Sub-states in transition:

Changing patterns of EU paradiplomacy in Scotland and Wales (1992-2021)

Abstract

This article sheds new light on the dynamics of Scottish and Welsh relations with the EU. We analyse the development of Scotland and Wales' "paradiplomacy" over a 30-year period (1992-2021), offering the first comprehensive analysis of the EU-focused activities of sub-states transitioning out of the EU. We identify the significance of the interplay between a territory's formal constitutional position and differences in party politics across levels of government in shaping Paradiplomacy. Increasing ensions between UK and devolved governments regarding the UK's EU withdrawal have reinforced conflict dynamics, including in the context of growing protodiplomacy from the Scottish Nationalist Party Government.

KEYWORDS: Paradiplomacy; protodiplomacy; Brexit; Scotland; Wales; secessionism

Introduction

On 31st January 2020, as the UK's 43-year membership of the European Union (EU) drew to a close, Scotland and Wales became sub-state nations of a third country to the EU. Whilst devolution arrangements reserve international relations activity to the UK Government (including EU relations), this has not precluded Scotland and Wales' direct engagement with the EU. Their activity began in earnest in the 1990s and included establishing offices in Brussels, engaging in multilateral European networks, forming bilateral relationships with

EU institutions, and pursuing soft diplomacy through events and networking (e.g., Keating, 2008; Rowe 2011; Royles 2017, Hunt and Minto, 2017; Minto and Morgan, 2019). Such international relations activity of sub-states (or "paradiplomacy") has increasingly featured on the world stage as sub-states recognise the political, economic and cultural benefits; and as opportunity structures for their participation have expanded.

This article forms part of a Special Issue (SI) on paradiplomacy towards the EU from 1992 to 2021. The SI uses the example of two United Kingdom sub-states to develop a sharper understanding of the explanatory factors that shape governments' more or less cooperative or conflictual approaches to paradiplomacy in the EU, including protodiplomacy, understood as international engagement shaped primarily by a sub-state's secessionist aspirations (Aldecoa and Keating, 1999; Lecours, 2002). The period of analysis has seen a near revolutionary increase in the visibility and impact of sub-state international activity. Sub-state actors have successfully disrupted state objectives and influenced decision-making in their favour (Antunes et al in this volume), including – rather remarkably – in recent negotiations on the EU's proposed Transatlantic Trade and Investment Partnership (TTIP) and the EU-Canada Comprehensive Economic and Trade Agreement (CETA) (Tatham, 2018). Contestation and politicisation surrounding sub-state mobilisation heightens the need for a fuller and more nuanced theorisation of paradiplomacy. As part of such theory building, Scotland and Wales provide valuable case studies, as sub-states which invested heavily in European paradiplomacy both as EU Regions and as they transitioned out of the EU.

Within the SI's theoretical framework (see Antunes et al in this volume), this article explores the conditions under which particular forms of paradiplomacy are prevalent across two

broad sets of sub-state cases (EU and non-EU). Analysis develops our understanding of the repercussions of state withdrawal from the EU on regional EU engagement, a subject which has understandably received scant academic attention. Furthermore, the openly secessionist aspirations of Scotland's Scottish National Party (SNP) government – in power since 2007 – enable investigation of the nature and scope of *protodiplomacy* in the EU, in the context of the UK's membership and in transition out of EU. Through analysis of new and existing empirical data from semi-structured interviews and policy texts, investigating the two cases sequentially allows for assessment of the significance of, and relationship between, two key variables in the SI's framework: constitutional status and intergovernmental relations (IGR), and party politics.

This article has four goals. The first is to map Scotland and Wales' paradiplomacy towards the EU from 1992 to 2021, classifying activity according to the conflict and cooperation typology provided by the SI's theoretical framework. The second is to explore the influence of the two key variables in defining the particular approaches adopted. Third, this research aims to contribute to a more granular understanding of protodiplomacy in practice. Finally, it assesses the impact on paradiplomacy towards the EU when a sub-state transitions from EU Region to a territory of a non-EU Member State.

Our article is organised into five sections. Section 1 presents our cases and the empirical and theoretical contribution of our research. Section 2 outlines the theoretical framework. Section 3 presents our methodology, research design and research methods. Section 4 shares the findings from our analysis of the empirical data, organised around the salient explanatory factors. Finally, the conclusion contextualises our findings in the extant

literature and identifies future research avenues. Overall, analysis confirms the significance of the *interplay* between constitutional structures and party politics across multiple levels of government as shaping the distinct patterns of Scotland and Wales' conflictual and cooperative paradiplomacy towards the EU. It also exposes the impact of an overtly secessionist political leadership on manifestations of protodiplomacy in the EU. These findings have particular significance for the theoretical modelling of paradiplomacy.

Scotland and Wales as sub-state actors in the UK state and the EU

When the UK joined the EU in 1973, the UK was highly centralised. Since then, building on processes of administrative devolution, political devolution has reconfigured its constitutional landscape, with the UK's EU membership as a constant backdrop (Hunt 2010). Within this shifting constitutional setting, distinct financial, economic, political and cultural relationships developed between the EU and Scotland and Wales respectively; relationships shaped by factors such as socio-economic status, key industries and political priorities (Minto et al 2016). These factors have informed Scotland and Wales' EU priorities and provided differing incentives for EU-focused activity through the various opportunity structures available (e.g., Hunt and Minto 2017; Minto and Morgan 2019; Rowe 2011; Royles 2017).

The period of our analysis captures three phases of this constitutional reconfiguration: 1992-1998; 1999-2016; and post-2016. Firstly, between 1992 and 1998, under a system of administrative devolution, the Scottish and Welsh Offices were central government departments with a territorial remit. Self-rule and shared-rule were limited. The main

channel of EU interest representation was via UK central government. However, excitement about the potential of a "Europe of the Regions" intensified sub-state pursuits in Brussels, seeing Scotland and Wales establish offices in 1992. Sub-state activity largely centred on maximising the benefits of the newly established Single European Market through informing EU policy; pursuing opportunities for EU funding through *inter alia* regional partnerships in technology and innovation, transport or higher education; and cultural and identity promotion to showcase territorial distinctiveness (Hughes 1999).

In 1999, the Scottish Parliament and Senedd Cymru/Welsh Parliament (National Assembly of Wales until May 2020) were established, marking the launch of asymmetrical political devolution in the UK. Through the Scotland Act (1998) and Government of Wales Act (1998), legislative powers devolved to Scotland and Wales included a range of already Europeanised policy areas, e.g., agriculture, fisheries and the environment. These Acts immediately established the relevance of both Scottish and Welsh governments influencing EU policy; however, in both Scotland and Wales, foreign (including EU) relations were reserved to the UK Government.

The UK's vote to leave the EU in 2016 proved a definitive moment in UK-EU relations and intra-UK relations, the latter coloured by the territorially differentiated referendum result, with Scotland and Northern Ireland voting "Remain"; and Wales and England voting "Leave" (see Henderson et al 2021). Despite diverging preferences, Scotland and Wales' EU relations were both transformed as the UK transitioned out of the Single Market, the Customs Union and the EU's wider legal, policy and funding frameworks. As sub-states of a non-EU Member State, Scotland and Wales lost access to the EU's political infrastructure,

including the European Parliament and the Committee of the Regions. They could no longer attend Council of Ministers (EU Council) meetings as part of UK delegations or, more significantly, the Committee of the Permanent Representation (COREPER) working groups meetings (invaluable for intelligence gathering, and formal and informal networks). Therefore, Brexit reframed the infrastructure and incentives structure for paradiplomacy towards the EU.

These constitutional changes unfolded against shifting sentiments towards the British union and the relative electoral performance of nationalist parties. Whilst Wales' party of independence (Plaid Cymru) has not enjoyed notable electoral success – with the unionist Labour party dominating Welsh politics – the SNP secured election to government in 2007, continuing to build its electoral strength since, including in Westminster. The SNP's secessionist aspirations underpinned a Scottish independence referendum in 2014 (in which a majority voted against) and calls for another following the UK's EU withdrawal, against the popular vote in Scotland.

Theoretical framework

Analysis draws on the conceptual framework elaborated in the introduction to this SI, which understands paradiplomacy as consisting of multiple "layers" of activity which are functionally distinct from one another. The first layer is policy, with sub-state activity covering both interest representation and regional cooperation opportunities. The second layer focuses on sub-state identity promotion in the EU, where activity is not associated with secessionist claims. The third layer concerns sub-state activity focused specifically on

independence goals, classified as protodiplomacy. These categorisations are set out in Table 1 below.

Table 1 here

In line with the SI's analytical framework, cooperation is understood as state and sub-state governments working together and respecting each other's interests and/or values. In contrast, conflict in paradiplomacy is understood as both levels of government working together in line with the constitutional arrangements but with instances of conflict arising as one level of government publicly or privately criticises another such that it affects the interests and/or values of the other level. Such conflict ranges in intensity from low, through medium to high. Finally, in cases of *benign neglect*, central and sub-state governments undertake separate international relations activity in the EU, respecting each other's interests and values. In all these classifications of paradiplomacy, governments work within the bounds of the state's constitutional structure.

The most prominent definition of protodiplomacy (Duchacek, 1986: 277) is 'initiatives and activities of a non-central government abroad that, explicitly or implicitly, endow economic, social, and cultural links with foreign nations with a secessionist potential'. Keating (2001) posits that in contrast to the tendency for state accommodation of paradiplomacy, sub-state mobilisation of international relations for secessionist goals is more likely to result in conflict with the central government. The SI's conceptual framework advances this proposition in *differentiating between* variants of protodiplomacy according to the strength of the secessionist agenda pursued (including whether a referendum is organised with/without the consent of the state).

Research design and methodology

In line with the SI, this article explores the significance of and relationship between two factors in explaining sub-state approaches to paradiplomacy: constitutional status and IGR (together considered as one factor in the SI framework), and party politics (see Antunes et al in this volume). There are two dimensions to the assessment of constitutional status and IGR. Across a first dimension, we illuminate the relationship between the formal constitutional rules for intergovernmental cooperation on European issues (as evidenced through the *quality* of IGR) and conflict or cooperation in strategies of paradiplomacy. Across a second dimension, we assess the impact of levels of self-rule and shared-rule as drivers of paradiplomatic strategies. As the period of analysis spans three distinct constitutional arrangements in the UK, our analysis sheds light on the impact of both formal constitutional status and mechanisms for intra-UK relations on strategies of paradiplomacy towards the EU, including as Scotland and Wales transition to become regions of a non-EU Member State.

Secondly, an exploration of party politics across levels of political authority within a member state exposes the implications for EU paradiplomacy of party congruence/incongruence, party competition and secessionist aspirations at the sub-state level. This is explored against contrasting commitments to unionism across governing parties, particularly following the SNP's election in 2007.

Analysis of the two cases is organised into three time periods, mirroring the key constitutional changes identified above (Section 1). Drawing on extant and new empirical data, we provide a rich description and analysis of each case and undertake an in-depth assessment of the relationship between the two factors under study. We use a qualitative research methodology and deductive data analysis; seeking to, firstly, identify sub-state governments' approaches to paradiplomacy and, secondly, identify the relevance of the framework's explanatory variables, across the three time periods.

New data was collected through 11 semi-structured elite-level interviews undertaken between July 2021 and February 2022 with individuals who had experience of Scottish and/or Welsh paradiplomatic activity towards the EU. Initial interviewees were identified using purposive sampling, with further interviewees identified through snowballing. The interview schedule was designed to collect rich, in-depth data about Scottish and Welsh governments' EU-related objectives over time, the tools adopted to pursue these objectives, and the factors influencing both of these. This new empirical data was complemented with data from primary sources (specifically Scottish, Welsh and UK level reports and policy documents), existing interview data and secondary research. The following sections investigate Scottish and Welsh paradiplomacy in chronological order.

Scottish and Welsh paradiplomacy 1992-1999: Rooted in conflict

The early phase of our analysis saw modes of conflict and cooperation in EU paradiplomacy which were driven by particular constellations of factors in each case. We investigate these in turn below.

Scotland

Under the UK's system of administrative devolution, Scotland was routinely involved in European policy-making, through the Scottish Office in Whitehall and the Secretary of State for Scotland in the Cabinet (Mitchell and Leicester, 1999). Throughout the 1980s, the UK Conservative government, with its centralist ideology, had appeased Scottish and Welsh devolution demands by suggesting that their representation was strongest through a Secretary of State with full cabinet membership, rather than a regional parliament or assembly (Holliday, 1997).

In the early 1990s, as completion of the Single Market generated excitement in both business and policy circles about new opportunities for economic growth through relationship building with the EU, there was a marked increase in Scottish demands for more substantive inclusion within the UK's perspective on the EU. Cabinet-level representation, it was argued, did not offer enough scope for Scottish interest representation in the EU (Mitchell and Leicester, 1999). This conflict was compounded by party-political incongruences at the time, not least because of the Scottish Office's control by the Conservative UK government which had only minority support in Scotland with, major metropolitan areas of Scotland largely under Labour control (Mitchell, 1995: 290).

Frustrations over the lack of an adequate voice for broader Scottish interests at the UK-level drove the development of a bottom-up strategy of paradiplomatic engagement towards the

EU (Roller and Sloat, 2002). Representative offices were argued to be strong and increasingly influential competitors for securing EU funding and influence, forming the basis of collaborative initiatives between regions, and regarded as important influential organisations by the European Commission (Mitchell, 1995). Therefore, by the early 1990s, there was a groundswell of Scottish support for establishing an independent office in Brussels.

Within central government, however, there was concern that such a move would unleash the potential for *conflictual* paradiplomacy (Mitchell and Leicester, 1999). As a result, the future control of any body set up to represent Scottish interests in Brussels became a key battleground. Fears ran high that any independent Scottish representation may promote conflicting policy aims and undermine the UK's ability to speak with one voice in EU negotiations. Ultimately, a compromise solution was engineered which saw the creation of a limited private company, 'Scotland Europa'. This established a focal point for collective "Scottish" interests in Europe, bringing together key private sector actors. Economic development agencies from Scotland held 51 per cent of the equity in the company, thereby ensuring that Scottish Office agencies retained a controlling influence, with local authorities and trade unions permitted to hold "small equity stakes" in the company (Mitchell and Leicester, 1999). Its remit was "minimalist", focusing primarily on economic, business and trade issues, and having a large private sector orientation (Mitchell, 1995: 292). This curious arrangement of both public and private sector actors – steered indirectly by central state authorities – highlighted the "ambiguous relationship between central and local government" over the setting up and running of a Scottish representative office in Brussels (John, 1997: 139).

EU regional policy, with its emphasis after 1988 on new partnership-driven ways of working, was taken as a genuine opportunity within Scotland to foster institutional innovation and new models of multi-level governance (Bache and Jones, 2000). In formal terms, the Scottish Office was tasked as "Implementing Authority" for EU regional funds disbursed in Scotland. It took a relatively "hands off" role in administering the funds (Bache and Jones, 2000: 11), allowing for construction of meaningful partnerships with key local and regional organisations on EU policy matters within Scotland.

Scotland's paradiplomacy towards the EU during this phase embraced both interest representation and regional cooperation dimensions of policy-focused paradiplomacy. Even cultural activities (such as networking events to mark Burns Night) also supported wider policy and economic development ambitions rather than falling into the arena of protodiplomacy or secessionist agendas. This functional distinction differentiates Scottish EU paradiplomacy in this period from much of what followed later.

Wales

Wales bears strong similarities with Scotland as its desires for EU representation and lack of influence resulted in a largely conflictual EU paradiplomacy strategy by Welsh actors. Wales' EU paradiplomacy in this period encompassed interest representation and regional cooperation dimensions, complemented by Wales' Brussels office's coordinated programme of cultural profile-raising events. In many respects, interest representation towards the EU was the contentious dimension of its paradiplomacy.

For Wales, the main impetus for alternative Welsh EU mobilisation was the perceived inadequacy of UK arrangements in representing Welsh interests, fuelled by party political tensions between a Conservative Westminster Government and local government representation in Wales that was predominantly Labour-led. As with Scotland, the Welsh Office was the main channel of Welsh-EU interest representation and the Welsh Secretary of State could represent a Welsh dimension on EU policy issues at UK cabinet and attend the EU Council when issues affected Wales (Bulmer et al., 2002). Though territorial offices had 'privileged access' in influencing the UK Government's EU position, ultimately the British interest dominated (Keating & Jones, 1995: 106). Other concerns included limited contact between the Welsh Office and the UK's Permanent Representation to the EU (UKREP) (Bulmer et al., 2002), suggestions that Welsh Office EU policy-making contributions were 'late or non-existent' and that it was 'obstructive to the pursuit of Welsh interests in Europe' (House of Commons, 1995: x, xi). Furthermore, the Welsh Office was rarely 'lead' department at the Council of Ministers, and Welsh Secretaries of State attendance was limited (House of Commons, 1995: ix). Tension also surrounded Wales' Committee of the Regions representation, with UK government preferences rejected in favour of exclusive local government representation (Bache et al, 1996: 314).

Against this backdrop, establishing the Brussels Wales European Centre (WEC) in 1992 by the Welsh Development Agency and other partners was the focus of conflictual EU paradiplomacy. Debates resonate with the Scottish case. Welsh Office concerns that an office would create confusion and undermine the UK position are deemed to have been Foreign Office and UKREP influenced (Keating and Jones, 1995). Ultimately, WEC's remit was

restricted, as the Welsh Office insisted that lobbying not be included in its core objective (Gray and Osmond, 1997: 11). Subsequent Welsh Office hostility led to concerns that it would instruct organisations to reduce or withdraw WEC support. The 'delicate relationship' improved after 1995 (Hughes, 1999: 11) and, overall, WEC enhanced Wales' profile, provided a more integrated approach to Welsh-EU links and expanded regional interest mediation, including regional networks membership.

EU regional policy was also key area of contention. In addition to questions surrounding the Welsh Office's ability to secure significant European structural funds (Keating and Jones, 1995: 101), the 1988 structural funds reforms resulted in dramatic budgetary increases and the 'partnership' principle created new opportunities for sub-national authorities in regional programme decision-making and implementation. However, the Welsh Office's 'Raj style of management' (Morgan, 2000: 1) was 'more confrontational' in controlling the process than in Scotland (Bache et al 1996: 306). It interpreted 'partnership' hierarchically and side-lined other actors. Local government accused it of attempting to control local authority-EU Commission relations and some could only participate following Commission insistence (House of Commons, 1995: xix). Ultimately, by 1996, structural funds administration was transferred to an independent local partner run secretariat. Furthermore, structural funds 'additionality' requirements were problematic as the UK Treasury regarded the funding as an intergovernmental compensation mechanism (Bache et al, 1996); the implications of this position were more profound for Wales than for Scotland. The Treasury's viewpoint led to 'serious conflict' between the Commission and UK Government (Keating and Jones, 1995: 111), with the Welsh Office reminded of its responsibilities.

Overall, conflict and tension characterised EU paradiplomacy in the two cases in the 1990s as growing opportunities for EU engagement underlined the inadequacies of UK arrangements to incorporate sub-state interests in UK decisions. Nevertheless, key aspects of formal and informal sub-state EU activity set an institutional precedent for Scottish and Welsh government EU representation post-1999.

Scottish and Welsh EU paradiplomacy during the early post-devolution period (1999-2016): testing the durability of a cooperative model

Devolution in the UK was initiated within the context of EU membership. Ostensibly, "the closest possible working relationships and involvement" were envisaged between the newly created devolved administrations and the UK government (Scottish Office, 1997) with practical arrangements for achieving this outlined in a Memorandum of Understanding (MoU) setting out the framework for UK IGR. This included a "Concordat on Co-ordination of European Union Policy Issues", which acknowledged a legitimate role for devolved administrations in developing the UK's negotiating position, particularly as many devolved policy areas overlapped with EU areas of competence, e.g., on agriculture, environmental protection and fisheries. This system was devised in a period of relatively low interjurisdictional tension over Europe, given political congruence arising from the Labour party then governing in London, Edinburgh and Cardiff.

Both the MoU and Concordat are soft governance tools which provide a framework of expectations of conduct on both sides, not a legally enforceable process, as in other

decentralised and multinational states, where IGR are contractually formalised in a constitutional document (Poirier and Saunders, 2015). They outlined processes for sharing information on EU issues affecting the devolved governments' powers and committed to involve devolved Ministers as 'directly and as fully as possible' on EU matters affecting devolved issues (Jeffery and Palmer, 2003). These documents established UK-wide IGR arrangements, including the Joint Ministerial Committee (Europe) [JMC(E)]; included provisions for devolved Ministers' inclusion in UK's EU Council delegations (contingent on adherence to a single UK position) and involvement of devolved government officials in UK-EU relations, including extending diplomatic status to their Brussels officials; and permitted the devolved governments to establish representative offices in Brussels on the expectation of close working with the UK's Permanent Representation (Moore, 2006).

Scotland

Initially, intergovernmental coordination on EU matters ran relatively smoothly, sustained by two key factors: the continuity of the civil service (with the same actors managing processes) and the political coherence of Labour party leadership at both Westminster and the new Scottish Executive. These relations were underpinned by effective cooperation and mutual trust developed in Brussels, with the Scottish Executive office forming part of the "UKREP family" of direct interest representation in the EU (Rowe, 2011: 181).This was a phase of learning by doing, with the entire system imbued with a sense of trust from the outset (Jeffery and Palmer, 2003).

At a strategic level, Scottish political leaders increased their engagement with European partners. In line with a "classic" strategy of cooperative paradiplomacy, activity spanned

fully the layers of interest representation, regional cooperation, network-building and distinct identity promotion in EU circles, across both the policy and identity layers, but falling short of protodiplomacy. In the newly reconfigured representation in Brussels, Scotland House was now home to the Scottish Executive alongside other internationally-focused Scottish organisations. These included Scotland Europa, which continued to operate as a representative membership organisation, alongside CoSLA (the Convention of Scottish Local Authorities). Against the backdrop of broad, future-focused debates on European governance, opportunities for strategic leadership on EU issues were significant. Cross-agency cooperation in Scottish interest representation facilitated, for instance, events at which Scotland could lead EU conversations on policy issues such as hydro-electric power, or cod conservation.[1] Such policy leadership was of interest to EU institutions and to other national, regional and local organisations, and a clear example of cooperative paradiplomacy.

In these early years of devolution, Scotland's paradiplomacy strategy was shaped considerably by the leadership of First Ministers, who actively established Scottish Executive cooperation agreements with other strong European regions such as Catalonia, Bavaria and Tuscany. In 2001, Henry McLeish signed the Declaration of Flanders with the "constitutional regions" of Europe, calling for recognition of their position within the EU and greater formal regional empowerment, including a right to challenge subsidiarity infringements before the European Court of Justice (Wright, 2002). This decision was widely criticised by other political parties and the UK's Foreign Secretary (Scottish Parliament, 2001). Jack McConnell, Scotland's First Minister 2001-2007, was a firm supporter of the benefits of effective horizontal cooperation between European sub-state actors[2] and invested significant

personal effort into establishing the RegLeg grouping of European constitutional regions (the Conference of European Regions with Legislative Powers), acting as President for one year and signing Scotland up to the "Salzburg Declaration" in 2003, to seeking improve the role of legislative regions within the EU (Scottish Executive 2004: 2). In the wider context of the European Convention on the Future of Europe, McConnell was an influential contributor, setting out a clear agenda on regional ambitions for the EU's future governance. He pursued these ambitions across multiple venues, even drafting a key Committee of the Regions contribution to the Convention and various RegLeg declarations (Jeffery and Palmer, 2007: 234).

The period under Jack McConnell's leadership also marks the highpoint of Scottish Executive inter-regional networking with EU partners. They were active members of a number of influential multilateral EU policy networks made up of pro-active sub-state authorities, advocating for policy change within EU institutions, notably through sectoral associations such as the Conference on Peripheral and Maritime Regions (CPMR), and engagement in wider debates about Europe's constitutional future[3].

This period saw a number of key policy achievements for Scotland's EU paradiplomacy, with the executive successfully lobbying decisions of particular note to Scotland. For instance, they secured exemption from EU state aid policy in industrial sectors significant for Scotland, but which would barely figure in a UK-wide context (Jeffery and Palmer, 2007: 234). However, this was not the case across all policy sectors. By as early as 2006, there was evidence that the Scottish Government ambitions to be more fully involved in EU policy-making was being constrained by the UK level. In a leaked report, the then Scottish

representative to the EU and an experienced British diplomat, Michael Aron, acknowledged to the First Minister the extent to which Scottish interests were marginalised in the formal process of EU decision-making (Aron, 2006). The root cause, he argued, was the impact of power inequalities within the UK and central government officials' lack of understanding of how to engage devolved administrations on EU matters. Scottish interests were being "routinely forgotten, ignored and dismissed" by Whitehall officials in European negotiations, with Scottish ministers "frozen out" of Council meetings in Brussels (Aron, 2006; McEwen, Swenden and Bolleyer, 2012). The dynamic during this period was routinely for the Scottish administration to be pushing to attend Council of Ministers meetings on portfolios relevant to their competences and powers. Yet the standard Whitehall line tended to be resistance. Having Scottish Ministers attend Council meetings on any subject other than EU fisheries policy – with 80% of the UK's fishing industry located in Scotland – "was always a battle,"[4] even in an era of political congruence. Therefore, already by 2006, the system for managing effective intergovernmental cooperation on EU issues was showing signs of strain.

Party politics defined EU paradiplomacy during this period in multiple ways. When the SNP took power in Scotland, the weaknesses of the IGR machinery became evident. The primary vehicle for IGR, the JMC(E), was experienced by Members of the Scottish Parliament (MSPs) taking office post-2007 to have been very much a Labour creation and a hierarchical means for the party "to make sure everyone was on the same page."[5] SNP politicians were genuinely shocked to discover that the JMC(E) was such a "Labour club" and essentially "served as a vehicle for Whitehall to tell the Devolved Authorities what to do.."[6] Inter-personal and inter-ministerial distrust meant that Scottish representatives were often not invited to significant UK Cabinet Office discussions in London, and then only at the

discretion of individual UK ministers. Overall, in the absence of formal, legally challengeable rules on intergovernmental negotiations, access to UK-wide policy discussions or relevant EU meetings was largely granted on an ad hoc, individual basis.[7]

From 2007, the SNP were able, finally, to operationalise their headline strategy developed in the 1980s of "independence in Europe". Whilst coming to power offered "explosive" potential for relations with the UK over Europe (Cairney, 2012), there was a marked degree of continuity of approach. The SNP agreed to operate within existing UK structures for formulating EU policy and accept the need to work within the confines of the current constitutional framework (Smith, 2010: 222), although this was supplemented by a stronger rhetoric on Scotland's independent role on the world stage and an expressed desire of the Scottish Government to enjoy a higher status, possibly even taking the lead in certain UK-EU policy negotiations (Keating, 2010: 162; Cairney, 2011; Gethins, 2021: 146).

Scottish paradiplomacy towards the EU during this period became more overt protodiplomacy. Conflicts arose primarily at the policy level, in relation to interest and policy representation to the EU; during its first year in government, the SNP made public disagreements between the Scottish and UK governments on specific EU policy issues, notably marine conservation (Scottish Parliament, 2008), which had taken place even under the relatively congruent situation of a Labour/Liberal Democrat coalition government in Scotland and a Labour government in London. This protodiplomacy saw EU relations being used by the SNP Scottish Government leadership to shore up its vision of a future independent state *within* the EU ahead of a future referendum on Scottish independence (Smith, 2010: 219). In 2008, the Scottish Government published its new "International

Framework" (Scottish Government, 2008a), supplemented with an "Action Plan on European Engagement" (Scottish Government, 2008b). In a launch speech in Brussels, the then First Minister, Alex Salmond, framed these ambitions to improve the Scottish voice in EU policy-making within an explicit trajectory leading towards eventual independence (Scottish Government, 2008c). It is also not surprising that from this point forward, membership in multi-lateral *regional* ventures in Europe were less significant for the Scottish Government; emphasis shifted towards alignments in Europe which would substantiate the SNP's ambitions on 'Independence in Europe'. New alliances sought to emphasise the success of small, independent states within an integrated Europe, and to position Scotland as a viable member of this network (McAnulla and Crines, 2017). This imagery also informed a key line of argument made by Alex Salmond during the 2014 referendum campaign on Scottish independence: that Scotland's positive contribution to the EU could be even greater if it was an independent country, free of the anti-Europeanism prevalent in England (Salmond, 2014).

Wales

Wales' experience contrasts with Scotland, as 1999-2016 was principally a period of cooperative EU paradiplomacy, and a 'model of clarity and cooperation between the Welsh Government and the UK Government, and then between the UK Government and the European Union.'[8] Operating in line with the constitutional arrangements and with the concordat, Welsh Labour-led governments' engagement with the EU via UK Government channels illustrates the way in which party politics facilitated the development of a complementary paradiplomacy agenda.

Indeed, with limited direct tension with the UK Government in relation to the EU, the implications of party politics were apparent whilst the side-effects of greater tensions in UK-Scottish Government relations had a more notable impact, with Wales potentially benefitting from its less "threatening" positioning.

The Welsh Government's cooperative EU paradiplomacy strategy recognised the importance of relations with the UK Government to 'play a full and active role in the development of EU policies' (Welsh Assembly Government, 2009: 5). It set out an agenda of active involvement in EU decision-making on matters affecting Wales by attending the EU Council, and developing relations with MEPs and the European Commission. Reflecting strong continuity in the main channels for Wales' representation in EU institutions via the UK Government, Welsh Ministers worked via the JMC(E), and regularly attended EU Council meetings in areas of Welsh interest. They sought to influence the UK negotiating position and were sometimes lead Minister. In 2002, in partnership with the Scottish Government, it influenced the UK's position on the regional aspects of the Convention on the Future of Europe and used this channel to influence EU international negotiating positions on issues such as climate change.[9]

Regarding official-level relations, the Welsh Government's Brussels office engaged regularly with the Cabinet Office EU Secretariat, complemented by other Welsh Government-Whitehall liaison on EU issues. However, relations were closest with UKREP as Wales' Brussels office considered themselves 'part of the UK family of EU representations'.[10] Frequent contact and cooperation facilitated identifying opportunities for Welsh

Government officials or Welsh experts to participate in COREPER working groups representing the UK. Welsh officials also chaired some Council committees on behalf of the UK in devolved areas.

In parallel, Wales' Brussels office developed formal and informal connections with EU institutions, regions, states and other institutions. Wales' Brussels office was smaller than Scotland's or Northern Ireland's and this led to greater collaboration with partners.[11] The primary driver of Wales' engagement was interest representation around funding opportunities and relevant policies – including investment and jobs, structural funds, rural development and climate change – although increasingly it emphasised cooperation, including information exchange and policy learning with other regions and organisations. Central was Wales' engagement in regional interest mediation and networks, particularly the CPMR, the European Association of Regional and Local Authorities for Lifelong Learning (EARLALL), Teleregions network, REGLEG, NRG4SD, and the Network to Promote Linguistic Diversity (NPLD). Networks and bilateral agreements strengthened Wales' EU profile and influence, with symbolic capital and legitimacy benefits from relations with prominent regional governments with legislative powers. This agenda was strongly influenced by the pro-European enthusiasm of First Minister Rhodri Morgan. Activities contributed to nation-building by promoting Wales externally, with identity promotion also prevalent, through cultural events with other state/regional offices and cultural organisations and by nurturing connections around minority language promotion. However, activity remained cooperative given Welsh Labour's pro-unionism.

Whereas officials in interviews noted the inevitability of disagreements in a multi-level state, there were limited examples of conflict in the Welsh case. The notable exception concerned the UK Treasury's ongoing insistence that EU regional funds were part of the UK's income from the EU, a situation exacerbated by Wales receiving the highest level of EU regional funding for 1999-2006 and European Commission insistence that EU funds be match-funded by additional public spending. Treasury assertions that such funds come from the Welsh devolved budget led to a no confidence vote in the Assembly's first leader in February 2000 given his apparent inability to secure match funding (Trench 2007: 103-4). The UK perspective on this highly visible tension was that reluctance to accept the Treasury's position impacted on trust between the two Labour governments.[12] Therefore, clear policy-focused tension in IGR during periods of party congruence was also present in the Welsh case. Limited examples of conflict are unsurprising as disagreements would not be disclosed so as not to undermine trust between UKREP and Welsh officials. One Welsh Government official explained: 'irrespective of any disagreements, the machinery should keep on working and that we continue to access the right information, the right material, the right meetings and so on.'[13]

The strained SNP and UK Government relationship caused 'real tension' for Wales' Brussels office in the run-up to Scotland's 2014 independence referendum.[14] There was *inter alia* a temporary information blockage from UKREP and the institution of regularised weekly meetings between officials from UKREP and the devolved governments' Brussels offices was interrupted. Accompanying this disruption was a greater sense of Wales' diminished influence in shaping the UK's negotiating line at EU Council meetings. Not being granted permission to speak – even to support the agreed UK position – highlighted the dependence

of Wales' participation on the goodwill of individual UK Ministers (National Assembly for Wales, 2014: 19). The revised 2013 Memorandum of Understanding provided devolved Ministers with a right of attendance in British EU Council delegations as a partial remedy.

Overall, the Welsh case contrasts with the hostility in Scottish and UK governmental relations, underlining the potential created by the constitutional arrangements and party politics for cooperative paradiplomacy encompassing interest representation, regional cooperation and cultural dimensions. Conflict was isolated to one policy issue where party politics significantly impacted on EU-focused relations between the UK and the pro-union Welsh governments.

Scotland, Wales and EU paradiplomacy since the Brexit vote (2016-2021): dynamics of conflict and cooperation in regions in transition

Whilst both Scottish and Welsh governments had adopted avowedly pro-Remain positions in advance of the EU Referendum, they confronted differing challenges following the "Remain" majority in Scotland and a "Leave" majority in Wales. Scotland voted convincingly to remain in the EU (38%-62%) with Wales voting for withdrawal (52%-48%) in the context of an overall majority for Leave across the UK (52%-48%). This raised notable questions about the future of the Scottish and Welsh governments' engagement in and with the EU.

Scotland

From 2016, the Scottish Government moved decisively to build on the EU referendum result which put the Scottish population at odds with the UK as a whole. For the SNP nationalist government, this vote underlined Scotland's "difference", not just concerning views on EU engagement but also its relationship with the rest of the UK. The referendum results therefore reframed the nationalist position of Scottish independence as one that more explicitly encompassed re-entry into the EU.

The EU referendum results strengthened the legitimacy of Scotland's more assertive EU protodiplomacy.[15] This saw the development of low-level conflict strategies of protodiplomacy and the articulation of a set of European objectives markedly at odds with the UK Government, at a time when no further referendum on Scottish independence had been set. Within days of the referendum, Scottish First Minister Nicola Sturgeon held face-to-face meetings in Brussels with European Commission and European Parliamentary leaders, in an immediate protodiplomatic move to distance the Scottish Government from the UK Government over Brexit. Sturgeon's Brussels visit symbolised, she argued, Scotland's continued commitment to the EU and articulated Scotland's reluctance to be "taken out of the European Union against our will."[16] It presented European leaders with a vision of an independent Scotland with an independent international relations strategy - a significant ideational step that is a foundational element of protodiplomacy, designed to augment the process of secession (McHugh, 2015: 240).

In parallel, paradiplomacy at the policy level, continued to increase. The Scottish Government presented its vision of a future relationship with the EU through bilateral partnerships and continued to invest heavily in its Brussels presence, Scotland House, as a

means to "salvage" - and invest further in - [17] relations with European partners. For instance, Brussels-based Scottish representatives led EU-wide conversations on the role of innovative data capture in the post-COVID-19 tourism recovery, and on the potential of digital platforms to innovate in online public sector service delivery.[18] Such engagement entails an intense schedule of meetings and events involving EU Commissioners, MEPs, and other European stakeholders. This dual approach has defined Scotland's European strategy since the EU referendum.

Yet the heavier focus by Scottish government actors on Brussels-based activity after the EU referendum was also partly driven by the breakdown of domestic IGR on Europe. Both the Scottish and Welsh governments disagreed with the UK Government's interpretation of Brexit; with the intergovernmental mechanism which had been designed specifically as a forum to secure an all-UK approach to the Article 50 withdrawal negotiations – the JMC (EU Negotiations) [or JMC(EN)] – failing to deliver. Objections to the EU Withdrawal Bill itself led to the creation of separate resolution mechanisms with the devolved governments, and whilst agreement could be reached with the Welsh Government, none could be achieved with the Scottish Government in the same time frame, resulting in a public stand-off between the administrations in Edinburgh and London over the details of Brexit (McEwen 2020). The tensions between the UK's governments over the Brexit negotiations and the breakdown of the MoU and Concordats cannot be overstated (Hunt and Minto, 2017; Kenny and McEwen, 2021). One senior Scottish official described these negotiations as a process whereby "we were managed, not engaged" on Brexit:

> "on all of the major announcements throughout the Brexit process, it was felt in Scotland that there was no meaningful conversation or exchange of positions between the UK Government and Scotland".[19]

In Brussels, the Scottish Government has used continued protodiplomacy to enhance its presence in the networks around the EU institutions, keeping Scotland "visible"[20], particularly through alliances with the EU's smaller member states. These relations are a key tenet of the 'Independence in Europe' agenda, which seeks to highlight the potential for success of small states in the EU (Rowe, 2022). The SNP makes clear that the Scottish Government's representation supports the party's longer term strategic diplomatic ambitions towards EU membership as a full member state:

> "We will prepare to rejoin the EU by keeping a close relationship with Europe. We will strengthen our Brussels base and make Scotland House the hub of our diplomatic representation across Europe." (SNP, 2022)

Alongside this, new international offices were opened in strategic locations around Europe, notably in Paris and Berlin in 2018, and Stockholm in 2022, the latter to enhance relations with similar-sized progressive economies in the Nordic and Baltic arc (Rowe, 2022). This soft protodiplomatic strategy is reinforced by international policy appointments that has brought into the Scottish Government several senior figures with wide experience of diplomatic leadership in the UK civil service, to strengthen Scotland's bilateral relationships both with the EU and partner countries around the EU.[21]

The paradiplomacy approach adopted by Scotland since the EU referendum is multifaceted, multi-layered and functionally distinct. Although the political framework of its strategic engagement has been fundamentally re-written, it embraces a dual approach of both conscious protodiplomacy, alongside a continued paradiplomatic agenda at the level of policy and identity promotion. Protodiplomacy is now much more overt but has as yet generated little conflict with the UK authorities, given that no Scottish independence referendum had been authorised by 2022.

Wales

Unlike Scotland, Wales' "Leave" vote sat at odds with the Welsh Government's ardently "Remain" position. As the only devolved nation to vote for Brexit, the Welsh Government keenly "focused on the form and not the fact of Brexit" (e.g., Drakeford 2018). Its actions reflect Welsh Labour's cooperative paradiplomacy strategy that developed into more qualified cooperation as intergovernmental tensions with the Conservative UK Government increased. In circumstances that highlighted the weaknesses of Wales' constitutional position, characterisation of the Welsh Labour Government as a "good Unionist and a good European" (Hunt and Minto 2017) (acknowledging the UK's Member State status and without secessionist aspirations) explains its efforts to avoid the more conflictual paradiplomacy evident in the Scottish case as it establishes a new relationship with Europe.

In the early post-referendum period, the Welsh Government sought to use both internal intergovernmental structures and external opportunities in Brussels to highlight its post-Brexit preferences for a close relationship with the EU, including continued Single Market and Customs Union membership (as outlined in "Securing Wales Future", Welsh

Government and Plaid Cymru, 2017). It used multiple channels to raise awareness of its position, including meetings between the First Minister and the European Commission's chief negotiator Michel Barnier (July 2017, July 2018 and July 2019), public events in Brussels and networking.

However, this cooperative approach was increasingly tested both by the lack of adequate consultation through the JMC(EN) and subsequently through the development of the 2020 Internal Market Act, which itself raised significant concerns of constraints on devolved competences. Whilst the former was the source of immense frustration and disappointment, the latter was viewed as 'aggressive unilateralism' that eroded trust in the UK Government such that the Welsh First Minister spoke of 'anger and alienation' over the disregard towards the UK devolved governments (Welsh Government, 2021).

As the devolved governments were side-lined in decision-making during 2020, the Welsh Government became increasingly strident about its investment in strong European ties, although this clearly diverged from preferences in London. Consequently, imminent withdrawal from the EU led to an intensified Welsh Government presence in Europe through the opening of new offices in European cities and greater impetus on soft diplomacy. Its Wales House presence was maintained, bilateral relationships with European partner regions were established and renewed, and there was continued active and focused engagement in European networks. Indeed, Wales chaired the Vanguard Initiative in 2020, identified as a high-priority network in which Wales could play a leading role.[22]

Following the end of the transition period, in January 2021, the First Minister made an important statement on Wales' vision in Europe, through a letter to the European Commission President (Drakeford, 2021). The letter built upon the Welsh Government's wider international strategy published in January 2020, notably profiling Wales as a "European nation" (Welsh Government, 2020). Drakeford set out Wales' distinct EU priorities and intentions, encompassing policy areas where Wales lacks full policy competence and including a commitment to continued alignment with EU social and environmental standards (although not going as far as Scotland in legislating for this alignment), strong relations with EU institutions, and participation within European networks. Drakeford framed this intervention with reference to shared values, making it difficult for the UK Government to contest. However, although the Welsh Government continues to seek a cooperative approach to EU-related activity, this period potentially marks the beginning of Wales' "sustained sense of divergence" [23] from the UK Government akin to Scotland's engagement with the EU. The translations of these political statements into actions included the appointment of a Welsh Government Representative on Europe in January 2022 to play a 'significant role in connecting Wales to Europe' (Welsh Government, 2022) and launching a Welsh International Learning Exchange Programme to replace ERASMUS.

The implications of Wales' European priorities were not entirely clear at the end of 2021. In the context of notable strain in relations between the Welsh and UK Governments and Wales' bold positioning in Europe, one Welsh Government official insisted that all work is "bound by constitutional proprieties."[24] The Welsh Government seemed willing to comply with requirements to inform the UK Government of all contact with EU institutions and

member states to avoid being 'deliberately antagonistic'[25] or affect UK Government interests. It also welcomed opportunities for its officials to engage in specialised committees of the EU-UK Trade and Cooperation Agreement (TCA) and trade specialised committees' preparations and to attend as observers. However, it was disappointed by the UK Government's lack of response to devolved Government Ministers' requests for more than observer status and to actively participate in the UK-EU partnership council meetings, akin to the previous EU Council arrangements. Indeed, they were considering not attending if only granted observer status (Welsh Parliament, 2022).

Post-EU Referendum, the shift from initial cooperation to more qualified cooperation in Wales' paradiplomacy towards the EU followed the devolved governments being repeatedly marginalised from Brexit-related decision-making and the ultimate realisation that Welsh preferences would not be reflected in the final TCA. The Welsh Government occupied a distinct position as both pro-Union and pro-European and has sought to assert distinctive preferences for its new relationship with the EU through interest representation and retaining and reaffirming its engagement in regional cooperation. Its approach, alongside the UK Government's rejection of meaningful inter-governmental working and reluctance to fully recognise devolved interests, suggest the potential for greater conflict in future.

Conclusion

Based on our analysis of Scottish and Welsh paradiplomacy towards the EU, we now outline our main findings in response to our four research goals. First, our longitudinal mapping of Scotland and Wales' paradiplomacy towards the EU – classifying governments' activity according to the typology provided by the theoretical framework –reveals cooperative paradiplomacy as the dominant paradigm over the full 30-year period punctuated with periods of tension and conflict. Variation in Wales' paradiplomacy is less dramatic, shifting from conflict (1992-1998) to cooperation (1999-2015) before reverting towards qualified cooperation (2016-2021). Degrees of conflict feature more consistently in the Scottish case, and we have identified periods of *more intense protodiplomacy* in the 2014 Scottish independence referendum context and *pronounced and assured protodiplomacy* since 2016 in the transition from EU Region to a region of an EU third country state.

Second, when identifying and assessing the causes of the paradiplomacy approaches adopted, our analysis demonstrates the centrality of the *interplay between* a number of key factors, primarily the constitutional status of Scotland and Wales, alongside the quality of IGR in the UK, and party politics. Indeed, as evidenced in our analysis, these explain both conflict and cooperation within Scottish and Welsh paradiplomacy strategies.

Both cases illustrate the significance of constitutional status and IGR for understanding conflict and cooperation in EU paradiplomacy. Our analysis finds that both dimensions of this variable have a significant impact across time (i.e., the level of self- or shared-rule, and the nature and the quality of IGR within the state). In 1992-1999, limited self-rule heightened the extent of conflicting paradiplomacy as did the perceived threats to devolved competences in EU withdrawal processes post-2016. Relatedly, within the dimension of IGR

on EU issues we see evidence of greater conflict. At points when the *quality* of IGR for domestic coordination on EU matters was considered inadequate, there is greater propensity for conflict in strategies of paradiplomacy. Our cases therefore illustrate that the *quality of IGR* is central to understanding conflict and cooperation in EU paradiplomacy. The UK's reliance on a system of intergovernmental concordats provided some basis for close working on the EU under party congruence up until 2007. Weak institutionalisation of IGR functioned relatively effectively for Wales, though the Scottish case highlights the limits of an informal system and dependence on goodwill at political and officials' levels, particularly in circumstances of political incongruence.

Our second main explanatory factor, *party politics*, had a significant impact on the *degree* of conflict in paradiplomacy in both Scotland and Wales over the 30-year time frame. Our cases were particularly insightful in exposing different dimensions of this explanatory factor. First, as would be expected, in addition to confirming the greater prevalence of conflictual paradiplomacy in circumstances of political incongruence, contrasts between Scottish and Welsh paradiplomacy strategies post-2007 strongly relate to the repercussions of the ideological positioning of sub-state main governing parties on the centre-periphery cleavage. Whilst Welsh Labour's European paradiplomacy contributed to its nation-building agenda, its loyal unionist stance guided its emphasis on cooperative paradiplomacy. In contrast, the SNP's increasingly explicit usage of EU external relations to reflect its secessionist agenda contributed towards the more conflictual paradiplomacy witnessed in the later phases of the period of study, pushing this activity firmly into protodiplomacy in the post-2016 period. Secondly, unexpectedly, analysis highlighted that political incongruence in the context of a secessionist governing party can have spillover effects on

paradiplomacy elsewhere within the same state structure. As was evident between 1999-2016, the SNP's 2007 entry to government generated broader repercussions, impacting on intergovernmental arrangements in relation to the EU for both Scotland and Wales.

Our analysis therefore highlights that greater recognition must be given to the ideological positioning of governing parties at the *central state level* as influencing cooperation and conflict in paradiplomacy, specifically their support for decentralization and their position on the EU project. Our research illustrates how party political incongruence alone is not a clear driver of conflict in strategies of paradiplomacy, but rather that ideological differences over salient issues is more significant. Similarities can be identified between the 1990s and post-2016. From 1992-1997, ideological tensions encompassed central government's approach to territorial politics, particularly its emphasis on centralisation and hostility towards the EU. This contrasted with the parties gaining greatest levels of support in Wales and Scotland who were more pro-European, and supportive of decentralisation and a more interventionist state. Such tensions encouraged sub-state mobilisation in an EU context. Post-2016, the Conservative Party's rejection of the EU and its hard-line approach to its post-Brexit EU relationship reflects an emphasis on re-affirming Westminster parliamentary sovereignty and a 'muscular unionism' towards the UK's devolved governments. This ideological positioning starkly contrasted to the continuation of the Scottish and Welsh governments' pro-European preference, leading to heightening conflict in paradiplomacy.

Our research has illustrated how Scottish protodiplomacy towards the EU has developed in practice. Since 2007, a more independent approach to European issues has seen the Scottish Government "bypassing" state processes[26] and moving into what in an empirical

sense can be regarded as a strategy of low level protodiplomacy. This strategy leads to a low degree of conflict between levels of authority, with the idea of an independence referendum proposed but not planned at the time of writing. Such activities have provided European partners with, at an ideational level, a preliminary understanding of the key features of a future independent Scottish EU policy. Crucially for the purposes of analytical clarity and a more refined understanding, we must recognise that a strategy of protodiplomacy does not simply displace strategies of paradiplomacy. As the Scottish case shows, both can operate in tandem, delivering goals in separate arenas; protodiplomacy in the EU is functionally distinct from EU paradiplomacy.

Finally, analysis sought to understand the impact on Scotland and Wales' paradiplomacy towards the EU of their transition from EU Regions to territories of a non-EU Member State; a change in constitutional status that is exceptional to these two cases in this SI. In their transition, both Scotland and Wales have sought to continue (and indeed build upon) their existing engagement in the EU, despite many reduced incentives for engagement post-Brexit. The party politics variable interplays with the IGR dimension of the constitutional status variable here. Similarities in approach between governments (despite clear differences between the Welsh Labour's continuing pro-unionist position and the SNP Scottish Government's constitutional goal of becoming an EU member state) underline the significance of their pro-European positioning of their EU paradiplomacy in these early stages of transition.

Also evident from our analysis is that arrangements for UK-EU engagement remain in flux. The creation of new intra-UK mechanisms for intergovernmental cooperation and bilateral

engagement have been hampered by the COVID-19 pandemic and the instability of arrangements for Northern Ireland. Only when the TCA beds in and new working practices are established can wider conclusions be drawn on the impact of transition for Scotland and Wales' paradiplomacy towards the EU.

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<tr><td rowspan="3">Paradiplomacy</td><td rowspan="2">Policy level</td><td rowspan="2">Interest representation</td><td>EU Regions</td><td>Representation to the EU</td></tr>
<tr><td>Non-EU Sub-states</td><td>Follow-up of EU agenda</td></tr>
<tr><td rowspan="2">Regional cooperation</td><td>EU Regions</td><td>Participation in transregional European networks</td></tr>
<tr><td>Non-EU Sub-states</td><td>International cooperation</td></tr>
<tr><td>Identity level</td><td colspan="3">Identity promotion to the EU without secessionist claims</td></tr>
<tr><td rowspan="3">Protodiplomacy</td><td colspan="4">Secession is not written in the constitution, but activities take place in Brussels in order to articulate a future idea of political independence and gain international support, before a referendum is set to be organized and before it is approved or rejected by the state government. E.g., Scotland in 2022 and Puigdemont since 2018.</td></tr>
<tr><td colspan="4">Secession is not written in the constitution, but an independence referendum is set to be organised with the consent of the state. Activities take place in Brussels in order to gain international support. E.g., Scotland 2014</td></tr>
<tr><td colspan="4">Secession is not written in the constitution, but an independence referendum is set to be organised without the consent of the state. Activities take place in Brussels in order to gain international support. E.g., Catalonia in 2017</td></tr>
</table>

Table 1: Types of Paradiplomacy

[1] Interview with former Scottish Office official, 13.7.21.

[2] Interview with Lord McConnell, Institute for Government (2018). Available at:

https://www.instituteforgovernment.org.uk/ministers-reflect/lord-mcconnell

[3] Ibid.

[4] Interview with former Scottish Office official, 13.7.21.

[5] Interview with former Scottish Office official 13.7.21; Interview with former Scottish Government official 13.7.21

[6] Interview with former Scottish Office official 13.7.21 Interview with UK Government DEFRA official 01.10.21.

[7] Interview with former Scottish Office official 13.7.21.

[8] Interview with Welsh Government official #1 13.7.21.

[9] Interview with Welsh Government official 30.6.08

[10] Interview with Welsh Government official 30.6.08.

[11] Interview with Welsh Government official 14.8.14.

[12] Interview with Welsh Government official #2 13.7.21.

[13] Interview with Welsh Government official 30.6.08.

[14] Interview with Welsh Government official 15.7.21.

[15] Interview with UK Government official 27.7.21.

[16] First Minister Nicola Sturgeon, quoted in interview with Scottish Daily Record, 29 June 2016, http://dailyrecord.co.uk/news/politics/nicola-sturgeon-says-brussels-visit-8312375 Accessed 17.03.2022

[17] Interview with former Scottish Government official, 25.1.22.

[18] Interview with former Scottish Government official, 8.2.22.

[19] Interview with former Scottish Government official, 8.2.22.; Interview with former Scottish Government official, 13.7.21 Interview with UK Government DEFRA official, 01.10.21.

[20] Interview with former Scottish Government official, 25.1.22.

[21] Interview with Scottish National Party politician, 1.2.22.

[22] Interview with Welsh Government official #3 13.7.21

[23] Interview with Welsh Government official #1 13.7.21.

[24] Interview with Welsh Government official #1 13.7.21.

[25] Interview with Welsh Government official #1 13.7.21

[26] Interview with former Scottish Government official), 25.1.22.