Haftar began massing troops near Ghadames. His political and military support suggested that he or his son, Saddam Haftar, may have been preparing a new offensive to seize control of Tripoli. However, with the Central Bank issue resolved, tensions appear to have been relatively defused (Fenton-Harvey, 2024) for the time being.

4. International Involvement in the Libyan Crisis: Mediators or Marginal Players?

Throughout the entire post-Gaddafi period, many major regional actors or with political-economic interests have played a relatively marginal role in the efforts to reduce tensions and solve Libya's internal problems, preferring to maximize their regional influence by indirectly supporting local factions. Particularly, the US, the UK, France, Italy, Turkey, Egypt, and Algeria, in addition to the UN and the EU, have assumed more of a mediator role with the aim of achieving a frozen conflict between the two Libyan governments rather than seeking common grounds that would facilitate the organization of free elections.

The decisions taken at international level, the UN resolutions adopted and their implementation, as well as the financial aid offered have largely remained either mere political declarations or measures aimed strictly at ensuring the presence of Libyan oil on the international market.

The UN adopted a series of resolutions and implemented a range of measures with the goal of providing support for Libya's stabilization, particularly between the years 2014 and 2024. However, many of these measures have proven to be either ineffectual or not fully implemented due to external interference and poor compliance by member states (Herța, 2019). To illustrate, the arms embargo imposed in 2011 through Resolution 1970, which was later extended to the two rival Libyan governments, was, despite its necessity, successfully ignored by regionally influential states. Moreover, since 2014, a multitude of weapons and other items of military technology of Russian manufacture (Kington, 2024) have been identified on Libyan territory under Haftar's control, as well as a few Turkish ones (Al Jazeera, 2020) on Tripoli's side. Adding further, there are serious suspicions (from government and military sources) that several foreign aid packages received by Libya to combat the COVID-19 pandemic, and its effects actually contained weapons (Kington, 2024). As a (ridiculous) result, the UN adopted Resolution 2733 on May 31, 2024, which extended the embargo and introduced new regulations on reporting and monitoring of seized goods, after even Russia and China criticized the embargo control regime, claiming that the EU's Operation IRINI had not effectively halted the flow of arms to Libya.

The Resolution 2174 of 2014 which updated the sanctions on entities and individuals involved in obstructing or undermining the domestic political process, although, on the surface, a logical and well-intentioned measure, in practice had more of a detrimental impact on citizens, similar to the sanctions imposed on the Gaddafi regime: in order to guarantee their financial stability and maintain a lifestyle far above the average of the population, leaders resorted to corruption on both sides (Lowings, 2022), further lowering the living standards of the ordinary people. The population, weakened by the 2011 war, apathetic due to the disappointment following the first free elections and feeling abandoned by the government in the face of local factions, no longer had the strength, enthusiasm or external support to understand the purpose of these sanctions and demand the change of the newly established semi-dictatorial regime. For what is worth, probably even in the absence of these events, the current regime would not have been challenged in a manner even close to the 2011 revolution, given the lack of a common national cause. Society is currently so divided and polarized that one side winning the conflict or even the establishing of a more moderate government ideologically somewhere between Tripoli and Benghazi are unlikely to be perceived positively by the public (Cristiani, 2022).

The Berlin Process and the adoption of resolution 2510 in 2020 sought to establish a permanent ceasefire (which should have later turn into peace) and the withdrawal of mercenaries from Libyan territory. These developments were met with approval by the international community, with the UN characterizing the outcome of the negotiations between the LNA (supporting the HoR) and the LSF (supporting the GNA) as a real success and a major early step in resolving the conflict. Tough, the situation proved to be more complex than initially anticipated. Unfortunately, the truce was not the result of the two sides' desire for peace (as a result,

Libya is still ruled by two governments, and isolated conflicts between the armies of the two, though occurring rarely lately, are not uncommon) nor was it the result of the diplomatic dexterity of the UN, but the effect of Turkey's military intervention on the side of the GNU in the spring of 2020, which managed to put the GNU back in a negotiating position (on March 1, 2020 the GNU only controlled 7-8% of the total area of the country; by August 31, the occupied area of GNU increased to somewhere around 28-29%). The considerable loss of territorial and military advantage by the LNA, coupled with war fatigue and the initial spread of coronavirus on Libyan territory, eventually led to the armistice between the two governments. In addition, the UN resolution that called for the withdrawal of mercenaries from Libyan territory was only partially respected, with various Russian, Malian, and Sudanese mercenary groups returning after a year (locals from southern Libya asserted that some of them only retreated into the desert, never leaving the country) (Williams, 2024).

On April 16, 2021, the Security Council, through resolution 2570, reiterated the necessity for free, transparent and inclusive elections to be held by the end of the year and called for the formation of a new temporary transitional government, comprising by of members from both sides, in order to facilitate an electoral process that is as fair (or as unbiased) and democratic as possible. Initially, this measure not only seemed to be a promising strategy, given the willingness of both governments to collaborate and acknowledge the legitimacy of the GNA as the country's executive authority, but showed signs that it might even exceed the optimistic expectations: the GNA and HoR had agreed to transfer their power to the GNU, numerous political prisoners were released throughout the country, suggesting the need for national reconciliation, and leaders from both camps were announcing the setting of newly formed cabinet meetings in both Tripoli and Benghazi, as well as the organization of elections in December (although originally promised in late spring). Unfortunately, the initiative ultimately proved to be another failure due to mutual suspicions of betrayal: several armed supporters of Haftar (Aslan, 2021) prevented Prime Minister Abdul Hamid Dbeibeh from entering Benghazi (where a cabinet meeting was scheduled to take place) and the headquarters of the Presidential Council was attacked by an armed militia (no one was in the building at the time, but the GNU interpreted the event as a statement from the LNA), while the other side suspected that the US favoured former GNA members and close associates within the GNU (Aslan, 2021), and that the latter, wishing to retain power, deliberately did not make the necessary steps to organize elections until the agreed deadline. Consequently, the HoR formally accused the GNU at the end of September 2021 of hindering the electoral process, not only due to the fact that elections have not yet been organized, but also because the necessary legal and constitutional framework did not even exist. Furthermore, just two months after the elections were officially postponed, on February 10, 2022, HoR voted a no-confidence motion against the GNU, and then appointed its own prime minister and government (GNS), effectively reinstating the dual system.

Last but not least, on 30 October 2023, the Security Council extended the mandate of the UN Support

Mission in Libya (UNSMIL) until October 2024 (Resolution 2702), insisting on the need for an inclusive political process and the rapid organization of elections, but several of the mission's actions and proposals have met with the disapproval and disinterest of regionally influential states, amid the worsening situation in Ukraine, humanitarian crisis in Sudan and, above all, the escalation in the Middle East. Moreover, not only has UNSMIL been unable in the last year to prevent the gradual escalation of the conflict between the two governments, but on May 8, 2024, the mission announced that it was more than 2 million dollars in debt (Emad, 2024), which forced it to close the working offices. Even so, the mission has recently achieved some success, successfully concluding (at least temporarily) the National Bank crisis. Of course, most probably, the two governments and UNSMIL would not have reached a consensus on the appointment of a new Bank leadership without the intervention of the US and UK, exerting pressure on the leaders of both sides, and the promising process of repair between Turkey and Egypt (Abdeen, 2024), but it is still a positive result.

Nor has the EU (as an entity separate from its member states) had a more substantial impact on the Libyan political-military crisis, focusing rather on assisting the civilian population situated in a precarious situation (€46 million in 2017 for migrants and refugees in Libya and €500 million in 2024 for Sudanese refugees on Libyan soil, for example) and on considerably reducing the flow of migrants. For instance, on March 23, 2015, the EU Border Assistance Mission (EUBAM) Libya was launched to secure the Libyan borders, which had been frequently violated by mercenary and paramilitary groups. The mission was largely unsuccessful, as member states, lacking a dominant capable and leading actor, were reluctant to deploy their own military personnel in a high-risk environment and thus maintained a minimal and constant presence only in Tunisia. Therefore, the modest and transient teams operating within Libyan territory were largely incapable of providing assistance or enforcement to local authorities in the implementation of the recommendations set forth by the Commission or the UN Security Council. Also, the mechanism to monitor Libya's southern borders, in collaboration with Niger and Chad proved ineffective as well (Tinti, 2024), as the two states lacked the necessary capabilities (and often will, considering their significant internal turmoil) to control crossing points and combat people and arms trafficking.

Operation EUNAVFOR MED SOPHIA, also launched in 2015, with the objective of combating human trafficking and illegal immigration in the Mediterranean Sea, was completely overwhelmed by the situation, having the Maltese state requesting international assistance to either "share" some of the migrants with other states or deport them back to Libya, due to the sheer numbers of people arriving on its territory and the alarming increase in crime rates. Nevertheless, despite the failure to achieve the primary objective, the mission at least was able to save the lives of thousands of individuals (Kirtzman, 2020).

Subsequently, beginning in 2017, the EU acknowledged the ineffectiveness of the operation and redirected its attention and resources to the Libyan Coast Guard with the goal of addressing the migrant issue

directly. In theory, this initiative had the potential to be more successful than the previous ones and aimed to train and equip the Libyan Coast Guard (with Italian assistance) to halt illegal migration, smuggling and human trafficking. It is, however, unfortunate that the pervasive poverty, even in urban areas, coupled with the prevalent perception of the use of violence, have resulted in a multitude of abuses (both legal and physical) and numerous instances of corruption (Salah, 2023). Despite the EU's efforts to condition funding on respect for human rights (2022) the situation has not improved much, so that although the migratory wave has been partially stemmed, the immorality of the measures taken by the coast guards and the inability of European actors to limit the abuses have drawn negative reactions from the international community (Salah, 2023).

It is also noteworthy that both the EUNAVFOR MED IRINI operation and the sanctions applied to leaders or entities supporting armed groups in southern Libya were largely symbolic. As previously stated, Operation IRINI was seriously limited by the absence of a robust mandate, with numerous arms shipments continuing to reach both sides, particularly from Russia, Egypt and the UAE. As for the sanctions, they were so lenient (Williams, 2023) that the pivotal sources of funding for the armed groups experienced minimal disruption.

To comprehend this hesitancy and inconstancy from international organizations and regionally influential states, it is essential to contextualize the interests of each actor involved.

The US aims in Libya are multifaceted. Primarily, they seek to reinforce NATO's southern European position, enhance its global image in the wake of the 2011 revolution, curtail Turkey's regional influence, counterbalance Russia's unofficial intervention, and, most crucially, guarantee the continued viability of the Libyan state in the global oil market. While the US does not necessarily need Libyan oil per se, ensuring a stable flow on international markets remains crucial to avoid unwanted fluctuations on the global energy market. With regard to the question of support for the Tripoli-based government, the GNA, this can be justified on the basis of ideological opposition to the GNS. Although the GNA is an Islamist government, which is incompatible with the values of the UN Charter, the US continues to support it due to its purported pursuit of a more liberal economic policy, while Haftar's ultra-nationalist ideology evokes memories of Gaddafi's era of economic isolationism. An eventual total control of Libya by the GNS could lead to a considerable reduction in access to Libyan oil by the US and its allies and that is obviously unacceptable.

In addition to the goals of access to oil, countering Turkish influence and preserving its image as a global power, Russia has two other important objectives: gaining access to one or more Libyan ports and air bases (Kington, 2024) and fragmenting NATO's attention in several directions. At the moment, considering the situation on the Ukrainian front, it seems probable that the primary objective of the Russian Federation in Libya, as well as in Gaza, Lebanon, Syria, Sudan, the entire Sahel region, and Yemen (allegedly), is to foster division among Western publics regarding these aforementioned conflicts and to divide financial and military

aid into multiple portions, thereby weakening the Ukrainian position. The choice of GNS in this conflict seems a logical one (even though HoR members are mostly moderates and liberals) because not only does Haftar's political discourse run along similar lines to Kremlin's, but the personality of the marshal is very common in Vladimir Putin's entourage.

Turkey and Egypt, in terms of economic and military interests, are very similar: a Libyan government friendly to their cause would offer preferential access to oil resources, facilitate the entrance on the Libyan market for their national companies in the future post-conflict era for state reconstruction, expand energy cooperation through gas extraction and processing, attract a new ally in maritime disputes, and ensure a permanent military presence on Libyan territory (pre-emptive in Turkey's case and to form a strategic buffer in the case of Egypt). Nevertheless, the most significant distinction between the two can be observed with regard to their principal objective: the consolidation of their respective regional leadership images. Turkey has aligned itself with the GNA because the Tripoli government is closely linked to the Muslim Brotherhood, and under Recep Tayyip Erdoğan's leadership, Turkey has sought to project an image of protector when it comes to moderate Islamist factions and allied governments, supporting Islamist movements in North Africa and the Middle East. Located under the wing of NATO's security sphere, Erdoğan appears to have been plotting for several years to cultivate the depiction of a caliph in relation to neighbouring Muslim states, playing the role of the Islamic world leader (MENA only) and suggesting the formation of a new regional order. Conversely, Egypt goes along with the GNS and Haftar due to its perception of Islamism and the Muslim Brotherhood as the main sources of instability in the Middle East and North Africa (MENA), posing a significant threat to Egyptian national security. In return, Egypt also aspires to play the role of a regional leader, but it is going for the card of uniting the secular Arab world.

The situation between Qatar and the UAE is analogous, though on a smaller scale. In addition to economic motives, gaining strategic military "strongholds" in Libya and positioning themselves as important regional actors, Qataris want the Muslim Brotherhood to have greater influence in the region, while the Emiratis prefer the establishment in Tripoli of an anti-Islamist, authoritarian regime that is economically and, above all, militarily dependent on the UAE (Badi, 2022).

France and Italy, although both part of NATO and EU, find themselves in a somewhat more complex position in this case, given their divergent interests. The French state is not necessarily interested in the possible economic benefits it could gain (although recent diplomatic rapprochement with Egypt and the UAE may suggest a possible deal in this regard), but rather in establishing an anti-Islamist iron fist at Libya's helm, who will allow the French quick access to the Sahel (where France has military initiatives) and will be able to control or eliminate terrorism and arms trafficking. On the other hand, Italy (which shares an almost identical position with the EU) is not so much concerned about the political regime as long as it guarantees Italy the

ability to participate in the prevention of illegal immigration and the continuation of ENI's contract in operating the oil and natural gas exploitation in southern and western Libya. Given the GNA's willingness to accept external assistance in enhancing the Coast Guard and its decision to permit ENI to retain its concessions and access to energy resources, it is understandable why Italy has chosen to align with them.

With regard to Sudan, the situation remains opaque, although the involvement in Libya of different groups internally engaged in the civil war is obvious. In addition to the presence of numerous mercenaries, both Arab and Furian, on either side of the conflict, there have been notable diplomatic ties between RSF leader Mohamed Dagalo (also known as Hemedti) and Haftar, at least in the last year. Some Sudanese military sources even indicated the existence of an agreement (Libyan Express, 2024) between the two to supply each other with arms in case of necessity. The position of the SAF can only be assumed to be pro-GNA, as there is no statement from leader al-Burhan about this. However, considering that the SAF-backed government includes individuals who have had or are suspected of still having links to the Muslim Brotherhood (Bociaga, 2023), it makes sense for SAF to back GNA.

Algeria's perspective on the conflict is distinct, as it does not align with either the Tripoli or Benghazi governments. Its interests lie in preventing instability and ensuring a non-violent Libyan government that does not threaten the regional balance. Thus, the Maghreb state has traditionally positioned itself as a neutral actor and supported an internal Libyan reconciliation process without major external intervention. Algeria refuses to support either side, citing concerns that both represent a threat to its national security: a GNA leadership could potentially allow various Islamist groups to cross into Algeria and would increase the regional influence of Turkey and France; in the event of a GNS leadership, Algeria is concerned about the emergence of strong Russian influence in the region, a likely lack of cooperation from Libya in the energy sector and a possible political and military ambition of the Haftar family in the region.

So, as we can see, it's no wonder that international actors and neighbours can't and won't cooperate properly to resolve the Libyan crisis, when everyone has different interests in the region and the supporters of both sides put together look like a melting pot of ideologies. Additionally, the realistic offensive vision of the states involved and the failure to implement liberal institutional measures and cooperation have further complicated the situation. States maximize their influence (and try to reduce others) by indirectly supporting local factions and apply the strategy of buck-passing rather than engaging in direct military actions, minimizing the risks and costs for themselves. On the other hand, the failures of UN and EU actions highlight the limits of liberal institutionalism in the Libyan context. The lack of a dominant actor capable of enforcing compliance makes these sanctions remain rather symbolic.

5. Avoiding Civil War or Ensuring Stability? The EU's Options in Libya

Libya is currently in a political and diplomatic stalemate, akin to a frozen conflict between the two governments. The recent unofficial territorial recaptures by the LNA in the western regions of the country, the onset of a new civil war in Sudan, and the entire National Bank crisis have prompted the international community, particularly the EU, to contemplate the potential for the conflict to intensify and for official hostilities to resume between Tripoli and Benghazi.

So far, as we have already discussed, the primary international actor engaged in the political and military stabilization of the country, as well as in the pursuit of common grounds between the two governments in order to organize free elections and form a new legitimate government, has been the UN, despite the countless failures it has recorded in its efforts. The EU has preferred to focus either on limiting the adverse effects of destabilization on its economy or on acting as a secondary partner, rather than spearheading ambitious initiatives with the potential to alter (at least in theory) the Libyan status quo for the better. The question thus arises as to whether the EU could, in the current circumstances, assume the role of a main actor in preventing the outbreak of a new civil war and/or in the future to stabilize the state, considering its proximity and interest in the Libyan resources.

In light of the prevailing circumstances in Libya and the irreconcilable differences between the two existing governments, it is clear that the only viable path to reunification and functional stability in the country is through the organization of new free and democratic elections, so that the legitimacy of the new government would no longer be a matter of national and tribal dispute. Evidently, this cannot be achieved by the current governmental and military configuration, so any actor seeking to play a pivotal role in the country's reconstruction must negotiate and guarantee peace throughout Libya with its own troops and military techniques during the electoral process, plus control of border points to minimize criminal activity and mercenary presence. As the EU currently lacks a common army and even an official consensus among its members regarding the direction in which it should act in the Libyan crisis seems quite far, it is therefore impossible for it to guarantee the management and success of such process. Moreover, the EU, as we have previously discussed, is experiencing significant challenges even only in managing the migrant issue (for example, ensuring non-abusive practices in the case of the coastguards that are part of the European training project) and keeping both local military leaders and mercenaries on a short leash.

Furthermore, the current likelihood need of the EU intervening to prevent a military escalation is low in light of recent geopolitical developments. To be more precise, Libya has been a theatre of regional assertiveness for many years, with Turkey and Qatar on one side and Egypt and the UAE on the other, but the start

of the Gaza War and the intensification of conflicts between Israel and pro-Iranian formations in the region have fundamentally changed the paradigm, compelling these states, heavily involved in supporting one side or the other, to turn their attention back to the Middle East.

Not only the four states have demonstrated a lack of willingness to provide funding for the two Libyan governments at levels commensurate with those existing prior to October 7, 2023 (Inanc, 2024), but the advent of hostilities between Israel and Iran and its associated entities (Hezbollah and the Houthis), has prompted Ankara and Cairo to reaffirm their diplomatic relations, now facing a bigger problem and a common enemy: Iran (Inanc, 2024). Even if both Turkey and Cairo want to become the main regional player in the future, based on different ideas and principles, the two agree, along with the other Sunni states in the region, that Iran is a real threat to all of them as long as the fundamentalist regime is in power and possibility of it becoming a nuclear power exists.

The proxy conflict between the US and Russia in Libya is not really present at the moment either, as the US, like Muslim countries, is paying close attention to the conflict in the Middle East, while Russia has much bigger problems in Ukraine and Kursk and obliges the mercenaries in Africa to relocate on the Eastern European fronts (Njie, 2024). Therefore, even if Haftar or the GNA were to entertain the idea of acting militarily against the other, they would be swiftly dissuaded, given that all their allies are unequivocally opposed to such a scenario.

Though, the EU may possess the capacity to ensure stability and progress towards peace in the Libyan space in the future, but only through liberal institutionalist approaches. Examining the somewhat successful institutional model of the National Bank, the EU could promote the formation of new independent institutions within Libya to ensure a non-partisan, democratic and equitable transition of the country.

For clarity's sake, the National Bank of Libya (Central Bank) manages the financial resources of the country, especially the revenues from oil and gas exports. It also oversees the foreign exchange reserves, pays the salaries of civil servants and armed forces, controls the distribution of government funds (making it a crucial player in the Libyan state) and exerts considerable influence over the country's economic policy. This significant power has given the institution a degree of independence (Michelin, 2024), as both the GNA and the GNS need access to funds to function, and they do not desire civil unrest over non-payment of salaries and pensions (especially from the force institutions). Therefore, it is not feasible for any government to jeopardize the stability of this institution from pursing solely the national interests.

Coming back, the EU could (by constraining the governments with economic standstills) support the formation of new institutions on this model, where both governments would confer formal legitimacy upon the institution, transfer power to it and respect its decisions. Moreover, there are already several institutions

that could readily be adapted to align with the aforementioned model, requiring only a few structural modifications.

One of these companies is the National Oil Corporation (NOC), a state-owned enterprise that manages oil resources not only before they are exported through the Central Bank, but also during extraction and transportation. It is currently operating somewhat (unofficially) independently and is itself a vital institution in the oil economic chain, but it benefits neither from bilateral appointments (the GNA is making board appointments), nor from neutral activity protection from the international community (partner states only impose the use of this company for extraction and management, not its general neutrality). To solve this, the EU could initiate a renegotiation of the economic partnership with Libya, conditioning trade on reforming the NOC and guaranteeing its neutrality. This could also considerably diminish the GNS's inclination to explore alternatives for oil extraction and export (Kennedy, 2021).

In order to ensure the seamless operation and autonomy of other institutions that are indispensable for the functioning of the Libyan state, the EU, in collaboration with its partners and regional states with a vested interest in Libya's stability, could establish a fund to rebuild the country's critical infrastructure. Such a fund could be utilized to finance infrastructure projects in Libya, including those related to roads, oil, health, education, electricity, and water, which have suffered significantly since 2011. Besides, the aforementioned fund could also facilitate the resumption of essential national projects, such as the Great Man-Made River, which has been entirely neglected since 2011, despite its vital necessity.

Under the guarantee of this reconstruction and development fund, the EU could propose the establishment of a National Council of Transport and Port Administration which would have the purpose and capacity (receiving training and support from European counterparts) to ensure the operational functioning of trade, both internally and externally, regardless of the political tensions. This institution could also work directly with the Coast Guard to mitigate the trans-Mediterranean crime rate. Of course, it must be acknowledged that this measure would not eradicate the abuses perpetrated by the Coast Guard; however, it would introduce a more rigorous monitoring system to prevent such occurrences.

In the event of the formation of a European army or the alignment of strategies among EU members regarding the Libyan crisis, European states could also impose the demilitarization of Sirte, the creation of a technocratic government, and the establishment of a National Reconciliation Council there. Despite the severe damage or destruction of Sirt's infrastructure by the preceding dispute between the LNA, LSF, and terrorist groups, the town's location on the border between GNA and GNS-controlled territories makes it a symbolic location for national reconciliation. Unlike other "border" towns, Sirt has access to the coast, which facilitates the provision of supplies and logistical support for the transitional government, and in case of necessity, peacekeepers could quickly step in, just as quickly as the government leadership could be evacuated unharmed. In

addition, despite having been controlled by Haftar's forces before, Sirt is not a traditional centre of power for either faction, which could render the town a more acceptable candidate for a technocratic transitional government from both sides and locals.

The primary objective of the technocratic transitional government would be to stabilize the Libyan economy and organize fair elections with the assistance of peacekeepers. Conversely, the National Reconciliation Council would include members of the governments, representatives of the military groups that support them, and local/tribal leaders. This council should, in conjunction with the EUNAVFOR MED IRINI mission, monitor Libya's borders and ensure the permanent expulsion of mercenaries and foreign tribal militias.

Finally, another potential mean of achieving the objective of stabilizing the state would be to enhance the EUNAVFOR MED IRINI mission, both in terms of increased funding and number of vessels and aircraft monitoring Libya's sea and air traffic. Its activity must also be expanded by working with Egypt and Algeria, with the target of ensuring the optimal protection of Libya's borders and a notable reduction in regional criminal activity.

It is therefore evident that the EU is unable to halt a potential new civil war in Libya unilaterally (and is unlikely to be required to do so), but it can play a key role in stabilizing the country by promoting neutral governance, economic reconstruction and the strengthening of national institutions, with the aim of preventing the complete fragmentation of the state and fostering a peaceful transition. Nevertheless, this would necessitate a considerable degree of professionalism, conscientiousness and a mobilization capacity which neither the EU, its allies, nor the states in the region possess yet.

6. Conclusion

The Libyan crisis, a decade-long struggle that emerged from the ashes of Gaddafi's regime, remains an intricate conflict characterized by internal fragmentation and the influence of regional and global powers. The initial promise of democracy and stability that accompanied the 2011 revolution has faded into a reality dominated by competing governments, armed factions, and recurring episodes of violence. After years of fighting, the power hunger and the dual political structures in Tripoli and Benghazi have only perpetuated delays in organizing elections, crimes against humanity, poverty and institutional paralysis.

Internationally, efforts to stabilize Libya have yielded only limited success. The UN has played a central role in attempting to mediate peace and implement ceasefires, but these initiatives have been consistently hampered by violations of arms embargoes, rival foreign interventions, and a lack of compliance from key stakeholders. For instance, the arms embargo imposed in 2011 has often been disregarded, with military

support continuing to flow to both sides from external backers, rendering many diplomatic efforts symbolic rather than transformative. As a result, the Berlin Process, UN resolutions, and various ceasefire agreements have, despite some progress, failed to deliver a sustainable political solution that could unify the country and pave the way for legitimate governance.

On the other hand, the EU's engagement in Libya has been predominantly reactive, oriented towards the mitigation of immediate concerns such as migration and terrorism, rather than the resolution of the underlying causes of instability. While the EU has provided humanitarian assistance and financial support, as well as contributed to the monitoring of arms embargoes through operations like EUNAVFOR MED IRINI, its impact has been constrained by the absence of a unified military force and a coherent long-term strategy. Furthermore, the EU's initiatives, including the training of the Libyan Coast Guard and efforts to secure the country's borders, have been marred by reports of abuses and have not substantially reduced the influence of armed groups or prevented illicit activities (Salah, 2023).

Therefore, from a theoretical perspective, the Libyan crisis exemplifies the tension between neorealism and neoliberalism, as both perspectives are necessary to fully grasp its dynamics and potential resolution. Neorealism, particularly Mearsheimer's offensive realism, explains the logic of competition for influence among international actors and their tendency to favour indirect interference (buck-passing) in order to avoid the costs of direct military intervention. This trend has been evident in the cases of regional actors such as Turkey and Egypt, but also in those of international powers such as the US and Russia. Conversely, neoliberal institutionalism provides a credible model of stabilization through the creation of independent institutions similar to the National Bank of Libya. Nonetheless, the usability of this model is constrained by political fragmentation and the absence of effective implementation frameworks. Thus, Libya's trajectory will be shaped by the extent to which the international actors can navigate between the strategic competition required by Mearsheimer's realism and the vision of structural cooperation hoped for by liberal institutionalism.

Given the unpredictable geopolitical landscape, any future initiative will need to transition from power-driven competition to institutionalized cooperation if Libya is to achieve sustainable peace and functionality. Thus, Libya's trajectory will ultimately depend on whether international actors remain trapped in neorealist power struggles or transition towards the institutional cooperation envisioned by neoliberalism.

The ongoing tension between neorealism and neoliberalism in Libya also defines the European Union's strategic options in the region, with recent geopolitical shifts presenting both risks and opportunities. Amidst shifting geopolitical dynamics, particularly the redirection of attention from traditional Libyan backers towards new crises in the Middle East, the potential for a renewed outbreak of civil war remains medium-low (Fetouri, 2024). However, this shift presents a chance for the EU to reassess its role in the region and assert a more proactive approach in the region. The temporary diplomatic thaw between Egypt and Turkey, coupled

with the reallocation of Russian and Western resources towards conflicts elsewhere, creates a strategic opening for the EU to facilitate negotiations and support the implementation of a more robust peace process. To prove it, the recent resolution of the Central Bank crisis, albeit temporary, demonstrates that external pressure, when strategically applied, can yield results.

In order for the EU to make an effective contribution to the stabilization of Libya, it is essential that it prioritize the establishment of resilient institutions that are capable of functioning independently of political factions. The example of the National Bank, which has managed to maintain a degree of neutrality due to its critical economic role, provides a model for the potential restructuring of other key institutions such as the NOC. By linking economic partnerships with the reform of these institutions and ensuring transparency in their governance, the EU can foster an environment that encourages political inclusivity and reduces the motivation for armed conflict.

Moreover, the EU should consider expanding its involvement in the reconstruction of Libya's infrastructure, by establishing a fund dedicated to rebuilding the country's vital sectors, such as transportation, healthcare, energy, and education. Such an approach would not only address the immediate needs of the population but also enhance the legitimacy of any future government that is open to cooperation. Then, initiating the creation of a National Council of Transport and Port Administration, with international support, could assist in the de-politicization of economic recovery efforts and guarantee that resources are utilized for the benefit of the entire nation and not only for one government or the other.

Ultimately, while the EU is not in a position to guarantee the prevention of a new civil war, it can influence Libya's trajectory toward a more stable and democratic state, by adopting a proactive approach that extends beyond crisis management, addressing both the immediate symptoms and the underlying structural causes of instability. This requires not only diplomatic engagement but also a willingness to deploy resources and expertise toward building a non-partisan, functional state. By renewing its commitment to supporting institutional reforms, promoting economic development, and fostering dialogue among Libyan factions, the EU can play a pivotal role in shaping a future where Libya moves beyond its current stalemate towards a sustainable peace.

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PROMOTING TRANSNATIONAL GENDER EQUALITY EDUCATION: ICELANDIC ACADEMIC AND GOVERNMENT AGENDAS

ABSTRACT: *The article discusses the origins and development of an international gender equality teaching program (GEST) at the University of Iceland, which is directed at students from low-income and post-conflict societies. By placing GEST within the historical context of gender education and feminist politics in Iceland and by engaging with the program's philosophical and political underpinnings, the purpose is to explore its impact on feminist thinking and practice. The program is guided by notions of transcultural understanding and cooperation—where social responsibility, collective action, and ethics of care play a significant role in promoting gender equality and social changes. While GEST is part of Iceland's development policies with its heavy emphasis on gender equality—and funded by the Icelandic Foreign Ministry—it is not concerned with exporting a specific equality model or imposing Nordic standards or policies. Every effort is made to avoid practices that favor devolution into normative relations of patronage that characterize global Northern engagements with the Global South. The premise is that by thinking of, and engaging critically with, development discourses from transnational and feminist perspectives, it will be easier to offer new ideas of transcending state borders and to facilitate inclusion and reconciliation. Finally, by focusing on teaching practical ways to implement changes, the goal is to encourage students to think about what kind of ideologies these practices produce and how they construct "femininity" and "empowerment."*

KEYWORDS: The GEST teaching program; gender equality; feminist theory and praxis; development politics; ethics of care.

1. Introduction

In the last few decades, there have been increased calls for reforming international organizations and for alternative humanitarian commitments beyond the interests of nation-states. This agenda has been promoted as part of the practice of ethical politics rooted in the ontological position that humans owe their existence to others and are responsible for them. Concepts like "generosity" and "unconditional hospitality" have

been used in an attempt to translate social and political relationships into practices of welcoming, courage, and solidarity. Echoing these ideas, the Gender Studies and Training Program at the University of Iceland (GEST)—an educational program directed specifically at students from low-income and post-conflict states—has concentrated on developing practices of transcultural sharing and solidarity by engaging in dialogues and information exchange. This chapter deals with GEST's contribution to feminist thinking and practice within a broader global framework. It is divided into three parts: first, it puts GEST within the historical context of gender education and feminist politics in Iceland; second, it sketches the program's beginnings and development; and finally, it engages with its philosophical and political underpinnings.

2. Historicizing Gender Education in Iceland

The struggle for women's rights played a significant part in the development of Icelandic society and politics in the 20th century. The active participation of women in all societal spheres, in the present, is a testament to the success of activists who led this fight. Iceland has been at the top of the World Economic Forum "Global Gender Gap Index" for the past 15 years. According to its 2024 survey, Iceland has closed over 93% of the overall "achievement gap" between women and men in four key areas: health and survival; political empowerment; economic participation and opportunity; and educational attainment (see World Economic Forum, 2024). What has contributed to this achievement is that Iceland is among the most affluent countries in the world, enjoying economic and political stability and peace. Yet the groundwork was done by three generations of women, whose political involvement was instrumental pursuing a gender equality agenda. As a result of their work, social and legal measures were enacted to address gender equalities, which have enabled women to take an active part in public life.

The University of Iceland, which has committed itself to gender equality and diversity, has adopted an ambitious equality policy that encompasses both staff and students. The policy was originally devised by feminist researchers working at various departments at the university; more recently, disabled and transsexual students have been active in advancing this agenda. Academic research in the field of women's studies and feminism has been conducted at the university since the early 1970s. As the only university offering a gender studies program, it is taught within the Political Science Faculty at the School of Social Sciences, and offers BA, MA (taught primarily in Icelandic), and PhD degrees as well as a postgraduate diploma in practical gender studies. Gender research is also conducted by other university departments, especially, at the School of Humanities, but also at the School of Education. RIKK – Institute for Gender, Equality and Difference, which was established in 1991, is the leading institution in the field of women's gender and equality research at the

university. It works with academics from the five Schools of the University of Iceland as well as with colleagues from other universities and institutions. RIKK is part of many European and Nordic networks and international research projects and offers advice to government institutions and civil society organizations. It also administrates, and provides funding, for research projects, organizes conferences, and runs a public lecture series, symposia, and workshops. It collaborates closely with the GEST program and EDDA, a Research Center in Critical Contemporary Research within the School of Humanities, with emphasis on (in)equality and difference.

RIKK and EDDA initiated the GEST program in 2009. A key motivation was to address gender injustices, both in rich and poor societies, reflecting feminist criticisms of "realist" definitions of security as being too state-centric. Instead, the stress was on "human" or "individual" security, with a broad definition of the security concept that encompasses both the private and the public and that engages with structural impediments to gender equality. EDDA and RIKK still provide support for GEST by contributing to academic research on gender, difference, and equality and by their collaboration with international research institutes and organizations. GEST has also contributed to EDDA's activities because of its ability to attract renowned academics to teach in the program, who have, then, established links with Icelandic scholars. In short, this institutional collaboration has raised GEST's academic profile and enhanced its international reputation as a teaching venue.

GEST was established through an agreement between the University of Iceland and the Icelandic Ministry for Foreign Affairs, which had previously highlighted gender equality in Iceland's development and post-conflict policies. Subsequently, GEST became accredited as part of the United Nations University (UNU) as a third partner. In 2019, after an organizational change, GEST joined the other three Icelandic former UNU programs (the Fisheries Training Program, the Geothermal Training Program, and the Land Restoration Training Program) under an Iceland-based umbrella organization GRÓ – Centre for Capacity Development, Sustainable Use of Natural Resources, and Societal Change. The United Nations Educational, Scientific and Cultural Organization (UNESCO) became involved in the program as an international partner, replacing UNU, with GRÓ operating under its auspices.

The stress on gender equality in Iceland's foreign policy can, to a large extent, be ascribed to feminists who were active within and outside political parties; they pushed for gender equality reforms by offering a powerful societal critique, which laid the groundwork for the adoption of policies and legislation in this domain (Erlingsdóttir, 2021: 94; Enloe, 2013: 77). The widespread inclusion of gender issues in government policies—which was initiated in the late 2000s by Foreign Minister Ingibjörg S. Gísladóttir, the leader of the Social Democratic Alliance—was a direct legacy of the Women's Alliance, a women's only political party that played a key part in increasing women's representation in parliament and other political institutions in the

1980s (Ómarsdóttir, 2010: 73–94).

It is common to present gender-equality expertise as a form of Nordic nation branding, even if there are differences among the five Nordic states. The EU Nordic states—Sweden, Finland, and Denmark—have sought to influence the policies of other EU member states, whereas Norway's and Iceland's focus has been on promoting gender equality in developing and post-conflict countries (Cull, 2016: 156). The case for the GEST program was made by academics who argued that if Iceland were to sponsor development projects in geothermal energy, fisheries, and land restoration—projects that had gained broad visibility and recognition abroad due to Icelandic expertise in these fields—gender equality was another domain where Iceland had a role to play internationally. Thus, GEST's activities and funding reflect efforts to play up Iceland's strength in gender equality, and it has become an integral part of Iceland's foreign and development policy agenda. Yet the program is not an attempt at exporting the Nordic Equality Model, as some have suggested (Thorvaldsdóttir, 2011: 413). The mission and academic aims of GEST are to engage critically in the debate over gender equality, not to impose standards or policies on women. The driving force behind the project is a critical and, in some fields, radical, feminist stance on development and international politics. This means that its content does not always dovetail with the Foreign Ministry's agenda, even if it is committed to the promotion of gender equality. Needless to say, it is a challenge to be an academic program funded by a government that may pursue policies that may run counter to its philosophy. But GEST has successfully insisted on maintaining total control of its academic program, which has enabled it to keep an academic distance from specific government policies.

3. GEST as a Cross-Cultural Education Program

The GEST program is about promoting gender equality and social change in lower-income, conflict, and post-conflict countries. It encompasses three spheres: policy research; a studies program; and a platform for transnational knowledge sharing. The main activity is a five-month intensive 30 ECTS postgraduate diploma program. In addition, GEST offers short and online courses, PhD scholarships, participates in applied projects and research, sponsors a lecture series, conferences, and expert meetings, and contributes to social media through blog series and podcasts.

The postgraduate studies program commences in early January and ends in late May each year. The fellows receive a postgraduate diploma in International Gender Equality Studies from the University of Iceland after a successful completion of their studies. The graduates finish five to six modules in addition to that of a final written assignment, which involves either a research-oriented work (an essay or a Ph.D. proposal) or a

project proposal (an applied project)—both dealing with gender equality issues in the students' home countries. The program seeks to produce an educational experience with diverse academic and cultural perspectives for the purpose of facilitating knowledge sharing between academics and practitioners from different parts of the world. The goal is to educate and train young professionals and early career researchers in gender equality methods and theories and to prepare them for implementing gender-sensitive projects in their respective countries. The number of GEST graduates has increased considerably since 2009. As of 2024, 241 fellows have graduated from the program, 169 women and 72 men, from 38 countries. The students work and/or study in the field of gender studies or a related field at educational institutions, government ministries and agencies, and civil society organizations.

The curriculum is based on theories and practices in gender equality and on development studies, where a multidisciplinary approach is adopted. GEST's Icelandic and international staff—around 40 instructors—from five continents teach the modules every year. It is a group of gender equality scholars and experts who represent the students' geography as well as a diverse spectrum of study fields from the humanities, social sciences, natural sciences, medicine, education, and technology. GEST has encouraged interdisciplinary collaboration through the creation of specific modules focusing on gender and the labor market; gender and security; gender and health; gender and education, and gender and the environment. The purpose is to stress how and why women's participation in peace-building and reconciliation after conflicts is crucial in achieving gender equality. The program integrates gender into health, economics, security, and education as well as into environmental issues, such as climate change. While gender equality remains a core value of the GEST program, it has expanded its intersectional involvement and focuses also on issues relating to LGBTQI+, disability, race, and class. In addition, GEST runs research projects and sponsors Ph.D. research that is based on one of GEST's pillars: global gender equality, sustainability, human security, and societal transition. Among its most visible activities involve open online courses that have reached a large international audience. The program has also developed short courses in cooperation with ministries, institutions, and organizations in partner countries. It includes, for example, courses on gender and climate change and on teaching gender to youth in cooperation with partners in Uganda and Malawi.

4. The Ideas behind the GEST Program

One year before the GEST program was launched, Iceland's banking system collapsed under the weight of the global financial crisis in 2008. As result, the government was forced to implement budget cuts

that negatively affected the financing of GEST. At the same time, however, the experience provided the program with a useful baseline. It demonstrated the failings of broadly accepted North-South binaries: that Western discourses on "weak" states and "state-building" in developing and conflict or post-conflict countries ignored societal failings in the global North. What the financial collapse in Iceland showed, in particular, was the hypocrisy of elites when lecturing "developing" countries about governance or ethics. Iceland became an example of a societal trajectory, which it had ascribed to the Global South. It also felt the consequences of what Arjun Appadurai (1996) dubbed "mobile sovereignties," that is, the interference of external powers or international institutions, such as the International Monetary Fund (IMF) (see also Pandolfi, 2002: 212–213), when it sought financial support to respond to the crisis. It proved to be hard for the Icelandic political elite to accept "conditionalities" of international institutions since it was put in the same category as the recipient countries of its development policies. Betraying a deep sense of insecurity, the Prime Minister of Iceland, Geir Haarde, was keen on making it clear that he had extracted a promise from the IMF that Iceland would not be treated like a "Third World" state (Gunnarsson, 2009).

The Icelandic crisis was used by the GEST program to highlight the breakdown of the artificial division between "developing" and "developed" states; it sought to resist notions of knowledge production and transmission, where particular nation-states and people represented authority and the rest were supposed to follow their guidance. Instead, the emphasis was on trans-cultural ideas and dialogues, where experiences and knowledge of students are not only taken into account but also valued. The program is, thus, guided by the ethical principle of social responsibility, an ethics of care, and a relational ontology. Further, it is strongly directed towards action and transformational change. It identifies social, economic, cultural, and political processes that contribute to the subordination of women and other vulnerable communities and ways to counter them.

GEST makes no attempt to offer moral lessons on gender equality, but it uses Icelandic experiences to make certain arguments about policy-relevance. It is concerned with explaining and understanding Iceland's policies with respect to women's inclusion and gender equality and with the question of whether they are transferable. It stresses that gender equality requires collective action and solidarity of women human rights defenders, political will, and specific means, such as legislation, gender budgeting, and quotas. Further, it is made clear that there is no single way to achieve gender equality or a blueprint to follow. The Nordic countries have been seen by many observers as a model to be emulated, but their gender equality performance is far from perfect and needs to be dealt with critically. As the Danish scholar Drude Dalerup (2006, 2007) has pointed out, while the Nordic social model is respected globally, it does not mean that it is suited for all other cultures; diverse cultures and political, social, and economic conditions call for different approaches. Gender-related problems, however, remain similar and resonate across diverse geopolitical spaces. The pervasiveness

of gender-based violence and violence against women and girls is a testament to the force of feminist criticism of realist definitions of security as being too state-centric.

GEST has made vision and action central to its study and training program. It not only seeks to disseminate knowledge already in place about gender equality as well as parity in the broader sense of the word. It also builds on known epistemological methods of identifying problems, articulating the potential for change, and developing strategies to fight against inequalities. The premise is that by thinking critically from interdisciplinary, trans-cultural, and feminist perspectives—of such problematic terms as "development" or "peacebuilding"—it will be easier to offer new ideas of transcending state borders and to facilitate political reconciliation and transcultural understanding and cooperation. Rich societies are often in the position of being able to transmit skills and educational opportunities. Yet much needs to be done to disseminate them in a way that does not promote political and cultural supremacy. There has been of late much international support for local ownership of development projects or local self-rule in post-conflict states. Yet the reality is often different and steeped in prejudices. It can take many forms, for example, through Western stigmatization of poor and conflict-ridden societies as being "corrupt," or in pathological terms, as "sick." One of the main challenges of the GEST program is to resist such political and cultural power displays by engaging critical and decolonial feminist thinking.

Although GEST is an independent academic program, it is part of Iceland's foreign policy and a development cooperation strategy in which gender equality is far from being projected in radical terms. The same applies to UN policies and documents where the women's rights approach is still informed by liberal conceptions of gender equality. Similarly, being part of the international "aid industry" raises ethical questions since unacceptable conditions are often sustained through aid agencies. Palestine, which is one of GEST's partner countries, is a case in point. Women's lack of access to decision-making in politics and the economy is one of the key challenges that GEST grapples with. This is also what UN Security Council Resolution 1325 on Women, Peace, and Security seeks to address, a resolution of relevance to many of the GEST students' national contexts.

The GEST program engages critically with UNSC Resolution 1325 as an instrument of gender equality. The enforcement of the Resolution has been inherently flawed since peace negotiations and post-conflict reconstruction efforts—under the supervision of Great Powers powers or international organizations—are dominated by men. What is more, the UN itself has often violated the spirit and letter of the Resolution in its international peacekeeping missions—through the infantilization of local populations and through the framing of post-conflict reconstruction in terms of a "learning process." Nonetheless, Resolution 1325 also offers the potential to promote women's rights and to hold international institutions accountable if they ignore it. Indeed, it can be used as an instrument to draw attention to the "free rider" legal status of personnel of international

institutions—such as the UN, the European Union, NATO, and the OSCE—in places of interventions, whether in Afghanistan, Iraq, or Libya, or the former Yugoslavia, where there was minimal local oversight over policy decisions made by external powers.

GEST is well aware of normative engagements with post-conflict or conflict-ridden countries, which sometimes serve the purpose of legitimizing foreign control over societies and of elevating the status of peace-keepers or development "experts" at the expense of the local population. Another such form is sending young inexperienced people to post-conflict countries—with no local experience or knowledge—and let them earn 20- or 30-fold the average wage of the local community. The exercise of such economic and political power has bred class-based resentment towards Western "identity entrepreneurs" in lower-income and conflict and post-conflict contexts in the guise of peacekeeping or development workers. It has also led to corruption among the internationals themselves who can buy whatever they please at the local level and who enjoy im-munity from prosecution for crimes, even if this involves participation in sexual violence, prostitution, and trafficking. Local populations often feel powerless to criticize representatives of foreign countries or interna-tional organizations because of unequal power relation and because of their dependence on development or post-conflict reconstruction assistance. What makes it even more difficult is that local elites usually collabo-rate with international institutions or external actors.

GEST does not only discuss equality and what equality should mean but also dissects key concepts such as "development," "peacekeeping," and "democracy." In addition, the program explores the role of gen-der within the context of environment and climate change. One module deals with the transformative potential of gender equality to advance environmental sustainability as well as vulnerability, mitigation, and adaptation to global environmental change. Sustainability is central to the activities of GEST; the concept is used as a reference point with which to measure whether practices or policies are worthy of support. It includes a for-ward-looking social justice agenda and is a reminder of the failure of a capitalist economic system by allowing outrageous global inequalities. Yet sustainability is only as positive as the thing that is chosen to sustain. This is forcefully argued by Cynthia Enloe (2017), who taught for many years at the GEST program. Enloe focuses on what she terms the "sustainability of patriarchy," its resilience, and its survival and on the need to counter it. It is a system that produces inequality, with consequences that run far deeper. It is an order contingent on dividing people into the "superior" and the "inferior," the "touchable" and the "untouchables" on the basis of race, gender, caste, religion, or sexuality. Enloe shows how complicity reinforces discrimination, with mascu-linization and militarization interacting in a dialectic relationship. Yet sustainability is also significant for attempts to take on patriarchy and other systems of global and local inequalities.

Finally, the GEST program focuses on teaching practical ways to implement changes. The purpose is to encourage fellows to think about what kind of ideologies these practices produce and how they construct

"femininity" and "empowerment." The program also seeks to facilitate how to work with institutions, how to change policies, attract funding for programs, and disseminate information about their activities. Just as GEST fellows are encouraged to think about the structural conditions that shape everyday realities, there is also a discussion on how to work within those conditions to bring about real societal changes.

5. Conclusions

The GEST program offers ways to think and practice feminism. In temporal and material terms, it matters to have the time and location to share experiences from different backgrounds that might be of value in the participants' own contexts. Transnational feminist theorizing places particular local experiences in a global context; it accentuates the inter-relationships between particular parts of the world and forms of inequality and fosters stronger responsibilities. Thus, the GEST program may also create new configurations since collaborations, networks, and solidarities are forged within program which are, then, sustained beyond the classroom through the research program and a transnational forum of alumni.

It is also notable that GEST articulates the deployment of resources, often reserved for those already privileged in the global North, for the development and strengthening of global Southern expertise. Every effort is made to avoid this devolving into normative relations of patronage that characterize global Northern engagements with the Global South. The epistemological and methodological frameworks of the program, which disrupt didactic pedagogies and stress the value of encompassing broad knowledge serve to open up an ethics of care and responsibility of shared implicatedness and responsibility.

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POLITICS OF FORGETTING AND COUNTER MEMORY IN CONTEMPORARY ICE-LANDIC LITERATURE: SJÓN AND RED MILK

ABSTRACT *This article discusses the trajectory of cultural memory in post-war Icelandic literature and culture. It draws on works from literary scholars and historians who have shown the difference between the memorialization of World War II in Iceland and elsewhere in Europe. It shows how the lack of social and cultural discussion of the war is influenced by different political and social forces and how it has been limited in scope and ambition. The article shows that there are, however, exceptions to this and takes as its case study the work of the Icelandic writer shown and in particular his novel* Red Milk *which tells the story of one young Icelandic man's fascination with Neo-Nazism in the aftermath of World War II.*

1. Introduction

The events in a country's history that are remembered and paid attention to, and the way in which this is done or not done, is one of the central concerns of the field of memory studies. Many examples in recent times also show how memory politics not only reflect but can have a considerable effect on our current political realities. This can be seen for instance in recent calls for removing statues of prominent historical figures who benefited from slavery or were instrumental in nineteenth century colonialism (Frow, 2019) or the way in which the Holocaust is evoked in the current Israeli aggression in Gaza. The way in which a society or nation remembers its past is thus part of daily reality, political discourse, and cultural practices. Ann Rigney emphasises the usefulness of 'a social-constructivist model that takes as its starting point the idea that memories of a shared past are collectively constructed and reconstructed in the present rather than resurrected from the past' (2005: 14). What this attention to memory – collective memory, cultural memory – clearly demonstrates is that such memory is under pressure from many different forces. Representations of the past in society are influenced by political expediency, economic considerations, calls for social cohesion, cultural traditions,

current aesthetic values, and local memory practices. Marita Sturken states in her seminal study of memory politics, Tangled Memories that: 'Public commemoration is a form of history-making, yet it can also be a contested form of remembrance in which cultural memories slide through and into each other, creating a narrative tangle' (1997: 44). One example of such narrative tangles is the way in which the Icelandic experience of the Second World War is remembered, or perhaps more to the point, forgotten. It offers an interesting insight into the complex politics of memory and the role of forgetting in public memorialization.

2. Cultural Memory and Fiction

Public and/or official commemoration of the Second World War in Iceland is in the main very limited in scope (Neijmann 2022); there are a very few public memorials, exhibits, events, or rituals dedicated to this period in Icelandic history. During and in the immediate aftermath of the war Icelandic literature was to a certain extent preoccupied with it (Neijmann 2012, 2016), and there is some evidence that there is a renewed interest in the war in fiction from the last decade or so (Helgason, 2011, Indriðason, 2013, 2015, 2016, Gunnarsson, 2017). The author Sjón (1962) is a prominent Icelandic novelist, poet, screenwriter, lyricist and more, whose works have been translated widely. In some of Sjón's work there is a preoccupation with the Second World War, for instance in the examination of the highly significant and politicised issues and ideologies at stake in the run up to the conflict and in its aftermath. This is evident for instance in his trilogy CoDex 1962 (2016, 2018), as well as in his novel Korngult hár, grá augu (2019, Red Milk, 2021), which will be the focus of this study. Among the issues addressed in these texts are the lives of ordinary people during the war, the fate of the Jewish immigrant in Iceland, and in the case of Red Milk, the rise of neo-Nazism in post-war Iceland (Gudmundsdottir, 2024).

Red Milk raises a subject in Iceland's past that has been more or less silenced and/or forgotten, and the way in which the novel examines these issues provides a new way in which to address this complicated past. The concepts cultural memory and counter-memory will be helpful in analysing the particular uses of the past at play here. The concept of cultural memory proposed by Jan and Aleida Assman, has been further developed by Ann Rigney and Astrid Erll, not least the relationship between literature and memory (J. Assmann, 1992, A. Assmann, 1998, Erll and Rigney, 2006). Erll and Rigney propose that literature has a threefold relationship to memory: 'literature as a medium of remembrance, as an object of remembrance, and as a mimesis of memory' (2006: 113). Rigney has demonstrated that literature's role in memorialisation can be described as a 'portable monument' (2004). Developing these ideas further, Rigney maintains that creative arts such as films and novels can create 'memorability' of forgotten or marginalized histories (2021: 12). This does

not only apply to works of realism, such as traditional historical novels, but experimental and self-aware works as well: 'drawing attention to the medium, rather than making it invisible, is also a way to generate interest in unfamiliar experiences' (15). This is highly relevant to Sjón's writing, as he works consistently within the avant-garde, pushing boundaries of narrative and representation, while constantly referencing real historical events, as he does to great effect in Red Milk.

In this novel, the author unearths stories that have been silenced or forgotten, or at least kept out of mainstream discourse for the main part. The forgotten therefore plays a prominent part in this work, where it creates 'memorability' in a silenced story. The relationship between remembering and forgetting is not a stable one, or one that can be easily defined. The closest theorists get to classifying the connection between these terms is to say that they are not mutually exclusive, as memory encompasses both remembering and forgetting. Or as Erll posits: 'Remembering and forgetting are two sides – or different processes of the same coin, that is memory' (2011: 8). In order to 're'member one must have forgotten; the forgotten is always already an integral part of memory (Gudmundsdottir, 2017). In Andreas Hyussen's words: 'Inevitably, every act of memory carries with it a dimension of betrayal, forgetting, and absence' (2003: 4). It is therefore hardly feasible to attempt to disentangle these two concepts and place them in separate categories, but rather pay attention to the way in which the forgotten is a constant presence in all memory work. Rigney suggests that the traditional mode of thinking about memory as one of plenitude and subsequent loss is not necessarily helpful, instead she prefers to consider it in terms of scarcity. Recollection 'is an active and constantly shifting relationship to the past, in which the past is changed retrospectively in the sense that its meaning is changed' (2005: 17). One of the principal ways in which we approach the past is through narrative, as storytelling is an act of memory (Erll, 2009), but one which always entails both remembering and forgetting. When examining memory politics, however, the notion of forgetting is a more complex phenomenon than the more natural progression of the slow erosion of the past we all experience. Jay Winter has suggested that 'silence' is a more appropriate term to employ, not least to describe the histories of war and violence (2010). In his famous study of forgetting Paul Connerton analysis the many different modes of forgetting at play in the uses of the past, such as forgetting as planned obsolescence or as humiliated silence (2008). These terms are helpful when considering how a society or a nation faces its past.

Literature is one of the ways in which societal forgetting or silencing, or planned obsolescence can be counteracted, reversed, and challenged. Fiction can bring to the fore events from the past that have been ignored or have for one reason or another been marginalised in the dominant discourse. The term counter-memory is useful in describing the memory processes at work. Initially conceptualized by Michel Foucault in 1971 as 'contre-mémoir,' counter-memory has been developed further in recent decades in memory studies.

It has been used to describe marginalized memory or suppressed and silenced memory and José Medina maintains that this approach: 'places practices of remembering and forgetting in the context of power relations in such a way that possibilities of resistance and subversion are brought to the fore' (2011: 10). Subverting national narratives, dominant and prevailing conception of the past, is in itself an act of resistance, a way of pointing out the dangers of ignoring transnational influences, that can lead to blindness on particular issues, such as Iceland's long and complex relationship with other nations, hence the importance of emphasising transnational memory's possibility as counter-memory (De Cesari and Rigney, 2014).

Examining pasts that have lain outside dominant discourses and common understanding of the past is a counter-memorial practice, according to Jarula Wegner: 'Any memory can be contested by countless countermemories that remember this past differently, in contradicting ways and create dynamic antagonisms that continuously question and disrupt the authoritative, canonized order of remembrance' (2020: 1222). This understanding of counter-memory echoes Walter Benjamin's view of the possibilities of history writing. According to Esther Leslie: 'Historical construction is Benjamin's term for history-writing that can account for the experience of the nameless' (2010: 133). Thus, fiction can unite these strands of transnational and counter-memorial practices, subverting or challenging common notions of the past, offering a different insight into historical event, by paying attention to the figures on the margins.

3. Memory and World War II in Iceland

As mentioned above, memory of the Second World War in Iceland has been particularly prone to forgetting and/or silencing and does not share many communalities with narratives established elsewhere in Europe, as the country profited considerably from the war and did not suffer the devastating effects so many other nations endured. The country was occupied by Allied forces from 1940 onwards, an occupation resented by many but tolerated by most, with its concomitant incursion of modernity, urbanization, and creation of wealth in what had historically been a very poor country. These factors have greatly influenced how the war is memorialised, or not memorialised in Iceland. In her examination and analysis of literature of the Second World War and the Allied occupation in Iceland, often in works that had thus far garnered little academic attention, Daisy Neijmann has discussed the limits of the response in Iceland to these events, despite the social, economic and cultural change they brought to the country (2016). She describes how little public commemoration of the war there is and how it is portrayed as an event that took place elsewhere and 'of which Icelanders are entirely innocent, while any discussion of Iceland during the Second World War focuses on the economic boom, modernization of Icelandic society, and the relations between soldiers and Icelandic women' (2016:

98).

One of main reasons for this was that it was a country without a military of its own, whose leaders echoed constantly an almost mythical idealisation of its enduring neutrality. It was sovereign state from 1918, but under the Danish crown until 1944. Remaining neutral after the occupation of the Allied forces brought with it its own complexities. On the one hand, with the occupation Iceland was placed in the Allied camp, but as Guðmundur Hálfdanarson explains: 'Although this did not happen through the conscious policy of the Icelandic government, it freed the Icelandic political and cultural elite from any implications of collaboration or active cooperation with Nazi Germany during the war years' (2011: 80). This means the country is in the unusual, albeit in some ways privileged, situation of being both neutral and aligned with the Allies, of being a participant (for instance by selling fish to Britain), but without a military. Neijmann has claimed that the implications of this can be found in some of the Icelandic war fiction she studies, where characters suffer from 'bystander syndrome' as the Icelandic neutrality the character believed in was compromised during the occupation when nearly everyone went to work for the occupying forces, thereby profiting from the war. The feelings expose 'the ethically dubious stance of neutrality, neutrality which is rarely real neutrality' (Neijmann, 2012: 135). Thus, the neutral stance is shown to be heavily compromised, or even impossible, as the country is already implicated, ideologically, politically, and/or socially. Michael Rothberg's concept of the 'implicated subject' is useful here, as it occupies positions aligned with power and privilege without being themselves direct agents of harm; they contribute to, inhabit, inherit, or benefit from regimes of domination but do not originate or control such regimes. An implicated subject is neither a victim nor a perpetrator, but rather a participant in histories and social formations that generate the position of victim and perpetrator, and yet in which most people do not occupy such clear-cut roles. (2019: 14)

The concept of the implicated subject can, mutatis mutandum, be applied to Iceland's position in the war, as it fulfils the criteria of prospering from the war, being neutral in name, but a participant, nevertheless. And not only is the nation already implicated in the conflict, it was already part of the larger world and transnational currents. John Brannigan shows in his analysis of W.H. Auden's and Louis MacNeice's expedition to Iceland on the eve of the war how for them Iceland was 'an otherworld outside of the violent inequalities, repressions and subjectivations of European society.' What they encounter instead is a place 'deeply mythologised by the Nazis as "Das Land," already tied to the global economies of tourism, and already weighted, however slightly, within the geo-political distribution of power. Iceland was peripheral, but it was neither outside of, nor alternative to, the ideologies and economies of Europe' (2022: 95). The emphasis in Icelandic political discourse on isolation – and thereby exemption – from the outside world, and on the idealised neutrality of the nation, does not reflect the economic or cultural, transnational realities.

Both Neijmann and Hálfdanarson draw attention to how foreign influences are viewed in Icelandic

cultural memory and political discourse as a pollutant (Neijmann, 2012, Hálfdanarson, 2011), but just as neutrality is an impossible stance, as we learn from Brannigan and Rothberg, isolation from world is not the reality either.

4. Sjón's Red Milk

Red Milk can be read through the prism of the cultural memory and dominant narrative in Iceland of the Second World War. It tells the story of Gunnar Kampen, a young Icelander of Norwegian descent who turns to neo-Nazism in the aftermath of the war. It is a disturbing read, not least because the protagonist is a very ordinary young man, and his conversion to this destructive and utterly bankrupt ideology is described as somehow inevitable. The novel starts with the body of Gunnar found on a train in the UK, and we learn that he had been suffering from an incurable disease. Death is thus a starting point and a constant companion throughout the text. It shapes both Gunnar's own life, and is a prominent force in the ideology he espouses. This is a brief text, 117 pages long in the original edition, and is made up of a collection of letters and childhood memories, fragmented and almost fragile in its sparsity.

A focus on international and transnational currents and consistently placing Icelandic culture and society in a broader setting, is a prominent a feature of Sjón's work. His interest in the war, however, as he explains in an interview, relates to his own story: 'My parents were born in 1936 and 1939 and in my search for what I am made off I have always placed ground zero there. The world I am born into begins' (Ormarsson 2019). This is where the origins of the protagonist of Red Milk also lie. The war here is the backdrop of the story, but very much in the background, as we only learn of it through Gunnar's viewpoint, and he was a child at the time. He has very vague ideas of what is happening, and he is not told very much about this as his father, living in fear of what is happening in his home country of Nazi-occupied Norway, locks himself away, listening to the news of the war on longwave radio in foreign tongues. It is thus beyond Gunnar's understanding, yet later becomes central to his attraction to far-right views.

Sjón's works are in the main not preoccupied with the same themes as Neijmann (2016) has identified in post-war Icelandic fiction, such as the occupation and modernisation, but there are interesting cross-overs. The figure of the Icelandic woman with the Allied soldier, a common trope in Icelandic war fiction, is echoed here in one of the most poignant episodes when Gunnar's paternal aunt, Kirsten, comes to visit from Norway shortly after the war. The reader has only Gunnar's adoloescent perspective, but certain facts can be gleaned from the sparse text. When the family come to meet her in the harbour as she gets off the ship, they see how she stumbles and drops her belongings, but no one comes to her aid: 'The few onlookers who noticed her

made no attempt to come to her aid and her hurried movements suggested that she hadn't been expecting them to either' (Sjón, 2021, p. 24). When the family greets her, the tension between the brother and sister is palpable; they do not hug and barely say hello to each other, and when they get home 'there was more shouting than weeping' (p. 25). We learn that Kirsten is waiting for her hair to grow back. In the morning, Gunnar, who shares her room, 'measures how much her hair had grown in the night' (p. 26) indicating that she was punished, as were many women from former Nazi-occupied territories for having relations with a German soldier, by having her head shaved. The patriarchal assumptions of ownership in the treatment of women who fraternised with soldiers was also a feature in Iceland's experience of war, although the response was more violent in Nazi-occupied territories. Kirsten returns to Norway when her hair has grown back and leaves behind a man's suit which Gunnar later wears. The suit has a mark 'where something had previously been sewn onto it' (p. 39) indicating that he is in fact inheriting a Nazi uniform.

Although this is never stated overtly in the text, we are reminded time and again that part of Nazi ideology – in particular nationalism – was a strong feature of politics in newly independent Iceland – which makes Gunnar's story all the more chilling. The notion of 'foreign pollution,' mentioned above, was a feature in both left- and right-wing Icelandic politics. As Hálfdanarson explains, the occupation 'challenged the alleged purity of both Icelandic blood and culture' and thus 'undermined what Icelanders held most dear – and the defenders of the Icelandic moral order could do little more than pledge their allegiance to the Icelandic Blut und Boden' (2011: 86). The text draws attention to that the Nazi rhetoric Gunnar espouses and advocates is not something utterly alien to Icelandic politics either during the war or in the post-war years. The closer this ideology and rhetoric is brought to the everyday and further away from the depiction of Nazi ideology as completely unfamiliar or the figure of the Nazi as a monster, the more difficult it becomes to reckon with.

Hálfdanarson' reference to Blut und Boden emphasises the racist element in Icelandic political discourse at the time. Gunnar gets ever more obsessed with the existence of Jews in Iceland, but his antisemitism had its counterpart in the Icelandic ruling classes, and the text refers to the role played by a member of the government at the time in preventing Jewish refugees from settling in Iceland: The Icelandic nationalists had fallen asleep on their watch, placing their trust in the Minister of Justice, Hermann Jónasson, leader of the Progressive Party and a well-known enthusiast for the purity of his nation. Yet, although the minister had done all in his power to halt the tide, evidently a sizeable group had made it to the white island, sinking their claws into Icelandic soil (p. 96).

This is very much in line with historical events; Jónasson indeed played a leading role in turning away Jewish refugees from Iceland in the run-up to the war. We are reminded in this text of an inglorious past which warrants re-examination, as it has largely remained forgotten and silenced, although there have been some signs of a revival of this discussion in recent years (Bergsson, 2017).

Racism has featured regularly in Sjón's work, antisemitism in particular, and Nordic 'Arianism,' which plays a crucial part in his novel Argóarflísin (2005, The Whispering Muse 2012). In the second volume of CoDex 1962, which in part takes place during the war, we first come across Nazis in Iceland, and this is represented as a most natural and unremarkable fact. It is one of the hidden pasts these texts unearth and thereby attempt to remedy that omission. There are of course, several reasons for on the one hand the prevalence of nationalistic discourse, and on the other the denial of the existence of Nazism in Iceland, the most obvious being that no one wanted to be associated with Nazism or admit their family's association with Nazism, despite its foothold in Iceland in the pre-war years, the role Iceland played in Nazi mythology, and neo-Nazism links to the country on the post-war years. But the avoidance of the subject and the refusal to address Iceland's role in that is also very much influenced by how the war shaped the country and the Cold War politics that dominated Icelandic political discourse in the decades after the war (Ingimundarson, 2013).

In Red Milk this hidden and silenced presence of the Nationalist movement in Iceland in the 1930s and the history of the growth of the neo-Nazis in the post-war years is unearthed and brought to the surface. It shows clearly how this was conveniently forgotten in the prosperous war years, where such allegiances became uncomfortable. When in the office of his boss being fired from his job in the bank, most likely because of his politics, Gunnar looks out the window: 'A famous photograph of the old Nazi party had been taken from this angle on 1 May 1936, when a hundred men in brown shirts had marched through the centre of town. He happened to know that the managing director, now escorting him to the door, had been one of the flag-bearers that day' (pp. 114-15).

As mentioned above, foreign influences were often viewed with suspicion in Icelandic discourse, but paradoxically, attention from abroad could offer validation and legitimation. Gunnar writes letters to leaders of neo-Nazis around the world (real life characters such as the US neo-Nazi George Lincoln Rockwell, who had ties to Iceland) and developed connections to the international movement of neo-Nazis – indeed, Gunnar dies on his way to a world gathering of neo-Nazis in the UK. The newspapers in Iceland notice that Rockwell has visited Iceland and in a news item on the issue, a reporter refers to Gunnar as the "Führer" and described the party as a "small group". Gunnar didn't let it get to him. What mattered was the information provided at the beginning of the piece: That there was "an international neo-Nazi movement". That its representatives were "travelling openly between countries" and that Iceland was one of their stopping-off points. And that they had a representative here in Gunnar Kampen.People would notice. (p. 117)

This not only confers legitimacy on Gunnar's activities, but also in some sense on the novel itself. Gunnar's experience and the subject matter of the novel is part of a larger picture, not limited to parochial issues in Iceland, but have their ongoing, larger, cross-border, histories.

Iceland and Icelanders are 'implicated subjects' in Sjón's works. They are part of a world at war,

showing the same leanings toward racism and nationalism as elsewhere in Europe at the time. In Red Milk Nazism is treated in a more serious manner than in Codex 1962, artifice is suspended with, and playful fables are nowhere to be seen. Instead, we get a glimpse of the inner life of a young person in the post-war years turning to this destructive ideology. Thus, Sjón's work introduces a new perspective on a rather stagnant discourse on the Second World War in Iceland, ensuring the 'memorability' of events. The novel becomes a 'medium of remembrance' while also enacting a 'mimesis of memory' in the childhood reminiscences of Gunnar Kampen. It thus takes part in the formation of cultural memory, by challenging the dominant national narrative, offering a counter-memorial representation of the forgotten or hidden past.

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