

THE DECENTRALISATION DEBATE IN THE UK: *ROLE-MODELL DEUTSCHLAND?*

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A curious feature of the present UK debate on devolution is its insularity. The debate seems scarcely to have been informed by those concrete experiences of decentralised government which lie close at hand: a number of the UK's European Union partners have introduced forms of decentralised government relatively recently, notably Belgium, France and Spain; others such as Austria and Germany have a long tradition of conducting government through decentralised structures. With few exceptions (notably Hopkins 1996), the evident potential for lesson-drawing and the enrichment of the UK devolution debate by reference to experience elsewhere in the EU has not been mobilised.

The purpose of this article is to explore the potential for lesson-drawing open to those UK politicians and policy-makers committed to devolution. The focus is on Germany and on the potential lessons which key features of the constitution and practice of decentralised government in Germany may hold for a devolution process in the UK. This may seem an ambitious premise given that the contrast between the German situation and that which currently exists in the UK is about as stark as one can get. The German constitutional order is purposefully based on a system of checks and balances on the exercise of political power, within which the federal system and the sixteen German Länder (regional units of government) play undoubtedly the most important part. By contrast, the constitutional doctrine of parliamentary sovereignty in the UK offers little scope for checks and balances and only as much scope for sub-national governmental input into decision-making processes as the central government of the day deigns to allow.

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This overweening power of central government is, though, clearly the main inspiration for the UK devolution debate. Seeking insights from a German experience in which central government is purposefully constrained is, in this light, a useful exercise. That said, however, the German system of sharing powers between federal and Länder institutions should not be held up as a paragon of virtue, as an unblemished *Role-Modell Deutschland*. The German federal system is often - and often highly justifiably - subject to hefty criticism within Germany, not least by those who work within it (e.g. Leonardy 1994). For that reason, many of the 'lessons' this article points to are negative ones: the German case can tell us how we should not do things just as much as, or more than, it can offer a positive example. These negative and positive lessons are illustrated below in reference to two core themes: firstly the ways in which policy competences are distributed between federation and Länder; and secondly the way that money is allocated in the federal system.

THE DISTRIBUTION OF COMPETENCES

A starting point is to summarise the key features of the division of powers between central and Länder institutions in the German federal system. Federal systems always involve some form of trade-off between unity and diversity, between some minimum level of commonality applied throughout the federation and some minimum level of differentiation between the component units of the federation. The German federal system is geared, probably more than any other democratic federation, to the production of unity, and is relatively unconcerned with the maintenance or promotion of diversity.

The emphasis on unity reflects a kind of mission statement which runs through those parts of the German constitution which deal with the federal system: that is, the 'maintenance of uniformity of living conditions' across the federation. The maintenance of a 'uniformity of living conditions' has the tenor of a license for centralised government and unitarism. It is certainly an odd mission statement for the guidance of a federal system. Its oddity becomes explicable, though, when one considers the founding circumstances of post-war German federalism. A federal system was not established in 1949 for the usual reasons that federal systems are established: that is, it was not established as a means of decentralising government functions to accommodate ethnic or cultural diversity or to integrate a vast territory within an overarching political system. The then West Germany was a

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relatively small and socially homogenous state which lacked the territorial or social foundations which typically support federal government. The rationale for West Germany's federalisation lay primarily in the experience of National Socialism. However much the federal system established in 1949 was able to draw on past German practices of federal-style government extending back into the Middle Ages, it was not federalised because of that German federal tradition, but because federalism and decentralisation was a condition laid down by the Western Allies against the background of the Third Reich. Seen against this background, federalisation was concerned less with the decentralisation than the deconcentration of political power among different institutions of government. It was, if you like, a post-dictatorship device for the dispersal of powers in a country emerging from the arbitrary abuse of centralised power in the Third Reich.

Sharing competences and constraining power

The founding rationale of deconcentration of power and the mission statement of uniformity of living conditions have produced a highly distinctive division of powers in the federal system in Germany. Neither the federal level nor the Länder possess a great range of their own exclusive competences under which they both make and implement laws. The predominant division of power is one between federal-level legislation and the implementation of those federal laws - with a considerable degree of discretion - by the Länder governments. Federal legislation provides for the requisite unity of national standards (or 'living conditions'), while Länder government discretion in implementation provides for an element of diversity, capable of adapting nationwide laws to particular regional circumstances.

The Länder do not, though, just implement federal laws, but also play a major role in formulating them. This reflects in part the need to feed in their administrative expertise into legislative formulation, and in part the legislative role of the Bundesrat, Germany's second chamber, and the federal-level legislative forum of the Länder governments. Bundesrat consent is required for well over half of federal laws, a provision which serves to draw in the Länder governments at an early stage to the federal legislative process. The net result has been, and - following a unification process which left the basic structures of German federalism untouched (Jeffery 1995) - remains, what has been termed 'cooperative federalism', a permanent and densely organised process of intergovernmental policy coordination between federation and Länder.

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This dense coordination process, expressed in a genuinely vast range of policy coordinating bodies, raises a number of issues potentially relevant to the UK devolution debate:

First, it is extremely expensive, requiring large numbers of civil servants - not to mention extremely well-paid Länder politicians - to run it.

Second, it is conducted by and large 'behind closed doors' and tends to 'pre-cook' policy away from parliamentary scrutiny, with the Bundestag (the first chamber at national level) and the Länder parliaments often effectively relegated to rubber-stamping devices. This intransparency - or, as Ellwein and Hesse (1987) termed it, the character of the federal system as a 'shunting station for political responsibility' - inevitably raises questions about the democratic accountability of decision-making. There is a strong suspicion that this 'democratic deficit' inherent in the operation of the federal system has much to do with the high levels of disillusionment the German electorate displays towards the political process in Germany (Sturm 1991), something captured in that defining phrase in contemporary German politics, *Politikverdrossenheit*. The German parties tend to reap the penalties of this disillusionment in the form of increasingly sceptical and volatile forms of voting behaviour. Perhaps the ire of the voters is at least in part misdirected; perhaps we are really observing a form of *Verdrossenheit* rooted in the often impenetrable and arcane modus operandi of the federal system.

Third, commentators have frequently suggested that the density of the policy coordination process and the high consensus requirements it imposes on all the actors involved impede the level and speed of adaptability in meeting new policy challenges. This is what Fritz Scharpf (1988) termed *Politikverflechtung*, an entanglement of different political institutions with one another, whose result was political immobilism. The jury is still out on this one. German decision-making can certainly be very slow-moving, but others have argued that this is a positive feature, facilitating a more measured, incremental, consensual and effective adaptation to new challenges (for example, Bulmer 1991) than the radical and perhaps damaging policy swings which have characterised post-war UK politics. As one of Germany's leading political scientists, Klaus von Beyme (1985), once noted, seemingly with a sense of relief: 'No German Chancellor would have dared to declare, as Mrs Thatcher did in 1976, that after his victory everything would change'.

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Von Beyme's pointed appreciation of consensual policy-making leads to a final, more general and perhaps self-evident, point, but one which is especially pertinent in the UK context. German central government is constrained government, bound in by the consensus requirements of the system. Whatever the problems of democratic accountability and policy adaptability, no would-be German Frau Thatcher could ignore specific regional concerns, as, for example many Scots feel their concerns to have been ignored over the last decade and a half, not to mention the similarly disgruntled in Wales, but also in those parts of England furthest-flung from London.

Having a stake: exclusive competences at the regional level

A second category in the distribution of competences in German federalism are those competences exercised primarily by the Länder. These, as indicated earlier, are relatively limited in scope and have been progressively eroded over the last 45 years. Two fields of competence remain particularly important, though, and are worth dwelling on. The first is the residual core of exclusive competence, the so-called *Kulturhoheit*, or 'cultural sovereignty' of the Länder, expressed in particular in educational and media policy. *Kulturhoheit* has allowed the expression of significant cultural difference, even in a country which, before unification at least, was culturally far more homogeneous than the UK. It has done much to maintain Germany as a multi-centred country, avoiding the drift to metropolitan predominance which afflicts and arguably damages the UK. Such a pattern has clear relevance for the protection of separate cultural traditions in the UK - most obviously the Welsh language and the Scottish educational, legal and clerical traditions - but also for the wider political and economic invigoration of the area outside the south-east of England. A number of studies (for example, Keating 1996) have convincingly argued that a robust and regionally differentiated educational and cultural infrastructure is an increasingly important prerequisite for economic growth. Regions with a 'stake' in educational and cultural policy are arguably more likely to provide such an infrastructure than a policy process dominated by a London-based policy elite.

Following on from this, a second field in which the Länder play a key, if not entirely exclusive, policy role is in the development of the regional economy. Over the last fifteen years - and with the partial and, hopefully, temporary exception of the new Länder in eastern Germany - this is a field in which central regulation has been cut back and the scope for Länder discretion

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increased. In many cases the result has been successful innovation in regional economic development or restructuring, with the emergence of concerted policy initiatives, typically with the involvement and mobilisation of public and private sector actors right down to the local level.

This is an area worth dwelling on for a moment, not least because regional economic policy has been a field in which UK central governments under both main parties have conspicuously failed to develop an effective record (Murphy and Caborn 1996). The German Länder by contrast have provided some of the most interesting and effective examples in western Europe of conducting successful regional initiatives in economic development through decentralised action. A central point to emphasise here is that there has been no one single model of regional economic development. Policy initiatives have been differentiated both in terms of the particular economic backgrounds and needs of the Länder concerned, but also in relation to the party-political situation, with different kinds of development strategy emerging from the centre-right and the centre-left in Länder governed, respectively, by the Christian Democratic CDU and the Social Democratic SPD. The ability to play a constructive policy role has, as it were, unleashed creative interventionist forces across the party-political spectrum.

The leading example among the Christian Democratic Länder is that of Baden-Württemberg. Baden-Württemberg boasts the strongest economic performance among all of the German Länder over the last 10-15 years or so. Structurally, its economic distinctiveness lies in the size of its small and medium-sized enterprises (SME) sector, which employs over 50% of the labour force, and with which the CDU has traditionally maintained close links. The task facing regional economic policy-makers in Baden-Württemberg has been to reproduce and perpetuate the region's economic success. The focus has been on 'feeding' the SME sector with the hi-tech research advances and the high-skill workforce necessary to maintain the region's advantages, particularly in specialised and hi-tech products, and to promote the region's hi-tech image in export markets abroad. The instruments of this policy have been a variety of institutions shaped 'from above' by the regional government which have been collectively dubbed as 'organised capitalism' (Allen 1989).

By far the most prominent feature of Baden-Württemberg's regional economic development policy has been the regional government's sponsorship of hi-tech research, both in basic and applied fields (Götz 1992). This research policy has been notable in a number of areas: the promotion of

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basic R&D activities in Baden-Württemberg's universities and research institutions; direct cooperation with the private sector - above all with SMEs - in promoting applied research often through groupings of firms with related interests; the development of a network of institutions of technology transfer designed to link the 'producers' and 'consumers' of new technologies; and the technical and vocational training/retraining of the regional labour force to equip it to use new technologies. The whole system has been further buttressed by the development of a network of institutions of external promotion, in particular in the EU, designed to exploit the growth opportunities established by the completion of the Single Market. The linking theme of these initiatives is that any individual SME will be unable to run any substantial research, technology transfer, training or external promotion programme of its own. The Baden-Württemberg government therefore provides these facilities as a kind of 'shopping basket' for the SME sector to 'dip into' and make use of as and when needs demand.

A second example is that provided by the Land of North Rhine-Westphalia, which has employed in many respects similar policy instruments, but has a rather different underlying philosophy. This difference reflects its party-political background as a traditional SPD stronghold and its contrasting economic structure. North Rhine-Westphalia was the undisputed economic powerhouse of Germany from the early phases of industrialisation through to the 1960s/1970s. Its economic strength was based on the mineral resources and large-scale, heavy industries of the Ruhr valley. These industries, as elsewhere in western Europe, have suffered serious decline since the 1960s, with the loss of something in the region of a million jobs.

The task facing regional economic policy-makers has therefore been to create new employment opportunities to compensate for the decline of heavy industry. The way in which this has been done in North Rhine-Westphalia has been highly distinctive. The same kinds of instrument - enhanced R&D, technology transfer, vocational training and external promotion - have been used, but rather than being organised 'from above' in a government-coordinated 'shopping basket' of economic development services as in Baden-Württemberg, the onus has been on development 'from below', on the decentralisation of opportunities, on devolving powers, responsibilities and initiative to the local level (Jochimsen 1992).

Local actors - local authorities, SMEs and large firms, universities, research institutions, vocational education institutions and, in a strongly Social Democratic region, trade unions - have been encouraged to come together to

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generate economic development plans designed to mobilise the resources and skills of the localities concerned. Those plans which met a number of stated criteria - technological innovation, retraining, employment creation, infrastructural modernisation and environmental protection - then became eligible for financial support from the Land government. The Land government thus acts as a hands-off arbitrator in the prioritisation of locally delineated initiatives.

There are two crucial points to note about these examples of regional economic development in Baden-Württemberg and North Rhine-Westphalia. First, they have generally been highly successful, enabling the economies of the two Länder to maintain high levels of competitiveness, and acting, as a result, as development models increasingly imitated by the other Länder. Second, they have been legitimate; the combination of hands-on tackling of regional needs, extensive involvement of relevant public and private sector actors, and the influence of regional party-political traditions have made these genuinely public, publicly owned policies. If the German example is anything to go by, this kind of 'stakeholding', to use a phrase which has attracted interest in the UK, secures a level of commitment, common purpose and sensitivity to regional needs which UK regional development policy has manifestly lacked, but which devolution in the UK might well help to deliver.

European integration and sub-national government

A third and overarching issue concerning the division of competences in German federalism is that of Länder competence in European integration policy. In the fallout from Maastricht, the Länder secured recognition of a reality which had previously been denied and hidden behind central government claims to monopoly competence in external affairs: that is that the European integration process is no longer 'foreign' policy in the received sense, but, given the widening scope of European legislation since the Single European Act, has effectively become an arena in which sub-national policy actors are centrally and perpetually engaged, in particular at the implementation stage of policy. As a result they have won recognition of a crucial principle: that they should have rights of participation in European policy measures to the same extent that they would be involved in corresponding, purely domestic measures.

These rights of participation are impressive, and include:

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- full, constitutionally entrenched rights of early information by the federal government on the EU legislative programme;
- the constitutional right collectively to express (and to receive feedback from the federal government on) opinions on EU legislation, and for that opinion to be binding on the federal government in areas which impinge on core areas of Länder competence;
- the constitutional right to sit and speak for the Federal Republic in the Council of Ministers in policy fields which domestically fall under their exclusive legislative competence;
- and the constitutional entrenchment of an EU-focused conception of subsidiary decision-making.

Interestingly, similar lines of argumentation in claiming access to EU decision-making processes have been adopted - with varying degrees of success and often in imitation of Länder views and achievements - by the other 'strong' regional governments in the EU: in Belgium, Austria, Spain, Italy and France (Jeffery 1996a). In each case the attempt has been made to establish the principle that regional governments should have the right to act in external, EU decision-making processes within the framework of their internal competences.

Although most of the post-devolution UK regions could scarcely expect such extensive European policy powers as the German Länder and other regional governments in the EU have won, any devolution process will certainly need to give some kind of consideration to the principle of regional participation in EU policy-making in policy areas for which regions are responsible at home. Given the scope of European-level policy competence in the contemporary EU, there would be little point in empowering regions in the domestic arena if they did not receive corresponding powers to help shape policy in 'their' fields of competence in the European arena. Wales was given a symbolic foretaste of the problems which can emerge in this respect in the former Welsh Secretary John Redwood's hostility to the activities of the Wales European Centre in Brussels, notably his opposition to the slogan 'Wales in Europe' and to the flying of the Welsh flag (rather than that of the UK) outside the Centre. The Scottish equivalent in Brussels - Scotland Europa - was similarly only established with difficulty in the face of considerable central government reluctance (Jeffery 1996b). In both cases central government opposition to sub-national activism in Brussels was based on the notion that only central government should be active externally,

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and more broadly that the UK Union was somehow under threat. The counter-argument is that such offices in Brussels engage in entirely legitimate lobbying and PR work and that such work would become all the more legitimate and necessary following any UK devolution process.

The current devolution debate has give entirely insufficient consideration to the rights and roles of post-devolution regional governments in EU policy-making. It seems imperative that what we might call the 'Redwood Question' be moved upwards on the devolution agenda in order to consider ways in which the legitimate European policy interests of the regions can be insulated from central government depredation in a post-devolution UK.

THE DISTRIBUTION OF RESOURCES

Financial equalisation

Turning now to questions of resource allocation, the lessons from Germany for devolution in the UK become increasingly negative. The present system of resource allocation in the German federal system is an inappropriate residue from a bygone era. Monies are allocated among the Länder in accordance with the formulas of a system of financial equalisation designed in theory to ensure that each Land has a more or less equal financial capacity, measured in terms of income per head of population, in order to fulfil its constitutional obligations. This was fine when the system was devised in the late 1960s, when divergences in the economic performance of the Länder were relatively small. It was increasingly unsatisfactory in the light of the growing divergence of economic patterns in West Germany in the 1980s. The situation is, of course, even worse now, in the post-unification era, in which there is a stark, east-west economic divide. The problems of the system have the following sources:

First, equalisation is income-oriented. It ensures that each Land has a minimum level of 99.5% of the average income per capita of all Länder taken together. However, it takes no systematic account of the differing per capita expenditure commitments of the Länder. This is a problem felt in Länder faced by problems of structural economic weakness: while the per capita shortfall in revenue-raising capacity caused by economic weakness is addressed by equalisation, the additional expenditure burdens per capita caused by economic weakness - above all on social security - are not.

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Second, transfers effected in the course of the equalisation process are not targeted on specific forms of expenditure. They accrue to the general budgets of the Länder concerned. They are therefore not necessarily used to address the problems which led to financial weakness in the first place. They could, in theory, merely sustain a financially incompetent or profligate Land administration. This is certainly a perception easily held by those economically buoyant Länder which supply the bulk of inter-Länder transfers. Their feeling is that they are being penalised for their economic success, while their recipient counterparts face no real disincentives acting against mismanagement or any other contributions they may make to their own economic and financial weakness.

The equalisation system thus performs the remarkable function of dissatisfying both the payee and payer Länder. This dissatisfaction regularly led to constitutional litigation in the 1980s; it would be surprising if it did not do so again in the coming years. These are the kind of problems which any financial mechanism designed to lubricate devolved structures of government in the UK would have to address and avoid. Expenditure criteria and some form of targeting of financial transfers would need to be incorporated into such a mechanism. There is, however, a further underlying problem, evident in the German case, which would need to be addressed, and that is territorial demarcation.

Territorial demarcation

Some of the German Länder are 'locked in' to a structural financial weakness by the way their boundaries have been drawn. This is true in particular of the smaller Länder, which carry disproportionately high per capita administration costs. It can be true also of Länder with insufficiently diversified economies, which, if afflicted by structural decline in core sectors, find themselves in a vicious circle of limited income-raising capacity and high expenditure burdens. Such has long been true of Bremen and Saarland in the west, and may also be a long-term problem facing some of the new Länder in the east, once the dust of the reconstruction process has settled down. Much of the dissatisfaction and conflict potential inherent in the German financial equalisation system can be attributed to these structural problems 'locked in' by the lines on the map.

For many commentators, the ideal solution to problems of structural weakness would be to redraw the map and create a smaller number of larger Länder with less structural imbalance between them (Benz 1992). However

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desirable in theory, this is extremely unlikely to happen given the vested interests and popular support attached to existing Länder structures. Nevertheless, an important lesson can be drawn for the UK case: Should we devolve, not just to Scotland and Wales, but also to English regions, extreme care has to be taken in how the map is drawn. Structural imbalances must not be 'locked in'.

Identifying with English regions

And on the question of the demarcation of English regions, a final and more positive lesson can be drawn from the German experience. There are compelling arguments that devolution to Wales and Scotland should be accompanied by regionalisation in England. In a negative sense, English regionalisation would help address the difficulties thrown up by the 'West Lothian Question'. As an aside, though, it should be emphasised that concern about the 'West Lothian Question' is probably much over-stated. Other west European states live quite happily with forms of sub-national government which give certain territorial units more powers than others, including Spain, Italy, France and Portugal. As Hopkins (1996, p.34) notes: 'The "West Lothian Question" is a non-issue in Europe'. Nevertheless, while it remains an issue in the UK, a more general regionalisation process would certainly take away some of its misplaced potency. More positively, though, a more generalised regionalisation process extending to England would deepen and consolidate the processes of democratisation, de-metropolitanisation, empowerment and economic regeneration which the current devolution debate has sought to set in motion.

Much scepticism is, however, uttered about the capacity of the English to identify with - and thus to help legitimise - regional structures created as part of a devolution process. The German experience, however, shows that a sense of identification can be won with unfamiliar regional boundaries. This applies both in western Germany, where most of the Länder were new territorial creations after 1945, but now form strong points of identification for their citizens. It also applies in the east. According to recent research by the Konrad Adenauer Foundation (Zelle 1996), the sense of self-identification of east Germans with their Länder is both stronger than their sense of self-identification as Germans and stronger than the sense of self-identification of west Germans with the western Länder. This is quite remarkable given the fact that these eastern Länder did not exist for the 38 years between 1952 and 1990, and in some cases have only a sketchy historical pedigree as units of government before 1945.

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The reasons why such a strong sense of identification developed so soon after 1990 are unclear. It may be because the Länder, rather than federal authorities, deliver the public services on which east Germans disproportionately rely. It may be because the Länder, and in particular some of their Minister-Presidents, are seen as the most effect representatives and *demandeurs* for the east in the German political system. Whatever, the moral of the story may be that those considering devolution in the UK should not be so coy about the question of establishing English regions. If one endows those regions with genuine and substantial powers, the potential for popular identification with them may well be far higher than the pessimists expect.

REFERENCES

- Allen, C. (1989), 'Corporatism and Regional Economic Policies in the Federal Republic of Germany: The 'Meso' Politics of Industrial Adjustment' in **Publius. The Journal of Federalism**, Vol.19.
- Benz, A (1992), 'Redrawing the Map? The Question of Territorial Reform in the Federal Republic' in **German Politics**, Vol.1.
- Beyme, K. von (1985), 'Policy-making in the Federal Republic of Germany: A Systematic Introduction' in K. von Beyme, M. Schmidt (eds) **Policy and Politics in the Federal Republic of Germany** (Aldershot).
- Bulmer, S. (1991), 'Efficiency, Democracy and West German Federalism' in C. Jeffery, P. Savigear (eds) **German Federalism Today** (Leicester).
- Ellwein, T., Hesse, J. (1987), **Das Regierungssystem der Bundesrepublik Deutschland** (Opladen).
- Götz, K. (1992), **Intergovernmental Relations and State Discretion** (Baden-Baden).
- Hopkins, J. (1996), 'Regional Government in Western Europe' in S. Tindale (ed.) **The State and the Nations** (London).
- Jeffery, C. (1995), 'The Non-reform of the German Federal System after Unification' in **West European Politics**, Vol.18.
- Jeffery, C. (1996a), 'Conclusions: Sub-national Authorities and 'European Domestic Policy'', **Regional and Federal Studies**, Vol.6.
- Jeffery, C. (1996b), 'Regional Information Offices in Brussels and Multi-Level Governance in the European Union: A UK-German Comparison', **Regional and Federal Studies**, Vol.6.
- Jeffery, C., Green, S. (1995), 'Sleaze and the Sense of Malaise in Germany' in **Parliamentary Affairs**, Vol.48.

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- Jochimsen, R. (1992), 'The Regionalisation of Structural Policy: North Rhine-Westphalia in the Europe of the Regions' in **German Politics**, Vol.1.
- Keating, M. (1996), 'Culture, Collective Identities and Development' in **Regional Identity and Economic Development. A Report of the Foundation Europe of the Cultures 2002** (Leuven).
- Murphy, P. and Caborn, R. (1996), 'Regional Government - an Economic Imperative' in S. Tindale (ed.) **The State and the Nations** (London).
- Scharpf, F. (1988), 'The Joint-Decision Trap: Lessons from German Federalism and European Integration' in **Public Administration**, Vol.66.
- Sturm, R. (1991), 'Die Zukunft des deutschen Föderalismus' in U. Liebert, W. Merkel (eds), **Die Politik zur deutschen Einheit** (Opladen).
- Zelle, C. (1996), 'National and Regional Identifications in Germany after Unification', unpublished paper.

February 1997