

# Which State for Which Sovereignty?

## *Qual estado para qual soberania?*

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### Abstract

This paper analyses the question of what sovereignty refers to in contemporary world. Starting from Robert Keohane's article entitled "*Ironies of Sovereignty: the European Union and the United States*", this paper investigates the evolutions and characteristics of sovereignty in the EU and the USA through the contribution of Norberto Bobbio's typology, and how sovereignty can be affected by the different conceptions on the State. This leads to evaluate the convergence between the European Union and the United States on the conception of sovereignty. Based on such comparison, this article raises the hypothesis of a "multilevel sovereignty" of States facing growing common pressures from the international system.

**Key words:** Multilevel sovereignty, state, European Union, United States

### Resumo

Este trabalho analisa a questão sobre o que se entende por soberania no mundo contemporâneo. Partindo do artigo de Robert Keohane intitulado "*Ironies of Sovereignty: the European Union and the United States*", este trabalho investiga a evolução e características da soberania na UE e nos EUA a partir da contribuição da tipologia de Norberto Bobbio, e como a soberania pode ser afetada pelas diferentes concepções de Estado. Isto nos leva a avaliar a convergência entre as concepções de União Europeia e Estados Unidos acerca da soberania. Baseada nesta comparação, este artigo levanta a hipótese de uma "soberania multi-nível" dos Estados que enfrentam uma crescente de pressões comuns do sistema internacional.

**Palavras-chave:** Soberania multinível, Estado, União Europeia, Estados Unidos.

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## 1 Introduction

In contemporary international relations, the issue of sovereignty is one of the most debated. Very often it is raised in terms of erosion (Trimble, 1997; Taylor, 2015) or end of sovereignty (Camilleri and Falk, 1992). Such a debate seems to be going on for years without any clear cut final answer. This is especially so as today's world is characterized by a growing complexity, among others with Rosenau's observation of the proliferation of spheres of authority (Rosenau, 2009). However some observers try to enlarge the debate. In his article entitled "*Ironies of Sovereignty: the European Union and the United States*", Robert Keohane observes how the United States and European Union's approaches to sovereignty have evolved differently (Keohane, 2002). The author highlights the strengthening of the American attitude in respect of sovereignty, while the European States, by contrast, move towards relaxing the concept. This article revives the debate surrounding the relevance of sovereignty in international relations. In the context of an interdependent world and of globalization, three aspects of sovereignty can be observed on the basis of Keohane's reflections:

- contrary to the position held in particular by Bertrand Badie (Badie, 1999) asserting that sovereignty has come to an end, in reality it remains important internationally;
- sovereignty is evolving;
- it has multiple manifestations: Keohane highlights three types of sovereignty: external, unitary and "pooled" (shared).

This logically leads us to ask what sovereignty refers to today.

While the debate in respect of sovereignty in international relations is often couched in terms of "more" or "less", Keohane focuses upon the formal (legal) dimension of sovereignty. In his opinion, sovereignty cannot be considered a fiction in any circumstances. The problem posed by Keohane's positions on the one hand and by those of Badie on the other resides in the fact that they are not operating on the same plane: while Keohane anchors his observation upon the formalities of sovereignty, Badie concentrates upon the reality of the fact of sovereignty and its political consequences. Keohane, however, means to maintain a distance from the issue of "more" or "less" as regards sovereignty. However, it is possible to move slightly outside this debate by postulating that the developing dimension of sovereignty should not only refer to its relaxation or strengthening. Its evolution can also be synonymous with transformation, as the shared or pooled sovereignty hypothesis suggests. If, to take up James Rosenau's observation, Keohane and Badie's points of view are, beyond the intellectual differences bound to the two commentators' temperaments, two ways of observing the same, multi-faceted reality, i.e. the legal dimension and factual dimension, we can advance a hypothesis for connecting the two aspects, after a fashion, by considering them to be the two sides of the same coin.

To that end, is it not appropriate to consider the legal dimension of sovereignty as the product of political decisions or relationships arising from negotiations and/or wars? Sovereignty is therefore a formalized social construct (Biesteker and Weber, 1996) whose reality is dependent upon being accepted by political actors (both internally and externally),

whether they are the political decision-makers or members of the relevant political community often referred to using the generic term “nation”. That construct meets the three conditions for sovereignty discussed by Stephen Krasner: autonomy, control and recognition (Krasner, 2001). Sovereignty is, in fact, the expression of the actors’ will to adopt rules of behavior for an organized and peaceful society; a means of departing or protecting themselves from the “bellum omnium contra omnes”. Without denying the formal dimension, the reality of which is still relevant today, sovereignty can therefore be assessed on the basis of its consequences, just as it is possible to assess the processes involved in the development of law and political, economic or social factors influencing its emergence, but also the results arising from it in reality. So, if nothing in international public law allows the formal character of a State’s sovereignty to be called into question, the factual dimension of its operation can be subject to debate. For example: to what extent is a small State, which clearly has legal sovereignty, in a position to exercise the full extent of that sovereignty while subject to significant external restrictions of various kinds (economic, financial, political, security-related...). Since the end of the 90’s, can the Republic of Serbia credibly assert that it does in fact fully exercise its sovereignty while UN forces are still stationed in Kosovo and while Kosovo is recognized as an independent State by no less than 111 States in the world?

The hypothesis that formal sovereignty is considered as the product of a political process allows the role of political decision-makers to be included in reflections on this topic, particularly as regards their notions of the State. The relevant question then is to what extent do the political decision-makers’ notions of the State on either side of the Atlantic (if we adopt Keohane’s approach to the question) influence their approach to sovereignty? And if we expand upon that reflection, to what extent do the differences in the approaches to sovereignty observed between the USA and Europe lead to evolution towards (and are we not already seeing) a certain convergence of the two in the future? And if that is the case what features allow us to draw the outline for a common model for sovereignty? In order to investigate this hypothesis, we will first call upon Norberto Bobbio’s typology relating to notions of the State (Bobbio, 2001). The US and EU approaches will be compared on that basis. We can then tackle the question of the likely convergence of the two analyzed entities’ approaches to sovereignty. The preceding two steps will allow us to determine the features of a common model for sovereignty.

## 2 The contribution of Norberto Bobbio’s typology

In his work “*L’État et la Démocratie Internationale*” (The State and International Democracy), Bobbio discusses two approaches to the State: one positive, the other negative. Proponents of the positive approach view the State in the context of all the advantages it can bring to the development of individuals and the community. If, by their logic, this approach comprises an aspiration to expand State institutions, and even, in an extreme utopian hypothesis, the materialization of a universal State, then this aspiration might present two different implications for State actors as regards sovereignty. On the one hand,

the confirmation of the importance of the State's role might mean that it is more important than all the external influences being exercised upon the State (e.g.: interdependence, growing importance of international rules,...) so not challenging but rather strengthening sovereignty. Looked at this way it is an instrument or condition which should allow the State to fulfil its functions (relating to social and economic cohesion and security) in the way which is most advantageous to the development of individuals and the community. This leads to a situation where the center of gravity for international relations remains with the State, thereby limiting the likelihood of the other possible implication of the positive approach. In this second implication, the development of human abilities requires the State dimension to be progressively exceeded, with the supra or inter-State level proving to be more relevant for this purpose. The State must therefore reconsider its sovereignty from a more limited point of view or from the perspective of pooling in order to favor the deployment of supra-State or international projects.

The negative notion of the State can itself be subdivided into two branches of opinion, one "weak" according to which the State is a "necessary evil", and the other "strong", seeing the State as an "unnecessary evil". The "unnecessary evil" hypothesis in relation to the State can be seen in the criticism of failures, deficiencies and dysfunction on the part of public figures: a crisis of confidence as regards national or supranational public institutions, a reaction to bureaucratic or technocratic influences lacking in transparency and evading democratic control, etc.. This hypothesis might prefigure the end of all State institutions and foresee the advent of an anarchical society. Currently this appears to be the least plausible eventuality. The numerous critics making themselves heard when various crises occur which affect the State, reveal aspirations relating to the revitalization of public figures and more efficient governance, this aspiration also being seen from the perspective of a State with reduced functions but most of all functions which are more efficiently fulfilled. These critics do not suggest at all that the State should disappear.

The "necessary evil" State alternative provides a pessimistic notion of the State operator whose reason for being resides in the necessity to preserve an order in the community, within which wickedness and arbitrariness would otherwise reign. The idea behind it is that "the State is better than anarchy" (Bobbio, 2001, 264). It implies that the State should be as small as possible. Following the example of the positive approach to the State, this idea can lead to two attitudes as regards sovereignty: one considers that sovereignty constitutes a minimum, inevitable basis which should allow the State to work against or avoid anarchy<sup>1</sup>, the other, which poses no particular opposition to the first, considers that, faced with growing external constraints acting upon the State, it is important that, from an efficiency perspective, sovereignty can be the subject of certain pooling so far as that does not challenge the minimum size which the State, or any substitute or partial alternative (EU, UN, WTO,...) must maintain<sup>2</sup>.

1 In this case, sovereignty cannot be invoked by the State in order to extend its field of intervention.

2 We should highlight that amongst these models there lies a series of variations which are more similar to one or another of the models as appropriate. Additionally, there is nothing to exclude the development of the notion of a political community or of political decision makers from one model to another over the course of history.

### 3 What are the United States' and European Union's notions of the State?

We can demonstrate the difference between the United States and the European Union by applying Bobbio's typology. In the United States, the notion of the State which has emerged is the weak negative approach: the State is considered a necessary evil. This emergence can be explained by historical reasons. The founders of the American republic were motivated by the desire to make a break from the intolerance and absolutism of European power. It is therefore a minimal State which intervenes as little as possible in citizens' lives, but whose sovereignty is strengthened in order to protect or defend the American model and American interests as regards security threats and certain negative effects of globalization. From this perspective, American sovereignty can be seen as essentially defensive.

European relationships with sovereignty are more complex, not only as a result of a different historical evolution over the last two centuries, but also because two approaches to the State coexist within the EU: the positive approach (with its two possible branches) and the weak negative approach. But these two approaches are combined around the dominant reference model in Europe: the changing welfare state. The European approach to sovereignty is therefore simultaneously defensive (seen as a means of protection against external threats) and open (due to a certain amount of advantageous pooling: for example, that is the logic behind the ECSC).

We can therefore ask how the differences between the two sides of the Atlantic in relation to sovereignty can be explained, when, as Mark Gilbert highlights (Gilbert, 2004), Americans and Europeans have a large, joint foundation, both as regards politics (democracy) and economics (market economy), etc.. In addition to the historical evolution discussed in Keohane's article, two other considerations can be advanced which are linked to ideas of power and sovereignty. At this stage of reflection it is important to approach this question on two levels: the first calling upon the concept of power and international relations theories, the second returning to the idea of the elites and their relationship with sovereignty. Analyzed from these two perspectives, the United States are constituting a power which became classical in the "realist" sense of international relations theories (Dougherty and Pfaltzgraff, 1990; Telò, 2008). This evolution implies a strengthening of American sovereignty. However, this is a grey area. It is indeed possible to see a certain duality within the United States. The United States is considered by many analysts as having an "imperialist" policy in relation to other countries (Boniface, 2003) in accordance with the White House's dual motivations: on the one hand, there are reasons which fall within "realist" ideas relating to international relations, defense and national interests, and, on the other hand, a very "constructivist" (Dougherty and Pfaltzgraff, 1999) approach to international relationships, in this instance by exporting democracy across the world. Yet, internally, the United States is a very lively democracy. However, due in particular to the 11 September 2001 attacks, we should highlight a hardening in the area of sovereignty, in its external and internal dimensions, in the sense of a strengthening of unitary sovereignty.

For its part, the European Union is motivated by the will, on the basis of historical reasons, to move away from the concept of classical power and therefore lends itself less to the "realist"

school. However, different nuances and even approaches lie behind this apparent consensus. Grosso modo it is possible to identify two categories of State: a) the former dominant classical powers (e.g. France, England...) which, in their external sovereignty dealings demonstrate that they still have an attachment to protecting certain attributes of sovereignty as much as possible; b) certain small powers which, like Belgium, are more open to the pooling of attributes of sovereignty. There is no avoiding the fact that, despite these differences, more evidence for Keohane's hypothesis that sovereignty is changing due to pooling is emerging. However, behind this common sovereignty model, we can observe the different political agendas within the EU (for example the different approaches of Eurosceptics and Europhiles). This pooling of sovereignty is also accompanied by an aspiration on the part of the EU to embody an essentially peaceful "civil power" (Hoffmann, 1999; Sjursen, 2006).

This brief comparison allows us to highlight a certain convergence in the ideas or attitudes in the United States and the former dominant European powers. This convergence demonstrates an aspect of the contemporary reality of sovereignty: the USA, as the new classical power, and the former "classical" European powers (with the exception of Germany for historical reasons) aspire to entire or partial unitary sovereignty more than others. This suggests that a link could be established on the one hand between the "realist" international relations theories which postulate the hierarchy of powers and, on the other hand, each power's attitude in the hierarchy as regards sovereignty. In summary, this observation can be expressed as follows: can be sovereign whoever holds the means of power. In other words, sovereignty is linked to the "ability to remain sovereign" in spite of external constraints. This is what Stephen Krasner emphasizes by citing autonomy as a constitutive element of sovereignty. But the United States differs from the European Union here too. Nowadays the USA has many more means of exercising its sovereignty (both relating to the economy and to security) and can therefore, in terms of an "informal" recognition of Krasner's criteria, claim it with more credibility than European States.

Aside from that difference, there is common ground between the USA and Europe. Today, no State can claim watertight sovereignty particularly due to the growing porosity of state borders (Badie, 1995). Additionally, State operators cannot claim absolute sovereignty in the face of many different issues (economics, security, environment,...) which they are no longer in a position to tackle alone. For eg, George W Bush certainly championed very sovereignist policies, including using alliances on a case by case basis and favoring bilateral links as part of his foreign policy. But this approach met certain limitations in the form of NATO and WTO rules, for example. The Bush administration considered multilateralism as something to be avoided so far as possible in as much as it appears to exercise greater constraints over American sovereignty. In this perspective, he remained basically in line with many US presidents during those last decades. For its part, the EU takes a much more multilateral approach, even if certain differences falling into the categories discussed earlier persist in relation to sovereignty. Certain States, which are former classical powers, remain anxious to preserve an independent foreign policy. However, it remains the fact, both for the USA and the EU Member States, that de facto or de jure multilateral agreements frame the States' sovereignty. The "regime" which is

characteristic of international reality, emphasized by Stephen Krasner<sup>3</sup>, (a collection of rules and formal or informal norms) is a reality which affects the sovereignty of all States.

#### 4 Is there a convergence between the United States and the European Union?

Even though, as Keohane emphasizes, sovereignty has evolved differently in the USA and Europe, to what extent, despite the differences we have previously discussed, are we not witnessing a movement over the long-term towards a single model for sovereignty in an increasingly interdependent world influenced by globalization? Such a hypothesis is a priori supported by two factors, namely the history of the USA and Europe on one hand, and analyses of contemporary international realities on the other. On reading Robert Keohane's article, we cannot but ask to what extent, from an historical point of view, has the United States of today reached a state of (unitary) sovereignty which has already been passed by the European States, and which might be followed by other evolutionary stages? The American Civil War in the 19th century contributed to the republic's passage from external to unitary sovereignty. We can see the same impact caused by wars through history in European States such as France, Spain and Germany.

Furthermore, in the modern world, international relations are already influenced by a shared political framework: the State and sovereignty. Nevertheless, despite the differences between the American approach (unitary sovereignty) and the European approach (pooled sovereignty) which we have highlighted above, to what extent are these differences so far apart in reality? The similarities already highlighted between the two sides of the Atlantic contribute to bringing these perspectives closer together. Even in the United States sovereignty is not absolute; it has never been so. Just as in the EU, sovereignty in the USA is subject to increasing limitations, particularly as regards autonomy (cfr Krasner). In both economic and security matters, whether they be classical issues such as threats posed by States to one another, or more recent issues such as international terrorism, the USA cannot tackle such challenges alone. Finally, just as is the case within the EU, the USA exhibits a strong resistance to anything which might detract from sovereignty in two particular areas: foreign policy and justice.

#### 5 Towards a return to a joint sovereignty model? On what basis?

What picture do these observations of the United States and Europe paint for us of the modern reality of sovereignty? The analyses converge upon the growing pressure exerted by the international system upon States: economic globalization and security issues, interdependence, etc. Such pressures constitute constraints upon States which must face a crisis of transformation (McCarthy and Jones, 1995; Bordoni, 2013). State actors themselves

<sup>3</sup> The «regime» is defined by Stephen Krasner as «principles, norms, rules, and decision-making procedures around which actor expectations converge in a given issue-area» (Krasner, 1995, 1).

conclude by explicitly acknowledging the increasingly restrictive nature of the international framework. This is particularly evident in economic matters when, in the UN's September 2005 "World Summit Outcome Document", the signatories highlight in particular: *"That the increasing interdependence of national economies in a globalizing world and the emergence of rule-based regimes for international economic relations have meant that the space for national economic policy, that is, the scope for domestic policies, especially in the areas of trade, investment and industrial development, is now often framed by international disciplines, commitments and global market considerations."* (Nations Unies, 2005) Nevertheless, despite this joint framework, we have already emphasized how much certain States could claim unitary sovereignty more credibly than others, but subject to one main condition: being sufficiently powerful. As a consequence this implies that the modern world, characterized by a hierarchy of power, from a "realist" perspective, is also a world characterized by different degrees of State sovereignty (both informal and formal), with certain States asserting themselves as more sovereign than others. During those last two years, Iraq or Syria do not enjoy the same degree of sovereignty as the United States.

In this context, what would a hypothetical sole model for sovereignty look like? It is important straight away to consider this hypothesis more as an analytical ideal, rather than a reality.

- a) The main characteristic of this model resides in the political regime highlighted in the international system. The modern political world is marked by references to democracy. A State is more easily accepted or recognized as sovereign if it claims to be democratic. Democracy is adopted or desired or presented as an example to be followed. In its wider sense, democracy is linked to an open society and to the principle of accountability.
- b) In the same vein, the modern international agenda is not only constituted of power struggles. It also deals with values and challenges: human rights, the principle of equal treatment for men and women,... which are advanced as norms to be followed by all State actors.
- c) Sovereignty is and will remain influenced, or constricted even, by the impact of the market economy which, since the end of the cold war, has been established in all States. This type of economy appears to be a double-edged sword for the modern State. The expansion of the market economy on a global scale makes the international community more integrated and prosperous. Yet, at the same time, it contributes to the crises of States overtaken by economic movements whose scale exceeds their control, and therefore their sovereignty. In this regard, the market economy appears to maintain an ambivalent relationship with sovereignty. On the one hand the free market, being free competition which requires the abolition of borders and constraints of all kinds thereby contributing to a Hobbesian logic relating to the fight between competing economic rivals to survive, is dominant. By calling for the abolition of borders and the development of market freedom, economic actors create an anarchical international system, in the Hobbesian sense of the term, which is in principal contrary to sovereignty. On the other hand, as Peter Evans emphasizes (Evans, 1992), economic



actors such as multinational companies need States capable in particular of offering bodies to whom they can make legal appeals in the event of disputes. From this perspective, sovereignty remains necessary. The balance will oscillate towards or away from sovereignty depending upon the prevailing economic concepts.

- d) Sovereignty is also called into question by joint international or even global issues: security, energy, environment, water, etc. Just as has been set out above in relation to economic matters, such issues constitute challenges which are beyond any isolated State's capacities for intervention or control.
- e) The debate on sovereignty is strongly influenced by the phenomenon of globalization. In this respect, we should highlight how much the process of globalizations and multiple fragmentations exist concurrently in the international system. These two movements can be linked<sup>4</sup>. Expressed simply, there are three types of relationship between globalization and fragmentation, each entailing a particular attitude to sovereignty:
- Globalization can create fragmentations which rival globalization by way of reaction to the same. These defensive fragmentations can provoke two different attitudes towards sovereignty: either that globalization, as a result of opposition (as in the case of a nationalist reflex), generates a call for a return to unitary sovereignty in a search for a new balance between the local and the global; or it encourages movement towards pooled sovereignty (as in the case of external commercial constraints stimulating European integration).
  - Other fragmentations can be linked to globalization (e.g.: regional economic groupings such as the ASEAN and NAFTA, which subscribe to the idea of free movement of goods and economic integration). Here again there are two possible consequences for sovereignty: either, as has been set out above, a call for more sovereignty or support for shared sovereignty.
  - Finally, certain fragmentations can simultaneously defend against and be allied to globalization. The preservation of specific regional interests (e.g. the European Union's common agricultural policy) does not constitute a challenge to the principle of globalization which is otherwise wished for. In such a case, the actors' attitude will fluctuate between the three types of sovereignty according to the circumstances.
- f) Despite or thanks to the fragmentations in accordance with the type of relations they have with globalization, modern issues which have increased in size require responses from ever larger and/or more powerful policy units, whether they be States (USA, Russia, China, India,...) attached to unitary sovereignty, or regional groups (EU) practicing joint sovereignty, coming into existence in those States as a means of compensating for the loss of ability to claim unitary sovereignty credibly. This idea can be expressed by the formula: "the bigger, the more sovereign".

<sup>4</sup> The concurrence of the globalisation and fragmentation phenomena is highlighted by James Rosenau in particular, who uses the term "fragmentation" when he observes the integration and division movements within the modern international system (Rosenau, 1999).

## 6 Conclusions

The preceding observations on the features of contemporary sovereignty provide us with a contrasting image. Certain features (democratic regime, values, shared global challenges) appear to lead to a sole sovereignty model. Conversely others, in particular the market economy, are loaded with contradictory leanings. No doubt sovereignty is now subject to more adverse pressure than in the past, making research into a coherent vision more difficult. The question of sovereignty is made more complex by the different degrees of sovereignty held by States in the world, which are the products of historical evolution, modern circumstances and the people responsible for policies' own ideas. However convergences and divergences in sovereignty contribute to its transformation, from external to unitary sovereignty for some, from unitary to pooled sovereignty for others. This movement of transformation constitutes a characteristic idea of sovereignty in as much as it is an evolving social construct by nature.

By accepting that sovereignty is a social construct, this contribution allows us to discuss the relationships which can exist between the idea of the State and sovereignty, as well as the impact exerted upon sovereignty by external constraints. The evolution of sovereignty therefore appears as that resulting in particular from the idea of the State, its power and the way its policy directors react to external constraints. However, it is not possible at this stage to evaluate whether one of these elements has dominion over the others. Doubtless we will observe different chemistry at work in different cases, each being particular to the outcome of the interactions between its three elements to which intra-State factors must be added. The difficulty in understanding the substance of sovereignty in all its complexity which is the result of numerous factors is demonstrated by Biersteker and Weber when they observe that:

*The modern state system is not based on some timeless principle of sovereignty, but on the production of a normative conception that links authority, territory, population (society, nation), and recognition in a unique way and in a particular place (the state). Attempting to realize this ideal entails a great deal of hard work on the part of statespersons, diplomats, and intellectuals: to establish and police practices consistent with the ideal, its components, and the links between them; to delegitimize and quash challenges or threats; and to paper over persistent anomalies to make them appear to be consistent with the ideal or temporary divergences from the diachronic trajectory toward a pristine Westphalian ideal. The ideal of state sovereignty is a product of the actions of powerful agents and the resistance to those actions by those located at the margins of power. (Biersteker and Weber, 1996, 3).*

All of the foregoing leads us to think that, in a context where, on the one hand, even for the most powerful States such as the USA or China, there is no such thing as absolute sovereignty. On the other hand, in a globalization and fragmentation context, on one side and a context of crisis of the State on the other, it is possible to advance the following hypothesis: to what extent, simultaneously taking into account evolutions from history and the modern world, in particular the growing pressure of the international system, are we seeing the rise of a type of sovereignty distributed across multiple power levels: local, regional intra-State, national, supra-State, a "multilevel sovereignty", which is possibly uniform but more likely multifaceted?

The gradual emergence of a type of sovereignty distributed across multiple levels contributes, furthermore, to assisting the State in resolving the crisis it is experiencing. Indeed there are many States which, under the constraint of external and internal pressures, are looking to end their crisis by redistributing State competencies between different levels of power. A possible alternative to the multilevel sovereignty hypothesis might be to consider the movement which can be seen in Europe of passage from unitary sovereignty towards pooled sovereignty as representing the likely evolution of other sovereignties which are still unitary, a step which Europe has made in advance of the rest of the world, as it were. In particular this raises the issue of the link between sovereignty and governance which would merit study elsewhere.

Observations resulting from a comparison between the European and American positions cause the following question to reappear: whether States are large or small, is it possible to avoid convergence towards a single or shared model? In any event, under the current circumstances, the United States (and other significant powers) can doubtless claim unitary sovereignty for longer and more credibly than other States, but this is subject to increasing restrictions and cannot go on indefinitely.

Finally, two points must be emphasized. First of all, arguments against the emergence of a sole sovereignty model distributed across multiple levels remain to be assessed. It is important, for example, to acknowledge that there are, today and will be in the future, geopolitical conflicts of interest which are likely to cause defensive retreats to unitary sovereignty, or to ask what the impact of the identity challenges which a priori contribute further to the strengthening of unitary sovereignty will be. Also, in the same vein, this comparison of this paper principally concerned two democratic groups. It therefore does not make predictions concerning the relationships to be assessed between other political regimes (authoritarian, totalitarian) and sovereignty.

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