

National EU Discourses in Germany and France and the Construction of European Identity

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Abstract

This article presents the core findings of a comparative study on the German and French national EU discourses around the draft Treaty on a Constitution for Europe in 2005 and on their effect on European identity formation. It is based on the main methodological assumption that European identity, among other means, can be constructed in national EU discourses, as such discourses construct meaning for the EU. The French discourse related to the referendum on the EU draft Constitutional Treaty in 2005, and the German discourse related to the ratification process of the EU Constitutional Treaty in 2005 are analysed in their function as means of European identity construction and in a comparative discourse-analytical design. The leading research question is: In what respect and to what extent do national EU discourses function as a means for the formation of European identity and the democratisation of the EU? The article first conceptualises European identity and collective identity and develops the research heuristics. After that methodology, techniques, cases, and research design of the comparative discourse analysis are developed. The main part presents core results. The article concludes that while the German discourse is an EU discourse with a national base, the French one is a national EU discourse. Both had few chances to serve as means of European identity construction, but for opposed reasons: the French discourse was very intense but constructed an opposition between France and the EU, and the German discourse constructed harmony, but was not intense.

Keywords

EU democratisation; European identity; France; Germany; national EU discourses

1. Introduction

What unites the EU as a polity? In what respect do the EU's citizens form a democratic sovereign, a demos? These questions lead into the field of research around European identity, which is the overarching focus of this article. The leading methodological assumption is that one pathway to construct the European identity is via national EU discourses. Such discourses construct meaning for the EU, and hence they potentially are means of discursive EU identity construction. The article analyses two such national EU discourses in a comparative perspective, namely the French discourse related to the referendum on the EU draft Constitutional Treaty (TCE) in 2005, and the German discourse related to the ratification process of the EU TCE in 2005. The leading research question is: In what respect and to what extent do national EU discourses function as means for the formation of European identity and the democratisation of the EU? (Wiesner, 2024, p. 1). Analysis is based on an independently developed comparative discourse-analytical research design. The findings are part of a larger study (Wiesner, 2014, 2024).

The article is structured as follows: In Section 2, the key terms European identity and collective identity will be conceptualised, and the research heuristics will be developed. In Section 3, the methodology and procedure of the comparative discourse analysis of national European discourses will be explained, to then present core results in Section 4. Section 5 contains a concluding discussion.

2. European Identity as a Collective and Democratic Identity: Conceptual Clarification and Heuristics

First, what is European identity? The following Sections 2.1 to 2.3 will serve at conceptualising European Identity, giving a brief overview of extant research in the field, and developing the research heuristics.

2.1. Normative-Theoretical Background

The research question of the present article is based on a broader normative-theoretical reflection (see in detail Wiesner, 2014, pp. 22–31, 2024, pp. 22–63) that can be summed up as follows: Chances and limits of EU democratisation are related to the formation of a European identity because democracy, no matter if it is conceptualised following a republican, communitarian, or liberal ideal, needs to consist not only in election or citizenship rights, but also in democratic practice. This means that further EU democratisation has to go along with the development of an EU demos, of a democratic subject in the EU. This is a normative condition since democratic institutions and procedures must be carried out and actively filled by a democratic subject (a demos) that defines itself as such. Democratic identity, in this respect, means the self-identification of a demos. This is what is at stake in asking after a European identity.

This claim is also the normative-theoretical background of the present article. In terms of research heuristics, it works as an ideal type for European identity. The research does not directly analyse the extent to which such a demos has been obtained. This would require a research design focusing on individuals' attitudes in relation to a discourse. What is concretely studied are the discursive processes that contribute to constructing European identity in that they construct patterns of meaning for the EU. The empirical research thus indicates which patterns of meaning have been constructed, which ones have succeeded in the discourse, and why this has been the case. This allows to draw conclusions on the meanings that are discursively attributed to European

identity and to answer the question to the extent that they are in accordance with the normative-theoretical ideal type laid out above. In order to assess this, a research heuristics is developed in Sections 2.1 to 2.3.

This article takes on a specific conceptual, methodological, and normative-theoretical perspective on public debates and discourses. On the conceptual level, debates and discourses are analysed as political practice (Wiesner et al., 2017). On the level of methodology and research design, they are analysed in an interpretative and comparative research design (see Section 3). For conceptual clarification, it has to be added that a debate is not identical to a discourse—while a debate is more clearly limited in time and space, e.g., as a parliamentary debate, a discourse (see Section 3) is a setting of language-related practices that constitute meaning. A discourse, thus by definition, can last longer, in the case of this study, over months. On the normative-theoretical level and following the rationale of the Jean Monnet Network, Debating Europe (www.debating-europe.de), debates and discourses are regarded as democratic practice and as a means of potential EU democratisation.

2.2. European Identity as Collective Identity

What has been said so far underlines that the research design aims at an EU-related form of democratic collective identity. But what is collective identity?

First of all, the concept has to be differentiated from individual identity (Mead, 2005), as it relates to human collectives. Human collectives that show a similarity in at least one dimension can be termed to show or have an identity (Niethammer, 2000, pp. 9–11).

Collective identity needs to be further distinguished from social identity, which is often studied in quantitative empirical research. This concept also regards social groups, but describes only the individual components of the individual's identification with the group (Tajfel, 1978, p. 63). Individual orientations are one central part of collective identity, and the patterns of meaning that represent the contents of this identification are another.

As constructivist research on nationalism has shown, people identify with a group, or a developing nation state, not without a reason, but precisely because they link this group or nation state to certain patterns of meaning (Anderson, 2006, p. 53). The crucial point is that human collectives construct collective identities themselves (Anderson, 2006; Gellner, 1983; Habermas, 1976, p. 92; Hobsbawm, 2008), and one of the decisive means to construct them is discourses. This means that collective identities always change, and they are complex—they are influenced by different types and patterns of belonging.

What does extant research tell us with regard to a collective democratic European identity? The academic debate on the matter can largely be differentiated into four main strands (see Wiesner, 2014, pp. 43–67, 2024, pp. 32–52, for more detail) that have been integrated in the research design of the present study: (a) approaches in political theory or philosophy that often have a strong normative background (e.g., Cerutti, 2009; Habermas, 2004; Meyer, 2009); (b) conceptual approaches (e.g., Bruter, 2005, p. XII; Checkel & Katzenstein, 2009; Duchesne, 2008; Giesen, 2008); (c) individually oriented approaches that focus on identification and support of individuals for a political system, analyse EU identity quantitatively and hence focuses primarily on EU citizens (Arts & Halman, 2006; Bergbauer, 2018; Castano, 2004; Górniak et al., 2004; Immerfall & Sobisch, 1997; Kaina, 2009; McLaren, 2004; Opp, 2005; Pichler, 2005; Schmidberger,

1998; Westle, 2003); and (d) macro-oriented approaches that regard identity as a pattern of meaning, these tend to focus on discourses by EU elites (e.g., Banchoff, 1999; Checkel & Katzenstein, 2009; Diez Medrano, 2003, 2009; Kaelble, 2009; Kutter, 2020; Marcussen et al., 2001; Pantel, 1999; Puntischer-Riekmann & Wodak, 2003, pp. 284–286; Schmidt, 2006; Seidendorf, 2007; Waever, 2005; Weiss, 2003).

To sum up the main results with regards to discursive European identity construction, extant research demonstrates that the contents of European identity—the patterns of meaning associated with the EU—are in flux, adapt to varying contexts and interests, and sometimes are contested. Discourses on the EU, therefore, have a central role in the social construction of EU identity as they are a key means of constructing and transporting meanings for the EU. The main level where these EU discourses take place is the nation state. National EU discourses are a central means of constructing meanings for Europe and the EU, and hence for constructing European identity.

2.3. European Identity: Research Heuristics

Based on the discussion in Section 2.1 and the state of the art in the research fields described in Section 2.2, the following working definition of European identity can be summarised. It works at the same time as thesis 1 of the research heuristics that assembles the conditions for sustainable European identity construction:

1. European identity is to be understood as *a self-definition of the EU demos*, i.e., an awareness of and identification with the EU level to which rights and democratic practice refer, as well as a mutual identification and recognition among the demos' members. (Wiesner, 2024, p. 51, emphasis in the original)

Furthermore, based on research on collective identities and constructivist research on nationalism, the following theses can be summarised that describe the conditions for successful discursive European identity construction, i.e., for pathways that help to attain the ideal type described in Section 2.1 (see Wiesner, 2014, pp. 65–67, 121–125, 2024, pp. 51–54, 105–108):

2. Micro and macro levels of identity are related and democratic identity includes individual orientations as well as patterns of meaning.
3. European identity is socially constructed and loaded with different meanings in the process.
4. European identity emergence is stimulated by EU-related democratic practice.
5. National and European identity constructions relate to each other in this process.
6. The meaning of collective identities must be compatible with established societal codes.
7. Collective identities must also correspond to the interests, desires, and fears of the population so that they can prevail.
8. Requirements for penetration and acceptance of collective identities are media such as written languages, communications, and the public sphere.

Quantitative-empirical as well as discourse-analytical findings on the emergence of European identity have further shown that national contexts play a central role in this process. Their findings lead to thesis 9 to 14 of the heuristics:

9. Content associated with the EU differs according to national affiliation at both the citizen and elite levels.
10. Only social stratification runs counter to national affiliation: the educated and wealthy identify more strongly with the EU than less educated and poorer people.
11. The emergence of European identity is thus tied to national identity patterns.
12. European identity is thus only sustainable as a multi-level system of different identity levels. Conversely, if there are conflicts between the national and European identifications, they probably negatively influence the formation of a European identity.
13. The emergence and persistence of a European identity is thus also conditioned by a positive relationship between national and European identities.
14. A positive relation between national and European identity levels only seems to be sustainable if the respective, mostly national contexts, support it.

3. The Comparative Discourse Analysis

As explained in Section 2, I chose national EU discourses as a subject of analysis as they are the main media for constructing meanings for the EU. This entailed a methodological choice for a discourse-analytical research design. The label discourse analysis, however, describes a field of various approaches that sometimes differ considerably with regard to methods, techniques, and research perspectives (see Boreus & Bergstrom, 2017; Johnstone, 2008, 2018; Wodak, 2008a; Wood & Kroger, 2000, for overviews). Hence, it is a methodological choice to opt for a discourse analysis, but this does not yet imply a choice of methods and techniques. These need to be explicated in the course of the study. In the present study, the comparative research design has been developed independently based on the following reflections and methodological decisions developed in Sections 3.1 to 3.4.

3.1. Analysing Discourse: Methodological Reflections

Most discourse-analytical approaches share three methodological assumptions. First, a discourse is a setting of practices or events that constitutes meaning and that can be distinguished according to a certain subject, or a special institutional setting or context (Johnstone, 2018, pp. 2–3; Wood & Kroger, 2000, pp. 3–5)—this definition is adopted in the present study. The general aim of discourse analysis is to find out how meaning is constructed in discourse (Johnstone, 2008, pp. 78, 124; van Dijk, 1998, p. 198; Wood & Kroger, 2000, p. 95).

Second, we must acknowledge that language is a social practice and needs to be analysed as such: “When you say something you are doing something” (Johnstone, 2008, p. 230). The choice of words and definitions in discourse always entails an interpretation or evaluation of the events and practices at stake. A discourse hence creates and circulates world views, ideologies, or dominance (Fairclough & Wodak, 1997; van Dijk, 2001).

Third, discourse does not happen by accident, but is structured as according to distinct rules which influence what can be said and which meanings are constructed (Foucault, 1972, p. 27; Johnstone, 2008, pp. 76–78; van Dijk, 1998, p. 198; Wood & Kroger, 2000, p. 95).

Besides these methodological assumptions, discourse-analytical approaches can be differentiated according to (see Wiesner, 2024, pp. 64–82, for more detail):

1. Their *analytical perspectives*: Generally speaking, there is a continuum ranging from conversation analysis—i.e., approaches that rather focus on conversations on the micro level—to critical discourse analysis and post-structuralist approaches—i.e., approaches that are more macro-analytical and concentrate on relations of discourse and society as well as power relations. In between are pragmatic approaches and those of “discourse analysis in social psychology” that work both macro- and micro-analytically (Johnstone, 2018, pp. 1–3; Titscher, 2000; Wodak, 2008b; Wood & Kroger, 2000, 22ff, 96).

Accordingly, there are differences regarding:

2. The *subjects of analysis*, ranging from communication to written text (Wood & Kroger, 2000, pp. 20–22).
3. The *methods* (Titscher, 2000; Wodak, 2001a, 2008b), even if most of them are qualitative (Wood & Kroger, 2000, pp. 20–22)
4. The *definitions of the term “discourse,”* as the basic definition of discourse named earlier is interpreted differently (Wodak, 2001b, p. 4).
5. The *role of context*: Some authors underline that aspects outside the discourse must not be analysed (Wood & Kroger, 2000, p. 64). An opposing view is that discourse is shaped by the world outside, language, media, previous and future discourse, and it shapes these vice versa (Johnstone, 2008, p. 10). This has been the approach in the present study.

3.2. The Comparative Discourse-Analytical Research Design: Methodological Theses and Heuristics

The following methodological choices have been at the base of the macro-oriented discourse-analytical research design (see Wiesner, 2014, pp. 85–103, 108–125, 2022, 2024, pp. 82–112):

1. The *analytical perspective is macro-oriented* in the sense that national EU discourses are the object of analysis (and not conversations).
2. The analysis concentrates on *written text* for a number of reasons (see Section 3.3).
3. It is *qualitative and interpretative* (Wiesner, 2022).
4. It follows the *basic definition of discourse* laid out in Section 3.1: A discourse is a setting of practices or events that constitutes meaning and that can be distinguished according to a certain subject, or a special institutional setting or context.
5. The *role of context*: it is assumed that discourses are not only potentially open to external influences, but also that they can always be influenced by socio-economic and political constellations. Therefore, it was an aim of the analysis to lay out the relation of the discourses to their context.
6. In addition, a *comparative research design* was independently developed and adopted.

Based on these theoretical and methodological considerations, I developed a research heuristics that was complemented by the methodological reflections of different authors on discourse analysis (Foucault, 1972, 1981; Laclau & Mouffe, 2001; Titscher, 2000; Wodak, 2008a), the standards of qualitative research (Gläser & Laudel, 2004; Kelle & Kluge, 1999; Mayring, 2008), and grounded theory (Glaser & Strauss, 2005; Strauss & Corbin, 1996). The following presents its core elements.

3.2.1. How, Why, and What

Analysing the discourses aims at analysing how meaning is constructed, not only at finding out what is part of the discourse. The heuristics of the present study are thus based on three leading questions: What happens in the discourse? How is meaning constructed? Why is meaning constructed in a certain way? To understand not only the “what,” but also the “how” and “why” of a discourse, the analysis has to aim at the contents of the discourse and the underlying processes and interrelations between discourse contents, discourse actors, and discourse contexts. It is hence necessary to include the contexts systematically in the analysis and to add further steps after the coding. In this, qualitative text analysis is a useful method, but insufficient for completely answering the questions after the “what,” “how,” and “why” of a discourse. Qualitative text analysis mainly helps to find out a “what,” e.g., the content of arguments or motifs. It does not explain “how” and “why”: How is meaning constructed in discourse, and why does this happen? Analysis, hence, needs to be interpretative (Wiesner, 2022). These reflections were operationalised as shown in Table 1.

Table 1. Leading questions of the discourse analysis.

What happens in the discourse?	How is meaning constructed?	Why is meaning constructed in a certain way?
Surveying the course: <ul style="list-style-type: none"> • Overviews (protocols) • Event overviews • Intensity (counting articles) • Actors Surveying discourse content: <ul style="list-style-type: none"> • Motifs • Arguments • References • Topics • Reference levels 	<ul style="list-style-type: none"> • Which rules of discourse are recognisable/can be deduced? (contextual knowledge, protocols, and results of evaluation) • Which arguments dominate/prevail? Where and how? • What connections can be found between motifs and arguments? • What references to relevant contextual factors can be identified? • Proceeding: According to principles of qualitative research: coding, collecting relevant combinations of characteristics, typifying, categorising, and forming models/theories 	<ul style="list-style-type: none"> • Which rules of discourse are recognisable/can be deduced? • What references to contextual factors can be found in the discourse? • Which combinations of arguments and which references seemed particularly effective? • Proceeding: According to principles of qualitative research: coding, collecting relevant combinations of characteristics, typifying, categorising, and forming models/theories

Source: Wiesner (2024, p. 85).

Quantitative analyses are only marginally helpful as well, since quantities of a “what” do not explain a “why.” Changes in quantities of discourse contents (motifs, discourse contributions, etc.) only hint at possible changes and developments in a discourse; they do not tell us what development happened and why. Hence, I only quantified the development of the discourse’s intensities by counting the total number of newspaper articles that appeared each day.

3.2.2. Features of a Discourse

Based on the reflections in Sections 3.1 and 3.2, I developed eight features that shape a discourse and that served as key categories of my analysis (Table 2).

Table 2. Key categories of a discourse analysis.

1. Course	The course of the discourse with regard to topics, intensity/number of contributions, and significant events
2. Actors	The central persons or institutional actors shaping the discourse
3. Rules	They structure the course of discourse and the sayability of utterances
4. Reference level	Political levels (EU, foreign, and domestic) or thematic fields to which the discourse relates
5. Topics	Content areas touched upon by the discourse
6. Motifs	Types of attributions of meaning in the sense of attributed characteristics and motives for action
7. Arguments	Typifying the course of meaning attributions or argumentation processes
8. Cross-references	Relationships between conceptions, subject areas, reference levels, rules, actors, or contextual factors constructed in discourse

Source: Wiesner (2024, p. 85).

3.3. Cases and Materials

National EU discourses mostly happen in cases of nation-state-related decision processes with regard to the EU (EP elections, referenda, and decisive votes), and both the discourses and the votes in turn can influence decision-making or even ratification processes on the EU level. Against this background, the research presented here focused on a comparative study of two national EU discourses in their function as vehicles of European identity construction and their national context: The first case is the French discourse before the referendum on the draft Treaty on a Constitution for Europe in spring 2005. It is particularly telling because it preceded a “no” vote in an EU referendum, which laid the base for a non-ratification of the EU TCE. The French 2005 discourse is an example of a national EU discourse with a high impact on EU politics. The second case is the German discourse around the ratification of the EU TCE draft in the Bundestag and Bundesrat, which took place in parallel in the first half of 2005.

The two discourses refer to two country cases that represent states with a similar role in the EU: Germany and France are both founding members, big member states, and situated in Central Western Europe. They are similar regarding their size, the duration of EU membership, and the stability and duration of the political systems. In the last 50 years, Germany and France have often been called the “engines of European integration.” These factors influence national EU discourses: governments of big member states often have a bigger influence in EU policy-making than governments of small member states, newer member states do not show as long-lasting effects of EU membership as old member states, and former transition countries often show less stable political and party systems than others.

While similar in their role in the EU, the cases differed with regard to their internal context. Context for the purpose of this research has been operationalised by five dimensions: (a) the political systems, (b) the political parties and their reaction to European integration, (c) the citizens and their views on EU integration, (d) concepts of national identities, and (e) previous discourses on the EU.

The next questions were how to operationalise the discourses, as a full discourse would comprise all discursive actions and events in a given time and hence cannot be analysed, and how to select a corpus of theoretically relevant material.

The period to be analysed was set from January 1, 2005, onwards. On this date, Jacques Chirac, then French president, announced he would hold a referendum on the EU TCE. The referendum took place on May 29, 2005. Just before, on May 12 and 27, 2005, the German Bundestag and Bundesrat had ratified the TCE. To include as well the discussion on the French referendum and its consequences, the analysis was extended until one week after the meeting of the European Council on June 16–17, 2005. The period of analysis, hence, was set from January 1, 2005, to June 25, 2005.

The research material, for a number of reasons (comparability, text-based strategy of analysis, and theoretical relevance of national elites), was limited to the quality press. To enable a representative view on the discourse, four quality newspapers per country were analysed in each country case, covering a broad range of the political spectrum from conservative-right over the liberal centre and the liberal left to the far left. The newspapers chosen are shown in Table 3.

Table 3. Quality press analysed.

	Germany	France
Conservative	<i>Frankfurter Allgemeine Zeitung</i>	<i>Le Figaro</i>
Liberal centre	<i>Süddeutsche Zeitung</i>	<i>Le Monde</i>
Liberal left	<i>Taz</i>	<i>Libération</i>
Far left	<i>Neues Deutschland</i>	<i>L'Humanité</i>

All articles concerning the referendum and the ratification of the TCE that had appeared during the period of analysis in the eight newspapers were sampled via different web-based search engines. In total, 6,373 articles were sampled for France and 2,152 for Germany. After a control of the material, 8,145 relevant articles were included and analysed in several phases (Section 3.4).

3.4. Phases of Analysis

In the analysis itself, I proceeded in four phases (see Wiesner, 2014, pp. 117–121, 2022, 2024, pp. 98–105).

The first phase consisted of the definition of cases, sampling of material (8,145 relevant articles, France 6,358 and Germany 1,787), and conducting a context analysis.

The second phase involved an overview and analysis of the course of the discourses, i.e., manual sighting and overview of all 8,145 articles sampled; protocol on the impressions and findings regarding: (a) the development of the discourse intensity (daily count of all articles, see Figure 1); (b) an overview on course, actors, rules, levels of reference, topics, motifs, arguments, and cross-references of the discourse; and (c) the manual overview and the protocols built the base for a theoretical sampling of theoretically relevant articles for further analysis.

Next, based on the preselection, the theoretically most relevant articles were coded with regard to the eight discourse dimensions sketched in Section 3.3 (course, actors, rules, levels of reference, topics, motifs,

arguments, and interrelations). The coding was based on a preliminary coding system, which was further developed inductively, i.e., based on the findings. It followed the logic of axial coding in the later steps. Theoretical sampling has been used throughout: based on findings of the previous steps of the analysis and the coding, the next relevant material unit has been determined. The selection process ended when no further theoretically relevant differences and findings could be detected in the material (Glaser & Strauss, 2005, pp. 53–55; Kelle & Kluge, 1999, pp. 44–49).

In total, 2,247 articles were coded (France 1,311 and Germany 936). In sum, I proceeded with the coding as shown in Table 4.

Table 4. Phases of the coding.

Preparation of the coding	1. Definition and sampling of the corpus
Coding	2. Definition of a basic coding system (previous knowledge)
	3. First phases of coding and further development of the coding system (theoretical sampling)
	4. Further selection of texts to be coded (theoretical sampling)
	5. After the first phase, a fully developed code system was in place
	6. Application of a fully developed coding system to the whole coded material
Analysis	7. Interpretation and further analysis of the results

Source: Wiesner (2014, p. 113).

The final phase of the analysis came after the coding, the synthesis phase, in which the results of the first three phases were synthesised and analysed with regard to the “how” and “why.” Based on the synthesised findings, the research questions were answered, the results were summed up, the contexts were compared, and the discourses were compared.

4. Main Results

The main results of the comparative discourse analysis will be presented in the following, all of which result from the steps of analysis described in Sections 2 and 3. Where quotes are inserted, they refer in abbreviated form to the quality press journals in Table 3 and the day of publication, as well as the rank of the quoted article in the account of the day. For example, the 13th analysed article in *L'Humanité* of April 24, 2005 will be quoted as H_240425_13. All translations have been carried out by the author.

4.1. The Contexts

It turned out that the contexts, as expected, differed decisively, which had an influence on the respective development of the discourses (Wiesner, 2014, pp. 126–190, 295–336, 2024, pp. 250–275).

France’s political system is semi-presidential, showing a traditionally strong role for protest movements and a weak parliament with a majority voting system, which sets other conditions for the discourse than the German system (parliamentary, with a proportional voting system and a strong culture of consensus). Moreover, in France, there was a referendum, which was not the case in Germany. This meant that in France,

the chances for an intense public debate were much increased, and an occasion was created for interaction of elite discourses and opinions and attitudes of the population. For six months, the EU became a central topic of public debate across nearly all social classes and groups. Germany, on the contrary, did not hold a referendum. In consequence, there was little public debate. Moreover, this debate rarely cuts across the limits of the level of political and media elites. Finally, France experienced decisive changes in the political system due to Europeanisation, but Germany less so.

Concerning political parties, France's political parties were strongly influenced by European integration, or more exactly, by the fact that they had to take a stand with regard to it. In particular, following the Maastricht debate in 1992, diverging actors left mainstream parties and founded new, often EU-critical parties or movements, while the official positions of the centre converged. In Germany, most mainstream parties, except the left party (in 2005, PDS), agreed in an elite consensus in favour of EU integration.

The citizens had a different role in both discourses: in France, they voted on the TCE; hence, they were decisively concerned by the referendum discourse, and they also were actors in the discourse. In Germany, the TCE was ratified in both chambers of the parliamentary and federal systems only, and hence, the citizens also intervened much less in the discourse. The citizens' opinions with regard to the EU, on the other hand, are rather similar in both countries—in both, there is an EU-critical potential of up to 50%—but only in France did this play a role in the discourse.

The national identity narratives are also different, in particular concerning EU integration. In Germany, European integration was part of the *raison d'état* of the new federal republic; it was a means to become sovereign again, and it became an integral base for the new narrative of national identity that the democratic Western German state developed after World War II. The French national identity narrative, on the other hand, is based on specific interpretations of the state, the republic, the nation, and sovereignty (unified, impartible, and special) that are rather contradictory to European integration.

In France, finally, the relation of national elites to the EU is traditionally conflicting, and so were most previous EU discourses. In Germany, both the relationship of political and media elites to the EU and previous EU discourses are much more harmonious. There is a broad elite consensus in favour of the EU, German EU membership, and Germany's role in the EU.

Table 5 summarises the findings with regard to the discursive impact of the contexts.

Table 5. Contextual factors in Germany and France and their discursive impact.

	Germany			France		
	Expression of contextual factor in Germany	Discursive reception in Germany: was it discussed?	Discursive impact	Expression of contextual factor in France	Discursive reception in France: was it discussed?	Discursive Impact
System	Loss of powers of the Bundestag Loss of significance of federalism	Not central	Low	Cutting down <i>services publiques</i> (public services)	Central	Strong
Parties	Smaller protest parties—without success	Marginalised	Low	EU as cleavage, major conflicts, and divisions	Central	Strong
Citizens	Critical	Marginalised, silenced, and not asked	Low	Critical	Targeted and successfully addressed by discourse actors with a strategic interest in EU criticism	Strong
National identity	Harmonious, inclusive, <i>raison d'état</i> , and few potential conflicts	Conflicts addressed, no enforcement	Low	Critical	Regularly successfully thematised	Strong
Previous EU discourses	Harmonious to alternating	Conflicts hushed up, do not assert themselves discursively	Low	Conflictual	Conflicts regularly addressed, linking to old lines of conflict	Strong
a) Government discourses	Harmonious to alternating	Conflicts hushed up, do not assert themselves discursively	Low	Officially convergent	Rather harmonious	Strong
b) Party discourses	Largely harmonious with alternating	Conflicts hushed up, do not assert themselves discursively	Low	Officially convergent; in fact, partly conflictual	Conflict potential in parties addressed; potential for division	Strong

Source: Wiesner (2024, p. 271).

4.2. The Course of the Discourses

Key findings on the overview of the discourse development, intensity, and key events are presented in Figure 1. Figure 1 shows that:

1. The key finding is that the German discourse followed the French one. Accordingly, the German peak was not linked to the Bundestag ratification vote, but to the French referendum.
2. The leading function of the French discourse ended after the French referendum: the German discourse continued after the referenda, while the French one ebbed off.
3. The number of articles per day, i.e., the intensity of the discourse, was continually increasing between January and May in both countries.
4. The French discourse was much more intense, at least in terms of output, throughout the whole discourse, many more articles were published than in Germany.
5. Media peaks—i.e., an extraordinarily high number of articles per day—were usually linked to key events in the discourse.

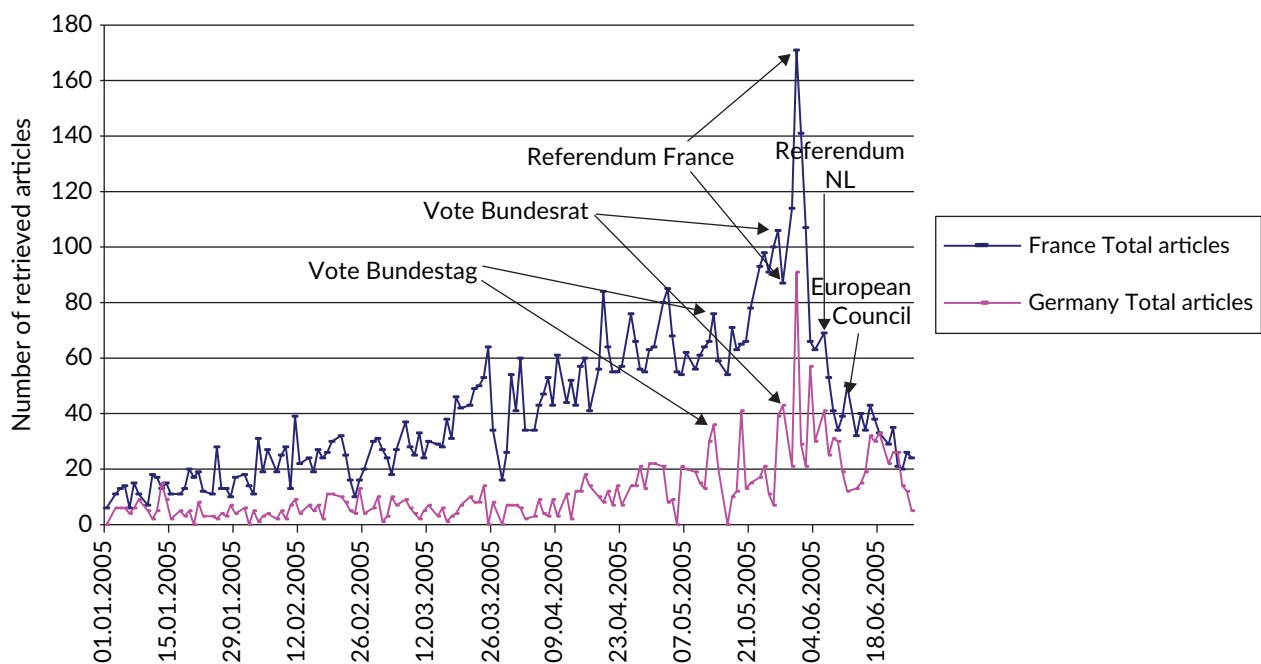


Figure 1. Intensity of the discourse in Germany and France. Source: Wiesner (2014, p. 417).

These findings were supported and further illustrated in the analysis.

4.3. Actors, Rules, and Levels of Reference

A decisive difference appeared with regard to the discourse actors: while in Germany, EU and national politicians as well as journalists and experts were the main discourse actors, the French discourse had a strong bottom-up component. Citizens, as well as NGO activists and trade union representatives, were key actors and also key drivers of the discourse, especially in the *Non de Gauche* movement that united the French extreme left parties and trade unions, as well as a number of dissenters from the Socialist and

Green parties. Different from Germany, politicians of other EU countries only had a small impact on the French discourse.

Moreover, the dynamism of the discourse was decisively influenced by NGO activities and also by a number of protests and demonstrations that took place. The main and most decisive motif of the French discourse, the “antiliberal motif” (see Section 4.4), originated in these contexts. In sum, the French discourse was decided by this bottom–up dynamics.

The rules of both discourses differed as well. In France, everything could potentially be said and obtain discursive relevance. The traditional differentiation of a left and a right camp served as a discursive rule, albeit relativised by the fact that a new divide was constructed, the one between the “yes” camp and the “no” camp.

In Germany, on the other hand, the traditional elite consensus in favour of European integration was at play. It successfully hindered EU-critical motifs from being circulated in the discourse via the silencing strategy (see Section 4.5).

The levels of reference differed as well. The French discourse was mainly oriented towards France. The EU, as well as other member states, were constructed as “others.” In Germany, it was the opposite, the EU and also other EU member states were referred to as “us,” and the French discourse, as was said above, had a leading role over the German one. Germans debated for a large part because they wanted to know what the French were discussing in preparation for their referendum. The French discourse clearly had a leading function, and the German discourse followed. To put it bluntly, the French discourse was the decisive topic of the German discourse. This also means that both discourses were strongly related.

4.4. Main Motifs and Arguments of the French Discourse

The following will present an overview of the main motifs and arguments of the French discourse (Table 6). They were markedly structured by the difference between the “yes” and the “no” camps. The first part of the motifs on both sides referred to the respective opponents. A second group of motifs referred to the general

Table 6. Main motifs of the French discourse.

Main yes-motifs	Main no-motifs
1. Internal motifs of the discourse Reference to opposing actors “Yes, but” arguments Internal debates in the “yes” camp	1. Internal motifs of the discourse Reference to opposing actors Populist motif Left alliance (Non de Gauche)
2. France's interests Responsibility Pragmatism France's role in the EU Europe puissance	2. EU criticism Antiliberal motif Criticism of TCE Sovereigntist motif
3. Normative Europe	

Note: This table was adapted from Wiesner (2016, p. 98, 2022, p. 18).

topic, the draft TCE. But while the “yes” camp underlined motifs that can be termed meta-motifs, underlining a generalised support for the EU as such, the “no” camp argued much more concretely (see Wiesner, 2014, pp. 245–279, 2024, pp. 158–177).

The key motif of the French discourse was the antiliberal motif. It was coined on the political left and mostly used by the Non de Gauche movement and citizen activists, but it became dominant in the discourse. The antiliberal motif, this is a finding of the analysis, can be summed up in an ideal-typical argument as follows: “The EU threatens France’s welfare state, and it is ultraliberal—and we are fed up with this!”

In the related arguments, the anti-liberal motif attributed various negatively connoted meanings to the EU. The EU was described as a brutal market-liberal or “ultraliberal” project led by economic leaders only and being only in their interest. The EU was also described as a project of corrupt elites. The concept of “ultraliberalism” was used to mark the EU out as a the “other” against which one must defend oneself with all means; the “no” in the referendum thus appeared as a “no” to “ultraliberalism,” and it also appeared as a means of legitimate and almost heroic defence, and as the rationale of the left Non de Gauche movement, which was constructed as a model for Europe. This was expressed by left leader Henri Emmanuelli: “If France protests, Europe moves” (H 250305_12).

In the course of the discourse, the antiliberal motif became a nodal point, i.e., a motif that shaped the discourse because all actors from all political camps, even the ones on the right, referred to it in their arguments. The motif used traditional concepts of the French political culture like *services publiques* (public services), *Égalité*, a strong state, protest, elite criticism, and France’s special role, it was used strategically by left-wing and centre-left actors (Trotzkists, communists, and dissident socialists like Laurent Fabius)—and it met with a mood of the citizens which was shaped by a disenchantment with politics and a strong feeling of social insecurity.

In more detail, the anti-liberal motif used various chains of argumentation.

First, the motif centred around the claim that the TCE was bringing an extreme version of market liberalism: “This Treaty is ultraliberal” (H 230505_11).

Or as the left opponents Francine Bavay, Marc Dolez, Elisabeth Gauthier (director of the left think tank *Espaces Marx*), and Claude Debons of the left-wing trade union *Confédération Générale du Travail* (CGT) said: “Europe is in crisis because since a long time it has given primacy to economic liberalisation over social cohesion, to high-level negotiations instead including the peoples. This is because it is reduced to being an organized market” (L 160505_2).

Other sub-motifs of the anti-liberal argumentation were: The EU since Maastricht has been responsible for privatisation and the dismantling of the *services publiques*, it (or the European Central Bank) acts in the interest of the financial markets, the TCE will support their hegemony, and the French right-wing government and French entrepreneurs support them in this. A report on the decision of the French Communist Party’s section of the Nord-Pas-de-Calais region in early January 2005 to campaign against the TCE summarises these criticisms:

Privatisations and destruction of *services publiques* have become...systemic...the triumvirat CRS [Chirac-Raffarin-Seillière]...is anticipating European market-liberal policies under the permanent dictatorship of the European Central Bank that fixes its goals in accordance with the interests of the financial markets...the draft constitution is tailor-made for the hegemony of financialised capitalism. (H 110105_5)

The third argument is that the EU would also facilitate the oft-cited company relocations abroad (*délocalisations*), as Henri Emmanuelli said: “Relocations are not a marginal phenomenon. They will become a key problem, because all activities, be it with high or small added value, can potentially be relocated” (H 030305_5).

Next, is that Laurent Fabius, in particular, coined the sub-motif of “entrenchment”: “The decision that you will take on May 29th will fix the European framework for 50 years” (L 030505_8).

Finally, the anti-liberal motif was sharpened and personalised in the criticism of the Services Directive, which was called the Bolkestein Directive after the former Competition Commissioner Frits Bolkestein. The spectre of “ultraliberalism” was thus stereotyped in the name of Bolkestein and very often directly linked to the TCE. Henri Emmanuelli, for example, said: “Bolkestein, *délocalisations*, TCE: it is the same logic” (H 170205_6).

The opponents actively used Bolkestein as a bogeyman—at the large demonstration in Brussels in March 2005, placards were saying: “Bolkestein = Frankenstein” (LM 220305_12).

A peak in the dispute was reached when activists from the left-wing Confédération Générale du Travail (CGT) trade union, working for the French electricity company EDF, cut off Frits Bolkestein’s electricity (LM 150405_5).

4.5. Main Motifs and Arguments of the German Discourse

The main motifs, topics, and rules of the German discourse, on the other hand, were divided into motifs related to the outside of Germany and those directed to the inside (Table 7).

The most decisive trait of the German discourse was revealed not only in the analysis of what was said, but also in the analysis of what was not said. This key rule of the German discourse was what I have come to term the “silencing strategy.” It was used to silence EU criticism in the German discourse.

The silencing strategy is based on the stable and longstanding German elite EU narrative, as well as the corresponding elite consensus of most parties represented in the Bundestag in support of European integration. In the German discourse, the pro-European majority of the German political elites reacted by silencing opinions that deviated from the elite discourse and minority voices, and by commenting on them in a delimiting, belittling, and pejorative way. The following illustrates how the silencing strategy was applied to inner-party dissenting voices in the mainstream parties.

Table 7. Main motifs of the German discourse.

External to Germany	Internal to Germany
1. Imported discourse France and its discourse Discourse at the EU-level Imported criticisms and reactions Discussion concerning the EU and the contents of the TCE 2. Fundamental debate on the political principles of the EU after the “no” vote The citizenry/the demos European identity What kind of Europe do we want?	1. Main rule Silencing strategy 2. Particular German motifs EU enlargement (especially Turkey) Assertions regarding EU politics Criticism of the EU and the TCE (anti-militarism) Classical motifs of German–EU discourse (Western integration) New motifs of support for the EU and the Treaty

Note: This table was adapted from Wiesner (2016, p. 101, 2022, p. 19).

The way internal critics of the TCE were dealt with in the Christian Democrat (CDU)/Christian Social Union (CSU) group in parliament illustrates that there were three stages of the silencing strategy. In January 2005, several CSU members of the German parliament announced that they would not vote for TCE ratification if certain demands were not met, such as more powers for the Bundestag in European policy matters.

The first stage of the silencing strategy against such dissent is to *downplay* it, as in the following statement by CSU party leader Stoiber: “CSU chairman Edmund Stoiber counts on a broad majority for the TCE in the CSU bundestag group. In the end only “very few” MPs would vote no, Stoiber said” (SZ 070105). Stoiber subsequently adopted the dissenter’s claims and negotiated them with the red-green government, which eventually agreed to some of them. However, in the run-up to the ratification vote, when the potential dissenters kept their line, Christian Democrat leaders tried to change the minority representatives’ minds.

The second stage of the silencing strategy is *inward courting*. Thus, at the preparatory parliamentary group meeting with a test vote, Edmund Stoiber and Angela Merkel made a plea for an integrated Europe and the TCE:

Even the catholic church was regarding the Constitution as progress, Stoiber explained to the EU sceptics in his own ranks—some of them had been complaining that a reference to god was missing in the Treaty. Stoiber, as was reported, added that the critics should not be more papal than the pope itself...Using a lot of pathos, the Bavarian minister president recalled how an old warring Europe grew together into a community of peace. CDU chair Merkel explained why the Constitution was a big step ahead. Her presentation was impressive, even EU sceptics said. (SZ 120505_3)

After the first two stages of downplaying and courting had not achieved the desired success, the third stage was introduced. *Threats* against dissenters who intended to vote “no” in the ratification vote were expressed: “MPs report that influential colleagues showed the marter instruments developed in democracies that serve at creating majorities—for instance, the threat that the[ir] career might eventually suffer” (SZ 120505_3).

After it had become clear that in spite of all the above, a minority of the Christian Democrat parliamentary group would vote “no,” the party leaders went back to stages one and two, i.e., downplaying and inward courting. The potential “no” votes were immediately downplayed in their significance again, as here by CDU leader Angela Merkel:

“A vast majority will approve, and this is good news.” She said she would recommend a yes vote to her group [the CDU group], but did not expect a unanimous yes vote. It was known for a long time, she said, that there would be some diverging votes. (taz 100505_3)

There were far fewer critics of the TCE in the then red-green government parties than in the opposition, but nevertheless, attempts were made to discipline them. In this, however, the Social Democratic Party of Germany (SPD) was quite dispassionate: “Two SPD MPs have announced they would abstain from the vote. The executive secretary of the SPD group, Wilhelm Schmidt, however, announced he would talk to both of them once again” (SZ 120505_3).

In contrast, there was an intense debate in the green group. The only Treaty critic, Hans-Christian Ströbele, earned severe contradictions:

In the green group meeting, only Hans-Christian Ströbele expressed his concern—which resulted in a 20-minute exchange with foreign minister Joschka Fischer....Should Ströbele not approve, Fischer said, he needed to be aware that he joined forces with Eurosceptics like the British Conservatives and the French extreme right. By referring to the latter, Fischer reacted to interjections of green chairwoman Claudia Roth, who repeatedly had mentioned the name Le Pen....Green insiders expect that Ströbele will now approve of the TCE. (SZ 120505_3)

5. Concluding Discussion

The main findings of the comparison of the two discourses will now be discussed against the conditions for EU identity construction laid out in the heuristics (see Wiesner, 2014, pp. 398–470, 2016, pp. 103–108, 2024, pp. 276–286, for more details).

5.1. *The Discourses and the Context*

The result of the analysis can be summed up like this: The German discourse can be characterised as an EU discourse with a national base: its key features were shaped by its openness and the permanent reference to the EU and other member states, and in particular, the French discourse. Both the EU and its member states were constructed as European domestic politics and as “us.” The German discourse was not very intense since before May, only several smaller debates followed one another. After May, and in particular from the middle and end of May onwards, the discourse intensified significantly.

The French discourse can be characterised as a national EU discourse: Its key features were shaped by its closedness; it was rather self-referential, EU and EU member states were more rarely referred to than was the case in Germany, and they were discursively constructed as foreign politics or “the other.” The French discourse, as opposed to the German one, was very intense. This was due to a high level of public interest, the EU being the most important discussion topic in April and May. Table 8 presents an overview:

Table 8. Comparison of the two discourses.

Germany: An EU discourse with a national base	France: A national EU discourse
Openness	Closedness
Continual references to the EU and its member states	Self-referential
EU and France are both described as “us”	France is “us”
	EU and member states are “the other”
Intensity	Intensity
Two phases: Until May, there was scarcely any discourse and from the end of May onwards it intensified significantly	Very intense
	High level of mobilisation: EU was the most important topic in April/May

Note: This table was adapted from Wiesner (2016, p. 103).

While the discourse context in France had a strong effect on the French discourse, this was not the case in Germany. The referendum, the split of the political parties on the matter, the ambivalences and latent contradictions between established patterns of national identity and European integration, as well as the reference to previous and conflicting EU discourses, fuelled a heated discourse in France.

In Germany, on the other hand, the treaty was ratified in parliament only; most political parties, except for the far left PDS (Party of Democratic Socialism), which today has been followed by the Left Party, were in favour, and the national identity conception as well as previous EU discourses were entirely pro-European.

5.2. National EU Discourses as Means of European Identity Construction?

Based on the heuristics resumed in Section 2.3 in the theses 1 to 14, it can be stated that both national EU discourses analysed could hardly function as means of European identity construction, even if it was for different reasons.

The French EU discourse succeeded in constructing a distinction between a French “us” and the EU as an “other,” which counteracts the leading Thesis 1 of the heuristics—there was no demos constructed, but an opposition. The French discourse constructed the EU as something the French precisely did not identify with—things would have been different if it had just been a criticism of certain EU policies while still constructing the EU as “us”.

Findings also underline a contradiction to Thesis 6—the meaning of collective identities must be compatible with established societal codes—and Thesis 7—they must also correspond to the interests, desires, and fears of the population so that they can prevail. There were also contradictions of European integration and the French context as expressed in Thesis 12—European identity is only sustainable as a multi-level system of different identity levels; conversely, if there are conflicts here, they probably negatively influence the formation of European identity. Moreover, the French case contradicts Thesis 13—the emergence and persistence of European identity is also conditioned by a positive relationship between national and European identities—and Thesis 14—a positive relation between national and European identity levels only seems to be sustainable if the respective, mostly national contexts, support it.

The German EU discourse, on the other hand, until the end of May, barely constructed any patterns of meaning at all. This is a contradiction to Thesis 3—European identity is socially constructed and loaded with different meanings in the process. However, the German discourse is in accordance with Theses 6, 7, 12, 13, and 14, as it constructed the EU as “us.” After late May, the situation changed, and there was an intense EU-related discourse.

These results indicate that in the discursive construction of EU identity, no simple cause-and-effect model is at work. It is not enough if political elites simply suggest patterns of meaning for the EU (as the French elites did) and expect citizens to follow. In order for European identity construction to happen, a number of factors need to play together constructively:

1. It is necessary that patterns of meaning are constructed and circulated. The German case demonstrates that this is not necessarily the case even when an EU Treaty is awaiting ratification in a leading member state. The French case, in exchange, underlines that this is the case if a discursive arena is opened up (scheduling a referendum) and used (citizens and political elites actively participate in the discourse).
2. In case a discursive arena is opened and meanings for the EU are circulated, it is a further condition that they construct a generally supportive identification with the EU as a polity (i.e., the EU as some sort of “us”) and not a clear distinction from the EU as a polity, notwithstanding criticism of EU policies.
3. Moreover, as European identity needs to develop in a multilevel system of identities, the discourses should neither construct clear distinctions from other member states.
4. These results also allow some conclusions regarding the question of an EU public space and the Europeanisation of nationally mediated public spaces. They underline that there are two paths for that: as in France, via national interests that are at stake and national actors that debate the EU as a national topic, or as in Germany, via a European opening and orientation of national political elites and actors.

These four conclusions describe four main conditions for a discursive construction of an EU identity that should be further studied in a broader research covering more country cases.

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Conflict of Interests

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Data Availability

The research data is assembled in a database that is in possession of the author and not publicly available.

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