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Marc Sanjaume-Calvet, Daniel Cetrà & Núria Franco-Guillén

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Leaving Europe, leaving Spain: comparing secessionism *from* and *within* the European Union

Marc Sanjaume-Calvet^a , Daniel Cetrà^b 
and Núria Franco-Guillén^c 

^aPompeu Fabra University, Barcelona, Spain; ^bInstitutions and Political Economy Research Group (IPERG), University of Barcelona, Barcelona, Spain; ^cAberystwyth University, Aberystwyth, UK

ABSTRACT

Are secessionisms *from* and *within* the EU comparable? What motivates them and to what extent do they pose similar challenges to EU territorial governance? This article addresses these questions by comparing the framing of the British Leave campaign and the Catalan independence movement. Drawing on the FraTerr database and method, the analysis suggests that secessionism *from* the EU and secessionism *within* the EU are different political phenomena despite sharing an emphasis on sovereignty and the common goal of breaking-up from an existing polity. Secessionism *from* the EU is primarily a call for the recovery of lost sovereignty and of classical functions of the state such as border control. Secessionism *within* the EU invokes sovereignty as the right to external self-determination and adds narratives around a better future and greater democratic quality and social justice. These two types of secessionism pose different challenges to EU territorial governance because the first entails a full rejection of the European project while the latter calls for a review of European multi-level governance.

KEYWORDS Secession; nationalism; self-determination; Catalonia; Brexit

The European Union (EU) is currently at the centre of a global trend towards new challenges to territorial governance. The ‘age of secession’ (Griffiths 2016), a historical period prone to territorial disintegration, overlaps with global signs of democratic erosion (Acemoglu and Robinson 2019; Levitsky and Ziblatt 2018). The withdrawal of the United Kingdom from the EU, the recent emergence of far-right parties in the EU with Eurosceptic views (Rooduijn *et al.* 2019), the centralising effects of the COVID-19 pandemic on federalism (Steytler 2022), and the territorial dimension of the Ukraine war, including two recent annexation referendums (Szpak 2022), bear witness of these turbulent times.

In this article, we examine territorial tensions in the EU from a comparative perspective. Are secessionisms *from* and *within* the EU

comparable? What motivates them and to what extent do they pose similar challenges to EU territorial governance? Answers to these questions are key to informing the ways in which European institutions can take action to address such challenges. And they have a broader relevance: politics and international organisations across the world may also be affected by pressures towards territorial disintegration.

We address these questions by comparing the political claims that underpin the two more relevant cases of secessionism *from* and *within* the EU (Bossacoma 2023) in recent times. These ‘polity attacks’, as labelled by Schimmelfenning (2022), constitute territorial crises for the EU that did not, until this moment, escalate into a membership crisis. We take the UK’s withdrawal from the EU as a key instance of secessionism *from* the EU, and the Catalan pro-independence movement as paradigmatic case of secessionism *within* the EU. By comparing how political elites in each case justify their claims for separation, we can better understand the nature of the two secessionisms and their implications for EU territorial governance. To do so, we rely on the novel and comprehensive FraTerr database of frames and territorial demands in Europe (Elias *et al.* 2021). Specifically, we draw upon the rich analysis concerning pro-independence actors in Catalonia and we apply its coding scheme to pro-Brexit campaign material. We contend that, by bringing together and comparing two advanced yet different cases of secessionism in the EU, we may better theorise and set the grounds for managing EU territorial crises (Cetrà and Liñeira 2018; Requejo and Sanjaume-Calvet 2021; Sanjaume-Calvet 2020).

The article is structured as follows. First, we present the structural differences between a member-state pursuing exit from the EU and a region pursuing independence from an EU member-state. This allows us to build up three expectations regarding political actors’ discourses. Second, we draw on current scholarship concerning trends towards territorial disintegration to complete our list of expectations. Third, we set out our methodology, including the extension of the FraTerr coding scheme to pro-Brexit material, case selection, and the main sources of empirical data. Fourth, we perform a comparative analysis of the political claims by leading political actors in both territorial crises. Finally, we discuss our results in relation to our expectations as well as their implications for EU territorial governance.

Secessionism and the EU

The literature on EU territorial politics has traditionally placed secessionism *within* the EU as an extreme form of territorial demand on the centre-periphery cleavage (Rokkan and Urwin 1982) continuum. While the field has been mostly dominated by valuable small-N comparisons

and case-studies (De Winter and Tursan 2003; Elias 2009; Erk 2005, 2010; Ferreira 2021; Keating 1996; Liñeira and Cetrà 2015; López and Sanjaume-Calvet 2020; Sijstermans and Brown 2022), there is also an increasing number of large-N studies (Álvarez Pereira *et al.* 2018; Brancati 2014; Massetti and Schakel 2013, 2016; Sorens 2005, 2012; Szöcsik and Zuber 2015). Scholarly work devoted to secessionism *from* the EU, and to comparisons between both types of secessionism, tends to focus on the legal and normative dimensions (Bossacoma 2019; Closa 2017; Ferreres 2018; Frantziou 2022; Requejo and Nagel 2019; Weiler 2017).

These two broad strands of literature offer valuable contributions. For instance, the determinants of the emergence of secessionist demands have recently been studied in a rich large-N study by Pereira *et al.* (2018), concluding that both economic and cultural differentiation explain the existence of regionalist and secessionist demands. In turn, Ferreres (2018) has discussed the legal rigidity to secessionism in member states' constitutional traditions, including withdrawal *from* the European Union as a differentiated form of secession. Our article aims at precisely linking these two strands of literature by comparing the articulation of territorial claims and unpacking the institutional implications of secession *from* and *within* the EU.

In what follows, we propose a set of expectations regarding the different ways in which secession *from* and *within* may be justified in political actors' discourses.

Structural differences

The comparison of two movements seeking the same political objective (withdrawing from an existing polity) can only be performed considering that in one case we analyse a state while in the other we analyse a region. This is a crucial *ex ante* difference from which we derive three interrelated expectations:

First, the institutional barriers to secession are antithetical when comparing the cases. The withdrawal of a European Union member state is a rare case of legal and institutionalised right to unilateral secession, considering the special character of the European Union as a polity (Schimmelfennig *et al.* 2015). Article 50 TEU establishes that the Union and the member state aiming to separate shall negotiate the technical aspects of secession, but the decision to withdraw from the Union remains entirely in the hands of the seceding member state. This unilateral right would be unsurprising if it was a simple international treaty or organisation. However, the peculiar character of the EU as a 'polity of differentiated integration' (Schimmelfennig *et al.* 2015) makes it almost unique in terms of constitutional flexibility of its territorial integrity (Ferreres

2018). On the contrary, secessionism *within* the EU faces harder institutional barriers given that, typically, constitutions do not allow for secession and protect territorial integrity and state unity using many institutional devices (Sanjaume-Calvet 2022). This gives rise to constitutional rigidity, or what Weill calls ‘unwritten eternity clauses of territorial integrity’ (2018). For example, in the case of Spain, the Constitutional Court rules out any possibility of unilateral or even negotiated secession without undertaking deep constitutional change (Castellà 2018). This first difference shapes our first expectation:

E1: Secessionism from the EU emphasises state sovereignty while secessionism within the EU combines pro-secession arguments with pro-self-determination arguments (because a member state’s right to decide on seceding is uncontested while secession within a EU member state is unrecognized).

Second, and relatedly, these institutional constraints modify the ‘strategic playing field’ (Griffiths 2020) within which political actors operate and make their case for secession. EU member states are already well-established states recognised by the international community. If one of them wants to leave the EU, it does not follow that it will have to face challenges to its international recognition, nor will its participation in other international organisations suffer. In contrast, if a region within a member state wants to become a state, and indeed an EU member state, it needs recognition from other existing states, possibly starting from other EU states, and most probably against the opposition of the host state. Thus, there is a need to address an international audience besides the domestic one. This difference underpins our second expectation:

E2: Secessionism from the EU addresses exclusively the internal audience while secessionism within the EU targets both the domestic and the international audience (because international recognition is strategically crucial for them).

Third, secession *from* the EU entails the institutional continuity of the seceding unit, while secession *within* the EU requires significant institutional change to transform a polity enjoying self-government into a fully-fledged new state. Thus, we expect the combination of grievance claims (to delegitimize membership in the existing polity) and advocacy claims (to present an alternative political project) to play out differently. For EU member-states, entrance into the host-polity (the EU) and the related ‘loss’ of sovereignty was a relatively recent political moment. Therefore, secessionists *from* the EU could be expected to stress the recovery or restoration of the status quo ex ante. In contrast, as most regions entered their host-states centuries ago (and the host-states changed their political systems substantively during these centuries), secessionists

within the EU may be expected to stress the building of a new, different (and, from their perspective, 'better') polity (Elias and Franco-Guillén (2021)). This difference gives shape to our third expectation:

E3: Grievance arguments are present in both cases to delegitimize membership in the existing polity, but secessionism from the EU calls for the restoration of lost sovereignty while secessionism within the EU presents independence as an instrument to build a different, better polity.

Contingent disintegrating factors

In addition to the implications of the structural difference presented in the previous section, we must consider contingent factors identified by the literature as elements shaping political disintegration discourses. We draw on them, with an explicit focus on the way they have been applied to our case studies, to complete our list of expectations: the 'return' of nationalism, democratic discontent and redistributive tensions.

The 'return' of nationalism¹

Political theorist Yael Tamir distinguishes between the return of progressive and regressive forms of nationalism, with secessionism being a manifestation of the latter, which would include: 'Trump's election alongside Brexit, the growing support for separatist movements, the rise of the new right in many European countries, and the phenomena of national and religious awakenings around the world' (2019: 4). Two overlapping phenomena, ethnic outbidding and psychological narcissism (Cislak *et al.* 2020; Oller I Sala *et al.* 2019), are linked to the 'return' of nationalism and have been widely studied. The notion of ethnic outbidding relates to the salience of national identities as ethnic belonging and its use by political leaders (Zuber 2012; Zuber and Szöcsik 2015). Here, the role of political leaders is understood as an *ethnic* leadership fostering the salience of group identities based on traits such as language, ancestry, origins and culture. In the cases of Brexit and Catalonia, ethnic outbidding operates in a different way in each context. Ethnic vote in the Brexit case is attributed to the reinforcement of the white identity of 'Brexit nationalists' and minorities' opposition to the project. Differently, in the Catalan case ethnic vote and ethnic outbidding are presented as a dynamic of conflict reinforcement promoted by secessionist elites (Barrio and Rodríguez-Teruel 2017) and by unionist parties (Sanjaume-Calvet and Riera-Gil 2022).

Scholarly contributions focussing on political discourse suggest another difference. A key element of the pro-Leave discourse was a deep-rooted rejection of new immigration (Kaufmann 2019). 'Taking back control' of

UK borders fundamentally meant enabling the UK Government to put a cap on the number of newcomers entering the country every year. This has been absent in other recent pro-independence campaigns, and the literature suggests that secessionist parties in places like Catalonia and Scotland have typically adopted an inclusive stance towards immigration (Franco-Guillén and Zapata-Barrero 2014; Hepburn and Rosie 2014). According to these authors, secessionist parties view immigration policy as yet another area of policy disagreement with the central government.² In sharp contrast with the pro-Brexit campaign, their claim is often that central government policies are harsh and lack compassion, whereas their sub-state legislation would be more inclusive if enforced as state legislation (Franco-Guillén 2015).

A third, final difference with regards to the ‘return’ of nationalism concerns the type of sovereignty and self-determination arguments being invoked in both places. While some scholars suggest seeing secession *from* the EU through the prism of the ‘return’ of homogenising, hard forms of state nationalism (Kallis 2018: 295; Keating 2021; Wincott *et al.* 2022), scholarship in nationalism studies and territorial politics has typically framed secessionism *within* the EU as a push for rescaling power in the European territory, a potentially different and more diverse form of distributing political power beyond ‘nation-states’ (Jordana *et al.* 2018; Keating 2013). Contrary to *Brexiteers*’ urge for ‘clawing back power’, mainstream sub-state nationalist parties in Western Europe typically adopt a pro-European outlook (Cetrà and Liñeira 2018; Elias 2009; Hepburn 2010) and use different strategies to influence European policy-making (Tatham 2016; Tatham *et al.* 2021).

All in all, we expect the ‘return’ of nationalism to emerge in our analysis as follows:

E4: Political and cultural frames around identity, sovereignty, culture and history dominate in both cases, but for secessionists from the EU it entails calls to recover traditional ‘nation-state’ powers, while for secessionists within the EU the focus is on history and national identity (because member states are already a political reality but regions’ status as nations are contested).

Democratic discontent

Constitutional lawyer Joseph Weiler argues that, while Brexit and EU regional secessionisms might seem separate phenomena, in practice ‘both discourses draw from the same well: the turn, or return, to national identity as a potent mobilising and coalescing factor in social and political life. Note that the turn, or return, is to a national identity which ruptures the usual assumption that Member State identity equals national identity. *This turn to identity is, in almost all places, associated with dissatisfaction*

with the functioning of democracy, either within the State or within the Union, and in some well-known instances is associated with an attraction of what is not euphemistically called illiberal democracy' (2017: 12 – our emphasis). Thus, Weiler's argument links Tamir's focus on the 'return' of nationalism to *democratic discontent* (Dahlberg *et al.* 2015; Dahlberg and Linde 2016), that is, dissatisfaction with the state or with the EU as democracies. Weiler also suggests a potential link between democratic discontent and *illiberalism*.

The most palpable phenomena related to democratic discontent are polarisation dynamics encompassing both the affective and identity dimensions of discontent (Hobolt *et al.* 2021), often in relation to populism (Canovan 2002; Müller 2016; Norris and Inglehart 2019; Pasquino 2008). In a study at individual level on public opinion in the aftermath of the Brexit vote, Hobolt *et al.* (2021) find that opinion-based groups replaced former partisan identification and created new cleavages. The authors do not establish a fully-fledged comparison between Brexit and other territorial crises but suggest that 'the notion of affective polarisation along opinion-based group lines could apply elsewhere, where political issues are sufficiently salient and divisive to give rise to social identities and out-group animosity. For example, this framework could be applied to the issue of Catalan independence, which has become very politicised and divisive in Spain, especially in the mobilisation leading up to and following the 2017 Catalan referendum on independence'. (Hobolt *et al.* 2021: 1489).

Indeed, Catalan secessionism has been described through the lenses of populism and polarisation because of trends towards more in-group trust (Criado *et al.* 2018), centrifugal party competition (Rodríguez-Teruel and Barrio 2021), social polarisation without violence (Balcells *et al.* 2020), or elite polarisation (Guntermann and Blais 2020). In all these studies, the role of political leaders and political parties is deemed crucial to create opinion-based citizen groups who become socially, emotionally, or affectively detached from existing democratic institutions. This, in turn, fosters a deep territorial crisis through the emergence of new territorial adscriptions.

Therefore, in the case of democratic discontent, we expect to find the following similarity:

E5: Both secessionists from and within the EU deploy similar discursive trends built upon bringing back the 'will of the people' and a critique to existing liberal-democratic institutions.

Redistributive tensions

A third group of studies finds a different driver for territorial crises and refers to what Christopher Harvie first described as the 'selfishness of the affluent'

(1994). Namely, a *lack of solidarity* and fiscal dumping that emerge from the aforementioned trend towards national identity reinforcement (Baglioni *et al.* 2019; Beutler 2017; Rautajoki and Fitzgerald 2022). Economist Thomas Piketty defends a modernised version of this idea in what he calls ‘the Catalan syndrome’³: ‘The Catalan crisis in its present form is a symptom of a Europe that pits region against region in a race to the bottom with no fiscal solidarity whatsoever. Every country seeks advantage for itself by undercutting its partners’ (Piketty 2020: 923). This view is further theorised by scholars of political sociology through the concept of the ‘nationalism of the rich’ (Dalle Mule 2017). This is defined as a form of discursive nationalism that tries to put an end to perceived economic exploitation inflicted by poorer regions and/or inefficient state administrations upon wealthy nations.⁴ The characteristic of ‘rich’ is thus not related to individuals or social classes but to regions or states. Key to the ‘nationalism of the rich’ approach is economic victimisation, whereby a backward core area is accused of holding back a more advanced periphery. This is combined with a sense of political marginalisation linked to *democratic discontent*. The lack of effective mechanisms to influence political decision making at the centre reinforces the sense of grievance.

However, the literature is not unanimous, and the emphasis on the ‘nationalism of the rich’ has been contested by recent empirical studies that either nuance or deny the weight of greed in motivating Catalan secessionism. Muñoz (2021), in an individual-level analysis, finds that the correlation between income and support to independence exists, but the predictive effects of the economic variables disappear when controlling for other variables such as culture and language. Similarly, Hierro and Queralt (2020) nuance the economic explanation using individual data on education levels and employment and show that the effects of income and selfishness are not the explanation of independence support at individual level. Drawing on a ‘class approach’, other social scientists point out the inter-class composition of the Catalan self-determination movement (Della Porta and Portos 2021). Further, while a detailed analysis of individual predictors of pro-Brexit and pro-Catalan independence votes is beyond the scope of this article, Catalan independence supporters have been found to be more educated, middle-class and progressive, while *Brexiters* were found to be less educated, from rather economically depressed regions, and of older age when compared to *Remainers*.⁵

In short, scholarly contributions dealing with the role of redistributive discontent in shaping secessionism do not provide us with a unanimous expectation as to how redistributive frames play out in secessionism. We have decided to follow the dominant approach and expect actors to invoke, perhaps in different ways and to different degrees, frames related to redistributive discontent:

E6: Both secessionists from and within the EU make use of similar economic grievance *frames to justify secession*.

Research design

In order to test the empirical validity of our expectations, we analyse the political claims by parties and civil society organisations advocating for secession in Catalonia (vis-à-vis Spain) and in the UK (vis-à-vis the EU). Implicit here is that we do not see both secessionisms as opposite poles but, rather, as paradigms that need to be unpacked through an empirical inquiry of the claims put forward by those justifying secession. It is for this reason that we focus on the analysis of the framing strategies of leading political actors in each case.

Data

We draw on the FraTerr database (Elias *et al.* 2021) to capture the main discourses in favour of Catalan independence and we compare them to those used by leading *Brexiteers*. In the UK we focus on the official referendum campaign in 2016, while in the Catalan case we use data from before the 2014 popular consultation, the 2015 electoral campaign of regional elections, and the 2017 unilateral referendum manifestos. In the last case, the 2017 unilateral referendum, the vote was declared unconstitutional, which meant that there was no official campaign, although we still find data from that year, mostly from the regional election that followed the suspension of autonomy after the referendum.

The FraTerr codebook allows for coding political documents such as manifestos, speeches, or press releases on the basis of ‘justification frames’ (Statham and Trenz 2012). This novel dataset captures the framing of territorial demands in 12 European regions during the period 1990–2018. Its main strength is capturing two aspects simultaneously: on the one hand, how demands for territorial change, including independence, are articulated in the political discourse across regions; on the other hand, the levels of government at which the region seeks to secure a given demand (i.e. region, state, EU, international). This methodology is a suitable approach to analyse the claims of both *Brexiteers* and Catalan secessionists. While there are clear differences between the two, as established in the previous section, we contend that the frames and discourse analysis can be applied to the state-wide level as a territorial demand vis-à-vis the EU (see Table 1).

As shown in Table 1, unlike the extant literature analysing justifications of territorial demands in general, or secessionist demands, the FraTerr dataset works with a large range of cultural, economic and political

Table 1. Types of frames in the FraTerr code book.

Cultural	Socio-economic	Political	Environmental	Other
Identity	Economic distinctiveness	Political distinctiveness	Environmental distinctiveness	Other
Cultural distinctiveness	Socio-economic prosperity	Dissatisfaction with the territorial status quo	Environmental crisis	
Linguistic distinctiveness	Territorial cohesion and solidarity	Attribution of blame	Environmental colonialism	
Religious distinctiveness	Social justice	Quality of democracy	Environmental sustainability	
Historical distinctiveness	Socio-economic colonialism	Civil and human rights		
Customs distinctiveness	Globalisation	Self-determination and sovereignty		
Cultural invasion	Economic crisis	Europe		
Cultural/identity crisis	Sustainable development	Comparison Efficiency Central state unity Political colonialism Political crisis Peace and security Policy		

Source: Elias et al. (2021).

arguments. Including all possible arguments is another strength compared to other qualitative approaches (Dalle Mulle 2017; Della Porta *et al.* 2017; Griffiths and Martinez 2020) which, as mentioned above, generally assume that pro-secession arguments are framed as grievances when they might also be framed as a way to build a different or better society (Elias and Franco-Guillén 2021).

We have applied the FraTerr's methodological approach to data collection and coding for the analysis of 10 key political documents published within the Pro-Leave camp during the Brexit referendum. Six of them pertain to the official Vote Leave campaign, and one each to Leave.EU, Labour for Leave, LibDems for Leave and Greens for Leave. By doing so, we obtain a comparable dataset of segments⁶ from manifestos on the framing and discourse justifying the Leave option in the UK during 2016 to be compared with the thirty documents already analysed in the FraTerr dataset project on Catalonia.

Actors

The actors studied in our framing analysis are presented in Table 2 by case and type of actor. We selected the existing actors already coded in the FraTerr dataset and we added the most relevant actors in the 2016 Brexit referendum campaign.

This design faces, however, two limitations. Firstly, we assume that the main documents presented by these actors capture their full case for secession. However, political messaging, especially campaigns and civil society organisations, are performative and visual in addition to textual.

Table 2. Actors coded in the framing analysis.

Case	Actor	Type
United Kingdom	Vote leave	CSO* – campaign
	Leave EU	CSO – campaign
	Labour for leave	Party – campaign
	LibDem for leave	Party – campaign
	Greens for leave	Party – campaign
Catalonia	Convergència i Unió	Party
	Esquerra Republicana de Catalunya	Party
	Junts per Catalunya	Party
	Junts pel Sí	Mixed coalition (electoral coalition)
	Candidatura d'Unitat Popular	Party
	Òmnium Cultural	CSO
	Assemblea Nacional Catalana	CSO
	Súmate	CSO

*CSO: Civil Society Organisation.

Content analysis cannot capture the wide range of frames mobilised by all actors. Secondly, the analysis includes a plurality of actors that are not equally relevant in the public debate. For example, organisations and platforms such as Súmate or LibDems for Leave do not obviously have the same impact on shaping the case for secession than the main parties and campaign platforms. We are aware that, particularly in the case of pro-Brexit discourse, we have prioritised comprehensiveness over representativeness, which may potentially introduce a bias in the results.

Empirical analysis

In this section we provide the results of our comparative analysis. The figures (see also the Annexe section) show aggregate data of our segments analysis of 10 documents (325 frames) in the case of the UK corresponding to 2016 and more than 30 documents (1298 frames) in the case of Catalonia corresponding to the period comprised between 2010 and 2018. We discuss the general trends of the comparison by focussing on the most salient, common and diverging frames for each case.

In the comparison of the general frames between both groups of actors we do not find noticeable differences (see [Figure 1](#)). In both cases the main type of frame is political, followed by social frames. Cultural and environmental reasons are far less relevant. In the Brexit case, as in the Catalan demands for independence, the discourses on sovereignty, public services and quality of government have dominated the main debates and mobilizations. The main slogans used by Catalan pro-independence actors and *Brexiters* were of a political nature such as ‘[We are a nation] We have the right to decide’ and ‘Take back control’, respectively. At a general level, these findings substantiate our E1 and E4, namely that dominant frames are political rather than cultural. There is an overall framing in terms of sovereignty and self-determination in both discourses

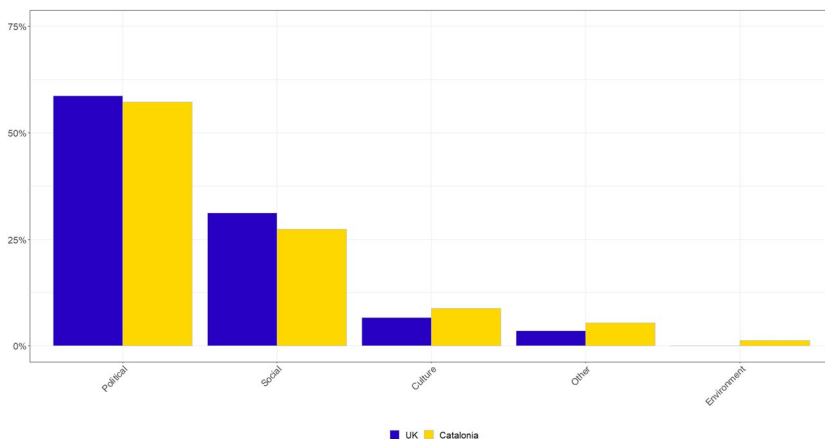


Figure 1. General frames comparison. Note: Colour online only.

that, from a first sight, do not allow us to draw any substantive difference between secessionism *from* and secessionism *within* the EU.

The general outlook presented in Figure 1 holds not only across cases but also across actors. All analysed actors prioritise justifications based on political frames over other categories of frames with two exceptions, both from the Catalan case. *Súmate*, a civil society organisation formed by Catalan Spanish-speakers supporting independence, shows a more social than political framing. This seems logical since it is an organisation set up to convince non-independentist Spanish-speakers by stressing the social-justice potential of independence. In fact, the most salient among the specific social frames in *Súmate* is precisely social justice. In the case of *Junts pel Sí* (JxS) party manifesto, the unitary pro-independence electoral platform of the 2015 regional elections in Catalonia, the dominant specific frame within the social category is not social justice but economic prosperity. Being a cross-party coalition that formed to deliver independence, the focus of that manifesto is on the economic viability of an independent Catalonia. Thus, according to this initial, general comparison, both secessionisms are more similar than expected. But how are these political frames built and related to nationalism, to democracy, and to the socio-economic dimension? We must dig deeper for an answer.

There are various aspects to be highlighted regarding the main differences in the specific frames (see Figure 2). First, *prosperity*, *sovereignty* and *political blame* are the most used frames in pro-Leave discourse. These frames are also used by Catalan secessionists but to a lesser extent. This finding offers a precise portrait of the *Brexit* discourse around the well-known axis of their official 2016 referendum campaign. In fact, these frames are consistent with the discourse described in the literature

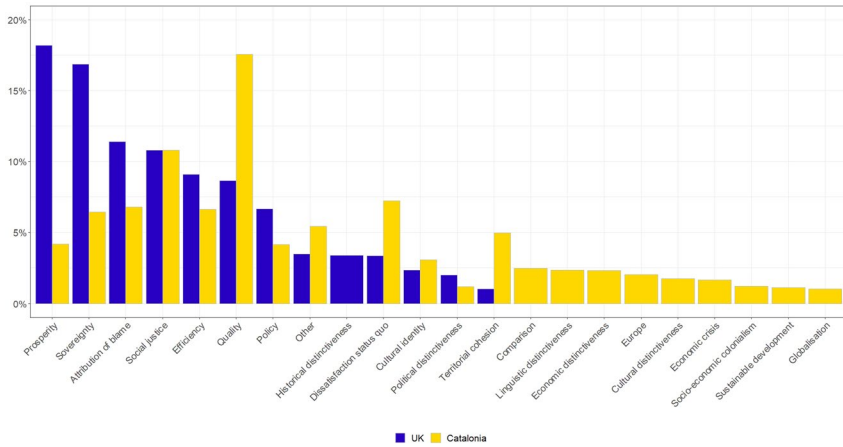


Figure 2. Specific frames comparison (>1%). Note: Colour online only.

(Menon and Wager 2020; Koller *et al.* 2019). That is, a vindication of recovering national sovereignty from supranational institutions, an assertion of the economic argument, and the reinforcement of these frames by blaming EU institutions. This discourse, with less intensity according to our data, includes two more frames: *efficiency* and *policy*. In fact, some pro-Leave actors use almost exclusively these frames, combining blame with claims of lack of efficiency of EU institutions (i.e. bureaucracy) and a strong emphasis on recovering borders control related to immigration policies. Boris Johnson provided a good example of the focus on sovereignty and border control with the following remark: ‘I think it bewilders people to be told that this most basic power of a state – to decide who has the right to live and work in your country – has been taken away and now resides in Brussels.’⁷

While these three frames (*prosperity*, *sovereignty* and *blame*) are also present in the case of Catalan pro-independence actors, there are relevant differences in the way they are deployed. Of course, in this case *prosperity*, *sovereignty* and *blame* are directed to the Spanish government and to Spanish institutions. As the JXC 2017 regional election manifesto states: ‘It must be clear that Catalonia is a nation where its citizens decide what and how they want to be, and not a territory that can be governed from the Spanish State through imposition, repression and suppression of its institutions’ (JXC 2017: 15–17). More substantively, differences arise from the actual meaning of the frames. In the case of sovereignty, *Brexiters* emphasise the need for the return of classical nation-state sovereignty and competences (chief among which is border control) to enhance its power and resources. In contrast, Catalan secessionist actors mostly refer to the right to self-determination in its ‘right

to decide' formulation. This seems to substantiate our E1: an emphasis on nation-state sovereignty in the case of Brexit and an emphasis on the right to self-determination in the case of Catalonia. However, our E2 is only partly substantiated because both secessionisms target largely the domestic audience. It is true, though, that Catalan secessionist discourse is at times partly directed to a hypothetical international audience, aiming at eventually obtaining recognition of the right to decide, whereas pro-Brexit discourse is exclusively directed to a domestic audience. For example, one of the analysed documents in Catalonia, a pledge for self-determination, was written exclusively in English.⁸

Blame, which is a frame potentially capturing both grievance (E3) and democratic discontent (E5) arguments, often takes a bridging function to the 'right to decide', whereby secessionists complain of the Spanish government's refusal to accommodate the self-determination demand. In the case of the *Brexiters*, by contrast, the EU is to be blamed for the aspiration to become a federal political project that undermines British democracy and does not rule in the interests of 'Britain'. Interestingly, in the materials examined, pro-Brexit political actors invoke 'Britain', rather than the United Kingdom, which leaves out Northern Ireland. This may be seen as indicative of a lack of careful thought about the UK territorial constitution, especially within the leading Conservative Party, and of the final outcome to prioritise Brexit over the territorial stability of the UK (Keating 2022; Kenny and Sheldon 2021). In the words of Boris Johnson: 'What was once the EEC has undergone a spectacular metamorphosis in the last 30 years, and the crucial point is that it is still becoming ever more centralising, interfering and anti-democratic. (...) The independence of this country is being seriously compromised. It is this fundamental democratic problem – this erosion of democracy – that brings me into this fight' (Johnson 2016). As a result, the key question becomes 'do the British people want to be a self-governing nation in control of their own destiny or governed by a European superstate designed to become a United States of Europe?' (Hickson and Miles 2016).

Thus, our E3 is partially substantiated because both movements engage in grievance arguments towards the existing polity, although for different reasons. However, our E5 is not substantiated: discontent seems to be more present in the Brexit case, whereas in Catalonia discontent takes the common form (among secessionists *within* the EU) of denouncing the perceived limits in the territorial accommodation and architecture of the host state. In fact, three different frames are the most salient in the pro-independence discourse in Catalonia: *quality, dissatisfaction and social justice* (see Figure 2). All actors raised critiques about the flaws of the current state of affairs, especially the ANC, ERC and CUP, which linked independence to breaking with the '1978 regime': '(recent events)

have confirmed the discourse that the secessionist, anti-capitalist left has been defending for years: the current structures of the Spanish State, heirs of the Francoist dictatorship, are designed in order to stop any initiative that questions the pillars of the regime, and the economic and political model issued from 1978' (CUP 2015: 52). Among Catalan secessionists, dissatisfaction is often used in connection to what Basta (2021) calls exhaustion frames'. It is used to highlight the failure of the statutory reform at appeasing the demands for protecting and enhancing autonomy, leaving hardly any alternatives to secession, according to these actors. This echoes former PM David Cameron's failure to obtain a 'special status' within the EU, subsequently used to call for a referendum, although Cameron himself campaigned for Remain. Regarding the social justice frame, it is used to argue that an independent Catalonia would be a fairer polity. For example, ERC's 2017 manifesto is systematically structured as, first, a critique to the current system in terms of policy and, second, as a list of potential social policies in an independent Republic. The ANC often uses the idea of social justice as a crucial element of their justification: 'Independence, by itself, does not ensure social cohesion, but we will be in better conditions to achieve it' (ANC 2015a: 40).

These findings are consistent with existing literature on the Catalan movement (Franco-Guillén 2016; Liñeira and Cetrà 2015). The main actors, parties and civil society organisations during the 2010–2018 period portrayed independence mainly as a form of building a 'republic' that would adopt, according to them, a better form of government and would be more socially just.⁹ This would seem to further substantiate E3, namely that grievance frames are present in both cases but in Catalonia there is an added emphasis on building a new, better polity. In the UK, *quality* is closely interlinked with sovereignty: returning control over key legislation to the Westminster Parliament will correct the current democratic deficits of the EU, so the argument goes, as it will be directly elected candidates who will pass legislation that will better reflect the will of the people. For *Brexiters*, social justice is almost exclusively focussed on the possibilities in social policy (and particularly funding the NHS) that would arise from stopping financial contributions to the EU: 'We stop sending £350 million every week to Brussels and instead spend it on our priorities, like the NHS' (Vote Leave Campaign 2016). This seems to partially substantiate our E6: while both movements draw upon redistribution discontent, in the Brexit case redistribution is linked to quality and to improving existing policies, whereas in the Catalan secessionist discourse the economic benefits of independence are projected to present injustices (territorial imbalances) and to future policies (thus, by definition, inapplicable at present).

Finally, there are frames that appear to be exclusive of the Catalan pro-independence discourse. This might be related to our methodology

(we have more documents from Catalonia while those on Brexit pertain to official referendum campaigns within which argumentative subtleties may get lost). Bearing this in mind, the results show a greater plurality of arguments used by the Catalan movement. Frames such as social *distinctiveness*, *globalisation*, *territorial cohesion*, *language*, *colonialism* do not have an important weight in the overall discourse but define certain actors' involvement in the pro-independence discourse. For example, the ANC stated the following on globalisation: 'In a global world, Catalonia must be able to directly defend its interests: we must have our own voice and not be subsidiaries in order to defend our companies and our citizens in the world, and to be able to participate in international organisations where decisions are made that affect our lives' (ANC 2015b). On territorial imbalances, ERC argued the following: 'Since the democratic restoration, only Madrid has gained economic weight at the expense of the rest of the Spanish regions, the alleged beneficiaries of our tax transfers'. (ERC 2017). Frames against European integration are virtually inexistent in the case of Catalan independence.¹⁰ In fact, the vision of the EU as a more *efficient* and more *high-quality* institutional setting contrasts with the negative use of the same frames regarding Spain, which is consistent with the characterisation of mainstream Catalan secessionism as a pro-European movement in the relevant literature.

These final findings seem to substantiate E4 only in part. We have not found that references to history and national identity are especially salient in the Catalan case, but we have found that other political and cultural frames are present in Catalonia and absent in the case for Brexit. This points to a specific construction of secessionist demands at the regional level that emphasises distinctiveness while insisting on the necessity of integration in international regional frameworks such as the EU. This discursive feature makes seemingly contradictory frames of disintegration and integration compatibles. As we suggest in the next and final section, this compatibility signals a substantive difference between secessionism *from* and *within* the EU.

Concluding discussion

This article set out to compare two key instances of secessionism *from* and *within* the EU, Brexit and the Catalan independence movement, in order to assess the extent to which these two types of secessionism are similar and whether they pose similar challenges to EU territorial governance. To do so, it proposed expectations drawing on a key structural difference (being a state or a region) and several contingent factors that helped guiding the analysis and drawing conclusions (see Table 3).

Table 3. Summary of expectations and results.

Expectations	Results
E1: Secessionism from the EU emphasises state sovereignty while secessionism within the EU combines pro-secession arguments with pro-self-determination arguments (because a member state's right to decide on seceding is uncontested while secession within an EU member state is unrecognized).	Substantiated. Our results clearly show that the case for Brexit is largely built on the recovery of lost sovereignty (for issues such as border control and immigration) while the overall justification for Catalan independence revolves around the central notion of external self-determination.
E2: Secessionism from the EU addresses exclusively the internal audience while secessionism within the EU targets both the domestic and the international audience (because international recognition is strategically crucial for them).	Partially substantiated. There is no discernible difference in our analysis as both secessionisms targeted the domestic audience. Nonetheless, Catalan secessionist discourse is somehow directed to an international audience (or as if there was an international audience) to obtain recognition of the 'right to decide', whereas the pro-Brexit discourse appears as exclusively directed to a domestic audience.
E3: Grievance arguments are present in both cases to delegitimize membership in the existing polity, but secessionism from the EU calls for the restoration of lost sovereignty while secessionism within the EU presents independence as an instrument to build a different, better polity.	Substantiated. Grievance (captured through the frame <i>blame</i>) is used by both movements for different reasons: Spain's refusal to accommodate the self-determination demand and the EU's aspiration to become a federal project, respectively. In Catalonia there is an added, more positive emphasis on building a new republic.
E4: Political and cultural frames around identity, sovereignty, culture and history dominate in both cases, but for secessionists from the EU it entails calls to recover traditional 'nation-state' powers, while for secessionists within the EU the focus is on history and national identity (because the member state are already a political reality but the region's status as nations is contested).	Partially substantiated. We have found that frames around sovereignty dominate in both cases but references to history and identity are not especially salient in the Catalan case, where other frames (i.e. language, globalisation) are present. The Brexit discourse is indeed dominated by the idea of bringing back (and protecting) sovereignty from external interdependence.
E5: Both secessionists from and within the EU deploy similar discursive trends built upon bringing back the 'will of the people' and a critique to existing liberal-democratic institutions.	Rejected. In neither case do we see frames used as an open critique to liberal democracy. Democratic discontent is more present in the Brexit case (with regards to the political expansion of the EU and its perceived inefficiency), whereas in Catalonia it is linked to a failed accommodation within Spain that would justify secession.
E6: Both secessionists from and within the EU make use of similar economic grievance frames to justify secession.	Partially substantiated. Both movements draw upon redistribution discontent frames. However, in the Brexit case redistribution is linked to quality and the improvement of existing policies, whereas in the Catalan secessionist discourse the economic benefits of independence are projected towards future policies and/or denounced as present injustices (territorial imbalances).

We have found that there is an overall framing in terms of sovereignty and self-determination and that political and social frames are the ones more widely used in both cases. However, when we dig deeper into the

composition of these two broad categories, differences dominate. Pro-Leave actors adopt a more defensive discourse related to the ‘taking back control’ of state sovereignty and immigration control, which is absent in the case of Catalan pro-independence actors, whose references to sovereignty relate largely to the right to external self-determination.

What are the implications of our findings for conceptualising these two types of secessionism and for EU territorial governance? Our contention is that our case-oriented comparison provides general insights about the different nature and implications of these two types of EU secessionism. Our findings suggest that secessionism *from* the EU and secessionism *within* the EU are different political phenomena despite sharing the common goal of breaking-up from an existing polity. Secessionism *from* is clearly a ‘polity attack’ (Schimmelfenning 2022) for the EU, as it represents a full rejection of the European project. It appears to be primarily a call for the return of nation-state sovereignty and of the classical functions of the state (such as control of national borders) vis-à-vis the complex interdependence of the European polity. The case for secession *from* the EU is not built upon an attack on liberal democratic values, it operates within these values. It is thus inaccurate to present it as an illiberal project, an inaccuracy that stems from conflating democratic discontent with illiberalism. What secessionism *from* the EU does is to problematise the notion of the pooling and sharing of sovereignty with a supra-state entity such as the EU, with its perceived inefficiency, bureaucracy and never-ending political expansion. Insofar as this type of secessionism entails a fundamental questioning of the European project, EU institutions have few tools available to counter it. One possibility would be to engage explicitly in counter-arguing some of its legitimising themes – i.e. offering reassurances or opt-outs with regards to the a ‘federal Europe’, or to tackle the claim that stopping financial contributions to the EU would open up new possibilities for social policy by stressing the benefits of current EU investment and membership. This would require a level of engagement with a debate deemed to be domestic that could be counter-productive for *Remainers*. Moreover, adopting a more resistant position to this kind of secessionism would probably require a rethinking of the EU’s constitutional flexibility regarding withdrawal (article 50). Tackling such ‘polity attack’ institutionally, rather than discursively, would imply more rigidity and a rethinking the whole polity, an endeavour that partially failed in the past with the Treaty establishing a Constitution for Europe (Hobolt and Brouard 2011).

Differently, secessionism *within* the EU calls for a review of the system of EU multi-level governance and a rethinking of the European framework of territorial management. Secessionism *within* the EU shares with

secessionism *from* the EU an emphasis on sovereignty but, crucially, it is invoked in a different way, as the right to external self-determination to become an independent EU member. This frame is mobilised to underpin the demand of a referendum on secession and a plethora of other demands, rather than secession itself. Like the case for secession *from* the EU, the case for secession *within* the EU is also built upon liberal democratic ideas. To these, it adds narratives in which a better future, democratic quality and social justice play a greater role. A new, independent state may be seen as an empty vessel that can be easily filled with desirable political goals. Secessionism *within* Europe accepts (arguably out of necessity) the premise of pooling and sharing sovereignty with a supra-national institution such as the EU but problematises the current European framework of territorial management. By projecting policies into the future, secession *within* adopts a more aspirational and integrative discourse than the seemingly disintegrative move towards recovering aspects of state sovereignty. Insofar as their goal is to have a sit at the decision-making table, rather than to leave the room altogether, EU institutions have in this case an array of tools available to address this type of secessionism. Mobilising these tools could include an ideological rebuilding of the EU integration project (Gulmez and Buhari-Gulmez 2021), admitting potential internal secessions (Requejo and Nagel 2019), and less dramatic measures such as allowing or refining institutional channels to better represent heterogeneous regional interests (Tatham 2008, 2016).

In conclusion, political actors' discourses underpinning secessionisms *from* and *within* the EU have different implications for EU territorial governance despite their shared goal and common appeals to sovereignty and self-determination. Secessionism *from* the EU appears as a state nationalist call for the return of the 'nation-state' (Kallis 2018; Tamir 2019), a true disintegrative 'polity attack'. European institutions may consider revising their anomalous flexibility allowing unilateral secession and/or provide a stronger sense of polity belonging through policies and discourse. Rather differently, secessionism *within* seems to project its discourse at the crossroads between autonomy and interdependence (Tatham *et al.* 2021), independence and globalisation, challenging its belonging to a member state but at the same time reinforcing the idea of interdependence through EU governance.

Notes

1. We place return in brackets to signal that we find the term inaccurate. Nationalism scholars are at pains to stress that nationalism never went away. It remains the modern source of political legitimacy (Greenfeld 1992) and the principle structuring our political order. It is, however, a 'thin' ideolo-

gy that easily goes underground and becomes 'banal' and taken-for-granted when it is not challenged (Billig 1995). What we are witnessing is, rather, a re-emergence of explicit, specific forms of nationalism.

2. This is not to say that all secessionist parties have the same stance around immigration, as the cases of South Tyrol or Flanders clearly show. The focus here is on whether immigration is used to promote secession and in what way.
3. See: 'The Catalan Syndrome'. Available at: <https://www.lemonde.fr/blog/piketty/2017/11/14/the-catalan-syndrom/> (accessed 10 March 2022).
4. Of course, economic grievances may be advanced to support secession by relatively rich regions (or states vis-à-vis the EU) but also by relatively poor regions (or states vis-à-vis the EU), as exemplified by Hechter's work on internal colonialism (1977). The differences between the two are, however, beyond the scope of this article.
5. In fact, Hobolt found an overlapping between losers of globalization (Teney *et al.* 2014) and pro-Leave voters as relatively 'less-educated, poorer and older voters, and those who expressed concerns about immigration and multi-culturalism' (Hobolt 2016). This evidence has not been found among Catalan independence supporters.
6. We followed the FraTer methodology for coding the Brexit documents. This methodology includes the key procedures for: (1) splitting sentences into quasi-sentences to deal with instances where multiple frames or demands exist; (2) applying the right codes; (3) ensuring that all members of the team are on the same page by undertaking intercoder-reliability tests, and intra-coder reliability tests.
7. See: Johnson, Boris (2016) *The Liberal Cosmopolitan Case to Vote Leave*, May 9, London. Accessible at http://www.voteleavetakecontrol.org/boris_johnson_the_liberal_cosmopolitan_case_to_vote_leave.html (accessed 10 March 2022).
8. The document was entitled 'Let Catalans vote' (Ömnium Cultural, 2017).
9. It must be noted that, along with the increased electoral success of the Republican Left, the Catalan political debate has been impregnated with the 'republican' jargon. The FraTerr database does not capture exclusively republican codes, but the Quality frame, capturing references to the democratic quality of the polity contains these discourses in Catalan secessionist actors.
10. Although, recently, since the 2017 events and the state response, some Eurosceptic voices have been articulated around the lack of concern of EU institutions regarding political and civil rights. See for example: <https://blogs.lse.ac.uk/eurocrisispress/2017/11/17/four-graphs-about-catalonia-and-citizens-attitudes-towards-the-eu/> (accessed 10 March 2022).

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Notes on contributors

Marc Sanjaume-Calvet is Assistant Professor of Political Theory at Pompeu Fabra University and Coordinator of the Political Theory Research Group (GRTP). His research focuses on secessionism, self-determination, federalism and democracy. He has published in numerous journals including *Journal of Politics*, *Party Politics*, *Nations and Nationalism* among others. He has edited the book (with Prof. Requejo) *Defensive Federalism: Protecting Territorial Minorities from the 'Tyranny of the Majority'* (2023, Routledge). [marc.sanjaume@upf.edu]

Daniel Cetrà is a Beatriu de Pinós Postdoctoral Researcher at the Institutions and Political Economy Research Group (IPERG) of the University of Barcelona. His research focuses on nationalism, territorial politics and language politics. He has published in numerous journals including the *Journal of Common Market Studies* and *Territory, Politics, Governance*. His books include *Nationalism, Liberalism and Language in Catalonia and Flanders* (2019, Palgrave) and *State and Majority Nationalism in Plurinational States* (2023, Routledge). [dcetra@ub.edu]

Núria Franco-Guillén is a Postdoctoral Researcher at Aberystwyth University. She specialises in territorial politics in general with a focus on political parties and secession movements, immigration politics and deliberative democracy. Her articles have appeared in journals such as *Political Studies*, *Regional and Federal Studies*, *Ethnicities*, or *Journal of Ethnic and Migration Studies*. [nuf@aber.ac.uk]

ORCID

Marc Sanjaume-Calvet  <http://orcid.org/0000-0001-8723-1618>

Daniel Cetrà  <http://orcid.org/0000-0002-2867-5339>

Núria Franco-Guillén  <http://orcid.org/0000-0002-2939-5937>

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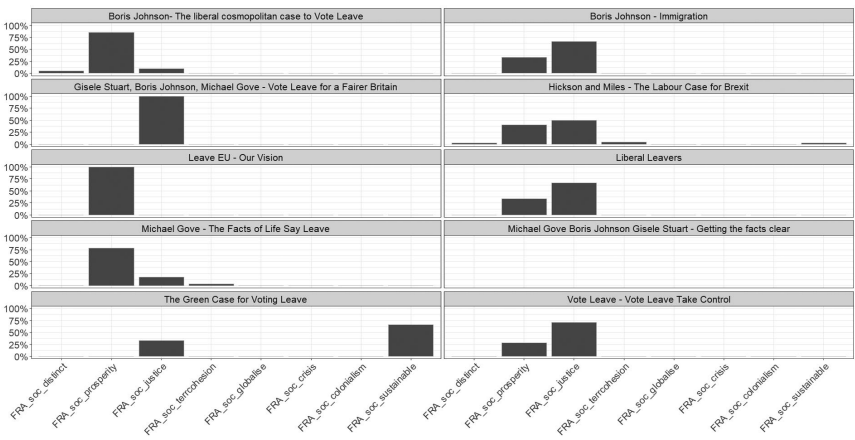
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