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EUROPE'S WORLD

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and the Anti-Liberal Challenge

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and Laura Landorff

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Beyond the Paradigm of Unity: Embedded Minilateralism in European Foreign Policy

Gjovalin Macaj

Introduction

It is not at all obvious that what the member states of the European Union (EU) do collectively in the realm of foreign policy is more important than what they do separately, in groupings or alone. Yet what has attracted most attention in academic and policy circles over the last three decades is common European foreign policy, or EU foreign policy for short, eclipsing this way our understanding of both what member states do in concert, and what they do independently. Beyond exaggerating the significance of EU foreign policy, we may this way have misread the autonomy of member states to work together ad hoc, among themselves or with third states, and pursue their foreign policy goals outside EU foreign policy. Given how crucial foreign policy is for enacting sovereign statehood, it is strange not to consider the full spectrum of options that member states possess in the realm of foreign policy, whether one is interested in understanding collective or individual foreign policy of member states, or both.

This chapter seeks to address this anomaly by theorizing European foreign policy beyond the EU. It develops a new perspective to think about foreign policy options, within and outside EU foreign policy, to allow for a systematic assessment of their use and relative weight. It explores ad hoc cooperation, or minilateralism, to illustrate foreign policy action beyond EU foreign policy and the paradigm of unity that underpins it. The chapter conceives of minilateralism as a function of rival visions about foreign policy ends and uneven possession of means to attain them. Minilateralism emerges as a structural choice that persists irrespective of the forms it takes in time

and space or the intensity with which it is used, but one that is embedded in manifold layers of cooperation and the institutionalized framework that underpins EU foreign policy. More specifically, European minilateralism takes the form of what can be called ‘embedded minilateralism’, defined as ad hoc cooperation among three or more member states with relevant means to solve an urgent and contentious geopolitical cooperation problem, with variable involvement of EU foreign policy. It is an outside option that puts in high relief the ability of member states to acknowledge, accommodate, and leverage difference by developing dynamic and agile responses to high-politics cooperation problems, irrespective of EU foreign policy; the latter is only one option, and possibly not the most relevant one. Embedded minilateralism is one indication of how much we have exaggerated the tendency of member states to be consumed by internal concerns rather than responding to external circumstances, and underestimated the use of outside options, especially when dealing with pressing problems of high politics (see [Chapter 1](#) in this volume).

The chapter is organized into five parts. It begins with a brief critique of the paradigm of unity and an outline of the main foreign policy options that member states use in addition to or beyond EU foreign policy. It then explores one of these outside options, embedded minilateralism, which is viewed as distinct but not separate from unilateralism, bilateralism, and multilateralism, and illustrated with examples of member states trying to cope with European, regional, and global high-stakes cooperation problems. The chapter concludes with an assessment of the use of this outside option in relation to the paradigm of unity and foreign policy in general.

Individual and collective European foreign policy

All member states have separate and distinct foreign policies. The foreign policies of the largest member states have shaped world politics for centuries, yet for all of them, large and small, foreign policy is an existential statement of state sovereignty. This fact alone makes their decision to coordinate their individual foreign policies, initially through the framework of European Political Cooperation in the early 1970s and then in the framework of Common Foreign and Security Policy since 1993, remarkable, even if it remains an essentially intergovernmental affair ([Bickerton et al, 2015](#)). The legal obligation to coordinate their individual action, as enshrined in a series of treaty reforms, and most notably, the creation of the position of the High Representative for Common Foreign and Security Policy in the Amsterdam Treaty of 1999 and the European External Action Service in the Lisbon Treaty of 2009, represent a considerable move towards institutionalized cooperation in a highly sensitive domain. Intensifying coordination has over time produced a growing volume of common positions in most areas, something that is especially visible in the cohesion of voting behaviour in

multilateral fora such as the United Nations (UN) General Assembly (Jin and Hosli, 2013; Burmester and Jankowski, 2014; Blavoukos et al, 2016; Gunes and Ozkaleli, 2023). Indeed, the aim of manifold political and legal measures has been to foster ever-greater unity and ensure that member states ideally speak with one voice in all foreign policy matters, even where their interests diverge significantly (Moschella and Quaglia, 2016).

Yet, unified action is just one avenue that member states have pursued to advance their interests, but not the only, or the main one. Large and small member states inherit centuries-old bilateral ties and special relations with other nations across the globe and continue to engage in different forms of cooperation with third states. It is therefore strange that the study of the foreign policy of member states has prioritized their collective action, divorced from national action, with a few notable exceptions (Larsen, 2009; Hadfield et al, 2017; Burmester and Jankowski, 2018; Bulmer and Lequesne, 2020; Blavoukos and Galarionis, 2024). Member states are typically relegated to the role of 'actors' in EU foreign policy, though they remain obstinate and adamant about preserving its intergovernmental character in the face of supranational pressures, eclipsing the significance of action adjacent to or outside of the common framework (Jørgensen et al, 2015). Even when a more open-ended approach is applied to explore the co-existence of national and EU foreign policies, it is still done through the prism of Europeanization (Wong and Hill, 2011), underscoring once more the power of the unrivalled mantra of unity.

The collectivist spirit in academic and policy debates is so dominant that EU foreign policy is presented as synonymous with the most significant actions of member states in the realm of foreign policy. De facto, EU foreign policy is seen as the ontology of European foreign policy, which encompasses all external actions of member states, in their individual and collective capacities. This is a pathology that mistakes the ideological discourse of EU officialdom about the aspirations of EU foreign policy for its empirical reality. It leads to the mischaracterization of the conduct and weight of European foreign policy by mistaking a part for the whole, the joint action of member states for their collective weight (Macaj, 2014: 23–4). The preponderance of EU foreign policy is particularly startling given that it still remains one of the most anemic of EU's policies (Gordon, 1997). The truth is that member states have preserved and used all foreign policy options – from unilateralism and bilateralism to minilateralism and multilateralism – prior to EU foreign policy, and during its development and operation. And if its evolution serves as a guide, it is far more likely that national foreign policy outlasts EU foreign policy than the latter subsumes, let alone replaces, the former. Decades of coordination have not diminished sovereign authority or harmonized core national interests of member states as expressed in separate positions and policies (Burmester and Jankowski, 2018: 669; Blavoukos and

[Galariotis, 2024](#)). That is why it is necessary to consider the full spectrum of foreign policy action by member states, when they act in concert but also, and most importantly, when they pursue alternative paths with fellow member states and third states, to approximate the significance of EU foreign policy and alternatives to it.

The paradigm of unity

The EU is a Union that evidently would not exist without unity among its constituent members. Unity is both a practical method to enhance cooperation and integration among member states, and an aspiration of what Europe ought to be – something that has captured the imagination of European writers, thinkers, and leaders for centuries. Unity is reflected in the existence of all things common in the EU, from common laws and practices, to institutions, their joint actions and shared outcomes. It embodies a basic notion of a European common good. It is therefore not surprising that the EU official discourse, as well as political and legal practices, constantly propagate the value of an ever-closer Union, of the vital need for EU to act in concert to uphold their values and interests in Europe and the world.

The benefits of unity appear only obvious when one considers the value of a uniform body of European law that applies equally in all member states, or the value of a trade policy that rivals that of the US or China, only because member states have amalgamated their separate policies into one policy ([Meunier and Nicolaidis, 2006, 2019](#)). If one assumes that EU trade policy has enabled member states to attain more benefits than they would have by preserving their national trade policies – an assumption that must be interrogated given that the EU has dropped from being the first to a distant third largest economy, behind China and the US – it is not unreasonable for EU actors to want to extend the same logic to other domains, such as foreign policy. By extrapolation, member states would be much better off if they acted in concert rather than going their separate paths to cope with their powerful competitors or adversaries such as the US, China or Russia. The quest for unity translates in relentless process to produce common positions at all cost, no matter how divergent the views of member states are, or how well they respond to the external environment, even if it consumes all resources required for meaningful external action. As the foundational paradigm of the Union, unity becomes an end in itself in foreign policy, providing an instant and tangible measure of gratification, irrespective of whether joint action is what is required to attain shared aims externally.

The lure of unity is so irresistible that it tends to produce a foreign policy that serves the latent function of fortifying European integration rather than

attaining its manifest aims externally. What counts as success or failure comes to be judged not by external standards but by internal, often intangible, ones (Keukeleire, 2003: 34; Keukeleire and MacNaughtan, 2008: 13; Majone, 2009; Bickerton, 2011). For the most ardent unifiers, the US serves as a constant reminder of what a truly unified EU with a single foreign policy would look like in practice. It is the same paradigm of unity that has informed efforts by the EU to enhance regional and global integration, including among international organizations such as the UN and NATO, purporting to act as an 'integrative power' (Koops, 2011).

Yet, the intensity with which unity is pursued might betray a secret awareness of deep and manifold divisions among member states, but also EU institutions, that would endanger the whole European project, if left unattended and not moulded to foster ever-closer cooperation, if not always ever-closer integration. The insatiable craving for unity may be more a sign of existential anxiety than confidence on its magical powers, especially when external forces may exploit divisions and play member states against one another. At first sight, unity appears as an effective strategy in countering 'divide and conquer' tactics because it ensures a common external front, but it is the urge for unity that makes the Union vulnerable to external manipulation of any of its members. The influence of the US in the EU through the United Kingdom and other Atlanticists, or the manipulation of Hungary by Russia or China come to mind. Yet it is the very commitment to unity that makes 'Trojan Horses' effective in EU foreign policy, as the requirement of unanimity to achieve unity renders the defection of a single member state sufficient to bring the whole of the EU to a halt, thus preventing other members from acting at all. The cracks in the paradigm of unity are plain to see when unity is needed most, in instances in which divergences among member states persist. Here, efforts to forge common positions produce either inaction, thus forcing the EU to abstain in relevant issues, or divided action, where member states split in two, three, or more positions, in an uncoordinated fashion. In neither case is the value of unity self-evident. What is more, the growing volatility, uncertainty and differentiation of the global arena put into question the adequacy of the EU's reliance on just one default strategy in all areas and contexts.

It is therefore not surprising that the lure of unity is tempered by powerful countervailing forces, reflecting radical diversity and dispersion of power among member states, not least in foreign policy. The dialectic of unity and diversity plays across the EU and has given rise to two alternative principles to manage it: harmonization and mutual recognition. While harmonization entails the uniformization of rules, standards, and practices, mutual recognition acknowledges differences, as found in national laws, institutions, and political cultures, by granting them equivalence (Nicolaidis, 2007). Harmonization is a vertical, centralizing process that requires surrendering

sovereign authority, while mutual recognition is a horizontal, decentralizing process of toleration of difference that embodies sovereign authority. The urge for unity in foreign policy, no matter how intense, cannot harmonize differences that are expressions of sovereignty, let alone override them – not until a new sovereignty is invented. At most, it serves to foster the trust that is needed for member states to operate in a realm of mutual recognition, where they retain their sovereign prerogative to choose between EU foreign policy or separate action. The vaunted ‘coordination reflex’ among member states and their multiple bonds of loyalty do not alter the basic fact that foreign policy remains essentially a realm of arbitrariness—probably the purest expression of state sovereignty.

The unwieldy and resource-intensive process of pursuing unity, sometimes only to fail to reach it, makes the search for alternatives necessary. This makes formal, institutionalized cooperation in EU foreign policy just one of the means that member states can choose from to pursue their ends. Given that diversity and resulting disunity are here to stay and cannot be defined or coordinated away, different outward positions are inevitable, deviating from the unity paradigm. Yet that need not be a problem, if member states are able to transform irreducible disunity into strategic disunity, whereby they engage with multiple outward positions to cope with geopolitical contingencies or external attempts to exploit their internal divisions (Macaj and Nicolaïdis, 2014: 1076–80). Strategic disunity can be an asset not just because it helps manage internal dissent, but also because it may be the best strategy to cope with uncertainty, regardless of internal divergence. If managed strategically, disunity among member states can, in certain conditions, allow them to wield greater influence in world politics as compared to acting as one. When member states cannot agree on a common course of action, allowing for separate actions might be more appropriate than complete inaction. This holds for normative questions such as affirming moral principles whenever they are transgressed as well as strategic questions of managing external conflicts when their outcomes are unpredictable. In other words, instead of putting all eggs in one basket, or failing to put them in any one basket at all, experimenting with multiple positions allows the EU to connect through multiple entry points and be more responsive to the external environment than unitary actors are capable of (Macaj and Nicolaïdis, 2014: 1076–80).

This is not a call for disintegration or disunity but for reflexive cooperation to turn unavoidable dissent into a strategic asset in specific situations and areas, rather than leaving it to fate or circumstance. It may seem paradoxical, but while strategic disunity introduces an element of experimentalist governance in the conception, formulation, and application of EU foreign policy, it still requires a significant degree of coordination and loyalty among member states to turn divergence into a resource of strength. The variable forms of

minilateral cooperation that member states engage in can be seen as practical expressions of divided action that illustrate the appeal of strategic disunity.

Beyond the paradigm of unity

Sovereign prerogatives entitle member states to individually explore all available options in international diplomacy, ranging from unilateralism to multilateralism, in function of internal and external constraints and opportunities. All options flow from the basic choice to cooperate or not cooperate. If states choose not to cooperate, they act unilaterally. When they decide to cooperate, they can still choose between ad hoc cooperation and engaging institutions, which allows for institutionalized cooperation (Jupille *et al.*, 2013: 20–3). By this logic, EU foreign policy emerges as an advanced form of multilateral, institutionalized cooperation, driven by thick norms and institutions that generate solid expectations among member states about acceptable behaviour in the future. These expectations constrain the choice for outside options, but not entirely.

Unilateral action among member states may seem practically impossible, yet it persists and can be momentous. The German decision to recognize Croatia and Slovenia in 1991 – in violation of the agreement among member states – was sheer unilateral action. So was the German decision to take in over 1 million Syrian refugees in 2015. The decision by the UK to exit the EU altogether is unilateralism of its own kind. Likewise, the decision by several member states to abruptly cut funding to the United Nations Relief and Works Agency for Palestine Refugees in the Near East (UNRWA) in 2024, without any form of due process or evidence of wrongdoing, or regard for further unnecessary suffering and loss of life among Palestinians, in defiance of the International Court of Justice (ICJ) provisional measures, is another expression of unbridled unilateralism. The recognition of Palestine in May 2024 by Spain and Ireland are also unilateral acts. Further, France acts in the UN Security Council unilaterally, with little regard for what is agreed upon within the EU, and certainly not in the EU's name. The prestige that comes from being a permanent member of such an extremely exclusive organ, overrides any obligation to adhere to EU positions even when there is a desire to do so. In other cases, membership in multilateral organizations requires member states to act unilaterally, that is, in their national capacity, as is the case of the Universal Periodic Review of the UN Human Rights Council, to preserve the universalist aspiration of the mechanism.

As paradoxical as it may sound, unilateralism can be found among and within EU institutions, too, especially in times of crises. The immediate, unqualified, and unconditional support that von der Leyen gave to Israel as it waged a war of extermination in Palestine, in response to the violent break of Israel's siege of Gaza by Palestinian armed groups on 7 October 2023, causing

the killing of more than a thousand Israeli civilians and combatants, including the abduction of more than two hundred fifty people, is a unilateral act with catastrophic consequences, for the Palestinians first and foremost, but also for the EU's respect for *ius cogens* norms. Her unilateral act bound the whole of the EU to a position that contravenes and reveals outmost contempt for these fundamental norms – without the consent or involvement of even the rest of the political leadership of the European Commission, let alone other EU institutions or member states. Her act, which goes outside of her remit, is an extension of unilateralism to its extreme, call it *solo diplomacy*. This form of diplomacy exemplifies personalized power, a symptom of deinstitutionalization and deinstitutionalization (White, 2022), which is antithetical to the paradigm of unity that seeks to deepen institutionalization to counter arbitrary power and ensure normative consistency. Her intransigence jolted Josep Borrell into issuing a series of statements to reaffirm the value of international humanitarian law and disapprove of the deliberate killing and starvation of civilians, without being able to change or even rival von der Leyen's stance. Remarkably, Borrell, too, spoke in a personal capacity, not in his capacity of EU foreign policy chief (and Vice-President of the Commission), thus exhibiting another form of solo diplomacy, albeit an impotent one. For while von der Leyen's solo diplomacy has defined EU policy, Borrell's one has only served to conjure up a mirage of normative consistency to her line, without bringing the EU in line with its obligations under international law. The sudden announcement by Oliver Varhelyi, the European Commissioner for enlargement, on 9 October 2023, that 'all payments' to the Palestinians had been 'immediately suspended', followed by a prompt rebuke by Janez Lenarčič, the European Commissioner for crisis management, stressing the 'imperative to protect civilians and respect [international humanitarian law]', followed by an announcement of the European Commission to carry out an 'urgent review' of the assistance for Palestine, is not just a spectacular fiasco, but also a taste of the arbitrariness that solo diplomacy produces (von der Leyen, 2023a, 2023b, 2023c, 2023d, 2023e, 2023f, 2023g; Varhelyi, 2023; Lenarčič, 2023; European Commission, 2023). Beyond this episode, solo diplomacy reveals growing activity in a grey area where Borrell, but also EU delegations, issue statements in their capacity and not in the name of the EU or its member states, when the latter disagree sharply on questions spanning Palestine to Hong Kong. These solo acts have been multiplied by further unilateral acts from diverse member states on various effects of and responses to Israel's war of extermination and genocide, further distancing themselves from the institutional and normative premises of the paradigm of unity.

Within the realm of ad hoc cooperation, bilateral relations are the oldest and most common type of ties among states. Member states maintain a dense web of individual relations within and beyond Europe. The Franco-German relations are crucial not only for EU foreign policy, but Europe in general. Of

a similar kind, if not degree, are the bilateral relations between France and Italy, as well as Italy and Germany. These relations are regulated through a myriad of separate bilateral treaties that provide for privileged access to information, sharing of resources and other forms of overt or covert cooperation that go above and beyond EU foreign policy. These bilateral relations express deep and enduring political bonds that structure the political space in Europe, and by extension the contours of European integration, including EU foreign policy. Perhaps of a different kind, but no less significant for EU foreign policy, are bilateral relations with third countries. Being part of the EU hardly dimmed the special relationship that the UK wished to have with the US. The same holds for US relations with Denmark, Germany, the Netherlands, or Poland. Poland maintains a special relation with Ukraine, Portugal with Brazil, Germany with Russia (at least until Russia's war of aggression against Ukraine in February 2022), France with Lebanon, Greece with Serbia, Italy with Albania, and so forth. These are all forms of bilateral cooperation that are informal and secretive, and therefore can go in any direction, in line with or against EU foreign policy. Germany and Israel have a bilateral relation of its own kind, one that defies not only EU foreign policy objectives or multilateralism but also peremptory norms. In addition to providing unconditional diplomatic, economic, and military support to Israel, even after the ICJ ruled in January 2024 that Israel had plausibly committed genocide in Palestine, and after the International Criminal Court issued arrest warrants for its leaders, Germany has consistently dismissed the application of international law, with its foreign minister going so far as to argue that 'civilian places can lose their protected status' (Baerbock, 2024) in the name of self-defence. The withdrawal of the UK from the EU has fully restored the primacy of bilateralism in managing relations between the UK and member states, although the constant interaction between national and EU foreign policies might sustain some of the qualities that characterized their relations as member states (Wolff et al, 2024), now as an expression of spontaneous convergence rather than regimented alignment. When viewed from the prism of EU foreign policy, all bilateral relations with third countries are unilateral in their effect, if not intent.

Somewhere between bilateralism and multilateralism lies another form of ad hoc cooperation: minilateralism. Minilateralism can be defined as a protean form of informal cooperation, driven by a small number of powerful states that is deeply intertwined with, and serves to spearhead, multilateral processes to overcome the gridlock they typically suffer from, but also to complement or provide an alternative to them. What is sometimes mistaken for multilateralism is nothing else than 'minilateralism in disguise' or 'minilateral leadership' among great powers, which have played a critical role in the creation, expansion and stability of post-war multilateral institutions (Kahler, 1992: 685–91). Minilateralism marks a break with the principles of universality and equality that distinguish multilateralism from other forms of

cooperation, favouring small-group cooperation among powerful countries instead. But minilateralism can also morph into multilateralism, if the cost of free riding from lesser powers and demands for greater inclusion become too significant to ignore. Minilateralism, or what is perhaps best described as cycles of minilateralism, has a problem-solving function in multilateral governance, corresponding with the ebbs and flows of multilateralism.

All four options – multilateralism, unilateralism, bilateralism, and minilateralism – are distinct choices with differential functions and consequences. Opting for any of them is subject to a multitude of pressures, but there are at least two factors that all options have in common. The first factor relates to *ends*, and the second is about *means*, as shown in [Table 8.1](#). The question of ends is about how a cooperation problem ought to be solved. This is a first-order political question with possibly far-reaching distributional effects, as any ‘solution’ that is formulated and implemented inevitably creates winners and losers. States are likely to exhibit different levels of divergence or convergence of preferences in relation to the status quo, which further varies from one context to another. The question of what needs to be done is thus primarily a function of how the solution alters the position of states in relation to the status quo, which is typically measured in terms of relative rather than absolute gains. The second question, that of means, is about who exactly could solve the cooperation problem, which boils down to the question of just who has the relevant power resources to provide for a solution. The magnitude of the cooperation problem is a first discriminant of whether one, few, or many countries can be enlisted to work towards a solution. That is to say, the means required to deal with a given cooperation problem can be concentrated in the hands of few powerful nations, a single hegemon, or require the involvement of many, if not all, states.

Means and ends are composite variables that can be further broken down into clusters of related variables in different context. For example, the question of means is not just about the concentration of relevant power resources and capabilities in the hands of a few powerful states, but also their willingness to deploy them. Likewise, the question of ends is not just about disagreement about what should be done in relation to a cooperation problem, but also about how it should be done. For example, most, if not all, states share the goal of a world without nuclear weapons, yet they are radically divided on how to go about it. Still, when we consider these two factors *in tandem*, we can uncover at least four ideal type configurations of action that correspond with a repertoire of four options that states can choose from to address differential cooperation problems, ranging from unilateralism and bilateralism to minilateralism and multilateralism.

These stylized foreign policy options are distinct but deeply intertwined as a choice for any of them affects all other options. For example, unilateral action, which is available only to a few powerful states, when

Table 8.1: Sources of foreign policy options

Ends	Means	
	<i>Concentrated</i>	<i>Distributed</i>
<i>Divergent</i>	Unilateralism (1)	Minilateralism (4)
<i>Convergent</i>	Bilateralism (2)	Multilateralism (3)

their interests diverge widely with the rest, has far-reaching consequences for multilateralism, in the sense of how other states position themselves in multilateral processes, the extent to which they are willing to make concessions, and what multilateralism can ultimately deliver.

In essence, all three options beyond multilateralism can be seen as derogations from multilateralism, or outside options (Voeten, 2001). Yet despite their entanglement, each option has its own dynamic and distinct sources and effects. In the case of unilateralism, there is radical disagreement about which path to follow to address cooperation problems, and extreme concentration of means to do something about them. Agreeing with others on how to solve cooperation problems, is either unnecessary or unavailable. This is an option that is open solely to exceptionally powerful states that can afford to act against the wishes of nearly everyone else and can exercise extreme asymmetric power. It is an expression of arbitrariness or exceptionalism that is rare but nevertheless enormously consequential for other states, even if they are not directly involved, as demonstrated by the drastic measures taken by the US in February 2025 to recast its alliances and reverse its commitment to international law and multilateral institutions.

In the case of bilateralism, we have a context where a state has the means to act on its own to solve a cooperation problem, and another state whose interests align to pursue that course of action. Bilateral relations are rarely equal, but they require reciprocity and mutual accommodation for them to be sustainable in the long run. Unless it is subject to extreme coercion, the weaker side can limit the degree of collaboration, or in extreme cases cut ties altogether. Bilateral ties begin with reciprocal recognition as sovereign states and form the basis for cooperation in other forms and account for the highest volume of diplomatic activity.

In the case of multilateralism, a large number of states, if not all, are required to pool their resources to attain their shared goal as well as show near unanimous agreement about the proposed solution. Given the requirements of equality and universality, the multilateral option is the most demanding form of cooperation, and invariably unwieldy, but its solutions are far more resilient and sustainable than outcomes of other forms of cooperation, let alone, unilateral acts.

Lastly, minilateralism is an option that stems from unsurmountable divergences about what needs to be done, and reliance on at least three or more powerful states to press ahead irrespective of the wishes of the majority of other states. In essence, minilateralism is unilateral in ends, and multilateral in means.

Embedded minilateralism

Member states have engaged in minilateral action well before the emergence of EU foreign policy, but it is only recently that scholars have begun paying closer attention to it. The growing salience of variable groups of member states responding to crises in the European neighbourhood, and the increasing centrality of differentiation in the study of European integration, are two main factors that have generated interest in this form of ad hoc cooperation (Grevi et al, 2020; Pirozzi and Bonomi, 2022; Siddi et al, 2022; Tekin and Meissner, 2022; Amadio Viceré, 2023; Amadio Viceré and Sus, 2023; Onderco and Portela, 2023; Schade, 2023). Ad hoc cooperation among sub-sets of member states has been rightly treated as a form of differentiated cooperation rather than differentiated integration (Siddi et al, 2022; Amadio Viceré, 2023), but expectations of integration still lurk in the background and colour what the concept of differentiated cooperation seeks to capture. The paradigm of unity forms the reference category for the analysis of various informal groupings such as the Normandy Format or the Visegrad Four, where questions of whether they complement or undermine EU foreign policy remain central.

What is also implicit in these accounts is a tacit acknowledgement that unified action does not live up to the expectations of member states to act in the world. Their findings are in line with a more fundamental critique of unity, which maintains that unity is not a sufficient condition for member states to exercise their collective power, and it may be not even a necessary condition, as can be illustrated by a simple model of matching issue-specific power externally with preference convergence internally; in fact, external division of labour might be preferable to unity (Macaj and Nicolaïdis, 2014), a proposition that finds growing empirical support in various fields (Delreux and Keukeleire, 2017: 1484–5; Alcaro and Siddi, 2021: 162; Finke, 2024: 436). This critique envisages the mobilization of diversity internally and well as externally to better connect to different parts of the world, allowing for differentiated cooperation among member states and third countries (Macaj and Nicolaïdis, 2014: 1077–81). Extending this critique, ad hoc cooperation is considered here in its own terms, as something that would exist irrespective of European integration. It is conceptualized as a form of minilateralism, analytically distinct from, but connected to other types of cooperation, as shown in Table 8.1. Hence, the European experience of

ad hoc cooperation is conceived of as a concrete illustration of the general phenomenon of minilateralism, and not something uniquely European that would require special theorizing.

Yet, even as member states are conceived as sovereign agents that engage in different forms of informal cooperation with other states, there is generally a discernible difference between member states and third states. It is a difference in degree rather than kind, but still significant enough in imposing limits to how far they can go with their informal cooperation with non-members outside the EU framework, differentiating them from third states. European integration has had a transformative impact on member states, including in the conception of EU foreign policy (Bickerton, 2012). These limits are much more obvious when member states engage in minilateral cooperation inside the institutionalized framework of EU foreign policy, as that has distributional effects for all member states irrespective if they are directly involved or not (Harnisch, 2007: 5). Already in its general form, minilateralism requires a degree of embedding within the multilateral setting from which it emanates, to resolve the problems it creates, such as free riding or underrepresentation of all affected (Kahler, 1992: 707). Minilateralism is more deeply embedded in the European context, where member states engage in protean, plural, and overlapping forms of cooperation, within a deeply institutionalized framework of rules, norms, and practices. This degree of embeddedness renders European minilateralism distinct, though the minilateral part of the equation still takes precedence over embeddedness: embeddedness comes in different strata and may even wither away, but minilateralism has staying power because it is an expression of sovereign autonomy, which states show no intention of forfeiting.

The protean character of minilateralism means that it is a malleable form of cooperation, scalable to match the magnitude of the cooperation problem that urgently needs resolving. It is a pragmatic, problem-solving tool that is deployed when other options are either unavailable or insufficient. Minilateral formats exhibit significant variation in terms of membership, informality, exclusivity, scope, duration, trajectory, and performance, but the dialectic of ends and means, as depicted in Table 8.1, are defining features. Their interaction reveals how cooperation problems that are essentially European correspond with minilateral formations consisting of member states. For cooperation problems of a global nature, we see minilateral formations consisting of member states and third states. Other formats fall in-between European and global problems, or regional problems. We can thus distinguish three categories of minilateral action empirically: European formations for European problems, and regional and global formations consisting of European and non-European countries for regional and global problems. Thus, the dialectic of means and ends produces cooperation at scale, accounting for action at all levels (macro, meso, and micro), where the number of participating states and institutions in different

formats is brought to scale with the changing nature of the cooperation problem, almost invariably a geopolitical challenge where the stakes are high and the need for a solution is pressing.

European problems

One of the clearest illustrations of minilateral formats that stems from European concerns is the Visegrad Four. This minilateral grouping, consisting of Poland, Hungary, Czechia, and Slovakia, reflects domestic political developments within these countries, cultural cleavages within Europe, adaptation to geopolitical changes, and fear of being trampled by great power politics. It responds to EU foreign policy moving either too fast, or too slow. It works against immigration policies at the European level, especially ones that seek to adhere to international law, but at the same time it advocates for the enlargement of the EU with Ukraine and Balkan countries. It is thus both a conservative and reformist force, depending on where one stands. Originally set up as a platform to foster integration into the Euro-Atlantic community, the Visegrad Four has morphed into a sovereigntist force that resists integration, especially cultural integration, and advocates for manifold autonomy within the EU. It is an identity-based minilateral cooperation that corresponds with disintegration and integration within the European realm, but its revisionist bent is part of a broader reactionary pushback against liberalism as such (Kazharski, 2020; Schmidt, 2023; see also Chapter 2 in this volume). It projects civilizational anxiety at the European stage, contrasting sharply with the secularist and universalist aspirations of EU foreign policy, whether it concerns human rights or the Israeli occupation of Palestine (Siddi et al, 2022: 116). The degree of coordination and cohesion of the Visegrad Four varies from one issue to another, something that is especially visible with the ideological decoupling of Hungary and Poland and their antithetical positions on the Russian war of aggression against Ukraine, yet it persists as a minilateral formation.

At the other extreme of European minilateral formats is the Weimer Triangle, consisting of France, Germany, and Poland (see also Chapter 5 in this volume). This is a platform for strategic coordination among major European powers, an ‘informal European Council’ that crafts common views on core European issues. It started as a means to overcome intra-European divisions after the fall of the Berlin Wall and ensure that Poland obtains recognition as a major power alongside France and especially Germany in shaping the direction of the EU (Yoder, 2017). With the withdrawal of the UK from the EU, the Weimer Triangle takes special significance as it must absorb the shift in the balance of power between France and Germany, their role in the broader European order, and the competing alliances they cultivate within Europe and beyond. It has become the fulcrum on which European leaders have scrambled to improvise

a response to the existential threat posed to European security by the sudden alignment of the US with Russia since February 2025.

Regional problems

EU foreign policy came into being as a response to the failure of its predecessor, the European Political Cooperation, to confront the violent disintegration of Yugoslavia, but that was not the only European response. Major European countries experimented with various minilateral formulas to contain the fallout of wars in the wider European neighbourhood and were decisive in creating and maintaining the security and political orders in place today. EU foreign policy was secondary to these minilateral efforts, which preceded, reinforced, and replaced it on various occasions.

The most important among these minilateral formulae is The Contact Group, which emerged in 1994 out of a need for major European powers and the US to craft common approaches to the Yugoslav wars. It arose in response to the failure of the International Conference of Former Yugoslavia ICFY in Geneva to deliver results, and the realization among European diplomats that direct involvement by both the US and Russia was necessary to stop the atrocities and force the warring parties to negotiate. Neither the US nor Russia wished to deal with the EU – they chose their European peers instead (Schwegmann, 2000: 4). The Contact Group was the forum that deliberated and decided on critical aspects of conflict, and the nascent EU foreign policy embraced these decisions without any role in making them (Amadio Viceré, 2023: 15). These were consequential decisions that included the creation and supervision of new states, such as Bosnia and Herzegovina and Kosovo. They took care of the negotiation, implementation, and enforcement of the agreements, backed by brute power, including the use of military force, as was the case of NATO's intervention in 1999 after Serbian president Milosevic refused to stop Serbia's military campaign and forced displacement of Albanians, and failed to sign the Rambouillet accord that envisaged a peaceful settlement of the conflict (Weller, 1999). This is a level of capabilities and resolve that EU foreign policy could not and cannot muster, so in a certain sense, the Contact Group resolved Bernard Williams' 'first' political question, that of order – which requires constant political and security investment. Only after this precondition had been met could the EU engage in formulating and answering other crucial questions such as reconciliation, economic integration, rule of law, and the eventual accession to the EU as a means to pacify conflicts (Grevi et al, 2020: 9–12).

This means that EU foreign policy was not, and is unlikely to ever be, equipped to conduct a realist foreign policy to deal with pressing, let alone existential, geopolitical problems, though it has a crucial role to play in transforming negative peace into positive peace. Russia left the Contact

Group in protest over the NATO intervention against Serbia in 1999, which was superseded by another minilateral forum, the Quint (the Contact Group minus Russia). This minilateral format was instrumental not only in enabling the NATO intervention to stop an impending humanitarian catastrophe and further forcible transfers of Albanians in Kosovo, but also in facilitating the declaration of independence by Kosovo in 2008. The Quint continues to play a crucial role in facilitating the EU-led Kosovo–Serbia dialogue for reconciliation and mutual recognition (Grevi et al, 2020: 10; Amadio Viceré, 2023: 16). Not only does the Quint combine the economic and military means necessary to compel the parties to negotiate, it also maintains peace and recognizes the indispensable role of the US in securing it. Neither of these ends can be achieved through EU foreign policy, not least because the trust that the US commands in the region, especially among Albanians, cannot be substituted by any European formation. The Berlin Process and the Normandy Format are two other minilateral formats that exhibit a similar logic.

Global problems

The EU cannot hide from global threats and some among its member states have both the capabilities and the resolve to do something about them. One telling example is the Iran Nuclear programme. The leaders of the UK, France, and Germany saw a window of opportunity to engage with Iran following the US-led invasion of Iraq in 2003, when the US rebuffed their overture for negotiations, including on their nuclear programme, in exchange for restoring diplomatic relations and the lifting of sanctions. The US persisted in its policy of isolating Iran by strengthening ties with and arming Gulf monarchies, and mulled regime change as the Bush administration viewed Iran as part of the infamous ‘axis of evil’, but it did give initial tacit support to the ‘E3’ for their mediating role (Harnisch, 2007: 8–9).

Recognition for the ‘E3’ initiative grew when the foreign ministers of France, Germany and the UK managed to negotiate a temporary suspension of the nuclear programme in October 2003. This way the ‘E3’ opened a diplomatic process that averted direct military confrontation between the US and Iran, but they needed the combined power of the EU to use sanctions for the negotiations to succeed, something that required a collective decision of the EU. This in turn required the formal involvement of the High Representative Javier Solana in the process, who became the official negotiator on behalf of the EU in November 2004. Thereby the ‘E3’ became ‘EU-3’, rendering it an initiative that formally enjoyed the backing of the entire EU. The groundwork laid by this minilateral initiative led to the involvement of all permanent members of the UN Security Council in 2006, upgrading it from ‘EU-3’ to ‘P5+1’, or ‘EU-3+3’, depending on whether one looks at it from a global or

EU perspective. Direct and intense negotiations among the parties led to the conclusion of the Joint Comprehensive Plan of Action (JCPOA) in Vienna on 14 July 2015, swiftly endorsed by the Security Council a week later by Resolution 2231(2015). The breach of JCPOA by the US, with its unilateral withdrawal in 2017, represents a critical setback for the trust built over a quarter of a century of intensive negotiations, which are yet to resume. It demonstrates once more that global European minilateral cooperation cannot succeed without at least tacit support from the US (Helwig, 2020: 34). Yet more than a failure of European minilateralism, the failure to reactivate the Iran nuclear deal is a huge failure for all those who fight for a world free of nuclear weapons, as the best response to the risk of nuclear annihilation.

Broader challenges to the maintenance of world peace and security, ranging from the protection of human rights to the fight against global warming, shape the opportunity structure in which member states operate, compelling sub-sets among them to coalesce around global fault lines on wide-ranging issues within the multilateral system, such as the UN. Although the UN is based on formal equality of its members, most of the time they act in group formations to pursue their agendas. In addition to the five regional groupings that serve as election caucuses and the stable cross-cutting political alliances, there is a dense web of protean minilateral formations covering the entire spectrum of the issues that the UN deals with, ranging from nuclear disarmament and peacekeeping to global warming and gender equality and the fight of impunity for atrocity crimes. They perform a plethora of functions that range from the creation of a focal point to raise awareness about an issue to canvassing wide support to set the agenda, and formulate and implement policies that reflect their priorities. These minilateral formations come in the form of:

1. Group of Friends, which focus on thematic issues (for example, The Group of Friends of the Responsibility to Protect; Group of Friends of Women, Peace and Security) or specific countries (for example, Group of Friends of Accountability for the Aggression Against Ukraine; Friends of Libya).
2. Core Groups, which again pertain to thematic issues (for example, The United Nations LGBTI Core Group; Core Group Advocating an ICJ Advisory Opinion on Climate Change) or a country (Core Group on Sudan; The Core Group (regarding Haiti, established by the Security Council); Friends of Syria Core Group – ‘The London 11’; The core group on ‘Independent Institution on Missing Persons in Syria’).
3. Shared Commitments (for example, among Presidencies of the Security Council to keep the implementation of Women Peace and Security at the top of their agenda).

4. Joint Pledges (for example, to focus the attention of the Security Council on the link between global warming and the maintenance of world peace and security).

This is only a small sample of the vast ecosystem of minilateral formations that channel the activity of variable groupings of states to address priorities that their counterparts do not share or refuse to recognize. They serve as floating platforms for like-minded states to coordinate and strategize together, to best advance their goals in the murky waters of multilateral processes. For example, the Core Group on Independent Institution on Missing Persons in Syria, facilitated by Luxembourg (and in which the present author was directly involved), was responsible for the drafting, and canvassing of cross-regional support for, the resolution establishing the Independent Institution on Missing Persons in the Syrian Arab Republic, adopted by the UN General Assembly in June 2023. The dynamic of these minilateral formats pulls member states in different directions, although not so much that they would end up joining minilateral groupings such as the ‘Group of Friends in Defense of the Charter of the United Nations’ – a club of overtly autocratic states. It goes without saying that the logic of such minilateral groupings has nothing to do with what moves EU foreign policy, yet they impose conflicting obligations on member states, and force them to adapt to the fluid dynamic of multilateral processes within the UN, irrespective of joint EU positions.

Nowhere are external constraints on EU foreign policy more debilitating than in the UN Security Council, a strange beast that is better at making rules for everyone else than in adhering to them itself. The few formal rules it lays upon itself say precious little about how the Council operates in practice. The Council is the paragon of informal global rule; informal rule is the rule of arbitrariness, and nowhere in the multilateral realm is arbitrariness higher than in the Council. This arbitrariness is an expression of naked power, which naturally shapes how select member states come to view themselves and their role in the Council, and in relation to expectations of unity flowing from EU foreign policy. They are confronted every day without pause with overlapping and at times mutually exclusive demands of loyalty. We can think of them as concentric circles of loyalties.

The smallest and most intimate concentric circle, at the midpoint of the concentric circles, consists of EU member states that sit in the Security Council, which are further divided between elected and permanent members. The vaunted ‘coordination reflex’ that would propel EU foreign policy (Drieskens, 2008; Rasch, 2008; Marchesi, 2010), fades away in the Council, and the ritualistic efforts by member states in the Council to inform those that are outside, are mostly perfunctory. The logic of the Council bends all other logics, including that of EU foreign policy. This is

the case for all member states that sit in the Council but specially so for the permanent ones. France acts according to the logic and the prestige of the Council and is anxious to maintain the exclusive character of its nonelected membership – at the cost of everything else. Elected members, even the most integrationist among them, barely mention EU positions, with the exception perhaps of when the EU as such is invited to address the Council in its capacity as observer at the UN.

A slightly larger concentric circle is formed among European members of the Council, which now includes a former member, the UK. Here, too, sporadic efforts are made to form a common European front, especially when seeking to adopt joint statements, but they are hampered by the logic of the Council and by the persistent objection of UK to the mentioning of the EU in any product of Council members, emphasizing once more the urge to decouple what happens in the Council from what the EU does, and much else.

A still larger concentric group is formed by like-minded, Western states, who form a strong caucus and share common views on most issues, especially with the worsening divisions with China, and the near breakdown of relations with Russia. The final circle is that of the Elected 10, which has its own dynamic but only faint solidarity, considering the strong pull of competing pressures generated by the non-elected members, mainly Russia, China, and the US. These circles of loyalties are also circles of distinct responsibilities that render EU foreign policy a faint mirage without any meaningful effect in steering member states in one direction or another – except for instances in which unrelated positions in superimposed minilateral formats coincide with EU positions.

Conclusions

It is tempting to conclude by saying that there is life outside EU foreign policy, that there is significant member state diplomatic activity that occurs around it, but that is a temptation that must be resisted because it obscures rather than elucidates reality. It is EU foreign policy proper that represents just one of the many forms of life of the foreign policies of member states, who operate within and outside its contours largely unconstrained. The bright glare of the paradigm of unity, propagated incessantly by EU officialdom, has impeded efforts of commentators and scholars alike to properly approximate both the troubles and significance of EU foreign policy. There is a whole ecosystem of ad hoc cooperation out there that serves to catalyse closer coordination among member states and third states to address pressing problems that do not enjoy the support of all the rest, or cannot be handled by them even if they were willing to. In contrast to its inflated status in policy and academic circles, EU foreign policy is just one

form of multilateral institutionalized cooperation nested in a wide-ranging web of manifold bilateral and minilateral forms of cooperation, punctuated by momentous unilateral acts.

This chapter sketched a path to identify and assess the sources and consequences of these types of action, and what they mean for member states to pursue their individual and shared ends. The dialectic of means and ends theorised here allows for a systematic examination of a virtually virgin territory of minilateral cooperation among member states in their attempts to solve European, regional, and global geopolitical problems, beyond EU foreign policy. It reveals how European minilateral experience is distinct in its degree of embeddedness within multi-layered norms and institutions that generate plural and conflicting bonds of loyalty. European minilateral cooperation can be seen as ‘embedded minilateralism’ because it operates in conjunction with a qualitatively higher level of institutionalized cooperation in the realm of foreign policy. But like its generic form, it is the minilateral part of European minilateralism that prevails, and not its embeddedness, as the former can override the latter in time and space. It reveals just one aspect of the degree of autonomy that member states retain in charting their own path and conducting their foreign policies that respond more directly to the demands for cooperation to solve specific problems, rather than predetermined expectations of unified action as a default strategy. This degree of autonomy, reflecting recognition and accommodation of internal and external difference, puts into question prominent critiques of EU foreign policy for its navel-gazing bent, introversion, and ultimately for prioritizing process over substance. For there to be such pathological tendencies, member states must show a degree of collective intentionality that cannot be observed in the realm of foreign policy. But even if that were to be found, EU foreign policy is just not significant enough to approximate how member states act and assert themselves in the world, as the retention and use of the full spectrum of foreign policy options demonstrates.

But does the use of options outside EU foreign policy signify a paradigm shift? What I have had to say above points to limits of the paradigm of unity, limits that are not new but more visible and harder to deny. With the advent of EU foreign policy, member states have engaged in two-track foreign policy – pursuing their interests within the EU track in parallel with the traditional track of national foreign policy, which includes all options of international diplomacy, ranging from unilateralism to multilateralism. National foreign policy outside EU foreign policy has become more salient but it is not a new phenomenon; its salience does not represent paradigmatic change given that the significance of the paradigm of unity itself has been overstated in its conception and implementation. What has become plainer to see are the limits of unity in serving as a power-multiplier and fostering

normative consistency. Its first and main quality is put into question by the primacy of outside options, including unilateralism, bilateralism, and minilateralism, despite their embeddedness within EU rules, practices, and institutions. Exactly the opposite can be said as regards normative consistency, as the case of Palestine demonstrates. Disunity, rather than unity, has proven indispensable to recover at least some degree of symbolic support for international humanitarian law within the EU, given that unifying pressures would have led to either complete inaction, or total defiance of international law. Open disregard for international law and direct attacks on the United Nations, both by EU institutions and member states, does question the universalists aspirations of the EU, which could classify as change in its normative self-conception. These are transgressive actions that concord with a strange infatuation with the rhetoric of power politics, geopolitics and militarism, which encourage and excuse attitudes and behavior that are antithetical to universally applicable norms, in external and internal affairs. Such developments mark a departure from the universal aspirations that have been taken to guide the founding of the EU and inform all its policies.

Multilateral action, also in its expression of EU foreign policy, is not a panacea for all the ills in the world, but its dependence on equality and universality makes it normatively preferable to the alternatives. Though it can never aspire to neutralize power asymmetries and hierarchies and their differential effects, a complete capture of multilateralism by powerful interests is much harder to achieve and then sustain. The inherent logic and fluidity of multilateralism constrains and restrains larger powers while giving a voice to lesser powers – a voice that would be silenced outside the multilateral realm. All options outside multilateralism are therefore a departure from the actualization of universal aspirations that virtually all states profess, especially EU member states. Contrary to the glamour and aura of nobility that diplomats strangely enjoy, they are in the main engaged in a shady business of crass transactionalism with little if any moral restraint, especially in bilateral relations—their opacity is an approximation of how morally bereft they really are in their dealings and how little they care for or contribute to the common good. Otherwise, there would be no reason to hide them from public view, except in rare cases where the common good would be genuinely harmed by publicity rather than secrecy. It is a realm of action that escapes normal judicial review, even *ex post facto*. That member states choose the route of arbitrariness to deal with fundamental challenges they face, such as radical evil, instead of legal, multilateral, and institutional approaches, illustrates their open disregard for their self-proclaimed universalist values – even when they claim to act in their name. That is why public and vigorous interrogation of the workings of the foreign policy of member states, in concert or separately, is vital to force them to practice what they profess.

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