N=2: The comparative study of the EU and the US as a research programme

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Abstract
EU-US comparisons have proliferated in the past two decades or so. Yet by and large this scholarship so far has proceeded without a serious reflection on its own nature, raison d’être, and key characteristics—a lack of ‘self-awareness’ which in turn hampers mutual communication and cumulation. Employing an original dataset of 90 publications, this paper aims to fill this gap by examining the substantive and methodological traits of the EU-US literature, analyzing its evolution over time, and reflecting on its possible future developments. A central conclusion of the paper is that, consistent with EU studies as a whole, EU-US comparisons have become increasingly normal vis-à-vis the paradigm of positive political science. I argue, however, that this normalization is only partly good news, and that a more desirable direction for the future is for EU-US research to be centred on the notion of a ‘dual mission’ (theoretical and empirical), whereby comparative work should aim to explain politics in these two federal systems (and possibly beyond) while at the same time acknowledging the two polities as interesting per se owing to their relevance and the strong political value of their comparison.

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Introduction
The proliferation of EU-US comparative work in the past couple of decades has rapidly turned what once was an eccentric choice of cases into a legitimate comparison spanning a wide range of topics and questions. Despite its growth as a literature, however, EU-US research so far has proceeded mostly ‘unaware’ of itself: for one thing, scholars have often been reticent about locating their work in the EU-US rubric as opposed—or at least in addition—to the various functional areas covered by their comparisons. For another, and more importantly, a systematic attempt to map the contours of EU-US scholarship is still lacking. The absence of self-reflection among EU-US scholars, in turn, hampers not only mutual communication (save for ritual citations) and cumulation, but also a serious appraisal of this literature.

This paper fills this void by presenting an analysis of EU-US scholarship based on an original and comprehensive dataset of 90 publications (see Appendix for data collection procedures). I begin the analysis in the next section by, first, placing EU-US research in the broader context of the Union’s comparability, and then showing how both the growth and diversification of EU-US work are closely connected to the EU’s advances toward the familiar model of federalism. Subsequently I draw a methodological map of EU-US studies (based on their ‘theoretical intensity’ and the presence of additional cases) that documents the increasing conformity of this research to the paradigm of positive political science. In the third and final section I reflect on the virtues and limits of this normalization and propose an alternative direction for the EU-US research programme centred on the coexistence of a theoretical and empirical mission at its core.

I. The EU, the US and comparative federalism: recasting the n=1 problem
The issue of whether the sui generis nature of the European Union hinders its comparability—the so-called ‘n=1’ problem—so far has been approached from two different angles, which one might call ‘theoretical’ and ‘pragmatic’. For the ‘theorists’ (see for all Caporaso et al. 1997) the EU’s exceptional character does not necessarily make it incomparable. Comparability, they argue, does not exist in a vacuum but always depends on what one is comparing for. The EU is not comparable with an
institution as close as the North American Free Trade Agreement if we are assessing different types of agricultural subsidies, but can be fruitfully compared with something as different as a country club if we want to know the effects of unanimity on the admission of new members. To generalize, as Sartori (1991) reminds us different entities are always and only comparable with respect to the traits they share. So, while it might be hard to find a match for the EU as a regional and supranational institution, reconceptualizing the Union within broader and more populated categories such as ‘associations of states,’ ‘territorial political organizations,’ ‘clubs,’ and so forth, should do the trick. As long as one asks the right questions and works at the appropriate level of abstraction, the theorists conclude, the EU’s comparability is ensured and the n=1 problem vanishes.

   The ‘pragmatists’ accept the above argumentations as logically correct, but point to the practical difficulties created by the EU’s sui generis nature. In particular, climbing the abstraction ladder to compare the Union with members of different genera is likely to cause three orders of problems. First, it can make our concepts so far removed from real life political problems as to be of little use outside the confines of pure intellectual discussion. Second, it can cause control problems. Categorization is, at the end of the day, a way of controlling for the ‘packages’ of variables that demarcate the category—say, what makes up a state—by eliminating their variation by definition. By decreasing the connotation of our concepts we relax this control and introduce the possibility that the variables now allowed to vary will disturb our comparison. The flip side of this—and the third problem—is that the factors that we allow to vary might answer our research question so obviously as to make the whole comparative exercise rather banal. While the EU is always comparable in principle, the pragmatists argue, once these three problems are considered the number of worthwhile (i.e. useful, interesting and methodologically sound) comparisons shrinks dramatically, making the Union practically an n of 1 in most cases.

   EU-US research is located somewhere in between the two ends of the debate. On the one hand, EU-US comparisons are by and large framed within the study of federalism, a familiar and well-populated political genus able to provide the Union with the sort of useful conceptual packaging recommended by pragmatists. The EU’s federal interpretation is favoured by the advances in the deepening of the European project in the past two decades, and the choice of the US as comparable case is, from the pragmatic standpoint, almost a no-brainer given the political, economic and social
similarities between the two systems. On the other hand, even by the most generous standards the EU is not (yet) a full-fledged federation. This makes some re-conceptualizing of the sort suggested by the theorists still necessary in order to establish full comparability with the US (and other federal states). Such re-conceptualization is usually achieved through the more or less explicit use of categories akin to yet more inclusive than traditional definitions of federalism, in the first place ‘multi-level governance’ or Elazarian federalism, which is independent of legal sovereignty (Elazar 1987). By employing these concepts, EU-US scholars strike a good balance between the need not to stretch the notion of federation and the convenience of remaining within the familiar boundaries of comparative federalism.

That the EU-US literature is linked to the federalization of Europe is no news. What is probably less evident is the extent to which scholarly and political developments so far have been connected. The following chart shows the distribution of EU-US publications over time.
The first evident aspect of this distribution is the absence of pre-1996 publications. Assuming a couple of years of lag between developments on the ground and publication, this confirms the Maastricht Treaty—and the resulting birth of the European Union—as the decisive event for the emergence of the EU-US literature. Equally interesting is the close correspondence between the production of EU-US studies and the EU’s advances—or lack thereof—toward federalism. After a few years of slow growth coinciding with the timid Amsterdam and Nice treaties, EU-US research accelerated in 2003 and peaked in 2004 in correspondence with the 2002-03 Convention on the Future of Europe, only to decline in the next couple of years with the crisis and eventual demise of the constitutional project as a result of the French and Dutch referendums. Almost immediately, however, a period of new and steady growth of EU-US scholarship began as a result of the works and signing of the 2007 Lisbon Treaty. The last part of the chart, finally, shows a mixed trend—declining yet not falling production—that seems consistent with the contradictory effects of the recent economic crisis, which has accentuated some rifts within the Union while at the same time providing a new stimulus for integration in certain areas.

With the expansion of EU-US comparative research over the past two decades has come its diversification. Figure 3 breaks down the literature cumulated in 2004 and 2012 by primary topic.

Source: Author’s data
Even after the 2004 peak the literature clustered mostly around four areas: agriculture, democracy, environmental policy, and institutional change. While work on all these topics has continued in the second period, research in other areas—most notably foreign policy, institutional functioning and lobbying—has grown at a higher rate, thus making the literature more varied. One explanation for this might be a simple catch-up effect, whereby scholars working more recently have tended to concentrate on topics scarcely covered in the past. Equally plausible, however, are two explanations relating to the links between the EU’s transformations and its comparability discussed previously. One is that integration in certain areas has made comparisons more possible, and hence likely, in those areas. This might be the case, at least partly, for the growth of comparative foreign policy studies. Increasing integration, however, may also have fostered comparison in areas not directly affected, by virtue of making the EU and the US’s institutional contexts more similar, hence attenuating the control problems explained above. This second mechanism may help explain the expansion of studies focusing on lobbying and activism and those on institutional functioning.

II. A methodological map of the EU-US literature
Responding to Riker’s (1969) oft-cited claim on the irrelevance of federalism, Jan Erk (2006; 2007) has recently argued that federalism matters if it can tell us something significant on one or more of four issues: political representation, participation and accountability; the accommodation of territorially based differences; public policy
and governmental effectiveness; finally, issues of institutional design. While not the most fine-grained imaginable, Erk’s list is a useful summary of the boundaries of comparative federalism and its basic mission within comparative politics, i.e. understanding the general dynamics governing this institutional form in those four fundamental areas of politics. As shown in the previous section, the EU-US literature so far has covered a fairly large range of topics within Erk’s categories. But how has it performed on the epistemological side of comparative federalism’s mission, namely discovering the general laws of this type of polity? One way to answer this question is to look at what might be called the ‘theoretical intensity’ (TI) of EU-US studies, or the extent to which the comparison aims to contribute to the body of causal knowledge on federal systems. Examining the literature from this standpoint, four comparison types emerge quite clearly: ‘analogical’, ‘descriptive’, ‘conceptual’ and ‘explanatory’.¹ I will briefly illustrate each of them.

The analogical group (six publications). In the first category are analyses of the United States as a case from which to draw lessons about (un)likely or (un)desirable political events, decisions or developments to be applied to the EU by analogy. Often based on solid theoretical work (developed there or elsewhere) these studies nonetheless have the lowest TI since the EU and the US are not juxtaposed to build or validate hypotheses, but to conjecture on the future of the former in the light of the latter’s past. Examples of this type of work are McKay’s book on the Union’s institutional design (McKay 2001), Thorlakson’s article on the problem of authority migration (Thorlakson 2006) and, more recently, Schall’s piece on social citizenship (Schall 2012).

The descriptive group (23 publications). These comparisons’ main goal is to gauge differences and similarities between the EU and the US, whether in a narrow area or adopting a comprehensive view. Examples of the latter type are Menon and Schain’s edited volume (Menon and Schain 2006) and Fossum’s appraisal of the EU’s ‘American dream’ (Fossum 2009), whereas more focused comparisons include Zweifel’s work on the democratic deficit (Zweifel 2002; Zweifel 2003), Vig and Faure’s edited book on environmental policy (Vig and Faure 2004) and Grugel’s study of regionalist strategies in the Cono Sur (Grugel 2004). Although generally low, the TI of descriptive studies is usually higher than the analogical group (and in any

¹ While my dataset includes 15 publications with somewhat ambiguous TI, for all those cases it was possible to identify the primary objective of the comparison and classify it accordingly.
case not nil) as their univariate analyses lend themselves to being used immediately for causal-type work—after all good description is part and parcel of good explanation. Menon and Schain themselves express this idea very well by setting as a central goal of their volume that of ‘provid[ing] a useful basis for future comparative research efforts’ (Menon and Schain 2006, 3).

The conceptual group (12 publications). In this category are comparisons in which the selection, organisation and interpretation of the material is loosely guided by some central theme or theoretical statement. Unlike descriptive studies, here the empirical analysis is not an end in itself but aims to illustrate or validate core concepts and ideas, of which the EU and the US are presented as prominent manifestations. At the same time, these concepts and ideas are formulated in terms that are too abstract and macroscopic to be submitted to the operationalization, control and falsifiability standards of mainstream political science. As a result, conceptual comparisons are not very well placed to make concrete and precise conclusions about the workings of federal systems. This category includes Howse and Nicolaidis’s edited volume on legitimacy and levels of governance (Nicolaidis and Howse 2001), Ansell and Di Palma’s project on the restructuring of territoriality (Ansell and Di Palma 2004) and Kirchner and Sperling’s study of security cultures (Kirchner and Sperling 2010).

The explanatory group (49 publications). These studies employ the EU-US comparison as a method to test theoretical propositions or answering specific questions about politics in federal systems. While the immediacy with which their conclusions are generalizable varies—depending on the school of thought, for instance—all comparisons in this group share an attention for causality and concreteness that gives them the highest TI among the four categories and places them fully within the paradigm of positive political science. Unsurprisingly, explanatory analyses also tend to have a rather narrow focus, as it is the case for, among others, Goldstein’s work on state resistance to central authority in early federations, (Goldstein 1997; Goldstein 2001) Kelemen’s research of the location and rigidity of environmental regulation (Kelemen 2000; Kelemen 2004), Bolleyer’s analysis of peripheral government coordination (Bolleyer 2009; Bolleyer and Börzel 2010) and Bomberg’s article on climate activism (Bomberg 2012).

More interesting than the static TI breakdown of the EU-US literature is the evolution of the four categories over time, shown in figure 4.
The chart shows a historical increase in explanatory research (especially marked in the past decade) not only in absolute terms but also, and more importantly, relative to the remaining three categories: while in 1996-2004 explanatory studies were about 40 per cent of the total (15 publications out of 37), in 2005-12 their share went up to 64 per cent (34 publications out of 53). Overall the data hence indicate a trend of increasing conformity to the methodological paradigm of mainstream political science. An interesting case study confirming the aggregate picture is the work of Sergio Fabbrini—perhaps the most prolific among EU-US scholars—who began his comparative analysis with a descriptive study (Fabbrini 2003), before producing a considerable body of conceptual work on the notion of ‘compound democracy’ (Fabbrini 2004; Fabbrini and Sicurelli 2004; Fabbrini 2007) on which more recently he has attempted to build a narrower and more explanatory study (Fabbrini and Sicurelli 2008).

Like its substantive diversification, the methodological evolution of the EU-US literature can be the result of several, not necessarily exclusive, factors. One of these might be a ‘maturation effect’, whereby recent explanatory studies have built on propaedeutic work of other type carried out before. Another explanation could be that more ambitious causal work is encouraged as the EU becomes—or is perceived as—more federal in nature, and therefore more comparable with the US.

A second way to assess the consistency of the EU-US literature with the theoretical mission of comparative federalism is to look at the incidence of
publications with additional cases (hereafter ‘three-plus’), which should tell us to what extent EU-US analyses are inserted in a wider and more general comparative context. Of the 90 publications in the dataset 34 (38 per cent of the total) are three-plus. Figure 5 shows the temporal distribution of these studies.

Figure 5: ‘Three-plus’ EU-US publications, 1996-2012

![Graph showing temporal distribution of 'three-plus' EU-US publications, 1996-2012.](image)

*Source: Author’s data*

Measured in absolute terms, the number of three-plus publications has clearly increased, although with a rather erratic path. The trend is less marked when these studies are counted against total production: as Figure 6 shows, while the relative weight of three-plus research has generally increased over time, its variability has been too big to allow confident conclusions.

Figure 6: ‘Three-plus’ EU-US publication as a percentage of total, 1996-2012

![Graph showing 'three-plus' EU-US publication as a percentage of total, 1996-2012.](image)

*Source: Author’s data*

The picture becomes more interesting, however, if one intersects the incidence of three-plus publications with their theoretical intensity. Seven of the 15 explanatory
studies published in 1996-2004 were three-plus, while in 2005-12 the number was ten out of 34—an absolute increase but a relative decrease from 47 to 29 per cent. On the non-explanatory (i.e. analogical, descriptive and conceptual) side, the number of three-plus publications was six out of 22 in 1996-2004 and 11 out of 19 in 2005-12: an increase from 27 to 58 per cent. What these figures tell us is not only that the absolute growth in three-plus studies has occurred largely in the non-explanatory part of EU-US research, but also, and more importantly, that the relative increase shown in Figure 6 is due totally to the non-explanatory literature, where three-plus comparisons have grown by such a margin to more than offset the relative decline among explanatory studies.

Emerging from the foregoing are two distinct and largely separate routes of normalization vis-à-vis the mainstream political science paradigm: while one part of the EU-US literature has increasingly used the comparison as an instrument of theory building, the other part has widened the comparison itself to make its conclusions broader and more inclusive. The following chart combines these two modes of normalization by showing the percentage of explanatory and/or three-plus publications as it has evolved over time.

**Figure 7: The normalization of the EU-US literature, 1996-2012**

Aside from some sharp variations in the left end of the chart (due to the low number of total publications in those years) the trend is quite clear. Adopting the usual cut-off point, in 1996-2004 the methodologically ‘orthodox’ literature represented 57 per cent of total production (21 publications out of 37), while in 2005-
12 the figure went up to 85 per cent (45 out of 53). These figures indicate quite plainly that EU-US research is becoming less and less distinctive within the broader context of comparative federalism.

III. The ‘dual mission’: a minimalistic proposal for a research programme

The normalization of EU-US research is consistent with the more general transformation of EU studies into a conventional field observed elsewhere (e.g. Keeler 2005; Kreppel 2012). But is methodological conformism really desirable for EU-US studies? Put differently, should we treat this as a comparison like any other? My answer is mixed: while the transition toward an increasingly explanatory model in EU-US scholarship is to be applauded, the growth of three-plus studies presents a number of drawbacks which should make us sceptical about this type of research. The first part of this statement is easily supported: assuming that the ultimate goal of all EU-US scholars is to say something about the functioning of these two polities (and possibly beyond), the explanatory model is to be preferred because of its concurrent focus on causality and concreteness which, as I have shown above, is lacking in other types of work.

Granted, some scholars might find the hypothesis testing strategy underlying explanatory work too dry and limited, and point to the value added of other modes of research, such as the ability to make normative and predictive statements or to engage with broader and more abstract ideas. The strength of the explanatory model, however, is that it is not only compatible with the remaining three types—an attribute most evident in the case of descriptive analyses which, as mentioned above, can be entirely contained in causal work—but also best placed to support and improve them. This is true of analogical studies which, whenever possible, should try to build on theories tested on the cases under exam, and of the conceptual comparisons, the core ideas of which can only benefit from being tested in their concrete implications. In sum, while it might not always be sufficient for good EU-US scholarship, the explanatory model is certainly to be regarded as an indispensable element of it.

The same unconditional endorsement cannot be given to the three-plus literature. Placing the EU-US comparison in a broader context has the clear advantage of immediately expanding the scope of whatever statement one is making, thus increasing its value and strength. However, these gains come necessarily at the cost of diluting what can be called the ‘empirical mission’ of the comparison, i.e. the degree
to which the two cases are seen as interesting *per se* (rather than as examples of the federal *genus*) and hence worthy of being studied in isolation. While this is a general trade-off, in the EU-US case empirical dilution is particularly problematic as it is weakens two desirable qualities specific to this comparison. One is *relevance*: both the EU and the US have a size and position in global affairs which affords them a level of political reach and international influence with virtually no equals, hence setting them apart from most other political systems. Besides being politically important, the EU and the US can also be seen as particularly relevant in a more scholarly sense as ‘analytically useful’ cases with respect to the theme within which they are studied, whether this is federalism or, more generally, multi-level governance (Gerring 2001). The effect of both types of relevance is not only to make the EU and the US very attractive cases, but also, and more to the point, to increase the marginal value of the empirical depth one has to sacrifice for each case added to the comparison.

The other desirable quality of EU-US research is its *political value*. While the fact that the EU is not a full-fledged federation is not overly problematic from a scholarly standpoint, in the realm of common parlance and politics, where the space for conceptual manoeuvring is limited, whether the Union is (or should be) part of the federal family is a much thornier and, above all, more contested issue. The peculiarity of studying the EU through the lenses of federalism, therefore, is that who does so is always making, intentionally or not, a political statement—a statement that is strongest when the EU is compared with the US, a polity that more than any other can provide a realistic model for the Union. In a way, EU-US scholarship can hence be seen as the academic counterpart to the institutional aspirations of Europe’s founding fathers, in the first place Altiero Spinelli (Spinelli 1957; see also Glencross 2009). Adding cases to the EU-US comparison, conversely, dilutes its political value not only because it multiplies, and hence weakens, the benchmarks for the Union, but above all because it extends the analysis to federations that are much less credible as models for the future of the EU. To the extent that scholars want to study the EU not just to understand it but, paraphrasing Marx, also to change it in a federal direction, such a dilution is to be regarded with scepticism.

How to reconcile the strengths of methodological normalization with the virtues of heterodoxy? The best way, I propose, is to centre EU-US research on the idea of a ‘dual mission’—theoretical and empirical—that recognises the centrality of
comparative federalism’s explanatory goals but at the same time embraces the notion that the EU and the US are cases distinct from the rest, and prioritises understanding the dynamics governing these two systems in the quest for generalizations about the federal genus. The dual mission is intentionally a minimalistic agenda: it only requires that EU-US research, or the vast majority of it, be explanatory in nature and have an n of 2—needless to say by choice rather than necessity. Within these broad criteria, the dual mission can accommodate, and should encourage, different theories and schools of thought (provided they do not reject explanation altogether), a variety of methods (including statistical analysis, if conducted at the sub-polity level) and, finally, all research topics.

To be sure, it would probably be naïve—or, worse, arrogant—to want to exogenously impose a specific direction to a small but already important literature such as the EU-US one: to a great extent research agendas go where scholarly practice takes them. Yet research does need some reflection and steering from time to time, if only to set its most basic direction and goals. The dual mission advocated here is in a very good position in this sense: on the one hand it is consistent with changes that have already been happening within the EU-US literature, where explanatory studies have grown in number and increasingly leaned toward the n=2 variety. On the other hand, it is not at all clear how durable these trends will prove and, more importantly, to what extent they are the product of some reflection on the peculiar nature of the EU-US comparison of the sort presented here. The dual mission can hence play an important role as a methodological principle around which the recent transformations of EU-US scholarship can be crystallized and reinforced for the future. Placing this idea firmly at the centre of EU-US comparative work will be, I believe, the best and easiest way to fully define the identity of this scholarly enterprise and ensure its development as a distinctive research programme within both comparative federalism and EU studies.

**Conclusion**

This paper began with an apparent contradiction: I set out to isolate, define and take stock of the growing EU-US scholarship while at the same time asking whether this is or should be seen as a literature in its own right. From the data I have presented another contradiction—this time real—has emerged. On the one hand, EU-US research is increasingly conforming to comparative federalism and, more broadly,
positive political science by becoming more diverse, causal and empirically inclusive. On the other hand, within this general trend there is a growing and distinctive literature combining an explanatory style with an exclusive focus on the two cases. It is this model of research, I have argued, that best represents what I have called the dual mission of EU-US studies, and which should be encouraged and cultivated in future years so as to replace the messy eccentricity that this comparison is now losing with a clear, solid and self-conscious raison d’être which will help EU-US scholarship mature as a research programme and eliminate its contradictions—whether apparent or real.

Appendix: procedures for data collection
The bibliographic research for my dataset was conducted in different stages. In the first I ran a series of unstructured searches on ISI Web of Science, Google Scholar and Google Books, followed by ‘second level’ searches within the literature cited by and citing the items found. I then filtered this initial list by eliminating: a) work written in languages other than English; b) unpublished material (such as working papers and other grey literature); c) work appeared in in marginal outlets or professional journals (such as PS or European Political Science).


I then proceeded to a final filtering of the overall list by discarding: a) work in disciplines other than political science (in the first place law and economics); b) literature reviews and research notes; c) analyses focusing primarily on EU member states (rather than the EU as a whole); d) studies dealing mostly or exclusively with EU-US relations.
References


