



## IDENTITY DOES MATTER: A COMPARATIVE STUDY OF TURKEY–BULGARIA’S ACCESSION INTO THE EUROPEAN UNION

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### *Abstrak*

*Proses perluasan Uni Eropa (EU), yang mengacu pada Kriteria Kopenhagen, merupakan upaya multi-dimensi EU yang dipengaruhi oleh faktor teknis dan sosial budaya. Meskipun kriteria ini menetapkan standar dalam bidang politik, ekonomi, dan hukum; akses suatu negara dalam EU sering kali bergantung pada persepsi yang mengakar pada identitas dan kesesuaian budaya. Dengan mengeksplorasi kasus yang kontras antara Bulgaria dan Turki, artikel ini, dengan menggunakan cara pandangan konstruktivisme, mengeksplorasi dinamika akses ke UE. Dengan metode studi kasus komparatif ditemukan bahwa akses Bulgaria yang relatif mulus, meskipun pada awalnya menghadapi tantangan ekonomi dan politik, sangat kontras dengan proses negosiasi Turki yang berkepanjangan dan rumit, sehingga akses Turki menjadi anggota EU belum berhasil sampai saat ini. Meskipun Turki telah melakukan reformasi signifikan yang selaras dengan standar UE dan menunjukkan pertumbuhan ekonomi yang mengesankan, faktor-faktor mendasar seperti ketegangan sejarah, perbedaan budaya, permasalahan geografis, dan masalah hak asasi manusia telah menghambat keanggotaannya. Analisis komparatif ini menggarisbawahi interaksi antara kriteria objektif dan gagasan subjektif tentang identitas Eropa dalam proses perluasan UE.*

**Kata Kunci:** Bulgaria, identitas sosial budaya, perluasan EU, Turki

### **Abstract**

The European Union’s enlargement process, guided by the Copenhagen Criteria, is a multi-faceted exercise influenced by both technical and socio-cultural factors. While the Criteria set standards in political, economic, and legal spheres, the accession of nations often hinges on deep-rooted perceptions of identity and cultural congruence. By exploring the contrasting cases of Bulgaria and Turkey, this article, with the application of the constructivist argument, explores the dynamic of EU accession. It shows, with the comparative case study method, Bulgaria’s relatively smooth accession, despite its initial economic and political challenges, stands in stark contrast to Turkey’s prolonged and complex negotiation process. While Turkey has implemented substantial reforms to meet EU criteria and has demonstrated remarkable economic advancement, its path towards membership has been hindered by historical tensions, cultural disparities, geographical considerations, and human rights challenges. This comparative analysis underscores the interplay of objective criteria and subjective notions of European identity in the EU enlargement process.

**Keywords:** Bulgaria, EU enlargement, socio-cultural identity, Turkey

## Introduction

The European Union (EU) is established on the principles of promoting peace, democracy, and common values. Its enlargement policy, set in the motion with the Copenhagen Criteria, has been the cornerstone for nations aspiring to join this community. The EU Commission will evaluate the conditions of the applicant country to determine their compliance with EU standards. In order to become eligible for EU membership, candidate countries must ensure the stability of their institutions to uphold democracy and the rule of law, safeguard human rights, and respect minority rights. Additionally, they must have a functioning market economy capable of withstanding competitive pressures and market dynamics in the region (Morelli, 2010).

Several candidate countries have been formally considered to the membership list and have submitted applications to join the EU such as Ukraine, Serbia, Moldova, Georgia, and Turkey. Since officially applying in 1987, Turkey has been implementing reforms to align with the Copenhagen Criteria, facilitating the start of negotiations for EU accession. However, the journey towards full membership has encountered challenges. In 2005, Turkey and the EU began membership talks. Although Turkey has entered into an agreement with the European Economic Community (EEC), for full membership, it needs to address 35 Acquis chapters that constituted the rule of law of the EU. However, progress in negotiating Turkey's accession has been very slow. Currently, only 13 out of the total chapters have been initiated, while the remaining chapters remain unresolved due to the conflict between Turkey and Cyprus, and concerns of human rights violations. Consequently, these challenges obstruct Turkey's negotiation process for EU membership.

Similar to Turkey, Bulgaria also faced comparable challenges during its application process for full EU membership. In 1993, by signing the Association Agreement with the EU, Bulgaria obtained its legal status, establishing a formal relationship with the EU. The occurrence of political unrest and the issue of violations of human rights caused a temporary suspension of the association agreement. The violations have been considered violations of one of the Copenhagen Agreements. Amidst political upheaval, Bulgaria formally submitted the application for full membership on December 14, 1995. In response to the application, the EU Commission declared that it would abstain from evaluating Bulgaria and would defer the commencement of accession negotiations.

Bulgaria's integration into the European Union has faced significant challenges as a result of pervasive corruption (Pashev, 1989; Lacatus & Sedelmeier, 2020).

According to Copenhagen criteria, all EU countries are required to adhere to democratic principles, uphold the rule of law, safeguard and promote human rights, and maintain economic transparency (Racoviță, 2011; Risse, 2012). Corruption falls under the scrutiny of EU monitoring mechanisms, as it directly contradicts the Copenhagen criteria, which emphasize the rule of law, transparency, and the division of powers. Corruption has the potential to undermine these principles, leading to a distortion of accountability and representation within the legislature, a suspension of the rule of law by the judiciary, and unequal service provision by the public administration. Consequently, Bulgaria has demonstrated limited progress in addressing the widespread of corruption and a notable lack of active political participation. Nevertheless, Bulgaria has received support through various programs, including the so-called 'twinning projects,' aimed at helping the country fulfill the accession criteria, particularly in the areas of law enforcement and economic development (Todorov, 2008). As a result, Bulgaria was successfully admitted as a full member of the EU in 2007. It demonstrates the disparate treatment that both countries receive in their pursuit of full EU membership.

This article explores the EU accession processes of Turkey and Bulgaria, rather than Romania, for several reasons. Despite Bulgaria and Romania sharing similar pre-accession conditions and both being labeled as the 'laggards of the fifth enlargement of the EU' (Dimitrov and Plachkova, 2020; Ganev, 2012; Kornai, 2000; Olson, 1995), their individual accession dynamics offer distinct insights. Bulgaria, in contrast to Romania, demonstrated less progress in terms of political and economic stability and has not shown sustained improvements since the implementation of the EU's Cooperation and Verification Mechanism (CVM) (Dimitrov and Plachkova, 2020). Therefore, analyzing the accession of Turkey and Bulgaria provides a pertinent comparison, capturing the dynamics of EU integration, particularly considering cultural and identity factors. Furthermore, Bulgaria's slower progress and challenging conditions make it an exemplary case to illustrate how the EU provides systematic assistance to lower-performing candidate countries, in contrast to candidates like Turkey, which had better conditions.

This article uses the concept of identity to scrutinize the difficulties Turkey faces in its quest to join the European Union. The challenges Turkey encounters are not merely due to its failure to satisfy the Copenhagen Criteria. Instead, the complexities of Turkey's EU accession process are significantly shaped by the discord between Turkish and European identities. The comparative analysis of the accession processes of Turkey and Bulgaria highlight that identity factors significantly influence the problematic and stalled nature of Turkey's EU integration efforts.

This article is organized as follows: Following the introductory section, the second section explains the concept of identity in international politics, approached from a constructivist perspective. It will serve as a theoretical framework to explain the challenging process of Turkey's entrance to the EU. The third section explains the process of accession for the two countries: Turkey and Bulgaria. The details of the process are discussed in this section. The fourth section presents a comparative analysis of the distinct experience of the countries on their way towards EU membership. This part examines how Turkey's identity complicates its bid for EU membership. The last section is the conclusion.

## **Methodology**

### ***Constructivism and Identity in International Politics***

Constructivism emphasizes two basic arguments in international politics: the construction of international politics and the significance of a state's identity in constructing behaviour and interest. Adler highlighted that constructivism could be seen as a theoretical and empirical approach that examines how identities and norms shape the formation of national interest, the establishment of institutions, and international governance. It also explores how new transnational regions, both territorial and non-territorial, are socially constructed, including regional integration and the organisation of politics and economy at a regional level (Adler, 2002). At its core, constructivism revolves around the construction of meaning (or knowledge) and the shaping of social reality (Wendt, 1992; Guzzini, 2000).

Constructivists emphasized that actors' behaviour in international politics is determined more by shared ideas, cultures, and identities than necessarily material factors (Onuf, 1989; Katzenstein, 1996; Lapid, 1996; Wendt, 1999). These understandings suggest that agents and structures are mutually constitutive (Wendt, 1987). The behaviour

of actors in pursuit of their national interests is influenced by the formation of ideas and their interactions within the social environment. It does mean that actors' behaviour to achieve their national interests is determined by the construction of ideas and their interactions in the surrounding social environment. This can manifest through social, political, economic, and cultural structures that define how actors embody and convey the ideas of their country (and region). For constructivists, states interests and identities are socially constructed, meaning that they are constituted through the social practices of states in a certain social structure (Hopft, 1998). Wendt (1999: Ch. 3) emphasizes that material factors in world politics, such as state economies and military power, do matter, but it depends on the construction of the idea.

Ideas and knowledge in constructivism strongly correlate to the culture that is given to human lives and constructs a state's identity, and thus they may significantly influence the inter-state relationship (Reus-Smit, 2018). The culture of a society can be identified through the sharing of ideas, knowledge, language, and practices among its members.

The culture of a society can be identified through the sharing of ideas, knowledge, language, and practices among its members. Universal ideas such as human rights can be understood and implemented differently by states with different cultures and identity. Southeast Asian countries, for example, strongly believe in cultural relativism, rather than universalism, of human rights, meaning that the states emphasized that the implementation of human rights principles should take into account seriously the local culture. It is believed that 'institutionalized knowledge and ideas are the source of international practice' (Adler, E. , 2002, p. 102).

Constructivists view the world as 'social facts' (Searle, 1996; Wendt, 1995)—that is, socially and intersubjectively constructed—and in turn, it has the structural power to shape the identities, interests, and behaviour of actors that are embedded in that structure. For constructivists, social facts in international politics, such as anarchy, military power, state sovereignty, political independence, regional integration, and other international concepts, are examples of social constructions. Those social facts contain particular ideas. Constructivists suggest that to understand the meaning of social facts, they must be 'contextualized in their social environment context' (Hopft, T. , 1998, p. 182). The existence of social facts depends on the meaning that is intersubjectively given to them. The interpretation of social facts may differ among actors. Actors (with different

collective identities and shared knowledge) may regard and define social facts differently. Therefore, social facts in world politics may not have a single meaning because they depend on interpretation and the relation of the state to international realms.

### *Norm and the Construction of Identities*

As noted, constructivists argue that ideational forces significantly influence the shaping of state interests and behaviors, as well as the transformation of international systems. Norms are believed to possess the structural qualities or constitutive force required to impact social and political behaviour as well as the social identities of a state (Reus-Smit, C., 2009). In turn, identities construct the state's interests and can affect interstate normative structures, such as regimes, security communities, or regional organizations (Jepperson, 1996). Identities are among the core themes in constructivism, as they are claimed to have a fundamental role in shaping a state's interests and actions (Wendt, A., 1994; Jepperson, 1996). Identity strongly correlates with the culture of actors. Lapid (1996: 6–9) argued that culture and the state's identity have a complex linkage that cannot be collapsed into each other'.

Wendt (1994) divides identities into two forms: corporate and social. Simply put, the former type of identity is the construction of actors about themselves, while the latter involves the meanings that an actor assigns to themselves from the other's perspective (Wendt, 1994). Identity can thus be seen as a self-representation that encompasses how actors understand their own identity, how others perceive them, and how they express their desires and concerns. Here, a state's identity is regarded as an interlinked and interconnected version of its corporate and social identities, rather than being strictly divided. As Acharya emphasizes, 'social identities of states are not entirely divorced from cultural and historical ties but [...] reinforced by them' (2017: 26). To this point, the focus of the EU on democracy and human rights demonstrates a good example of the blending of corporate and social identities. The EU member states collectively define themselves as democratic countries that are dedicated to preserving the norms of human rights. Simultaneously, the international community acknowledged the EU as an exemplar of how countries may successfully uphold civil-political liberties and secure socio-economic entitlements for their populations. This combination highlights the interdependent relationship between their corporate and social identities. The discussion of identities in this chapter and generally in this research refers to the understanding that states' identities



are a social construct that originates from the historical and cultural base of self reflection' and the intersubjective construction of states in international affairs.

### **Research Method**

This article uses a qualitative comparative case study approach. This approach is used to enable an in-depth examination of the complexity of cases to identify patterns (similarities and differences) between the cases. This approach provides an opportunity to unpack non-material factors, such as the construction of a particular idea and identity, that causes certain outcome. More broadly, this approach may provide a deeper theoretical understanding, in this case how states' identity influence the way they treat others with different construction of culture and identity.

This article compares two cases: Turkey and Bulgaria's accession to the EU, as both countries offer comparability and relevant insights to understand the factors leading to their differing outcomes in the accession process. Bulgaria was chosen as a comparison to Turkey because it was one of the most challenging countries in Central and Eastern Europe in terms of its economic, political, and human rights issues. This article uses document-based data including statements, reports, and journal articles related to Turkey and Bulgaria accession process into EU. For example, this article uses data primarily from the EU such as the 'Cooperation and Verification Mechanism for Bulgaria and Romania' (2023); 'Chapters of the Acquis and Accession Criteria. In addition to the documents from the EU, this article engaged broadly with the existing literature on the EU membership discourse and norm literature, in particular, that follow constructivists arguments. In this article some steps are taken to make sure the data used are valid. Some keywords have been applied to find the relevant source of data. The relevant data to the topic have been sorted by considering the credibility of the source. To this point, data used in this article includes written documents from the EU, political speeches and comments, journal articles and books, and any other credible sources from international media. All the data are analyzed through a general qualitative data analysis (Creswell 2014: 320). Some steps have been conducted to ensure the validity and reliability of the data. For example, source verification has been taken to ensure that all data comes from credible and authoritative sources. In addition, a consistent coding and categorization have also been conducted to develop a consistent coding and analysis framework, and to avoid subjective bias. According to Creswell (2014), the process of qualitative data

analysis includes the process of managing and coding the data, finding and deciding the themes, and interpreting the data. The process of the coding involves the use of keywords to the available data to generate categories. For example, some codes were found from the data such as Copenhagen Criteria, economic crisis, human rights violations, European support and assistance, and cultural and identity differences. Some similar codes are grouped into categories such as accession requirements and cultural-identity factors which include the Copenhagen Criteria, democracy and human rights, market economy, and the discourse of European identity. The categories are developed into themes such as the influence of identity and culture in EU membership and unequal treatment in the EU enlargement process. In the last stage, the themes are analyzed by engaging to the existing literature and linking back to theory, especially the constructivist arguments (Creswell, 2014: 317-24).

#### ***Applying for Membership: Turkey's Problematic Accession into European Union***

It is commonly observed that Turkey acts as a link between the Western and Eastern regions, both geographically and culturally, and is a vital ally for the European Union in numerous crucial sectors (Aydın-Düzgüt, S., & Tocci, N., 2015; Linden, R. H., Kirişci, K., & Straubhaar, T., 2012). Turkey's engagement with the European Union traces back to the 1940s, beginning with its entry into the Council of Europe in 1949. In 1963, Turkey signed the Ankara Agreement with the European Economic Community (EEC), which primarily focused on the trade of agricultural products. The agreement was intended to boost economic growth, enhance trade, and reduce economic disparities. However, the relationship between the EEC and Turkey faced significant hurdles during the 1970s and most of the 1980s, influenced by factors such as Turkey's role in Cyprus and its own internal political and economic instability. These issues were of particular concern to the EU because they pertained to the accession regulation established in the Copenhagen Criteria (Aksu, 2012). To respond to these challenges, since the 1980s, Turkey introduced new policies in its economic model and preferences. Turkey transitioned its economic policy from import-substituting industrialization in the 1930s and the national development plans of the 1960s to an export-oriented growth strategy. This transition emphasized the liberalization of financial markets and an increased focus on international trade (Aksu, 2012). However, the new policy faced difficulties in its implementation due to a military coup that took place in Turkey on September 12, 1980 that maintain the state



intervention and increased the scope for corruption (Toksoz in Ricz, J., & Gerócs, 2023). Under these circumstances, the top military officials suspended the constitution and disbanded the parliament. As a result, the European Commission (EC) has restricted the extent of European Union (EU) connections with Turkey. The EU temporarily halted its economic and military aid to Turkey and postponed the country's application for full membership (Yesilada, B. , 2002).

The European Commission called on the Turkish military to respect and protect the rights of the people, including the release of political detainees and the handover of authority to civilian governance (Human Rights Watch Watch, 1995). The National Security Council responded to international pressure by saying that the military forces have committed to stopping the fighting between brothers to prevent a civil war and to transfer power to civil authorities (Kars Kaynar, 2017). After Turkey managed to restore its civilian governance, relations with the EEC countries were gradually normalized in 1983. In this situation, Turkey expects to become a full member of the EEC. The EEC-Turkey Joint Committee met on September 16, 1986, thawing a relationship that had remained dormant since 1980. However, leaders from some EU countries, such as Helmut Kohl and Margaret Thatcher, warned Turkey not to rush into its submissions to the EU. In addition to the human rights abuses within Turkey, European leaders are also worried about labor freedom issues and the potential mass migration of workers from Turkey to EU member states (Yackley, 2016).

During the Helsinki Summit in 1999, the EU initiated accession negotiations for Turkey to potentially become a country aspiring to join the EU. To enable the negotiations process, Turkey must be able to meet the Copenhagen criteria. At the Copenhagen Summit in December 2002, it was reiterated that the Council of Europe, relying on reports and recommendations from the Commission, determined that if Turkey fulfils Copenhagen's political conditions, the EU will commence negotiations promptly (Duzgit, 2006). During the Brussels Summit in 2004, the decision was made for the EU to initiate negotiations with Turkey, and the formal negotiation process commenced on October 3, 2005.

In the negotiation process, to achieve EU full membership, Turkey must complete thirty-five chapters of negotiations related to policy areas to be agreed upon. Unfortunately, from the 35 newly opened chapters, 8 chapters are still frozen due to

Turkey's dispute with Cyprus (Kambas, 2015). The progress of the negotiations with Turkey remains unknown due to the current deadlock. In October 2001, The Turkish parliament approved 34 constitutional amendments concerning freedoms of expression, organization, and assembly, minority language rights, the partial abolition of the death penalty, and military intervention in politics(Hale,, 2010). The parliament has also tried to change press freedom, associational activities, political party dissolution, and the prohibition of torture. However, the attempts have fallen short because human rights abuses continue to be practised.

By the end of 2006, the EU had postponed eight Customs Union chapters and barred provisional conclusions until Turkey fulfilled its requirements. For the EU to reconsider and reopen the chapters concerning judicial and fundamental rights, as well as justice, security, and freedom, which have been closed since 2009 due to the Cyprus issue, Turkey needs to reinforce its fragile democracy and demonstrate a stronger commitment to upholding human rights (Chislett, 2015). Consequently, the negotiations for Turkey's entry into the EU have been going very slowly as a result of the postponed chapters. Given the current circumstances, Ankara is unlikely to join the EU in the near future. Turkey does not meet the Copenhagen criteria, which require candidate countries to have institutions that uphold democracy, rule of law, human rights, and a market economy. In 2008, the EU Council stated that no additional chapters will be considered for opening or closing, thereby halting the membership negotiations.

### ***Bulgaria's Application for Membership: from difficulties to Success***

Bulgaria initiated the process of seeking membership in the European Union and restoring its connections with the union in 1990. Both parties signed a Trade and Commercial and Economic Cooperation Agreement in November 1990. In December 1993, Bulgaria and the EU negotiated an Interim Agreement for commercial liberalization, which became the Association Agreement (the "Europe Agreement" or "Agreement") on February 1, 1995(Alexandrov & Petkov, 1997).The agreement includes provisions for free commerce as well as political dialogue, financial support, and other forms of help. It also contains a chapter on economic and technological cooperation. Bulgaria's exports to EU nations notably expanded by 260% in the years after the trade and economic agreement, reaching ECU 1.83 billion in 1995. The main things that Bulgaria exports to the EU countries such

as to Germany, the UK, Italy, and Greece include iron, steel, basic metals, textiles, agricultural products, and chemicals.

While all Central and Eastern European (CEE) applicants fell under the European Commission's negotiating authority for the Association Agreements, issues related to democracy and human rights emerged specifically concerning Bulgaria. These issues consequently has suspended the agreement that were deemed as a violation to one of the components in the Copenhagen Criteria. Consequently, there was minimal progress in the EU accession process until the economic crisis and human rights concerns were resolved. The suspension of the agreement was linked to widespread protests against the Videnov administration in the beginning of 1997, where demonstrators demanded immediate elections and swift action to address the economic crisis (Dragneva-Lewers, *et al*, 2002).

Amidst the political unrest, Bulgaria formally submitted its application to join the EU on December 14, 1995, with the proposal being put forward by the Bulgarian Socialist Party government led by Zhan Videnov. However, considering the economic situation in the country, the European Commission emphasized that they would not review Bulgaria and will delay the membership discussion. In response, Bulgaria initiated its national plan in 1998 to facilitate further discussions for EU membership. The Accession Partnership, agreed upon by the EU and Bulgaria, aided Bulgaria's preparation efforts a year later. This newly introduced instrument was designed to offer a coherent framework to enhance the preparation for accession.

The formal negotiations commenced in March 2000 with the initiation of discussions on six chapters of the *acquis*. The Bulgarian administration expected to launch fourteen chapters and keep the discussions moving further. The European Commission's evaluations indicate that Bulgaria's governmental and economic structures are generally aligned with the fundamental principles of liberal democracy and the market economy, and its legislative frameworks largely conform to the EU *acquis*. However, there are significant concerns about governance quality and the rule of law, with explicit appeals to combat high-level political corruption and deficiencies in the operation of judicial systems and public administrations being acknowledged in official EU documents. After successfully aligning its institutions and policies with EU standards, particularly during the last eight years of preparation, Bulgaria officially became a member of the European Union on January 1, 2007 (Noutcheva, & Bechev, 2008).

Bulgaria's accession to full membership in the European Union involved prolonged negotiations due to challenges and values that did not align with the Copenhagen Criteria, especially with regard to the corruptions, instability of the economy, and human rights issues including the lack of democracy and the protection of minorities in the country (Kaneva, 2007; Noutcheva and Bechev, 2008). To this point, a country will only be considered as a credible accession candidate if they could demonstrate that 'its polity is a full-fledged liberal democracy and its economy functions according to market rules' (Noutcheva and Bechev, 2008). Consequently, at the request of the European Council, the Commission prepared evaluations for each membership application. In this instance, the Commission's duties were unique compared to its functions in the three previous expansions, as its responsibilities went further than merely assessing the candidates' ability to implement the *acquis* (Alexandrov & Petkov, 1997). Bulgaria needs to make significant advancements in a number of essential sectors in order to start its accession discussions and fulfil the membership requirements. The Commission found that Bulgaria was not prepared to start accession talks due to a number of concerns. There were no laws or regulations governing the civil service in Bulgaria, despite the country has changed its legislation (Alexandrov & Petkov, 1997).

Furthermore, another significant challenge in the accession process was the exceptionally high level of corruption in Bulgaria, which posed a major issue for the country (Lacatus & Sedelmeier, 2020). The considerable discretionary power and absence of transparency in distributing roles and authority among government bodies fostered an environment conducive to corruption. From 1990 to 1997, corruption intertwined with the partially legal transition towards democracy and a market economy, manifesting in self-serving, antisocial behavior aimed at the state itself, thereby eroding trust in public institutions (Racoviță M, 2011). Corruption schemes in Bulgaria involve the deliberate draining and subsequent collapse of state and commercial banks through a form of "privatisation" that entailed overt plundering with the implicit involvement of government officials. Additionally, there was the phenomenon of an "in-and-out" economy, marked by corrupt practices where profitable activities of State-Owned Enterprises (SOEs), such as the supply of raw materials and equipment, are taken over by the private sector while the state bears the losses (Racoviță M, 2011). Therefore, the Commission asked Bulgaria to develop competent and impartial public services, as well

as transparent public administration procedures, particularly in the area of public contracts.

The EU has significantly contributed to helping Bulgaria by implementing the Cooperation and Verification Mechanism (CVM), as a transitional tool, to monitor and evaluate the country's progress in meeting the Aquis Criteria, particularly in judicial reform, corruption, and organized crime. The EU has also allocated substantial financial support to Bulgaria through some instruments such as so-called Structural and Cohesion Funds, aimed at bolstering the country's institutional capacities, infrastructure, and development projects. The fund has also aided Bulgaria in law and judicial reform (European Commission, 2023).

### ***Comparative Discussion: Identity Does Matter***

Becoming an EU member requires certain steps. According to the Copenhagen Criteria, the fundamental prerequisites for becoming a member state encompass three key areas: political, economic, and the aquis criteria, which all candidate countries must fulfill. The political criteria refer to the need for institutional stability that upholds democracy, the rule of law, human rights, and the protection of minority rights. Economic requirements require member states to construct a market economy that can withstand competitive pressures and compete on the EU market. Meanwhile, the aquis criteria require commitment to the rights and obligations that bind all EU member states, encompassing adherence to EU laws. Meanwhile, the aquis criteria require commitment to the rights and obligations that bind all EU member states, encompassing adherence to EU laws. Considering the cases of Bulgaria and Turkey, it is clear that they have made a difference in their EU accession processes. The beginning of negotiations between the two parties is imminent, but Bulgaria successfully held a full membership in 2007. In contrast, Turkey has not yet received the result of its negotiation process. This has brought to light disparities in treatment during the negotiation process. In addition to the issues of human rights and the instability of Turkey's market economy, other factors such as the European and Turkey's identity play at stake. It showed that national press in some European countries such as in France, Britain, and Greece gave significant concerns about the differences between Europe and Turkey's culture and politics (Negrine, *et al*, 2008).

Prior the accession, Bulgaria did not have the characteristics of a market economy and was not ready to integrate into the European single market (Dragneva-Lewers, *et al*,

2002; Noutcheva & Bechev, 2008). Bulgaria was dominated by a strong-rooted despotic governance that maintained centrally-planned economy and conserved backwardness to the state and society (Kalotay, 2008, pp. 16 - 17). During the mid-1990s, the country faced an economic downturn and hyperinflation, attributed to weak institutions and slow progress towards a market economy (Noutcheva & Bechev, 2008, p. 115). The data indicated that consumer price inflation reached exceptionally high levels, exceeding 1000% during the 1997 financial crisis (Kalotay, 2008, p. 14). Against this backdrop, Bulgaria was included from the outset in all programs initiated by European institutions to foster the transition to democracy and a market economy. Bulgaria was part of the PHARE programme (Poland and Hungary Assistance for Restructuring Their Economies), which aimed to support the country during its political and economic transformation. Moreover, Bulgaria received 476.5 millions Euro as an economic assistance from the European Commission (Noutcheva & Bechev, 2008, p. 118).

In contrast, Turkey's accession process has faced challenges from the very beginning. This case highlighted different complexities of the accession process compared to the EU enlargement in Central and Eastern Europe (CEE) such as Bulgaria, Romania, Latvia, the Czech Republic and some others. With this regards, the relatively similar of culture and identity between the Western Europe and the CEE countries played a crucial role in facilitating the accession of the CEE countries into EU. It is not to say that the EU accepted the CEE countries to be the member states by only considering the similarity of the culture, but factors of identity and culture cannot be neglected in the accession process. As Thomas Risse highlighted that the EU and its representative countries utilized the feeling of community and identity discourse from the very beginning to legitimize the requests of CEE countries to join the union (2012: 92).

Following its official candidacy for integration into the EU, Turkey has enacted a wide array of reforms. These reforms on freedom encompassed the acknowledgment of diverse religions, permitting the use of languages other than Turkish, overhauling the school curriculum comprehensively, and modifying its legal framework to align with international human rights treaties (Çayir, 2009). In addition to the aspect of freedom, Turkey has become more democratic since the middle of 1990s, aiming to attain candidacy for the EU membership. The country had political reform in order to fulfil the Copenhagen criteria so that the accession negotiation could begin. This reform has been



intentionally taken to facilitate the accession process. As Baç argued that the 'Europeanization process stimulated democratic change in Turkey... tried to adopt basic principles and norms of liberal democracy for the sake of inclusion in the European order' (2007).

Based on the Copenhagen Criteria, Turkey could be considered eligible to join the European Union. For example, in 2014, Turkey ranked as the 16th largest economy globally and the 6th largest in Europe. HSBC's 'The World in 2050 Report' forecast that the country will become the 12th largest economy in the world and the 5th largest in Europe by 2050. It also highlighted the country as the fastest-growing market in terms of GDP among European and OECD nations (Foreign and Commonwealth Office, 2014). In 2021, Turkey was the 19th largest economy in the world with total GDP for around US\$ 815 billion (Silver, 2022). This economic capacity surpasses the GDP of several other EU nations like Poland, Romania, Hungary, and Bulgaria (The World Bank, 2023).

In the political aspects, since 2002, Turkey's government has adopted seven major packages of political reform, including constitutional reform, eliminated death penalty in all circumstances according to the Protocol 13 of the European Convention of Human Rights, adopted various Covenants of the UN that Turkey has many reservations, and adopted the changing of military in politics (Baç, 2007). Considering the discussion around Turkey's entrance has primarily focused on European identity, the boundaries, and ambiguities of the European project, rather than necessarily Turkey's capacity to meet the EU accession requirements (Baç & Taşkin, 2007). It demonstrates that identity does matter, in addition to the material factors that have influenced the dynamics of the relationship between the EU and Turkey.

One could argue that the stark differences in identity between Turkey and European nations are a key factor in Turkey's continued unsuccessful bid for membership in the European Union. The opposing identities between Turkish and European have been claimed to be a fundamental factor contributing to Turkey's unsuccessful membership in the European Union. Currently, both the European public and state leaders are questioning Turkey's 'Europeanness' and its identity as part of Europe.

Former French President Nicolas Sarkozy and German Chancellor Angela Merkel have highlighted that Turkey's democratic system, geographical location, historical background, cultural aspects, and the attitudes of its politicians and citizens render it a

non-European country, making it unsuitable for EU membership (Aydın-Düzgüt & Rumelili, 2021, p. 4). Sarkozy also asserted that "... a Europe without borders means a Europe without value" (Kylstad, 2010: 22). In this statement, the word 'boundary' in Sarkozy's statement has a tendency to refer to cultural and identity differences between Turkish and the European (Kylstad, 2010). As Sarkozy emphasized that Turkey does not belong in the EU (Matthews, 2006).

At this point, by taking into account the matter of identity in international politics, the consideration of Turkey's accession to the EU should move beyond just the tangible requirements of the Copenhagen criteria, but also focusing on the development of shared identities between Turkey and the EU. Consequently, the discussion surrounding Turkey's EU accession process is not merely about meeting specific criteria, but rather about whether the Turkish identity aligns with European identities (Risse, 2012, p. 92).

It must be acknowledged that Europe is built and developed in the context of the construction of a particular civilization, especially the Roman Empire and Christianity. This civilization played essential and cohesive roles in uniting the peoples of Europe. At this point, being European encompasses not only residing in Europe but also involves sharing and adhering to a collective history, norms, traditions, and values (Baç & Taşkın, 2007, p. 38). With regard to this, "Europe and Europeanness have long been central referent ideology of national identity in Bulgaria", despite the country was dominated by communism (a contrast ideology with majority of the European nations especially the West European countries) in the post world war II (Pilbrow, 2005). In contrast, considering Turkey's history, it is widely recognized for its robust Islamic culture. Historically, the Ottoman Empire (then Turkey in the modern years) had a more contentious relationship with Europe (Kylstad, I., 2010). Commencing with the fall of Constantinople, which marked the end of the Byzantine Empire, Europeans perceived the Ottoman Empire as embodying the most unfavorable aspects of Islam.

## **Conclusion**

The issue of Turkey's EU membership has been a subject of debate spanning several decades. The accession process ostensibly centers on the Copenhagen Criteria, which encompass political, economic, and legal dimensions. Nonetheless, the accession process is not purely a technical endeavor; it is profoundly political and shaped by prevailing perspectives on identity and culture within the current member states.

Bulgaria's accession serves as a notable example. Despite grappling with challenges such as a centrally planned economy, autocratic governance, and the economic crisis of the 1990s, the EU demonstrated readiness to invest in and support countries committed to reforms and perceived as sharing a common European heritage. The EU's PHARE programme and financial assistance given to Bulgaria were reflections of this attitude. Bulgaria's historical, cultural, and geographical proximity to the European heartland facilitated its integration into the European fabric, making it easier to envision and promote to the European public.

Turkey's case, however, is more complex. Despite making substantial progress in political and economic reforms and aligning itself with EU standards, it continues to remain on the periphery of the accession process. Turkey's reforms, remarkable economic growth, and the fact that portions of its territory lie within geographical Europe would appear to position it as a feasible candidate for EU membership. Unfortunately, the negotiation process is very complex and remains unsuccessful. The historical tensions between the Ottoman Empire and European powers, the cultural differences rooted in the predominance of Islam in Turkey versus the Christian heritage of Europe, and the perception of Turkey as the 'other' have played into these debates. To some extent, Turkey's geographical location at the crossroads of Europe and Asia makes it strategic but also brings complexities in terms of its relations with neighboring regions, especially the Middle East.

Contrasting these two cases underscores the significant aspect that shapes the dynamics of international politics: not only material forces but also the ideas and identities of actors, such as states and regional organizations. When looking at the complexities during the negotiation process, Turkey and Bulgaria have relatively similar problems in human rights violations, economic crises, and other violations that are inconsistent with the standard of the Copenhagen Criteria. If the accession process into the EU were solely based on the Copenhagen Criteria, Turkey's performance appears more favorable compared to Bulgaria's, making it a stronger candidate for EU membership. Bulgaria received extensive assistance from the EU to enable them to fulfil the Copenhagen Criteria, but the process for Turkey is still controversial. The EU's enlargement process serves to define the borders of what is considered Europe and what is not, making Turkey's potential entry into the EU the most significant and conspicuous point of

demarcation in that regard. This implies that how a candidate is perceived to align with a predetermined European identity will influence the outcome of the accession negotiations with the EU (Baç and Taşkin, 2007). Hence, the dynamic process of Turkey's accession into the EU is closely linked to ideational factors such as the different conception of culture and identity between Turkey and European rather than solely the technical aspects outlined in the Copenhagen Criteria.

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