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UK and the EU Referendum: which option to take, *Brexit* or *Bremain*?

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In January 2013, United Kingdom Prime Minister David Cameron announced that he would be in favour of holding a referendum on membership of the European Union (EU) if he remained in post after the 2015 general elections. The intent of this compromise was to temper English European skepticism as well as UKIP's electoral success. Even though David Cameron reached an agreement with the UK's European partners on the 20th of February 2016, the outcome of the second referendum on UK membership to be held on the 23rd of June 2016 is far from being settled. The purpose of this paper is to put *Brexit* into context; to make sense of British public opinion and to identify the possible scenarios for the outcome of the UK's European referendum.

WHEN AND WHY CAMERON SET OUT THIS REFERENDUM?

Following the election of a Conservative Government with a majority in the 2015 General Election, David Cameron announced that a referendum would be held on membership of the EU. The referendum was suggested as a result of the rise of UKIP during last parliament and the apparent threat that that success posed to the Conservative's electoral (Curtice, 2015: 10). Even though UKIP's turnout feel short of the initial predictions, UKIP has managed to reach 14,1% of the votes in England; 1,6% in Scotland and 13,6% in Wales (see table 1 above).

Table 1. 2015 General Election vote share by country (in %)

	England %	Scotland %	Wales %
Conservative	41,0	14,9	27,2
Labour	31,6	24,3	36,9
Liberal Democrat	8,2	7,5	6,5
SNP	-	50,0	-
Plaid Cymru	-	-	12,1
UKIP	14,1	1,6	13,6
Green	4,2	1,3	2,6
Turnout %	65,9	71,1	65,6

Source: Ormstrom, Rachel, *"Disunited Kingdom? Attitudes to the EU across the UK"*, 2015, p.13
The idea of holding a referendum on EU membership became real on the 23 of January 2013 with the Bloomberg speech (UK government 2013) where David

Cameron explained how he believed that the European Union needed to change in order to deliver economic prosperity and maintain support amongst the EU's citizens. The Prime Minister went on to set out 5 principles for change to establish a European Union in the 21st century. These

principles were: competitiveness, flexibility, repatriating powers to Member States, democratic accountability and fairness (Scottish Parliament, 2015).

The Prime Minister specifically referred to the need to complete the Single Market in the areas of services, energy and digital alongside adopting a flexible approach to membership of the Union. Building on his Bloomberg speech a year later in an article for the Telegraph (2014), David Cameron presented a more developed view of EU reform. He set out seven major changes he wanted to make to the European Union:

- New controls to stop "vast migrations" across the continent when new countries join the EU;
- Tighter immigration rules to ensure that migrants come to Britain to work, not as tourists planning to cash in on "free benefits";
- A new power for groups of national parliaments to work together to block unwanted European legislation;
- Businesses to be freed from "excessive interference" from Brussels, and given access to new markets through "turbo charging" free trade deals with America and Asia;
- British police and courts liberated from "unnecessary interference" from the European Court of Human Rights;
- More power "flowing away" from Brussels to Britain and other member states, rather than increasingly centralizing laws in the EU;
- Abolishing the principle of "ever closer union" among EU member states

What has been finally agreed?

The final UK's negotiating position was spelled out by the Prime Minister Cameron in a letter to Donald Tusk, President of the European Council, on the 10th of November 2015. In this letter, four areas of concern have been identified:

- **economic governance:** the settlement provides a two-way commitment. On the one hand, it guarantees that as a non-Eurozone country the UK cannot be discriminated against or excluded from important decision processes. Nor can these countries be expected to face financial penalties related to Eurozone "bail-outs".
- **competitiveness:** the commitment of the EU and its member states to enhance competitiveness and to complete the single market is reiterated. Specifically, a commitment to decreasing the regulatory burden and compliance costs for business and to repealing any necessary legislation is made. The EU commits to pursue an active and ambitious trade policy. National parliaments and stakeholders will be involved in this process.
- **sovereignty:** the commitment to "ever closer union" will not include the UK and may not be allowed to justify moves to further political integration in the EU. The existing UK arrangements to opt-out or to opt-in to EU level measures in the areas of policing,

immigration and asylum continue to stand. National security remains the responsibility only of the UK government. A so-called "red card" procedure will be introduced. This will allow national parliaments to halt discussion of EU legislative proposals in the Council if the principle of subsidiarity is believed, by 55% of national parliaments, to have been disrespected.

- **immigration**: the settlement addressed issues of access to free movement, particularly prevention of abuse or fraud and the assessment of potential threat. In relation to social benefits, an "emergency brake", allowing limitation of full access to in-work benefits for new EU workers, may be instituted in cases in which a Member state is experiencing an "exceptional situation". Member states may also index child benefits to the circumstances of the country to which they are being exported.

These four areas have been addressed in the new settlement announced by the European Council, after lengthy negotiations, in February 2016 (Cram, 2016: 40). The new settlement includes a range of commitments due to enter into force following notification that the UK public has voted for the UK to remain a member of the EU. Reactions from all nations of the UK rapidly emerged.

In Scotland, the Scottish Government agreed that the EU needs to be reformed, though they differ on the type of reforms that they perceive as being necessary. Whilst the Prime Minister has stressed the need for a more flexible and accountable EU with some powers being returned to member states, the Scottish Government has suggested that the powers that the EU currently has need to be made to work better for EU citizens and that treaty or other structural reforms are unnecessary. In that respect, the Scottish Government's view on EU reform was summarized by the First Minister in an article in The Scotsman newspaper on 26 May 2015. The First Minister was quoted as saying:

> "We don't think it's perfect, we think reform is both desirable and necessary, but we believe very strongly that Scotland's interests are best served by being members of the European Union and we will argue that case strongly and positively."
>
> (*The Scotsman*, 2015)

With these statements, pro-European Scottish National Party made it clear that Scotland would not leave the European Union against its "democratically expressed wishes" as a result of a majority vote to leave in England (BBC, 16 October 2015). Very seemingly, in Wales, Leanne Wood, the leader of Plaid Cymru has immediately warned of a "constitutional crisis" if voters in England decided to leave the EU (The Independent, 23 October 2015) as well as in Ireland the Irish Prime Minister has already suggested that the Northern Irish peace deal would be undermined if the UK decided to leave the EU (Telegraph, 9 November 2015).

WHAT DOES BRITISH PUBLIC OPINION THINK?

The UK has traditionally been known as an "awkward partner" in relation to the EU (Cram, 2016: 38). This is the second referendum on UK membership on the EU. The first referendum on UK membership, held in 1975, resulted in a 67/33 vote in favour of remaining in, but it also shaped relations between the UK and its partners. That referendum reinforced the UK's awkward partner status. As for British public opinion, UK-wide polls on whether the public will vote to "remain" or to "leave" the European Union in the upcoming referendum have shown a lot of variation in recent months, but in Northern Ireland, Scotland and Wales polls have consistently shown that Irish, Scottish and Welsh voters would support staying in the EU by a considerable majority with 75%, 64% and 55%, respectively (see table 2 below). Meanwhile, a panel base poll for the Sunday Times last summer put England on 51% for leaving the EU, with 66% in Scotland wanting to stay. These figures suggest a major political divide between Scotland and England with potentially explosive results depending on how the EU referendum goes.

Table 2. EU referendum voting intentions by country (in %, excluding "don't knows")
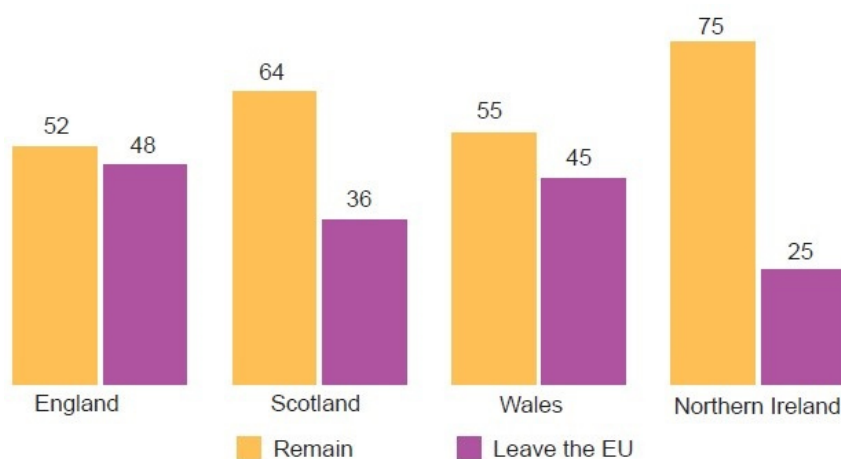
Source: Ormstrom, Rachel, 2015, *"Disunited Kingdom? Attitudes to the EU across the UK"*, p.3

In this section, we will present and discuss data from opinion polls conducted from September 2015 – when the referendum question wording was confirmed - to March 2016. The table sets out the headline findings of ten polls with all-England findings, fifteen Scottish polls, four from Wales and two from Northern Ireland. All had sample sizes or at least 1.0000 respondents and all were conducted by reputable polling companies. "Don't know" and "wouldn't know vote" responses have been excluded to provide a simple remain/leave analysis.

What does Scotland think?

The different territorial positions on EU membership within the UK are particularly manifest in Scotland. Scotland has a reputation for being less skeptical about European integration than the rest of the UK, and in particular, England. If it is true for political leadership – with major Scottish

political parties such as the governing Scottish National Party, and Scottish Labour, being thoroughly pro-European - it also appears true for ordinary Scots.

Table 3. Scottish Public Opinion (September 2015-March 2016)

	Scotland	
	Remain %	Leave %
2015		
10 Sept	64	36
27 Sept	65	35
30 Sept	72	28
13 Oct	62	38
16 Nov	75	25
9 Dec	61	39
2016		
12 Jan	66	34
14 Jan	64	36
4 Feb	66	34
7 Feb	70	30
16 Feb	66	34
29 Feb	64	36
7 Mar	59	41
9 Mar	61	39
17 Mar	65	35
Average	**65,3**	**34,7**

Source: *Britain's Decision*, 2016, p. 33

Indeed, Scots are significantly more positive about EU membership than people in England and Wales. While it would be an over-statement (Cram, 2016: 39) to describe Scottish voters as Europhiles or Euro-enthusiasts, it is fair to say that levels of Euroscepticism are considerably lower in Scotland (and to a lesser extent in Wales) than in England, with 34,7% of Scotland on the Leave side against 49,9% of England (see table 3 and table 6 above). These differences (Jeffery, 2016: 31) matter not just for their impact on the UE referendum outcome on 23 June 2016, but also for their possible implications for the UK's internal constitutional debate as the *Brexit* and Scottish independence debates have become deeply intertwined. Indeed, unless all parts of the UK vote in favour of staying in the EU, the result is likely to be highly politically divisive. Whether the result is *Brexit*, with England dragging Scotland, Wales and Northern Ireland out of the EU against their

will, or the other way round, that is Scotland, Wales and Northern Ireland keeping England inside the EU against England's will, any political solution that is sought for the retention of Union will not be straightforward.

What does Wales think?

   Wales has a profile that falls somewhere between Scotland and England. Whilst Welsh political thought has often been portrayed as more sympathetic to European Union values, it is not as pro-EU as Scotland. It is normally, however, less Eurosceptic than England. Wales has received considerable support from the European Union, especially in terms of Objective 1 Structural Funds for its most deprived regions, which include rural areas and post-industrial communities. This assistance has certainly helped to shape some people's views on membership of the European Union. While some sections are extremely grateful for the funding and opportunities, other voices portray it as money that has gone from the UK Government to Brussels, only to then be returned to the poorer parts of Wales. On the other hand, Wales also has a sizeable rural constituency, with agriculture a key component. The Common Agricultural Policy is therefore an important discussion point, and provisions for farming communities, in the event of a *Brexit*, are widely considered. So there is a division of opinion within Wales on how useful EU membership is. As we can tell from numbers, Welsh public opinion is evenly divided between remaining and leaving the EU with 50% average for each position.

Table 4: Welsh Public Opinion (September 2015-March 2016)

	Wales	
	Remain %	Leave %
2015		
24 Sept	53	47
4 Dec	49	51
2016		
11 Feb	45	55
18 Mar	53	47
Average	**50**	**50**

Source: *Britain's Decision*, 2016, p.33.

   Carwyn Jones, First Minister of the Welsh Government, warned that "the Welsh economy would 'tank' in the event of *Brexit*, as EU grants to the nation disappear and multinational employers pull out". Jones maintains that 200,000 Welsh jobs are reliant on EU funding. Despite First Minister Carwyn Jones' support for the idea of a 'Welsh veto' on exit from the EU, there is

solid agreement that this should be decided by a majority of votes across the UK. 64% in Wales take this view, against only 55% in Scotland (England is at 68% and Northern Ireland 60%). This suggests that on some issues voters continue to the think of the UK as a single political unit.

With this in mind, Plaid Cymru has called for a 'double majority' in order to change the status quo – where a majority of those participating in the referendum in each of the four nations of the UK must vote to leave the EU before negotiations take place to do so. They have suggested that Wales, Scotland and Northern Ireland could all be in favour of remaining in the EU, but would be forced to leave. So if Wales voted to Remain then the UK would remain. This will not be the case, however, as a simple majority will settle the result.

What does Northern Ireland think?

The table below (table 5) is indicative of the more conservative nature of Northern Irish public opinion. It shows fairly a healthy majority in favour of the Remain argument with an average of 74% of the remain vote**.** As Northern Ireland has experienced a period of transition since the Good Friday Agreement and establishment of the Northern Ireland Assembly many feel that a movement away from the established order, that is the EU, would be a leap in the dark. Although some politicians and church leaders see these matters in traditional sectarian terms, others (of all persuasions) look at economic realities, and judge *Brexit* or *Bremain* in terms of trade, commerce and employment. As many parts of Northern Ireland are amongst the poorest in the UK these issues really matter.

Table 5. Northern Ireland Public Opinion (September 2015-March 2016)

Northern Ireland		
	Remain %	Leave %
2015		
16 Oct	81	19
21 Oct	67	33
Average	74	26

Source: *Britain's Decision*, 2016, p.33

What does England think?

In many respects, Euroscepticism can be classified as an English phenomenon. It certainly had its roots in the movement away from big government and fear of 'un-British' elements that emerged out of Thatcherism. Although Euroscepticism was around from the beginning of the European Coal and Steel Community, contemporary Euroscepticism really began with the founding of James Goldsmith's Referendum Party in 1993. Since then that flame has been maintained by UKIP, who despite having representation across the UK, are still perceived by many observers to be an inherently 'English' political force.

Table 6: English Public Opinion (September 2015-March 2016)

	England	
	Remain %	Leave %
2015		
16 Sept	48	52
1 Nov	54	46
8 Nov	55	45
11 Nov	46	54
15 Nov	52	48
17 Nov	49	51
13 Dec	49	51
2016		
29 Feb	49	51
6 Mar	48	52
13 Mar	51	49
Average	**50,1**	**49,9**

Source: *Britain's Decision*, 201, p.33

This fascinating set of figures (table 6) shows just how split English opinion is –with an average of 50% in both camps -, and how close the debate on maintaining or rejection UK membership actually is. There are many in England who see the EU as 'the enemy without'. That means it is an extraneous force that interferes in daily life. As an old imperial nation, English people regard themselves, and especially their capital London, as global players and world powers. Counteracting this is a more contemporary view of England is a nation within the UK within the EU.

Opinions are often divided along class and age lines**.** Whilst wealthier people have more access to travel, and therefore experience more about the benefits of EU citizenship, poorer people tend to be more static and skeptical about growth in GDP in areas a long way from their own. Similarly, younger people who have experience of Erasmus exchanges view EU membership different to elderly people, especially those with memories of mid 20th Century conflict. All of this defines, sociologically, England's mixed response to EU affiliation**.**

What does the UK think?

At the time of writing, there are only 50 days to go until the British people decide whether or not to continue their membership of the European Union and numbers are very close. In the

regular Ipsos-Mori of 16th February 2016[1] (see table 7 below), Remain's lead has steadily declined from 69% in June 2015, to 60% in December 2015 and 57% in January 2016. Moreover, according to the authoritative "Polls of Polls" of 29th April 2016[2], the Remain vote would represent 50% of the votes against 50% for the Leave vote. It really is a dead heat. It is worth noting that in the telephone polls, which have traditionally given Remain a comfortable lead, there has been a notable closing of the gap.

Table 7. British Public Opinion (June 2015-February 2016)

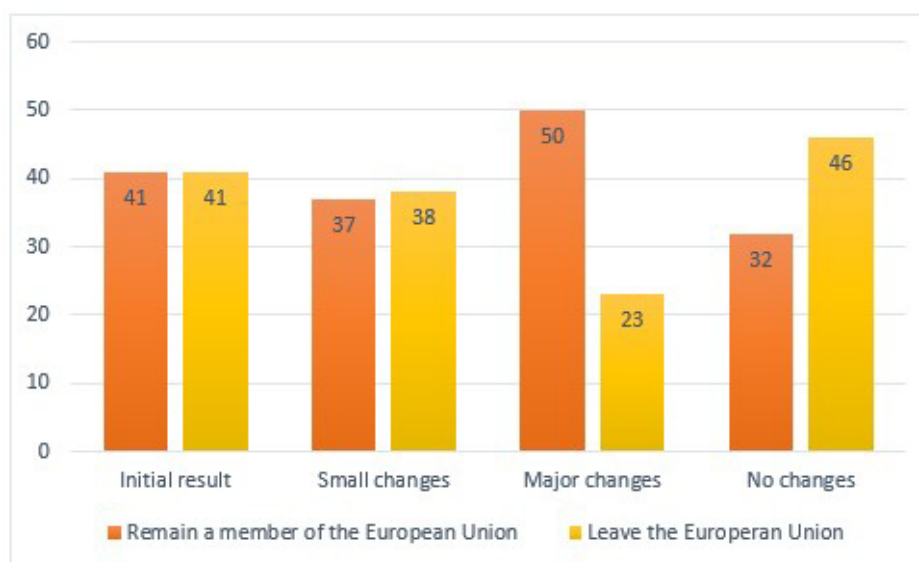|	All			All expressing an opinion	
	Stay in	Get out	Don't know	Stay in	Get out
	%	%	%	%	%
14-16 June 2015	61	27	12	69	31
17-19 October 2015	52	39	9	57	43
12-14 December 2015	53	36	11	60	40
23-25 January 2016	50	38	12	57	43
13-16 February 2016	51	36	13	59	41

Source: Ipsos-Mori, February 2016

However, irrespectively of territorial variations within the UK, the Remain vote is still ahead in most polls but its lead appears to have narrowed. Across all polls since March 1st Remain has averaged 43.8%, Leave 40.9% and the Undecided 15.2%. Given that British society is highly polarized on the question of EU membership, with support for Remain and Leave anchored in very different social groups, it is unlikely that we will now see dramatic change in the underlying trend. *You Gov* asked – November 2015[3] - for people's responses to how they felt Prime Minister David Cameron was managing his negotiations with other EU leaders, and what impact these would have on whether that would persuade people to vote Remain or Leave. The negotiations undertaken by Prime Minister received a generally mixed response from the UK public and the media. What is clear from these figures is that people who showed a tendency towards Brexit wanted a significant package of measures to persuade them to Remain. In fact, 50% of the respondents asked for major changes against 37% asking for small changes and 32% asking for no changes (see table 8 below). The major policy area that was highlighted by recent polls and surveys (You Gov 2015) was immigration and border control. UK public opinion indicated to Prime Minister their desire to see a strengthening of the UK's position regarding tighter immigration controls (52%), a restriction on freedom of movement and limits on what welfare benefits people (46%) from other EU states could claim within the UK.

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[1]https://www.ipsos-mori.com/researchpublications/researcharchive/2435/European-Union-membership-trends.aspx
[2] http://whatukthinks.org/eu/opinion-polls/poll-of-polls/
[3] https://yougov.co.uk/news/2015/12/10/eu-polling-soft-leave/

Table 8. EU referendum permutations

Sour
ce YouGov, November 2015[4]

In terms of what is perceived to be less important for people in their decision-making, areas like employment regulations (3%), climate change and environmental legislation (2%), and financial sector checks come towards the bottom of the list of priorities. So it can be concluded that emotional macro-issues, such as immigration, is seen as more important in terms of how people calculate their opinions, than some of the more detailed arguments about CO2 emissions or stock market prices.

WHAT DO THE "REMAIN" AND "LEAVE" CAMPAIGNS SAY?

The "Remain" and "Leave" campaigns have interpreted the new settlement through their own lenses (Cram, 2016: 41). For many of those in support of the UK remaining a member of the EU, the settlement resulting from David Cameron's renegotiations has resulted in a legally binding "special status" that allows for a renewed and protected position for the UK in the EU.

For those in favour of the UK's exit from the EU, the special status is unconvincing, representing a temporary compromise unlikely to be sustainable as the European integration process continues to move ahead and presents new challenges to the UK's ability to control its own affairs. An additional voice is also emerging – from those who broadly favour UK membership of the EU - but feel that the renegotiations, focused on competition, deregulation and benefit restrictions for migrants, have moved the EU further away from the type of Union that they want to be part of.

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[4] https://yougov.co.uk/news/2015/12/10/eu-polling-soft-leave/

In Scotland

Scottish politics is still, in many respects, experiencing the aftermath of the fairly divisive Independence Referendum. There is also the sectarian nature of Scottish politics, which sees the Union Flag as a symbol of loyalty. These aspects, therefore, feed into attitudes towards Europeanism.

The SNP's approach, both as a party and as the Scottish Government, is to back the UK remaining in the EU. Indeed, the Scottish Government boasts of its positive vision for Scotland within the EU. However, there are some indications that about a quarter of SNP voters will back the Leave campaign in the referendum. One senior party figure, Jim Sillars, is openly calling for Scottish people to back *Brexit*, but he stands fairly isolated in his desire to see Scotland operating outside the EU. It is felt that some SNP supporters see *Brexit* as the most convenient way to ensure future political independence for Scotland

The Scottish Conservatives, whose fortunes revived in the recent Scottish Parliament Election, are in a similar to the Conservatives at a UK level. The party is split in terms of its affiliation to the EU, or its dislike of the institution. There is also the fear that *Brexit* could trigger a second Independence Referendum in Scotland, something which the Conservatives deeply oppose. Ruth Davidson, the Scottish Conservative is a supporter of Remain, and this may persuade some Conservatives to back her, and UK Prime Minister David Cameron, in voting in favour of continued membership.

Scottish Labour appears to be a party in relative decline, finishing third behind the Conservatives in the Scottish Parliament election. Scottish Labour officially supports the "progressive case" for EU membership. Nevertheless, like the other Unionist Party, the Conservatives, Scottish Labour also has its malcontents. A grassroots campaign, Labour Leave, has held meetings across Scotland, and it opposes the EU from a class-based, anti-austerity perspective. The socialist idea of the EU existing as a 'capitalist club' is put forward within this grouping. Labour Leave was originally closely allied to Vote Leave but has now established a Labour GO offshoot working with Grassroots Out. Both are run in Scotland by Nigel Griffiths, the former Edinburgh South MP (Gardham, 2016).

The Scottish Green Party has always promoted the benefit of EU membership in tackling climate change and environmental damage. But they have also been very critical of the EU's economic models, which they describe as "unsustainable and market-obsessed" (Scottish Green Party, 2016). Despite officially supporting the Leave campaign, the party stresses that if individual party members wish to back the Leave campaign, they are free to do so.

Two smaller socialist parties – RISE and Solidarity have also announced their intentions. Whilst RISE maintain that they are 'neutral' on the subject, Solidarity, led by former MSP Tommy Sheridan has said that they are in favour of "an independent Scotland out of the EU – unless it is reformed in the interests of working people " (McCall, 2016).

UKIP, though a much smaller force in Scotland then elsewhere in the UK, maintain their *raison d'être* of total opposition to the European Union.

In Wales

The Labour Party has dominated politics in Wales for nearly a century. Likewise, Welsh Labour has been in control of the National Assembly since its inception in 1999. In May 2016 it won its fifth victory at the Welsh Election, and now rules, albeit with a minority administration.

Welsh Labour, as a party, and as the Welsh Government, is a staunch supporter of continued EU Membership. Wales has been a net beneficiary of EU funding and Welsh Labour seeks to highlight this in their literature and narrative. There is a *Labour In for Wales* campaign, spearheaded by Ni Griffiths MP. They pinpoint their argument that there would be substantial job losses in Wales if there was a *Brexit*. There is the case that some of the trade unions, who fund the Labour Party, are less than enthusiastic about the EU, but this dissent may be placated to present a relatively united front in favour of Remain.

Plaid Cymru state that their aim is to establish Independence within the European Union. Hence, the party is very much in favour of the UK remaining within the EU. Like the SNP, Plaid Cymru sees the importance of working with smaller and emerging nations within Europe Union, such as Catalunya and Flanders, and therefore wishes to continue being part of the larger social, economic and political structures.

Welsh Conservatives, like UK Conservatives, are inclined towards a greater degree of Euroscepticism than other parties and individuals. The Welsh Conservative leader, Andrew RT Davies, has come out in favour of *Brexit*. Davies thought that he could keep his personal views apart from his party leadership at the Welsh Assemble lection, but the fact that the Conservative vote fell may have backfired on him Welsh Liberal Democrats have traditionally been the most pro-EU of all the parties. Their leader, Kirsty Williams, is now their only Assembly Member. Williams has argued that "More than one in ten Welsh jobs depend on trade with EU, why on earth would we want to risk people's livelihoods?" (BBC, 2014). The Liberal Democrats also present themselves as the most internationalist and cosmopolitan of parties, and this reflects their pro-EU stance.

In Northern Ireland

Politics in Northern Ireland takes on a different complexion to elsewhere in the UK due to the historical sectarian divisions. These political philosophies naturally infiltrate people's and parties' views on Europe and sovereignty.

The DUP is the primary Unionist party, and largest political bloc, in the north of Ireland. In February 2016 it officially announced that it would campaign for *Brexit*. Arlene Foster, DUP Leader and First Minister of Northern Ireland, stated at the time, just after David Cameron had been locked in a debate with other EU leaders, that "The Democratic Unionist Party has always been Eurosceptic in its outlook. Therefore, we will on balance recommend a vote to leave the EU" (Belfast Telegraph, 2016).

The other main Unionist political party, the UUP, has taken an alternative position. They issued this statement: "The Ulster Unionist Party believes that on balance Northern Ireland is better remaining in the European Union, with the U.K. Government pressing for further reform

and a return to the founding principle of free trade, not greater political union. The Party respects that individual members may vote for withdrawal on the 23rd of June." (McCann, 2016). UKIP accused the UUP of betraying Unionism.

Sinn Fein, meanwhile, take an all-Ireland rather than a Northern Ireland approach. Martin McGuinness, Sinn Fein's Leader at the Northern Ireland Assembly, and Deputy First Minister, noted that a *Brexit* "would be absolutely economically disastrous for this island and particularly for us here in the North." (Belfast Telegraph, April 2016). Sinn Fein also contends that any vote in favour of *Brexit* would re-open calls for a referendum on an United Ireland. Though unrealistic at present, possible scenarios could arise in the years ahead if there is a constitutional reshuffle within the UK.

The other nationalist force within Northern Ireland, the SDLP, also supports the idea of remaining in the EU. SDLP leader, Colum Eastwood. has been a consistent supporter of the EU, and he noted how the EU referendum represents one of the most important votes ever for the people of Northern Ireland and the UK.

The non-sectarian Alliance Party also favours the retention of the UK's status. Stewart Dickson, SDLP Spokesperson on Europe, has noted how,"A vote to exit the EU will leave our nation weak and divided". (Irish News, 2016).

In England

Whilst the debate on the European Union is usually conducted out of Westminster, and is therefore a UK political discussion, there are some distinctly English views on *Brexit* and *Bremain*, with the smaller parties offering interesting angles.

The English Democrats want independence for England, but outside of the EU. They argue in favour of England trading with EU nations through the European Free Trade Association. Whilst only a small party at present, there strength may increase if there is a *Brexit,* as calls for an independent England will invariably arise.

The British National Party is a far right Eurosceptic Party. They advocate a vote for *Brexit*, in order to re-establish traditional, 'family' links with Canada, Australia and New Zealand.

Respect is a left wing party that claims that the EU is "an undemocratic plutocracy, a bankers' Europe" (Respect, 2016). It states that it is pro-Europe but anti-EU, and that it will campaign for *Brexit*. They do, however state that "if the British people choose to remain, we will campaign, along with our sister left-wing parties around Europe, for the EU to be a more inclusive and democratic union." (Respect, 2016).

The regionalist Yorkshire First party acknowledge that they have supporters from both 'In' and 'Out' camps. To that extent, they propose that *"regardless of the EU Referendum result, Europe must be democratised - local and regional first, national and European where appropriate and beneficial for all the peoples of Europe."* (Yorkshire First, 2016).

Mebyon Kernow, who advocate greater representation for the old Celtic nation of Cornwall, is a pro-European movement. At its 2016 Spring Conference, it passed a motion stating that *"MK reaffirms its internationalist view that nations and regions should work together to tackle issues*

of Europe-wide and global significance, and observes that the existence of the EU has underpinned a period of unprecedented peace and prosperity across Europe" (Mebyon Kernow, 2016).

WHAT ARE THE POSSIBLE SCENARIOS FOR THE OUTCOME OF THE EU'S REFERENDUM?

If Scotland did vote at around 66% in favor and Wales and Northern Ireland vote to remain too, this would outweigh an English "leave" vote at 51%. Very seemingly, the "remain" in the EU camp would have a majority at that point of over half a million votes – giving a close overall UK vote of 51% for remain and 49% for "leave". Such a vote could also counteract an English "leave" vote at the level of 52% support for *Brexit* – though with a majority narrowing to around 100 000 votes – an overall UK vote of around 50,16% for "remain" and 49,83% for "leave".

However, if English views were strongly swayed by the "leave" campaign, then a 53% or higher vote to leave in England would dominate any likely "remain" vote in the rest of the UK, given much larger size of the English electorate – again with an extremely close UK-wide result (at that point at about 50,66% for "leave" and 49,33% for "remain"). On the other hand, if Scotland voted to "remain" much more weakly – for example at 52% for "remain", then England would pull the UK out of the EU with just 51% English vote for "leave".

To conclude, we could argue that these results would give the narrowest of margins for "leave" at 50,33% for "leave" and 49,66% for "remain". Such potentially narrow margins would certainly fuel the debate across the UK with Scotland, Wales and Northern Ireland asking for a new referendum – a demand that could be heard in England too where many of the public, business, unions and politicians are deeply concerned with the consequences of the UK leaving the EU (Hughes 2016a). There are three key scenarios for the outcome of the UK's EU referendum:

- **First scenario:** if all parts of the UK vote in favour of staying in the EU, the immediate political consequences of the vote would be relatively slight – although the UK's opted-out, low influence model of EU membership will be important.
- **Second scenario:** the second scenario is of a vote for *Brexit*, with England's choice dominating that of Scotland, Northern Ireland and possibly Wales too. This would result in a major political and constitutional crisis. In face of this situation, the three devolved administrations in Scotland, Wales and Northern Ireland would also need to liaise rapidly. They could potentially block the repeal of EU laws that would be part of the *Brexit* process. They could also turn to the EU for advice and Brussels would find it hard not to get dragged into the debate.
- **Third scenario:** a vote for the UK to stay in the EU driven by Scotland, Wales and Northern Ireland against England's will would also lead to considerable political debate in England, probably reinforcing Euroscepticism in that country, increasing support for UKIP, and posing major challenges to the unity of the Conservative Party, and to the future policies of the Labour Party.

What are the options for Scotland in case of Brexit?

If the UK voted to leave the EU at the upcoming referendum, the implications for Scotland are many and challenging (Hughes, 2016: 20). The route to independence could become much more complex and difficult if the UK voted for Brexit, while Scotland voted to remain in the EU. While some pro-independence voices in Scotland are quiet cautious and would not rush into a second independence referendum in the face of *Brexit*, the challenges for Scotland if it, along with the rest of the UK leaves the EU, mean that a rapid push for independence could make sense.

The key question here is whether *Brexit* would result in "no" voters changing their minds significantly on independence. Indeed, slipping from the rest of the UK when the rest of the UK is no longer on the EU is more difficult, and may be less appealing to voters, than doing so while both are in the EU. For John Curtice (2016), so far, there is no evidence on whether those who are currently inclined to vote *No* to independence but to "Remain" in the EU would switch to backing *Yes* to independence in the event of a UK-wide vote to "leave". A "Leave" vote could only potentially represent a threat to the maintenance of the Union if that were indeed the case.

For Kristy Hughes (2016a and b), if the UK decides to leave the EU, Scotland will have to choose amongst four broad options: 1) Scotland could leave the EU along with the rest of the UK; 2) Scotland could go for a rapid second independence referendum; 3) Scotland could adopt a combative political strategy, aiming to challenge the *Brexit* process on constitutional and legal grounds; 4) Scotland could aim to negotiate with the EU and Westminster for a differentiated deal for Scotland as part of the UK outside the EU-something that has no precedent in the EU.

The choice between these four options will not be easy. It will rely on the public and political reactions across Scotland to vote for Brexit and the *Brexit* vote in the rest of the UK and across the EU. Ironically enough, it seems that Scottish independence would be much more straightforward if the UK remains part of the EU, which means that even thought the SNP is relying on the European card to push for a second referendum on political independence, it is far from being certain that staying in the EU as an independent state could bring only benefits to Scotland. By the end of the day, the SNP may wish the UK votes to remain in the EU in order to avoid difficult choices, debates and negotiations in the near future.

What are the possible options for the UK in case of Brexit?

If on the 23rd of June, the UK decides to leave the UE, we should bear in mind the alternative position for the UK in the world outside the European Union institutional framework. According to Michael Keating (2016: 53), the idea of going back to what is was before the UK entered the EU is useless since the world has changed since then. International trade is subject to regulation under the World Trade Organization (WTO) and regional trading blocks. It would therefore be necessary to decide on the country's participation in the global trading order. Within the possible alternatives to the EU, we could identify four possible scenarios for the UK. Each of these solutions has their own advantages and disadvantages which, in other words, do not facilitate the decision to be made on the 23rd of June 2016.

First scenario: Go it alone

Some would argue that "go it alone" would provide the best solution as the WTO provides sufficient rules for world trade, preventing unfair competition or protection. This option would allow the UK to restore their sovereignty as well as to control the movement of labour. Following this option, there would be no free trade in services; so financial services providers would opt to set up subsidiaries in EU countries in order to remain in the single market. At this moment, the UK does not negotiate trade deals, within the WTO or bilaterally with other countries outside it; that is done by the EU. As a non-member the UK would be able to represent itself in negotiations and press its own priorities but could have less weight than the EU in facing up global economic giants.

Second scenario: a free trade agreement with the EU

As a non-member of the EU, the UK could sign a free trade agreement with the EU and so retain free access to European markets. There would be no common institutions or policies and the UK would be free to make its own laws in most fields. Free trade agreements, however, do not usually include free trade in agriculture and services – which can be problematic for the UK – or free movement of labour. On the other hand, non-tariff barriers to trade would also remain. Therefore, it is likely that the UK will have to make a deeper arrangement of the kind provided by the European Economic Area (EEA) as it is the case of Norway, Iceland, and Liechtenstein or by the European Free Trade Area (EFTA) as it is the case of Switzerland.

Third scenario: EEA or Norwegian option

The European Economic Area (EEA) is based on the European Free Trade Area (EFTA), founded by the UK in 1960 as an alternative to the European Economic Community (EEEC, now EU). The EEA was set up in 1994, to link Norway, Iceland, Lichtenstein and the EU (Switzerland voted against). It is a free trade area but excludes external relations, agriculture, fisheries, transport, general budget contributions, regional policy and monetary policy. It provides for free movement of labour on the same terms as the EU.

Norway, Iceland, and Liechtenstein all opted out of EU membership for various reasons during its development, but chose instead to become part of the EEA. Its purpose was to allow countries that didn't want to take part in all aspects of political union to participate in free trade. All EEA countries are part of the single market, but are not required to participate in other areas of the EU, including justice and home affairs, economic and monetary union, the customs union, common foreign and security policy, common fisheries policy, common trade policy and common agricultural policy.

So the logic of the Eurosceptics is clear: copying Norway would retain Britain's route into the single market, while providing a plan of escape from further European integration. However, the problem with this logic is that by accepting entry into the single market, all three countries agreed to the most important, and controversial, principles of the EU: the free movement of goods, services, capital, and people. As a result, their borders with the Union are as open as those of Britain, and they pay benefits to EU nationals under virtually the same conditions as their EU

counterparts.

If we assume that Britain leaves the EU and remains in the EEA in its current format, it would gain exemptions in some areas but most rules and regulations related to the single market would remain unchanged. At the same time, it would lose its place in the European Parliament and the European Council and, with those, any direct influence over European policy. This includes legislation related to the internal market, which it would have to implement. On top of this, although EEA members are not required to pay membership fees, they are required to pay the equivalent in contributions to EU structural programs. This means that it is unlikely that the fees paid by Britain would change much.

Fourth scenario: EFTA or Swiss option

Like the EEA, EFTA was founded as an alternative to the growing European Economic Community (EEC). It was intended to facilitate trade between its members. Switzerland remains the only member that is not also a participant in the EEA or the EU. It doesn't have direct entry into the EU's single market but instead has had to negotiate its own bilateral agreements with the EU to gain access. These agreements give Switzerland a similar status to EEA countries and crucially include the free movement of people and the provision of benefits on similar terms to its EU counterparts.

This means that although the 'pick and choose' system implied by the Swiss model could, in theory, allow Britain to selectively adopt the EU stipulations it wants whilst ignoring the rest, in practice there is very little difference between Switzerland, the EEA, and the EU in terms of open borders and migrants' benefits. Some might argue that Britain, in negotiating its own deal with the EU, could choose not to adopt the provisions on free movement and welfare benefits. However, recent developments in the EU's relationship with Switzerland suggest this will not be possible.

CONCLUDING REMARKS

The purpose of this working paper was to briefly explain *Brexit,* and its implications. When considering the UK's European referendum, it could be argued that the UK appears to be a deeply divided society, which looks upon the political and economic structures of Europe with a certain dizziness. Whilst the referendum campaign is already in progress, it is evident that the final outcome of this referendum - to be held on the 23th of June 2016 - is far from being settled.

The current referendum on UK European Membership is important for two main reasons: first, it will have important implications for the relationship between the UK and the rest of the EU member states; second, it will affect the debate over Scotland's constitutional future, and the constitutional futures of the UK's other component nations – England, Northern Ireland and Wales.

It can also be observed that the UK referendum may be the first of many in the years ahead, as questions are asked about the shape and developments of the European Union, and the constitutional settlements of nation-states such as the UK, but also maybe Spain, Belgium, France,

and others. The UK Referendum, therefore, could herald the beginning of a lively democratic discussion about the future of politics and societies across Europe.

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