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# Learning from the European Union? Eurasian Regionalism and the “Global Script”

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**ABSTRACT.** *Even from the cursory observation, the Eurasian Economic Union appears to be a good example of what is frequently referred to in the comparative regionalism research as diffusion of the EU model – many specific institutional solutions and, more generally, the fundamental agenda and the design of the EAEU are inspired by the EU experience. This article asks two questions: first, how can we explain the diffusion of the EU model in case of Eurasia, and second, which consequences does the diffusion have for the relations between the EAEU and the EU, as well as the EAEU and the Asian integration projects (like the Belt and Road Initiative). Our conclusions are paradoxical: we show that the standard arguments of the diffusion literature show limited empirical validity in the Eurasian case; and that the institutional similarity between the EU and the EAEU makes the interaction of these two organizations more, and not less difficult.*

**KEY WORDS:** *diffusion, European Union, Eurasian Economic Union, models of regionalism*

## Introduction

The development of regionalism in the global economy and politics over the last decades has been characterized by two trends. On the one hand, the number and the scope of regional organizations has been going up; regional organizations emerge in different parts of the world and play an increasingly important role. On the other hand, the heterogeneity of countries establishing and joining regional organizations is not matched by the heterogeneity in designs of the organizations themselves. On the opposite, there is a clear trend towards adjustment of regional organizations to a single blueprint – the institutional design and the sequence of integration steps characteristic

of the European Union (EU). It became commonplace in the comparative regionalism literature to emphasize the uniqueness of the EU experience and the limits of its applicability to other parts of the world [Söderbaum 2014]. However, regional organizations continue systematically imitating and mimicking the EU – to a larger extent than the differences in their local contexts would imply. In this respect, one frequently refers to what one could call a “global script” [Jetschke 2010; Jupille, Jolliff, Wojcik 2013; Lenz, Burilkov 2017]: a “standard model of regionalism”, which is “downloaded” by newly established organizations.

Post-Soviet Eurasia from the early 1990s has been an example of numerous attempts of “downloading the global script”, with the EU serving as a clear benchmark for many regional organizations set up by the Post-Soviet countries. While the first organizations and treaties signed in the early 1990s did not follow the EU model (the CIS ruble zone being the best example of it), since 1993–1994 the EU model unambiguously becomes the dominant paradigm for the Eurasian regionalism. The Eurasian Economic Union (EAEU) is yet another example of what one could probably refer to as “normative EU-centrism”: as we will show in what follows, there is substantial evidence that many aspects of the EAEU design and treaties are influenced by the EU example. Obviously, the EAEU did not achieve the level of integration and supranationality of the EU (and does not inspire to do so), but the fact that the institutional design and the integration agenda of the EAEU are to some extent influenced by the EU experience is hardly disputable.

Thus, in order to understand the interplay between the EU and the EAEU, we need to look not only at the (so far limited) direct interaction between organizations, as well as at the (indirect) competition between the EU and Russia in their shared neighborhood, but also at the ideation-

al links between two organizations. From this point of view, this article asks three questions. First, how does the “downloading the global script” function in Eurasia and which factors explain this process? Second, how does the “global script” influence the ability of the EAEU to engage in dialogue with the EU? In other parts of the world, “downloading the global script” appears to be a factor fostering cooperation (since it makes the partners easier to understand and more attractive for the EU) – is it the case in Eurasia as well? And finally, third, how does the “downloading the global script” affect the ability of the Eurasian regionalism to develop ties to other regionalist projects and regional (and global) powers, e.g., in Asia?

The aim of this paper is to review these questions, attempting to offer a number of preliminary observations from the last decade of the Eurasian regionalism. We conclude that, first, the Eurasian case (in spite of substantial evidence of learning from the EU model) poses a serious challenge for the diffusion theories of regionalism typically used to explain the “downloading of the global script”, because many causal channels discussed in this literature are absent in the Post-Soviet space. Second, “downloading the global script”, somewhat paradoxically, does not support the development of the EU-EAEU dialogue: on the contrary, the similarity of organizations makes it more difficult. And third, “downloading the global script” makes the EAEU quite different from many Asian regional projects (in particular the Chinese Belt and Road Initiative) – which is, in turn, an obstacle and an advantage for the EAEU’s interaction with regional organizations and regional initiatives in this part of the world. In the remaining part of the paper, we offer a more detailed discussion of each of the arguments.

Before we proceed to our discussion, we need to provide an important caveat. It goes without question that the lack of di-

dialogue between the EU and the EAEU is driven by a variety of factors. The substantial contradictions in goals of Russia and the EU (and the leading EU countries) are likely to play a more important role in deterring the EU-EAEU dialogue than the issues discussed below. Even if the problems we discuss below did not exist, the geopolitical confrontation Russia and the EU are engaged in, differences in the organization of political systems and lack of trust would make an effective cooperation between the EU and the EAEU hardly possible. We do believe, however, that our study investigates yet another factor making cooperation more difficult, which has not been explored before in the literature and appears counterintuitive: as such, it also adds to the general literature about “downloading the global script”, looking at an unusual and previously unexplored case study.

### EAEU as an example of “downloading the global script”

As we have already mentioned in the introduction, the similarities between the EU and the EAEU in terms of their design are substantial. There is already a large literature, which investigates these similarities: thus, it is not the goal of this study to offer an explicit comparison of the EU and the EAEU (rather, we build upon the already existing evidence and attempt to look at the determinants of this similarity and its consequences for the EU-EAEU interaction). However, it is helpful to provide a review of the existing evidence on the similarity of two regional organizations as the first step of our investigation.

Comparative literature on the EU and the EAEU can be found in different disciplines (economics, political science and law). This is not surprising, because, in spite of the progress of the comparative regionalism literature, the EU still is frequently used as a benchmark for

the evaluation and comparison of regional organizations. One way at approaching the comparison between the EU and the EAEU is to look at the *economic fundamentals* (structure of the economy, heterogeneity of membership, levels of economic development) and *political goals* of the member states and of the bureaucracy (e.g., [Obydenkova, Libman 2019]). While these aspects are extremely important, for the research question of this paper, a more relevant topic is to find out the similarity in the *design*, i.e., *formal institutions* of the EAEU, as well as the *declared agenda of the regional integration*. From this point of view, the similarity of the EAEU and the EU is particularly visible at four levels:

- *Integration agenda and sequence of integration steps.* EAEU, similarly to the EU, starts with integrating the trade area and establishing a customs union; then proceeds to liberalizing the movement of people and capital; and then proceeds to creating more advanced forms of regional integration. Yeliseev [Yeliseev 2014], from this point of view, compares the EAEU Treaty with the Treaty of Rome of 1957. Other regional organizations often deviate from this sequence of steps, which was originally used by the EU.
- *Structure of institutions.* Two institutions of the EAEU, for which the institutional similarity is the most obvious one, are the Eurasian Economic Commission (EAEC) Board and the EAEU Court [Popescu 2014; Lanko 2015; Podadera Rivera, Garashchuk 2016; Vicari 2016]. The design of the Commission with individual “ministries” and large supra-national bureaucracy, the very name of the institution seem to be borrowed from the EU experience [Libman, Vinokurov 2012]. In the same way, the EAEU Court seems to be inspired by the European Court of Jus-

tice both in terms of its overall design and the intended legal practice [Neshatayeva 2015].

- *Formalization and legalization of integration.* The EAEU heavily relies on common norms and regulations in its functioning: it is essentially primarily a regulatory institution [Dragneva, Wolczuk 2015]. As the subsequent discussion will show, treating regionalism as a “common legal and regulatory framework” is an inherent feature of the EU model of regionalism (which seems to be accepted by the EAEU without any discussion), while other models of regionalism often rely on more project-based approach and emphasize the financing of common infrastructure.
- *Explicit reference to individual EU policies and integration steps.* Thus, Petrov and Kalinichenko [Petrov, Kalinichenko 2016] describe the relation between the EU and the EAEU legal orders as a “back door approximation”, with the EAEU systematically referring to the EU *acquis* while designing its own judicial decisions. The EAEC refers to the EU practice in designing its macroeconomic convergence and product safety policy [Lanko 2015]. EAEU officials explicitly describe the EAEU as “sufficiently similar” to the EU in the economic sphere (at the same time clearly excluding the option of the political union). EAEU common energy policy, according to Zemskova [Zemskova 2018], can also be seen as a point of similarity between the EU and the EAEU.

This description, as mentioned, should not be taken as evidence of the EAEU being completely identical to the EU. In fact, each of the four points we mentioned, being considered with sufficient thoroughness, reveals substantial differences be-

tween the EU and the EAEU. Thus, while the overall agenda of integration of the EAEU seems to be influenced by the EU experience, the depth of integration in the EAEU is not comparable with that in the EU and is unlikely to reach the EU level [Vinokurov 2017]. The institutions of the EAEU, although resembling the EU, have substantially weaker autonomy and show more similarity to the EU in form than in practice [Kembaev 2015; Karliuk 2015; Roberts, Moshes 2016]. The “back door approximation” should not be seen as synonymous to the identity between the EU and the EAEU *acquis* or even as evidence of the existence of the EAEU *acquis*: the latter is disputed, with more optimistic [Vicari 2016] and pessimistic [Petrov, Kalinichenko 2016] voices among the observers. The cooperation in other areas (macroeconomic policy, antitrust policy etc.), while refers to the EU experience, is more declaratory than factual. The legalization of the EAEU integration model can also be disputed, if one considers the fundamental predominance of informal rules and relations in the Post-Soviet countries [Libman, Obydenkova 2013]. However, unfortunately, research on the actual practices of the Post-Soviet regionalism is extremely limited and no actual evidence on the extent to which formal rules or informal practices dominate the decision-making of the EAEU is available.

However, even with this battery of cautionary remarks, which indicate that the EAEU and the EU are very different entities, one has to acknowledge two issues. First, the similarities become more numerous, if we look at the formal institutional level than at the actual practices (although organizations are not identical in this respect as well). This is very typical for most examples of “downloading the global script”: it works much better at the level of formal institutions than the informal ones (as, probably, all examples of institutional transfer). Second, there appears to be a

clear interest of the organization and/or its creators of emulating the European Union in its design and policy agenda to some extent. Our question therefore remains: what explains this drive towards emulation and how does the emulation affect the possibility for the EU-EAEU interaction?

### **"Downloading the global script": Mechanisms and puzzles**

The phenomenon of "downloading" has been extensively discussed in the existing comparative regionalism scholarship (e.g., [Jetschke, Lenz 2011; Börzel, Risse 2012]). It identified a number of causal channels, potentially explaining the spread of the EU model. Risse [Risse 2016] singles out a number of diffusion mechanisms. To start with, the EU itself could make it more attractive for other regional organizations to follow the EU's blueprint by offering more extensive support to more similar regional projects (*rewards and sanctions mechanism*).<sup>1</sup> Second, EU model could spread through *socialization and persuasion*: by training bureaucrats and engaging politicians and by disseminating information about the advantages of the EU model, the European Union increases the chances that the organization will be copied (to some extent) elsewhere. Third, imitation of the EU model could be driven by the perception of the EU as a *successful regional organization*: in this case, countries outside Europe rationally search for optimal solutions for organizing their regional interaction, which the EU appears to be offering. And finally, fourth, the EU mod-

el could be imitated without conscious effort of and interaction with the EU (socialization and persuasion), if the EU model is perceived as the only "*legitimate*" way of implementing regional integration: the "EU-centrism" becomes a (global) norm.<sup>2</sup>

The problem with these arguments is that they seem to be of rather limited validity for the Post-Soviet Eurasia. Generally speaking, Eurasia is frequently studied as an example of "diffusion" from the EU: e.g., in case of political and economic reforms (e.g., [Lankina, Getachew 2006; Gawrich, Melnykovska, Schweickert 2010; Langbein, Wolczuk 2012]). Geographic proximity of the Eurasian countries to the EU and the interest the EU expressed into the development of the region since the onset of transition in the 1990s and definitively since the enlargement waves of the 2000s make Eurasia a natural candidate for the diffusion effects. However, in case of the Eurasian regionalism, finding evidence of specific mechanisms of diffusion from the EU turns out to be a much more difficult task.

To start with, it is indeed the case that the EU established itself as a force supporting regionalism worldwide by engaging in dialogue with regional organizations, offering advice and material support and strengthening their legitimacy and actor-ness [Börzel, Risse 2009].<sup>3</sup> The Post-Soviet Eurasia, however, appears to be literally the only exception to this approach of the European Union. Here, the European Neighborhood Policy (ENP) and the Eastern Partnership at the beginning ignored the Eurasian initiatives entirely (ironically, trying to promote regional cooperation be-

1 This support could manifest itself in financial assistance, organizational aid, training of personnel or simple willingness to engage in high-level dialogue, increasing the legitimacy of the EU's partner organization.

2 As we have already mentioned, until recently, the EU was the main case used by the regional integration studies for developing their theoretical approaches. This made the epistemic communities worldwide more likely to treat the EU as the "natural" blueprint for evaluating other regional organizations. The acknowledgement of the heterogeneity of possible regionalisms and an attempt to move beyond the EU model became an important goal of the "New Regionalism" literature [Söderbaum 2016].

3 The EU-ASEAN dialogue is an interesting example of this logic, see [Stokhof, van der Velde, Hwee 2004].

tween the ENP members [*Pulisova* 2011] – without any success), and later considered the Customs Union and the EAEU as an obstacle for the EU agenda. The idea of the EU-EAEU dialogue became popular in Europe only in 2014–2015 primarily because of an external shock – the Ukrainian crisis, which forced political elites and experts to search for new dialogue formats with Russia [*Meister* 2015]. Thus, the first channel identified by Risse: sanctions and rewards – is absent in the Eurasian case. In fact, precisely the interest of the EU to support institutional transplantation of certain governance practices to the Eurasian countries appears to be an important reason for the EU *not* to engage Eurasian regional organizations. In other (more remote) parts of the world, interaction with the local regionalisms is attractive for the EU, but in the proximate Post-Soviet Eurasia it attempts to transplant its model through other, more direct instruments (like the ENP) and recognizes the Eurasian regionalism only if it becomes a constraint for the EU initiatives.

Furthermore, there is also almost no evidence of socialization and persuasion mechanism as well. Furman and Libman [*Furman, Libman* 2015] show that only a handful of high-level bureaucrats of the EAEC have any experience of studying in an EU country or working there – a striking contrast to, for example, African regional organizations, for which the EU plays a crucial role in training their bureaucracies [*Shams* 2005]. The EAEU countries show relatively little interest in supporting systematic socialization of their “integration bureaucracies” at any level in the EU (the only possible exception being Kazakhstan with its Bolashak program),<sup>4</sup> and the EU itself is not enthusiastic about socializing the EAEU bureaucrats for the reasons present-

ed above. The interaction between organizations has been too limited to really trigger any socialization and persuasion effects.

Imitating the EU as the only “successful” regional integration model appears to be much more plausible in the Eurasian context. Indeed, the collapse of the Soviet Union coincided with one of the major leaps in the development of the European project – the Maastricht treaties – which could have made the EU a logical benchmark in the eyes of many decision-makers and experts in Eurasia. This line of argumentation, however, also faces two empirical difficulties. On the one hand, if one looks at the recent development of the political and expert discourse in Russia, it appears to be the case that precisely when the EAEU (and the Customs Union, which preceded this organization) came into existence, the discourse turned to be much more skeptical towards the European project, highlighting its difficulties and drawbacks [*Neumann* 2016]. It is not the goal of this article to discuss the reasons for this development;<sup>5</sup> for us it is sufficient to conclude that this discourse makes the interpretation of the emulation of the EU as the only possible approach to success less plausible. And on the other hand, Eurasian (in particular Russian) actors frequently pointed out a very different approach to regionalism – one focusing on implementation of specific and mutually beneficial projects (e.g., in the area of infrastructure or business cooperation) rather than on creating common regulatory frameworks, institutions and norms – as a particularly attractive one and potentially associated with very large benefits for the participants [*Libman, Stewart, Westphal* 2016]. Why then would they treat the EU (which emphasizes common norms and regulations rather than projects) as a story of success?

4 On Bolashak see [*Del Sordi* 2018].

5 At the very least, it is hard to treat the EU as a normative benchmark in the immediate aftermath of the Euro crisis.

This leaves us with one final explanation, which is, unfortunately, very difficult to test empirically: the perception of the EU as a “universally acceptable” and “legitimate” approach to regionalism. The legitimacy logic indeed seems to have some explanatory power in the Post-Soviet case. Lanko [Lanko 2015] argues that in Russia research and expertise on the Eurasian regionalism were heavily influenced by the scholars of European integration<sup>6</sup>. Golovnin et al. [Golovnin, Zakharov, Ushkalova 2016, p. 65] point out that

For a prolonged period of time, expert and scientific community tended to idealize the European model of integration and, respectively, the model of the traditional regionalism. Attempts at blindly copying them in the Post-Soviet space in the 1990s and in the early 2000s did not reap any positive outcomes (translated by the author).

But even here, caution is required. First, how substantial this degree of “idealization” (if any) was in the 2010s, when the EAEU came to be? Second, accepting the EU as an attractive model of regionalism does not automatically imply the support of “mimicking” the EU: and precisely in this respect there have been many skeptical voices in the Russian epistemic communities suggesting that the EU model – with all its advantages – is unlikely to succeed in Eurasia (see [Kosikova 2010; Ushkalova 2014])<sup>7</sup>. And third, how important are epistemic communities at all for the decision-making in the Eurasian countries? There is, unfortunately, very little research on this topic, but it would be cru-

cial to evaluate the importance of the legitimacy argument for “downloading the global script”.

Summing up, our observations are not unambiguous: we were able to rule out some of the arguments explaining “downloading” with very high certainty and to cast doubt about other arguments (which may still be valid, but require further investigation). Anyway, we can conclude that precisely the Eurasian case should *not* be automatically treated as a “natural” example of the diffusion of the EU model: on the contrary, it is a difficult case, which calls for further and more nuanced research. There are some further region-specific arguments, which can be suggested in this respect. Furman and Libman [Furman, Libman 2019], for example, hypothesize that the imitation of the EU model could have been driven by an attempt to create an organization, which would be recognized *by the EU itself* and by other non-regional actors as a respected counterpart (possibly, leading to the dialogue between the EU and the EAEU, which Russia very much supported in the mid-2010s and interpreted as a possible sign of recognition and respect from the European actors). Yet another explanation could be path dependence: in this case, the choice of the institutional model for the EAEU could have been driven by the specific approach to regional integration in Eurasia, which emerged much earlier in the 1990s and “locked in” the integration agenda, making it focus at a particular regionalism model. Further research on this topic would enrich not only our understanding of the Eurasian regionalism, but generally speaking the comparative regionalism studies.

6 However, at the same time, as Libman [Libman 2009] notes, an at least equally important community influencing the debate on Eurasian regionalism in the past consisted of the former students of COMECON and experts on the Post-Soviet and Eastern European countries, The relation between this research tradition and that of the European studies in influencing the discourse on Eurasian regionalism in Russia remains under-researched.

7 Compare, for example, the assessment of the perspectives of the Eurasian regionalism in Shishkov [Shishkov 1992] versus Shishkov [Shishkov 1996] – the second study is much more vocal in pointing out the limits of the applicability of the EU model in Eurasia.

## Implications of the global script

### EU AND EAEU

Regardless of the factors determining the choice of the institutional model of the EAEU, it ended being rather similar to the EU in its form (although not necessarily in its substance). How does it affect the interaction between the EAEU and the EU? Should the similarity lead to greater readiness to dialogue? The unfortunate conclusion for Eurasia is that in this case similarity does not breed understanding: on the contrary, it seems to create barriers and encourages misconceptions, making dialogue more difficult (but not fundamentally impossible, as the subsequent discussion would show).

Throughout the last decade, membership in the Eurasian regional organizations and closer partnership with the EU were perceived as mutually exclusive options for the Western CIS countries [Cadier 2014; Delcour 2015; Stefanova 2018]. This perception seems to be heavily driven by the political rather than by the economic logic; however, it also is based on an underlying institutional feature of any customs union – it precludes its member countries from negotiating unilateral free trade deals with other states. Since mid-first decade of the 2000s, the EU used the Deep and Comprehensive Free Trade Agreements (DCFTAs) as the main tool for organizing its interaction with the Post-Soviet countries. The choice of the DCFTAs as the main tool of the ENP is not coincidental and reflects path dependencies in the functioning of the EU bureaucracy itself (which, given the history of the European project, is inclined to focusing on trade issues as the main aspect of regionalism). However, if a Post-Soviet country joined the EAEU, it became unable to sign a DCFTA. And signing DCFTA excluded the Post-Soviet countries from joining the EAEU or the preceding Customs Union. This is one of the factors, which led to the (perception

of) competition between the EU and the Customs Union / EAEU for the membership of Eastern European countries. For a different institutional design of the Eurasian regional organizations, which were less similar to the EU itself (i.e., did not pursue the goal of the customs union or even did not focus on trade), this contradiction would be absent.

We do not claim that the choice of the institutional design of a customs union automatically means full incompatibility of the EU activities in what it describes as its Eastern neighborhood with the Eurasian regionalism. For instance, the EU bureaucracy could have attempted to develop ties to Eurasian countries by signing agreements excluding trade aspects and concentrating on issues associated with governance (which, presumably, is a more important issue for the EU). The 2017 Comprehensive and Enhanced Partnership Agreement with Armenia (a member of the EAEU) shows that this approach is feasible, although it would require larger flexibility on the side of the EU bureaucracy than the DCFTA approach. Furthermore, some observers in the past pointed out an even more encompassing option of a free trade area between the EU and the Customs Union / EAEU [Vinokurov, Libman 2013], which, however, became impossible after the imposition of mutual sanctions by the EU and by the Russian Federation in 2014. Thus, there are ways for two customs unions (EU and EAEU) in Eastern Europe to cooperate with each other: however, they require more effort and more willingness to make concessions on the side of both actors than it would be the case of the EU and the Eurasian regionalism used very different designs (as the case of the interaction of the EAEU and the Asian regional projects we review in the next section shows).

In addition to that, similarity can in fact become a factor increasing mutual misunderstanding. The use of some-



what similar language combined with subtle differences could turn into serious obstacles for cooperation. The following example illustrates the problem we refer to. Since 2015, there has been some willingness of the EU and the EAEU to engage in dialogue at the non-political, technical level (given that the overall geopolitical situation made the dialogue at the political level impossible). The problem is, however, which level should be treated as non-political and technical. For the EU, the “bureaucratic” level is associated with the Directorates-General (DGs), the main units of the organization of the European Civil Service. The directors-general (heads of the DGs) report to the European Commissioners, who themselves are not seen as representatives of the bureaucratic level – Commission is a political institution of the EU. In the institutional design of the EAEU, the equivalent of the Commissioners appears to be the Ministers of the Board of the EAEC, each heading several Departments (which appear to be an analogue of the DGs). However, the relative importance of these institutions differs a lot. In the EAEU, these are Ministers who are seen as the “technical level” (with the Council of the EAEC being the “political level”); the Department directors play a smaller role than the DG directors. Therefore, for the EAEU the “technical” dialogue would imply the contact between the Ministers and the Commissioners; but for the EU this contact is already political (because Commissioners are a political office) and therefore unacceptable. At the same time, Ministers of the EAEC cannot engage in dialogue with the directors-general because it is perceived as not fitting their status, and a dialogue between the directors-general and the heads of the EAEC Departments is less attrac-

tive because of relatively limited authorities of the latter. Greater institutional dissimilarity would, somewhat paradoxically, improve mutual understanding by removing these subtle differences.

Again, we have to stress that it is certainly feasible to overcome the differences we have described. Furthermore, as we have pointed out in the introduction, the main challenges in the relations between the EU and the EAEU are for sure not associated with the institutional design: they are an outcome of political confrontation in Eastern Europe (with the Ukrainian crisis being the strongest manifestation of it). Our main point is, however, that *institutional similarity does not make cooperation easier* – and this has to be taken into account.

#### **GLOBAL SCRIPT, ASIA AND THE BELT AND ROAD INITIATIVE**

While the “global script of the EU” appears to matter in various regions of the world, Asian approach to region building is probably the best-known example of attempts at developing alternatives to the EU, which, to some extent, proved to be successful. In the 1990s and the first decade of the 2000s, the “open regionalism” model of the APEC attracted a lot of attention of the observers [*Bergsten* 1997]. Similarly, before the crisis of 1997–1999, the Southeast Asian model of business-driven regionalization (with much stronger emphasis on interaction between private actors than on common institutions, see [*Peng* 2002]) received a lot of attention (the crisis caused an increase in the degree of institutionalization of regionalism in the ASEAN though)<sup>8</sup>. Generally, Asian regionalism models are typically characterized by a much higher flexibility of the institutional framework (if any), by the fo-

8 Both models were also discussed in the context of the Post-Soviet space prior to the establishment of the EAEU, see [*Kheyfets, Libman* 2008; *Kosikova* 2010].

cus on implementation of specific projects (e.g., trade facilitation or infrastructure) rather than on detailed common norms, and by adjustable roadmaps, which did not necessarily follow the same steps European regionalism followed in the last seventy years. The Belt and Road Initiative (BRI) is probably the most pronounced example of this flexibility: it is even doubtful whether one can consider it an example of “regionalism” in the narrow sense (it is certainly not a regional organization, it does not have a clear-cut framework or set of goals) rather than a “project” initiated by the Chinese government<sup>9</sup>. The BRI includes a very broad set of projects and attempts at developing cooperation spanning the entire Eurasian continent [Huang 2016]. How does the Eurasian regionalism, based on the “downloading the global script” of the EU, fit the Asian models of regionalism, and in particular, the BRI approach?

Unlike the EU, where the dialogue between this organization and the EAEU has shown very limited progress, the congruence (*sopryazhenie*) of the EAEU and the BRI gained momentum since 2014. In 2018, China and the EAEU signed a trade and economic cooperation agreement, which did not envision the creation of a free trade area (an option clearly unacceptable for Russia and some other EAEU members), but included a large array of the trade facilitation measures. The congruence of the EAEU and of the BRI has received some attention in the scholarly literature [Wilson 2016; Skriba 2016; Markarov, Sokolova 2016; Gatev, Diesen 2016; Peyrouse 2017; Kembayev 2018; Svetlicinii 2018], pointing out numerous potential benefits, but also difficulties this process faces (from incompatible geopolitical objectives of Russia and China to differences in the visions of the geography of transportations corridors, see [Vinokurov, Liso-

*volik* 2016]). For us, however, the most important question is insofar this congruence was influenced by the differences in the institutional framework: a flexible “project” of the BRI and a heavily institutionalized international organization like the EAEU. Both projects are clearly conceptually very different (thus, strictly speaking, unlike the EU-EAEU case, we cannot refer to the EAEU-BRI relations as a “dialogue”, because the BRI is not an organization – the dialogue happens between the EAEU and China; there is no issue of competing membership, because the BRI has no “members” – there are merely countries, which agree to participate in some of the infrastructural initiatives financed by China and by China-led international organizations, etc.), but how does it affect their ability to mutually support each other in achieving their goals?

As we have shown in the previous subsection, mimicking the EU did not improve the ability of the Eurasian regionalisms to engage in a dialogue with the EU – on the contrary, similarity of agendas made cooperation more difficult. But precisely for the same reasons, *dissimilarity* of the Eurasian regionalism and the BRI appears to make some sort of mutually beneficial interaction *more* likely [Libman 2016]. The focus of the BRI on the infrastructural development does not contradict the trade liberalization measures within the EAEU – they approach the agenda of bringing the economies closer together from different angles (through infrastructure and through common rules and norms) and, as such, are fundamentally compatible. Furthermore, while engaging the EU ultimately requires accepting a set of rules and norms EU generates, Asian projects are much more flexible in this respect. The discussions between Russia and China about a free trade area (originally

9 And, as some observers suggest, possibly even merely a label for the Chinese approach to the international economic policy.

suggested by the China within the framework of the Shanghai Cooperation Organization) turned out to be unsuccessful – thus, a different, and more moderate form of cooperation was chosen (the EU rarely shows this level of flexibility).

At the same time, the “EU-centric” model of Eurasian regionalism could also under certain conditions become an obstacle for more intensive interaction with the Asian project. An important feature of the EU model (which is also to some extent characteristic of the EAEU, see [Gerasimenko 2012]) is that it combines economic integration *within* the regional organization with erecting protectionist walls *outside* the organization. The success of the BRI is based on the overall high level of economic liberalization in the Eurasian continent, which makes the transportation corridors viable [Schiek 2017]. A question remains insofar the EAEU is able and willing to offer this level of external trade liberalization. At the very least, the interests of the Eurasian countries in this respect differ a lot: Russia, for example, is much more protectionist than Kazakhstan, and Kazakhstan is concerned about Kyrgyzstan’s de-facto open border to China (which was one of the reasons for the short-term trade conflict between Kazakhstan and Kyrgyzstan in autumn 2017). One can debate the normative implications of the protectionist policies within the EAEU framework (this question goes beyond the scope of this article), but for us it is important that if that is the case, compatibility of two projects described above is likely to go down<sup>10</sup>.

It is finally worth noticing that since 2015 the Russian leadership occasionally refers to a new and broader idea of regional cooperation in the Eurasian space –

the Greater Eurasian Partnership, which should have the EAEU at its core and link it to other regional organizations in Eurasia (e.g., the ASEAN). As of now, however, while there is some discussion of the Partnership in the scholarly and expert publications [Timofeev, Lissovolik, Filippova 2017; Tsvetov 2017; Li 2018; Lewis 2018; Köstem 2019], the idea remains so vague that one can hardly offer any systematic analysis of this approach. In any case, the idea of the Greater Eurasian Partnership appears to be more inspired by the new “transcontinental” agreements (like the TTP or the TTIP), and the extent to which it could be actually compatible with the “EU-like EAEU” with inflexible institutional framework and elaborated multilateral decision-making mechanism is not clear (but then, whether the project will ever go beyond the realm of political rhetoric, is not clear as well).

## Conclusion

It remains to summarize the main arguments of this paper. Our goal was to investigate the driving forces for “downloading the global script” of the EU in case of the Post-Soviet Eurasia (and, specifically, the EAEU) and the effects of this “downloading” for interaction between the EAEU and both the EU and the Asian regional projects (of which we singled out the BRI as the most interesting one). Our conclusions are paradoxical. While the geographic and cultural proximity makes the EAEU an intuitively likely candidate for mimicking the EU, none of the mechanisms typically suggested in the literature on regionalism diffusion as the driving

10 Somewhat similarly, the main concern the EU has about the development of the BRI and the cooperation between China and the CEE countries is that it undermines the common rules of the EU, e.g., in the area of public procurement (<https://thediplomat.com/2018/04/eu-ambassadors-condemn-chinas-belt-and-road-initiative/>). However, the regulatory scope of the EU is much broader than of the EAEU, which leaves less space for coexistence.

force for the spread of the EU model seems to plausibly explain the case of the EAEU – although the very fact of “downloading” is beyond question. EAEU is not influenced directly by the EU (through the rewards and sanctions or through socialization and persuasion). While there is some evidence that the epistemic communities of the EAEU countries see the EU as the only “legitimate” model of regionalism, there is also evidence to the contrary – that the EU model is considered not applicable for the Post-Soviet Eurasia. And whether the elites and the experts of the EAEU countries really have been seeing the EU model as the most “successful” one (especially during the period when the EAEU and the preceding Customs Union were developed) is questionable as well.

Another paradoxical conclusion is that institutional proximity of the EU and the EAEU does not encourage their dialogue in any way. On the one hand, the focus of both organizations on trade and the design of the customs union for the EAEU increase the extent to which the organizations are perceived as competitive. While it does not preclude searching for solutions for cooperation, in the past they have been scarcely used (probably, for political reasons). On the other hand, small incompatibilities in the institutional design sometimes turn into particularly difficult and challenging issues for the dialogue. At the same time, in case of the BRI and the EAEU, enormous differences in the design of the two projects actually make the “congruence” easier; here, however, there are also limits associated with the extent to which the EAEU engages in the external protectionism.

Our article does not suggest that “downloading” the global script is a suboptimal choice for the EAEU. There are prob-

ably arguments both in favor and against imitating the design of the EU, with all its consequences (for example, a specific sequence of integration steps built into the project; the development of supranational bureaucracy; certain inclination vis-à-vis external protectionism; focus on common rules and institutions rather than on implementation of specific projects; specific mechanisms of redistribution across countries – e.g., through the reallocation of customs duties<sup>11</sup>). However, our conclusions show that, first, mimicking the EU in case of Eurasia is, from the theoretical perspective, not a “natural” outcome (and requires further empirical justifications), and second, mimicking the EU affects the development of the external ties of the EAEU, including the EU-EAEU interaction this issue of the journal is devoted to – and while other factors (like the political climate) are likely to be more important, the impact of the (probably unintended) consequences of “downloading the global script” should also not be neglected.

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11 On this topic see [Vinokurov 2018].

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## Уроки Европейского Союза? Евразийская интеграция и «глобальный сценарий»

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**ФИНАНСИРОВАНИЕ:** Данная статья поддержана проектом Министерства образования КНР финансирования ключевого научно-исследовательского института гуманитарных и социальных наук в университетах Китая (Центр российских исследований Восточно-Китайского педагогического университета), номер проекта: 16JJDGJW004.

**АННОТАЦИЯ.** Даже поверхностный анализ развития Евразийского экономического союза (ЕАЭС) позволяет рассматривать эту организацию как пример столь часто обсуждаемого в теориях сравнительного регионализма процесса «диффузии модели ЕС» – многие институциональные решения и в целом повестка дня и дизайн ЕАЭС сформировались под влиянием опыта ЕС. В этой статье мы рассматриваем два взаи-

мосвязанных вопроса. Во-первых, какие факторы объясняют диффузию модели ЕС в случае евразийской интеграции? И во-вторых, к каким последствиям ведет диффузия для отношений ЕАЭС и ЕС, а также взаимодействия ЕАЭС и азиатских региональных проектов (например, инициативы Пояса и Пути). Мы приходим к двум парадоксальным выводам. Во-первых, стандартные аргументы теории диффузии моделей ре-

гиональной интеграции не позволяют в полной мере объяснить случай ЕАЭС. Во-вторых, институциональная близость ЕС и ЕАЭС является фактором, затрудняющим, а не облегчающим их взаимодействие.

**КЛЮЧЕВЫЕ СЛОВА:** диффузия, Европейский Союз, Евразийский экономический союз, модели регионализма

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