

plexity of the matter. Even less so can one affirm that such calls have a nationalistic and anti-European character that endangers the future of the EU. Catalans seem to be rather open on citizenship and committed to further European integration.

The issue is not that modern states cannot encompass more than one nationality but rather that regions are required to abide by the rule of a central state. In many of these cases, the regions may not have been willing members of the state in the first place, and they want to have more autonomy because of their notion of a shared cultural and linguistic identity. This amounts to different preferences in various policy domains.

In essence, it is the EU that provides a common home for all regions and nations, replacing the role of their national states. In this new reality, some states, despite having adopted a modern and constructive view towards the European integration process that involves sharing their sovereignty with other EU member states, seem not to have evolved in the same way with respect to their own regions. This is clearly the case in Spain, which has remained a prisoner of older notions of sovereignty based on the principle of state territorial integrity. Indeed, Spain invoked this very principle in refusing to recognise Kosovo's independence.

The critical role played by member states in the EU goes some way to explain the EU's reluctance to take a position on the situation in Catalonia and other cases, such as Scotland. EU leaders may privately voice concerns about a lack of dialogue and the poor handling of the situation with their Spanish colleagues, but they are constrained by the fact that the EU needs the member states to function and to cooperatively solve common and pressing problems. Fittingly, it was with regard to discouraging secession from the UK and Spain that the European Commission asserted – taking solely into account the position of those states – that a newly independent Scotland or Catalonia would have to re-apply for EU membership, *acquis communautaire* notwithstanding. During the application period, in the case of regions of eurozone countries, access to the ECB would be lost and the euro could only be used unilaterally, as in Kosovo and Montenegro.

The aspirations of individual regions continue to depend to a large degree on their state. European integration, on the other hand, offers some flexibility – differentiated integration – for member states. Furthermore, the EU grants them the right to exit the club, which is not the case for regions with respect to their states, where talk of secession is generally taboo. Indeed, Article 50 is arguably a useful feature of the EU, with very positive consequences for the Union's good functioning, since unhappy members can leave if they no longer wish to contribute to the common good instead of obstructing the process of European integration and the capacity of the EU'S institutions and policies to deliver.

The treaty-based principle of subsidiarity should not stop at the relations between the EU and its member states but ought to apply equally to the distribution of competences between states and their regions. Regions do play a role in EU multilevel governance, exercised notably through the Committee of the Regions, where they may address EU subsidiarity issues. However, this only applies to the institutions of the Union and not to member states. Member states need to heed the principles of fiscal federalism and confront any trade-offs implied by this theory as part and parcel of their commitment to European integration. They ought to enter into dialogue with their regions to find the best ways to apply subsidiarity principles with regard to sub-state actors, be it through more autonomy or, as in the case of Scotland, independence referenda. This requires a more open approach to the interpretation of the EU's motto "unity in diversity" and to addressing the subsidiarity gap at the member state level. It is no doubt a challenging task but one that needs to be tackled within the framework of European integration.

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