

WHO SHOULD BENEFIT FROM FREE MOVEMENT? A COMPARATIVE STUDY ON BRITISH AND ROMANIAN POLITICAL DISCOURSES IN THE PRE-BREXIT PERIOD

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ABSTRACT

The right to free movement in the European Union is currently an extremely topical matter, accentuated by the Brexit referendum, and its eventual impacts on the free movement regime. In this article, I analyse how the British Prime Ministers and the Home Secretaries as well as the Romanian Presidents and the Prime Ministers between January 2005 and January 2015 discussed the right to free movement in terms of the benefits and costs it incurs. British statements were collected from the government and party websites, and Romanian statements were collected from the official website of the President of Romania, from the Prime Minister's website as well from the archives of the Romanian government. The analysis reveals that the right to free movement was discussed in the British and the Romanian contexts mainly in connection with social security and brain drain, respectively. The article is divided in two parts, first of which considers theoretical and methodological questions, and the second discusses utility-related utterances about free movement in their political contexts. Finally, I draw my conclusions relying on the sections concerning utility-based questions related to free movement in the British and the Romanian discourses. I argue that the British approach relied on the view that only UK citizens should be entitled to social benefits. Romanian politicians, in turn, balanced between brain drain and benefits for individual citizens. Despite the seemingly different approaches, both perspectives were informed by the view that free movement should benefit societies, or rather, that people should not be a strain on the society. Both also represented free movement as a zero-sum game where one's gain is another's loss, and surprisingly, the national economy in both countries was presented as losing in the game.

KEYWORDS

Romania, free movement, European Union, UK, utilitarianism

INTRODUCTION

The aim of this article is to analyse the British and the Romanian free movement discourses from the utilitarian perspective, which will reveal perceptions towards costs and benefits of EU migration. Particularly in the UK, EU movement has attracted increasing critical attention in recent years, culminating in the referendum on EU membership in June 2016. The question that I ask in this article is, *what sort of cost-benefit arguments do British and Romanian politicians utilize in their free movement discourses*. Romania and the UK provide interesting comparative cases, since Romania has the most mobile citizens in Europe, whereas Britain has been reluctant to host EU citizens, which contributed to the decision to leave the European Union. Britain maintained the maximum period of transitional restrictions for Romanian workers, which only ended in 2014. Also due to these restrictions, Romanians have headed more to Southern European countries, notably in Italy, but their numbers have been on the rise also in the UK. In any case, the numbers of Romanian migrants in the UK are not massive; in 2016, the total number of Romanian citizens was 237,000 in the UK, while the number in Italy was more than 1.1 million and 695,000 in Spain, according to latest Eurostat statistics (2017). When Romania joined the European Union in 2007, the numbers did not drastically grow, since all these countries established transitional restrictions for Romanian workers. The majority of Romanian immigrants are of working age (25–34) and both genders are rather evenly represented (Eurostat 2017). In contrast, according to the Migration Watch UK, the number of UK migrants in EU countries was 1,2 million in 2015, which is a little more than a third of the number of EU citizens in the UK. The situations thus differ considerably: there were approximately 3,2 million EU citizens in the UK in 2015, whereas only 48,000 in Romania, according to Eurostat (2017). Due to these differences in numbers, it can thus be expected that the discourses in these countries also differ.

The task of studying free movement discourses is important, since there are no comparative studies on discourses in the host and sending countries in Europe. The issue has, however, been looked at from single perspectives at a

more principled level. In the scholarly literature, it has been argued that free movement in the EU presents a type of post-national dilemma, where the fact that countries have open borders in the EU contributes to the increase of more nationalist stances voiced in different parts of Europe, most notably in the UK (Tonkiss, 2013a). My analysis demonstrates that the primary reference point in free movement issues appeared to be state interest, which might require restricting free movement. The British approach towards cooperation in immigration matters, in particular, has been reluctant. It has also been argued that the British preferences in the immigration matters include 1) strict immigration policies, 2) focus on external instead of internal controls, 3) supranational cooperation in tackling negative externalities caused by other states' policies and in reinforcing the British immigration control (Ette & Gerdes, 2007: 107–108). In the light of these findings, the British discussion on free movement in the European Union does not appear that surprising.¹ Since Eastern European migrants have been in the focus of the British debates, this article provides an interesting insight to the differences in the Romanian and the British rhetoric.

The period of analysis spans from January 2005 to January 2015. This period allows me to analyse the development from the adoption of the 2004 Free Movement Directive to the time after the end of Romanian transitional restrictions in January 2014. The material consists of utterances of British and Romanian Heads of States and Government and British Home Secretaries. I collected the British documents from the official websites of the government as well as from the websites of the major parties. More specifically, I gathered the documents from the government announcement site as well as from the UK Government Web Archive, where I examined the previous versions of the sites of the Office of the Prime Minister's and of the Home Office in order to find the relevant utterances.² Since the speeches at the government website are not allowed not include party political material, I also collected speeches made by the Prime Ministers in their party conferences.

I accessed the Romanian documents from the official website of the President of Romania, from the Prime Minister's website as well from the archives of the Romanian government. As there were no search functions, I

¹ There have also been studies on the media image of EU migrants, and a study conducted by the Migration Observatory suggests that especially Bulgarians and Romanians are often depicted as criminals in the British press (Migration Observatory, 2014). In addition, a study concerning Eastern European migrants in rural England suggests that Eastern Europeans are not considered at the same level of 'whiteness' as the villagers (Moore, 2013: 1–19).

² In the collecting process, I also utilized the search function of the Internet browser, with 'movement' and 'mobility' as my keywords.

went through all the documents at the title level.¹ Since Romania has a semi-Presidential political system, the analysed utterances include those made by both the Romanian Presidents and Prime Ministers from January 2005 to January 2015. The President of Romania should officially represent Romania in the European Council. However, Prime Minister Victor Ponta, who was in office until his resignation in November 2015, questioned this practice. Although it was decided in the Romanian Constitutional Court that the President should attend such meetings, Prime Minister Ponta participated in the Council meetings anyway, and at the end of 2012 when there was a constitutional crisis involving protests, they signed an agreement of cohabitation. In the analysis, I have translated all the Romanian utterances in English and the Romanian original is found in the footnote. Before moving on to examining what the politicians stated about free movement, I present the theoretical and methodological framework of the article.

THEORETICAL AND METHODOLOGICAL BASIS

In this article, I only focus on utilitarian arguments, which are by no means the only ones. I have looked at other types of argumentation in the Romanian and the British cases (Heinikoski forthcoming, 2015a, 2015b), but here the focus is exclusively on the alleged costs and benefits of free movement. In utilitarian thinking, free movement is understood in the instrumental sense, a view inspired by the utilitarian moral theory of R.M. Hare (Hare, 1981). In Hare's theory, rights in general should be known intuitively, and the utilitarian deliberation is necessary only when there are conflicting rights (Hare, 1981: 156). Originally, the utilitarian theory was most prominently outlined by John Stuart Mill (Mill, 2000), and Hare also incorporated some Kantian elements in his theory.

According to Hare, moral statements are not descriptive sentences in the sense that their 'meaning completely determines their truth-conditions', and therefore the words true or right should not even be used with regard to moral statements (Hare, 1981: 212–213). When considering the sentence, 'no EU citizen should be prevented from moving and residing in the EU area', in Hare's thinking the proposition is a moral imperative: 'do not prevent EU citizens from exercising their right'. Still, this imperative may conflict with other imperatives, such as preventing people incurring costs for the country from entering. According to Hare, an imperative needs critical and rational assessment in each specific situation.

¹ The search function of the Internet browser was also utilized in the collecting process, with 'mişc*' 'circul*' and 'mobilitate' as the keywords.

This version of utilitarianism is sometimes called two-level utilitarianism, as it differentiates moral principles at the critical level and at the intuitive level (Hare, 1981: 60). According to Hare, rights in general belong to the class of intuitive moral principles, which everyone should intuitively know and always respect. However, in a situation where there are different rights operating simultaneously, one needs to employ critical thinking in order to determine which rights override others. The only universal and overriding right, according to R.M. Hare, is the 'right to equal concern and respect' (Hare, 1981: 154), referring to the view that all people should be treated similarly. This means that rights should be applied in a manner that promotes the interests of all relevant actors. Ideally, free movement should thus be observed more at the level of the entire EU (or globally), though in practice, domestic politicians tend to focus on their own societies. In the case of conflicting rights, Hare argues that we need to decide: 'on the score of their acceptance-utility, i.e. on the ground that they are the set of principles whose general acceptance in the society in question will do the best, all told, for the interests of the people in the society considered impartially.' (Hare, 1981: 156)

First, it should be determined, which are the conflicting rights with regard to free movement. In political rhetoric, planned restrictions to free movement are often justified in economic terms, and the conflicting right is the right of individuals to maintain their prosperity. Studies suggest that EU migration in general has a positive impact on Member State economies (e.g. Galgoczi, Leschke & Watt, 2009), but politicians might still want to exclude migrants who constitute a burden for the society. If we compare the right to free movement and the right of citizens to demand control over state borders, the results of the acceptance of either right is not clear. In pure economic terms, it appears that the acceptance of free movement would lead to more positive economic results, if discrimination decreased and the potential labour force could be more widely utilized. However, as free movement is not a human right but a right of a selected group of European Union citizens, it may be paradoxically harmful for European integration. With the lack of mutual trust between the Member States, it may turn people against European integration as a whole, such as in the UK, where a referendum on the EU membership resulted in the decision to leave the Union.

Another central idea in Hare's theory is universalization: since the core of Harean moral thinking is to find out other people's preferences, the changing of 'I' and 'you' makes no difference in the universal properties of a moral sentence (Hare, 1981: 122–123). In other words, within moral deliberation, the changing of a person's position (or changing the persons) in a situation should not affect the result. More generally, the moral principles should apply to all people universally regardless of their background.

Universalization in the context of free movement means that the characteristics of the person utilizing the right should not influence the validity of the right. In moral terms, free movement limited to certain people rests on a morally arbitrary principle, namely citizenship (usually equalling to the place of birth).

My starting point for analysis is constructivist, relying on the role of rules in policy reasoning and categorization as a manner for making sense of the world (Onuf, 1989). More specifically, my methodology is based on discourse analysis, adopting the constructivist view that discourses shape and are shaped by reality. The procedure of discourse analysis is inspired by the discourse-historical approach particularly elaborated by Ruth Wodak (Wodak, 2001; Wodak, 2009). The discourse-historical approach is based on three dimensions: topics, discursive strategies and linguistic means. The topics of the discourse analysed in this study include free movement and its related phenomena, and I analyse discourse strategies through different argumentative *topoi* of the analysis. Wodak specifies five different types of discursive strategies (Wodak, 2001: 73), but for the purposes of this study, the most interesting include those of justificatory *topoi*. Linguistic means, in turn, are the manners in which these discursive strategies are constructed (Wodak, 2009: 38; Wodak, 2001: 74). Wodak argues that the *topoi* are ‘parts of argumentation which belong to the obligatory, either explicit or inferable premises’ (Wodak, 2001: 74). Different *topoi* include those of usefulness/advantage, uselessness/disadvantage, definition/name-interpretation, danger and threat, humanitarianism, justice, responsibility, burdening/weighting, finances, reality, numbers, law and right, history, culture and abuse (Wodak, 2001: 74). In this analysis, I focus on the utilitarian *topos* of usefulness, which the following arguments reflect. Before starting the analysis, my hypothesis was that the costs and problems of free movement would be more emphasized in both cases, but that was not entirely the case.

ANALYSIS ON THE UTILITARIAN POLITICAL REALITY

In this section, I focus on the discourses in Romania and in the UK, which appear to present migration as a zero-sum game where one’s gain is another’s loss. In the British discussion, the EU citizen’s gain was British taxpayer’s loss, while in the Romanian utterances, Romania’s loss of workers was the host state’s gain. In other words, if free movement creates material loss, policies should be reformed. Indeed, while Britain was struggling with too many newcomers, Romanian politicians were worried that their educated young people leave abroad in search of better wages. Still, the general

approach of the UK and the Romanian leaders was surprisingly similar regarding the European Union: the EU was seen as something far away that tried to dictate what to do.

Many of the studies on the benefits of EU migration have been conducted in the UK (e.g. Dustmann & Frattini, 2014: F593–F643), while studies examining the impact on the entire EU are few (Galgoczi, Leschke & Watt, 2009). Still, the positive results have hardly penetrated the British political speeches, and its positive effects in creating European labour markets can also be questioned. The free movement discourses are interesting also in the sense that although the principle serves an economic purpose, it is simultaneously a crucial part in the construction of European identity.

In addition, the question here is about state interests and balancing between material benefits and costs. In this regard, it is important for politicians to fight the idea that some receive benefits from integration, while others do not (Vaciago, 2015: 128–132). This might be related to the approaches towards free movement, especially in the UK. Although the UK citizens are also rather mobile, the fact that many Europeans from other states have moved there (albeit generally contributing positively to the economy) may give the impression that Britain is losing in the game. Overall, the British utterances were not only centred on the material costs and benefits, but the Conservative politicians implied that EU migrants were immoral, claiming benefits they should not be entitled to. In Britain, the ‘Europhobia’ is also reflected in the rhetoric of the politicians, supporting the argument that Brits see Europe and especially the new Eastern European migrants as its “Other” (Tonkiss, 2013a: 500; Favell, 2014: 275–289).

Romanian politicians, in turn, acknowledged the problem of qualified people leaving the country, but they considered it beneficial for the individuals and for the country in the sense that the movers did not claim employment benefits in Romania. Romania is the country sending most migrants to the EU, which has not been always positively approached in other countries. For example, the UK Government introduced some changes in the social welfare provisions before the end of the Romanian and Bulgarian transitional restrictions in 2014.¹ Romania joined the European Union in 2007, but it had to wait seven years until the largest Member States granted full access for Romanian workers.

According to Romanian politicians, the manner to make free movement more beneficial was to have a smaller number of qualified Romanians leaving the country. Romania has seen a major outflow of both educated and less

¹ However, some measures may be in breach of the EU legislation but not yet contested (Glennie & Pennington, 2014: 20).

well-off people towards other EU countries. For Romania, as for other countries that joined the Union in the 21st century, being a full-fledged Member State was naturally connected also to geopolitical factors and identity. For example, in the case of the French expulsions in 2010, Romanian press coverage has been found to focus primarily on free movement as an integral part of European integration (Balch, Balabanova & Trandafoiu, 2014: 1154–1174).

Whereas Romanian politicians were worried about brain drain, British politicians explicitly condemned migrants who claimed benefits in the UK. However, Tony Blair's Labour Government decided not to impose any transitional restrictions for the 2004 accessing countries, and he defended that decision in several occasions afterwards. Eastern European workers were considered to consist of low-skilled workers, thought to substitute for the previous programmes for low-skill migration. Therefore, PM Blair deemed free access economically beneficial, and instead of just perceiving it a benefit for the British employers, he hoped it would be a two-way traffic. The utterance below was made in a joint press conference with the Slovakian Prime Minister, which might explain why the perspective of Eastern Europeans was considered:

I think probably it is an awful lot easier for people to move between Slovakia and the UK than it was before because we have got free movement, not just of people, but of workers now with the European Union membership. And I think, is it 35,000 Slovaks who are working in the UK - some testament to that. Obviously though people have got to make sure that the proper procedures are gone through. Look, I think in time this will settle down. I think the most interesting thing is that Britain was one of the very few countries to say let's have free movement of workers as well as people. There were many predictions of catastrophe that accompanied this decision, but actually it has not worked like that at all, people have benefited enormously, and I am sure and I hope it is a two-way traffic. (Blair, 2006)

Therefore, Premier Blair deemed free movement granted for all the countries that joined in 2004 as beneficial. Mr Blair mentioned both the free movement of persons and workers instead of focusing only on workers. There were also references to the emigrants leaving for other EU states. In a similar vein, in the below utterance of the Home Secretary of Mr Blair's government, John Reid, we can also find praise for the Polish migrants, who

have been the most numerous in the UK after the 2004 enlargement of the EU:

The Polish people who have come recently have brought doctors, they've brought dentists, badly needed, they've brought plumbers, they've brought a host of skilled labour to this country. So, we recognise, most sensible people do, that migrants can bring great skills to the United Kingdom but they also want to be assured that immigration will be properly managed and their own public services and benefit systems, schools, hospitals, and other public services, will be protected from misuse by those who come not to contribute but to use and to leave, and at best will be protected from over-demand which means that there is some, in their view, unfair access by citizens of this country. (Reid, 2006)

This reflects a general worry about EU migrants exploiting British social security. Still, Home Secretary Reid assured the listeners of his speech that migration would be managed and public services were not in danger. Minister Reid considered that it was unfair that non-British can use their public services. In moral terms, it would rather appear that it was unfair to restrict the access to welfare benefits on the basis of country of birth, which is an arbitrary occurrence (Huysmans, 2000: 751; Tonkiss, 2013b: 90–91). The subsequent government also presented critical voices (Smith, 2007).

While the British discussion focused on immigrants, the Romanian utterances were more concerned over emigrants. After Romania joined the EU in 2007, the utterances of President Băsescu (PDL) were very positive, considering the fact that many Romanians were leaving the country. President Băsescu still acknowledged that it was good to have the chance provided by the free movement of labour. Therefore, he took a rather individual-centred approach to free movement, where free movement was beneficial for individuals who strove for more. The more positive tone is understandable, given that the Romanian economy was badly hit by the economic crisis, and the GDP fell by 6.6 % in 2009 and resulted in around 315.000 unemployed people from industry, commerce and construction (Stan & Erne, 2014: 35). Therefore, it might also be beneficial for the country to have people working abroad rather than being unemployed in Romania. While the British discourses emphasized that immigrants were costly, the Romanian leaders noticed that national unemployed people were also costly. Graduated people leaving the country was thus a controversial issue in Romania, but the politicians assured to be convinced that Romania did not lose from free movement. President Băsescu explicitly stated that they had to choose between having free movement and keeping the graduated people in

Romania: ‘We have to choose between ‘we want free movement for workers’ or ‘we do not want that graduated young people leave us’. I can say you that Romania does not lose from the free movement of workers.’ (Băsescu, 2009)¹

We can see here that the Romanian balancing between enlarging and restricting free movement was very different from that of British politicians, who mainly calculated whether the people who came were beneficial for the state. Romanian politicians, instead, focused on whether they wanted equal right to free movement or whether they wanted to keep their graduates in the country, but the President was strongly in favour of the former. As noted above, although the Romanian economy soared in the 1990s, and in the beginning of the 21st century, it was badly hit by the economic recession beginning from 2008 (Stan & Erne, 2014: 35). During that time, Romania was forced to cut both wages and social security benefits. In the British *Daily Mail*, Romanian President Băsescu even thanked Romanians working abroad for not claiming social security benefits in Romania: ‘Imagine if the two million Romanians working in Britain, Italy, Spain, France, Germany, came to ask for unemployment benefits in Romania’ (Băsescu, 2010). Thus, the Romanian leaders employed contradictory discourse regarding whether they considered people leaving Romania a positive issue. However, the fact that President Băsescu put much effort in justifying free movement implies that the benefits were not that obvious.

In contrast, in Britain, some politicians have tried to argue that EU migration is beneficial for the country, but the public has not considered such utterances very convincing. For example, British Prime Minister Gordon Brown uttered clearly the benefits of free movement. As the 2010 elections approached, PM Brown emphasized migration’s economic contribution, and in the case of EU migrants, the economic benefits were presented as obvious:

There have been disagreements in the past – for example over whether to impose temporary restrictions on eastern European migrants in 2004. But recent research published by the institute of fiscal studies has the first detailed analysis of the contribution to our economy of the eastern Europeans who came to Britain in the last few years – showing that in every year their net contribution was positive – and that even after 5

¹ ‘Noi trebuie să optăm între: „Vrem libera circulație a forței de muncă” sau: „Nu o vrem ca să nu ne mai plece tinerii pregătiți”. Eu vă pot spune că România nu pierde prin libera circulație a forței de muncă.’

years here they are over 50 per cent less likely than British people to receive benefits or tax credits and over 40 per cent less likely to live in social housing. They pay 5 per cent more than their share of tax, and account for a third less than their share of the costs of public services (Brown, 2010).

In this case, Prime Minister Brown demonstrated an approach in favour of free movement, illustrating that EU migrants were less likely to incur costs for the society, and that they even contributed more than their share of tax. It was not considered unfair that they contributed more than they utilized the public services, while the other way around it would have been unfair, at least according to the logic of Home Secretary Reid. While the British discussion thus focused mainly on the national benefits, Romanian leaders also took into account the consequences for the European Union. For example, in 2012, Prime Minister Victor Ponta stated that entering the Schengen Area was not that important. According to him, Europe has more to lose than Romania: ‘After all, Europe has much more to lose than Romania in that we would have free movement’ (Ponta, 2012)¹. It is not certain which European benefits would be created if Romania joined the Schengen Area, since the only practical issue would be the abolition of border controls between Romania and the other EU countries. That would of course facilitate travelling from Romania to other countries, from which some benefits could be drawn from the Romanian perspective. In addition, transport to and from Romania could facilitate trade in the EU, but it is unclear whether the other countries lose something in the current situation.²

In Britain, Schengen Agreement was not much discussed, and the UK is not even part of the convention. Although Labour Home Secretaries rarely discussed free movement in the EU, Conservative Home Secretary Theresa May referred to it more frequently, and it appeared to be one of the coalition government’s most highlighted topics on the European Union. It seems that the utterances became more centred on the national perspective, although EU migrants were presented as closer to Brits and the non-EU migrants were less welcome. In addition, the G6 meetings of the European Interior Ministers did not report free movement as a major topic before 2012, when Home Secretary May declared to have brought it up. She attacked the European Court of Justice that had taken a stance that protected particularly the right of European citizens to employ their right to free movement. According to her, free movement did not appear as a fundamental right but

¹ ‘Până la urmă Europa are mai mult de pierdut, decât are de pierdut România, că avem circulație liberă.’

² In general, the abolition of the Schengen Area would be very costly for the Union, as argued in a study made by the German Bertelsmann Foundation (Böhmer et al., 2016).

something that must be abolished if it did not result beneficial. Home Secretary May often presented utterances in the Parliament regarding free movement after meetings with her European counterparts, and she sometimes used positive descriptions of free movement:

The UK (Home Secretary) acknowledged that freedom of movement was an important principle of the EU, but it could not be an unqualified one. [...] The UK believed the Commission needed to accept that fraudulent claims for social welfare were a growing problem, and that current rules on social security coordination prevented member states from taking the necessary steps to ensure that only those migrating to work and contribute to a host country's economy could access welfare benefits. (May, 2013)

With this, she made the point that migration should be economically beneficial for the host country. In the UK, the politicians often compared the taxes migrants paid and the social services they used, and therefore the ideal situation would be migrants who only worked and paid taxes while did not utilize any services. This reflects the idea of 'welfare chauvinism' where nationality measures entitlement to rights (Huysmans, 2000). In this case, balancing towards the state won, as Ms May considered that the European coordination should be diminished and national decision-making enforced.

In contrast, the Romanian politicians did not discuss who was entitled to which benefits, but emphasized that the other countries benefited from Romanian migration. In a joint press conference with the German Chancellor Angela Merkel, the incumbent President Klaus Iohannis also addressed the problem of brain drain among young Romanians, and declared that:

The problem of poor migrants is a problem, which, unfortunately, has been too many times confused with the problem of the free movement of workers in Europe. The free movement of workers is a beneficial achievement, enormously important for all of us in Europe. Unfortunately, with regard to Romania, one first thinks of the migration of the poor, which is not numerically significant, and it is considered very heavy, and very rarely a phenomenon is discussed, which is significant, it is problematic for Romania and it is net income for Germany, namely the question of the migration of the

qualified and highly qualified workers who leave Romania for Germany (Iohannis, 2015).¹

In other words, President Iohannis stated that free movement of educated people from Romania to Germany was a problem for Romania and a net win for Germany, and emphasized that the amount of educated Romanian migrants in Germany was much higher than that of the poor migrants. It is interesting to observe that it did not matter what the poor people did, but the President wanted to stop educated people from leaving, which is rational from the utilitarian perspective. This is a clear example of utility calculation, where the people who constitute a cost to the society (the poor) are allowed to leave as they wish, but something should be done to prevent those who are an economic benefit (the educated people) from leaving. This is something that is visible all the way in the Romanian discourses, although some utterances also praised the free movement of educated Romanians as beneficial.

In contrast to the positive Romanian approach, British Prime Minister David Cameron was particularly vocal about his willingness to limit free movement in the EU. It seems that in the UK, the approach towards the EU and free movement was practical in the sense that if economic benefits could not be drawn, the whole membership should be reconsidered. However, the Labour politicians, while being in the government, did argue that EU free movement was beneficial for the country, a common line of utterances until David Cameron stepped in. Premier Cameron was particularly worried about welfare migration, whereby people allegedly came to the UK to claim social benefits. In light of this, he also declared changes in the social security conditions for EU citizens in 2014, and achieved EU-wide possibility to restrict social security of EU citizens in 2016. The intention of these concessions was to assure Brits to vote in favour of remaining in the Union, but, as we know, they were in vain. Indeed, the belief in the EU creating benefits appears to have faded, also in the light that the nationalist parties such as the British National Party (BNP) and the UK Independence Party (UKIP) are gaining more power (see also Tonkiss, 2013b: 112–121).

¹ 'Problema migrației sărăciei este o problemă care, din nefericire, s-a amestecat de prea multe ori cu problema liberei circulații a forței de muncă în Europa. Libera circulație a forței de muncă este un bun câștigat, enorm de valoros, pentru noi toți în Europa. Din păcate, când este vorba despre România, se vede prima dată migrația sărăciei, care nu este semnificativă numeric, și se vede foarte greu și foarte rar se discută un fenomen, care este semnificativ, este problematic pentru România și este un câștig net pentru Germania, este vorba de migrația forței de muncă calificată și foarte calificată care pleacă din România și vine în Germania.'

There were also references related to the benefits of British citizens in utilizing their right to free movement. Indeed, free movement appeared a principle that should benefit the UK, and all abuse of the principle should be prevented. EU migration constituted also a theme utilized in electoral campaigning, which further polarized the utterances. For example, Prime Minister David Cameron's utterances against free movement became more utilitarian leading up to the 2015 general election, and the costs of free movement were discussed more directly. Prime Minister Cameron referred to EU migration as a strain on Britain, while studies cited by PM Brown demonstrated the opposite, as well as more recent studies published in the UK. Furthermore, while Mr Brown considered free movement beneficial for both Britain and Europe's entirety, Mr Cameron made a cost-benefit assessment only from Britain's perspective:

Well I don't think that the right answer is for Britain to leave the EU. I think the right answer is for EU reform and then a referendum. And I've set out very clearly the changes in terms of immigration and welfare that need to take place; and they don't, I think, break the principle that there should be free movement because, of course, many British people benefit from moving inside the European Union to live and work in other countries [...] Those are 4 of the welfare and immigration steps I've set out. They do require some changes in Europe, but I think they are sensible. They're practical. I'm enjoying talking to European colleagues about them. And I think that is the way to control the abuse of free movement inside the European Union (Cameron, 2015).

This approach appears understandable before the election where politicians focused on the national interest, and national interest was very clear in this case: free movement should exist *because* British people benefit from it. PM Cameron also introduced more restrictions for EU migrants in claiming benefits in the UK, and argued that the right to free movement was being abused in terms of benefit tourism. Apparently, the British perspective was that only people who have contributed to the society are entitled to benefits. One could of course ask, how about children, who may not ever contribute to the society (Tonkiss, 2013b: 90–91)? Although David Cameron did not want to abolish free movement altogether, it was obvious that free movement was to benefit British citizens and not be abused by others. Overall, it seems that the British Prime Ministers, in the hope to be re-elected, needed to be careful in their discourses not to present too close a relation to the European Union. Their utterances were evidently addressed to

their electorates, as they made promises on securing the unfair abuse of the system. While Gordon Brown strengthened his pro-European stance before the 2010 general election, David Cameron expressed more criticism leading up to the 2015 election. The national interest thus did not only derive from material benefits but also from the prospect of gaining votes in elections.

CONCLUSIONS

Free movement was a discussed topic during the British discussion on EU membership before the EU referendum in June 2016. The discourses analysed in this article also point towards different conceptions of free movement in the European Union. The British politicians contended that free movement was justified only if it benefited the British citizens and society. By contrast, Romanian politicians did not put primacy on the Romanian benefits of free movement but wanted to receive full free movement even though it might be economically harmful for the country. This illustrates that British politicians approached European integration rationally and instrumentally, while it appeared a more identity-related issue for Romania. The fact that even those promoting the 'Bremain' side in the referendum were critical of free movement (David Cameron and Theresa May) well reflects the lack of identification with the European Union. Romanian politicians, in turn, seemed to want to identify with the European Union, but felt that the country had to be included in the Schengen Area to be a full-fledged member of the EU family. The UK seems to be heading for a hard Brexit, i.e. leaving the Single Market in order to be able to control the entry of EU citizens.

Andrew Moravcsik notes, while examining the negotiations leading up to the Maastricht Treaty in 1993, that Britain did not see any point in mentioning migration in the treaty, since it was able to control its own borders (Moravcsik, 1998: 425). This might also explain why Britain is so eager to control intra-European migration, and has restricted the access of non-EU migrants, since that they can control in any case. Moravcsik argues that the UK was forced by economic motivations, and the country opposed strongly to common provisions in social and immigration policy for economic reasons (Moravcsik, 1998: 427–428). This tendency is also visible in the analysed discourses, where free movement was considered an economic issue that should be restricted on economic grounds. Labour Premiers Blair and Brown employed a variety of utterances acknowledging the right to free movement and its benefits, while David Cameron argued against free movement and the idea of utilitarian costs appeared to be the strongest justification in favour of free movement. After the start of his first term as the Prime Minister, Mr Cameron's rhetoric became more UK-centred, probably also voicing concern over the rise of UKIP toward the end of his

term. Premier Cameron saw utilitarian costs as the problem in the right to free movement. In contrast, it was not only costs that he discussed but also the idea of abuse and unfair action, which served to alienate EU migrants further by claiming them to be immoral.

In contrast, Romanian utterances demonstrated balancing between 1) free movement as a beneficial achievement and 2) the fact that many educated people leave the country. Although they acknowledged that the solution would be to raise wages in Romania, no practical measures have been adopted in order to really raise them. Romania is thus very different case than the British one. The approach was similar to the British one in the sense that it was considered that the immigrants themselves gained something. Instead, while Romanian politicians argued that Romanian emigrants provided benefits also for the host countries, British leaders deemed that immigration should not provide any strain to their country.

The currently leading party in the UK considered free movement as a problem, which is interesting in the sense that it cannot be easily explained by mere national interest in material terms. Conversely, it may be more related to the political interest in gaining domestic voters. Also in Romania, there were challenges caused by free movement and emigration in Romania, but that did not make the Romanian politicians question free movement. Instead, they considered the problems such to be solved at the national level. This implies that while the national level and the European level were complementary in free movement issues in Romania, in the UK they appeared to be contradictory, at least in the sense that necessary national measures could not be realized in the current framework of the Union. Of course, the situations were different; while a country cannot prevent its citizens from leaving, it has more power in deciding who may enter the country, making immigration and emigration morally asymmetrical (Walzer, 1983: 40).

It is interesting to note that Romania and the UK were both fairly state-centrist, but very different types of discourse were employed in these cases. State-centrism in Romania did not mean that the politicians were against the European Union. Free movement was discussed from the state perspective, focusing on the rights of Romanian citizens and the costs of people moving abroad. In contrast, state-centrism in Britain was more related to the view that the European Union may not benefit the country, but it harmed the country's decision-making power. In other words, Romanian politicians wanted to hold a European state identity while the UK politicians were not willing to give up national sovereignty in e.g. social security issues for EU

citizens. It remains to be seen what the Brits will do with their sovereignty now that they have decided to leave the European Union.

The results of the study represent rather well the results of previous studies, where the UK sees the EU migrants as the Other despite economic benefits (e.g. Tonkiss, 2013b). In contrast, the results also reflect the view that Romanians approach the European Union positively despite the problem of qualified people leaving the country (e.g. Sedelmeier, 2014). All in all, this study has thus demonstrated that despite utilitarian rhetoric, the right to free movement is not only a question of costs and benefits, but the matter of identification with the European Union seems to be the crucial one. It is important for politicians to be able to argue that free movement is beneficial, but identities also matter.

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