

Editorial

## Merits and Challenges of Comparing the EU and Canada

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### Abstract

In the last decades, EU studies have increasingly broadened in terms of their theoretical and methodological approaches. By now, comparative concepts and theories are an integral part of studying the EU, which aids the study of its polity, politics, and policies. Despite the indisputable peculiarity of the EU as a political system, many scholars have stressed the value of using comparative approaches to study it. This thematic issue aims to investigate a specific case—the political system of Canada—as to its merit for comparison with the EU. While both systems have been described as *sui generis* in the past, forming a class of political system by themselves, recently the similarities between both have been stressed. This thematic issue gathers articles that compare different aspects of these two systems—focusing on polity, politics, and policy—to reap the benefits of the comparative approach and gain new insights into the functioning of both systems. The contributions to the thematic issue show the benefits that both Canadian political science and EU studies can gain from engaging in comparative exercises.

### Keywords

Canada; comparative politics; comparative turn; EU; EU studies

### Issue

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### 1. Introduction

Over the last 50 years, the EU and its institutional predecessors have undergone an unprecedented evolution as a political system. The academic study of this political entity has also changed profoundly, moving beyond its original foundations in IR and regional integration studies to increasingly embrace tools and approaches borrowed from comparative political science (Jupille & Caporaso, 1999; Keeler, 2005). Today, comparative concepts and theories are an integral part of studying the polity, politics, and policies of the EU (Jupille, 2006; Keeler, 2005; Kreppel, 2012; Tortola, 2014). As part of this

development, comparative federalism has also found its way into the study of the EU (Börzel, 2005; Fossum & Jachtenfuchs, 2017; Kelemen, 2003; Sbragia, 1993).

The use of comparative methodology to analyze the EU is less common, yet many scholars have analyzed (parts of) the EU’s political system comparatively—especially with a focus on the US federal system (for instance, Fabbrini, 2005; Menon & Schain, 2006; Nicolaidis & Howse, 2001). While the US was an early and natural system for comparison (Tortola, 2014), comparisons with other federal systems, such as Canada, are gaining prominence (for instance, Crowley, 2004; Verdun, 2016).

## 2. Comparing the EU and Canada

We argue that the comparison with Canada offers both empirical and theoretical opportunities. First, the development of Canadian federalism and the functioning of Canada's political system invites a comparison with the EU from an empirical perspective. Despite relevant differences, Canada and the EU show structural similarities and face similar fundamental challenges (Crowley, 2004; Fossum, 2018). They are both multi-level systems that have undergone constitutional transformations as well as treaty reforms and both systems face constitutional contestation and a commitment to accommodate differences and diversity. This raises many possibilities for comparison that include intergovernmental relations and the role of executives, executive–legislative relations, accountability, constitutional asymmetries and opt-outs, the recurrent calls for secession and exit, the struggle of balancing “self-rule” and “shared rule,” and contestation of the nature of the respective union. On the policy side, the comparison invites questions regarding policy coordination and implementation and managing the differential regional impacts of federal policies, especially given the shared grand policy challenges, such as migration and refugee policy, international trade, and climate change.

Second, there are commonalities in the development of disciplinary approaches in Canada and the EU. Like EU research, IR approaches have found their way into Canadian research to help explain intra-Canadian dynamics (Simeon, 1972). Also, while both the study of Canadian and EU politics have generated introspective, *sui generis*, and sometimes insular approaches to their polities (Simeon, 1989; Vipond, 2008), both have recently embraced comparative approaches (Keeler, 2005; Kreppel, 2012; Turgeon et al., 2014; White et al., 2008). The evolution of the EU as another attempt to reconcile unity and diversity, its institutional structures, a similar engagement in constitutional engineering and assessment, and the challenges the EU has in common with Canada have encouraged Canadian political science to deal with the EU in a comparative perspective (Simeon, 2002; Vipond, 2008).

The aim of this comparative study of the EU and Canada is twofold: First, the thematic issue assembles comparative studies focusing on (parts of) the political systems of the EU and Canada to provide new insights into how the two federal systems work. Second, based on these empirical studies, the contributions of this issue discuss how comparative analyses can improve our understanding of the EU and Canada and what lessons, merits, limits, and risks of the comparative method are in the study of different aspects of these unique political systems.

The studies in this thematic issue demonstrate that the EU and Canada offer meaningful comparative lessons with regard to their constitutional and institutional setups (polity), their actors and political processes in a

multi-level system (politics), and their attempts to tackle the challenges they face (policy). They underpin our argument that EU studies should not only apply concepts and theories from comparative politics but also explicitly compare the EU with other political systems to gain insights into both the EU's political system and multi-level governance in general.

## 3. Contributions to the Thematic Issue

Contributions to this thematic issue compare Canada's and the EU's polities, politics, and policies to test the value and benefits of the *comparative turn* in Canadian political science and EU studies.

Both the EU and Canada are characterized by the diversity of their constituent units and the contested nature of their polities. Given these conditions, Fossum (2023) tackles the question of how these multi-level systems can be characterized in conceptual terms. Starting from a federalist perspective, the author locates the comparative potential of both systems in their contested character. Rather than focusing on differences and classifying the EU and Canada as a multi-level system and a multinational federation respectively, Fossum argues it is the internal contestation of the federal entity that sets both systems apart from “classical” federal systems as the US. Fossum develops the notion of “poly-cephalous [i.e., multi-headed] federation” to stress the similarities of both systems. It is this constant contestation, observed in instances of constitution-making, that opens up valuable venues for comparison.

With a similar focus on contestation and conflict in the building of a constitutional order, Hurrelmann's (2023) contribution innovatively applies the concept of “constitutional abeyances” from Canadian politics to the EU. These describe instances of “settled unsettlement” (Hurrelmann, 2023, p. 242), allowing actors to proceed with constitutional integration despite disagreement, making use of ambiguity in constitutional and institutional arrangements. This perspective not only sheds new light on the underlying reasons for the current multi-crisis in the EU but also suggests a cautious approach towards calls for grand reform of the EU constitutional system, advocating it at the policy level to re-establish endangered abeyances. Ultimately, they keep the system stable despite persistent disagreement between its constituent polities.

Most of the contributions in this thematic issue compare the EU and Canada's policy action in policy fields ranging from migration to health to social policy, covering many conflicted and salient questions and challenges facing the two systems. Reflecting the recent emphasis by both Canadian and EU political leaders on value-based polities, these articles often link policy analysis to the adherence to basic values such as inclusion, labor, and refugee rights, and probe the impact of the multi-level system on outcomes. Felder and Tamtik (2023) analyze the role of inclusion in student mobility policy outcomes.

Applying a policy-framing perspective and focusing on the federal Canadian government and the Commission's role in these policies, they find that while inclusion has been an underlying value in both, it has not been a goal in and for itself, especially in the European case. Accommodating sub-unit preferences in policy design as well as the multi-level character of policy implementation has instead allowed political goals, such as furthering integration (in the EU case), and economic objectives to take center stage. The study also opens interesting perspectives on the ability of different policy goals to drive integration forward.

Examining the impact of crisis on migration policies, Xhardez and Soennecken (2023) show that both polities reacted to the Russian invasion of Ukraine with temporary protection schemes to host Ukrainian refugees. While the EU response showed unprecedented unity among EU member states when it comes to migration policy, the Canadian approach departed from the historical prevalence of permanent refugee protection. Despite apparent similarities between these responses to a common crisis, the authors detect discrepancies and identify how political and historical contexts shape these differences.

The contributions by Gebert (2023) and Fierlbeck (2023) focus on the dynamics of multi-level policy design and implementation. Gebert (2023) analyses a topical and contested policy issue: labor rights for platform workers. Analyzing different approaches to the classification of platform workers in the EU and Canada, he identifies how the peculiarities of policy implementation in federal/multi-level systems have so far prevented comprehensive social security for platform workers. In health care, where the European Commission responded to the pandemic by taking a more important role in a policy field of so far limited integration, Fierlbeck (2023) finds that these dynamics in the EU have led to greater health policy centralization than in Canada. While the case of the EU seems to support neo-functionalist approaches to political integration, the Canadian case represents a contradiction. Here, the nature of the crisis, historical and political preconditions, and the political culture within the polity limit the applicability of a neo-functionalist logic. As a result, there is more centralization in this new area of health policy in the EU than in a federal state.

Lastly, two articles analyze contestation and conflict in the multi-level politics of international agreements using the cases of CETA ratification (Broschek, 2023) and the implementation of the Paris Agreement (Müller Gómez, 2023). They focus especially on conflict emerging in the sub-federal levels of the political systems. Broschek (2023) analyzes the postponed ratification of CETA due to the resistance of a regional government in Belgium, one of the most prominent cases of multi-level policy conflict in recent EU history. He finds that joint decision-making among constituent units was not the only format of coordination available and that other successful forms of intergovernmental coordination pre-

ailed, underscoring the importance of the federal institutional configuration. The inclusion of the Canadian case in his two-level analysis which takes into account that the EU incorporates both unitary and federal constituent units has delivered valuable insights in this respect, widening the focus for analyzing joint decision-making in trade policy.

Müller Gómez (2023) analyzes how federal systems fulfill international commitments. He traces the means of conflict resolution used by the federal government (supranational level) to ensure support and compliance by sub-units and finds that two structural conditions determine the success of side-payments: the initial willingness of sub-units to comply and the absence of alliances of powerful sub-federal entities trying to resist implementation.

Taken together, the studies in this thematic issue show how valuable a comparison between the EU and Canada can be in widening our knowledge of policies, political processes, and institutional design of both entities. Taking cautious account of the differences between the two polities, the contributions show that not only is comparison methodologically possible and desirable, but empirically fruitful, as well. Constitutional-level analyses allow us to develop new and conceptually innovative perspectives on the struggles of political and legal integration in both multi-level systems and, potentially, beyond. Policy analyses deliver valuable insights on partly similar problems of policy design and implementation. The articles have produced non-idiosyncratic insights and pointed out the various parallels between Canada and the EU, debunking the *sui generis* myth in the study of both systems. They demonstrate how comparing constitutional and institutional issues, as well as policy matters, can advance the theorizing and understanding of multi-level systems.

This thematic issue has sought to contribute to a research program that synergizes EU studies and comparative politics. Arguably, both the absence of structured interaction of comparativist scholars within the EU studies community and the insulation of EU studies as a "discipline" of political science and related fields are in parts founded in the absence of such a program. By demonstrating the benefits for EU studies in engaging in comparative exercises, we hope to make a valuable contribution to the advancement of this discipline.

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### Conflict of Interests

The authors declare no conflict of interests.

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