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**Europe's Unilateralists:
Member State Strategic Plans
and the De Facto Differentiation
of EU External Action. A Preliminary
Inquiry and Research Agenda**

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1. Introduction: A Preliminary Inquiry into Europe's Unilateralists and the Future of EU External Action

The European Union's external action is facing a silent crisis. While academic attention has long focused on the formal fragmentation enshrined in the Treaties – the persistent dualism between the supranational Community method and the intergovernmental logic of the Common Foreign and Security Policy (CFSP)¹ – a more subtle and potentially more corrosive phenomenon is emerging: the rise of large-scale, unilateral strategic initiatives by powerful Member States. Italy's 'Mattei Plan for Africa', a multi-billion euro strategy aimed at reshaping relations with the African continent, is the most recent and ambitious example of this trend. Such plans, conceived and governed at the national level but operating in the same geopolitical and thematic spaces as common EU frameworks, pose a fundamental challenge to the Union's constitutional order. From the perspective of an international law scholar, this trend complicates the EU's very identity as a single legal actor on the global stage, raising profound questions about its capacity for coherent action and the predictability of its commitments.

This working paper offers a preliminary conceptualisation of this phenomenon. It aims to launch a scholarly debate by advancing the argument that initiatives like the Mattei Plan are best understood not as anomalies or acts of defiance, but as a form of *de facto* differentiated integration. We posit that such unilateralism is a strategic and rational response to the systemic pathologies that have long afflicted the Union's external action, particularly in a region as complex and vital as the Mediterranean.² Decades of EU policy have, we argue, actively constructed a governance vacuum, marked by strategic indecisiveness, normative inconsistency, and bureaucratic inertia. While this analysis is, at this stage, necessarily provisional and focused on the Italian case, it lays the conceptual groundwork for a broader comparative investigation. Acknowledging the limitations of a single case-study, this paper's primary objective is to build a clear analytical framework

¹ E. CANNIZZARO, M.E. BARTOLONI, «Unitarietà e frammentazione nel sistema dell'azione esterna dell'Unione», in *Il Diritto dell'Unione Europea*, 2013, p. 531.

² F. CASSANO, «Mediterraneo contro il conflitto tra le civiltà», in E. TRIGGIANI (ed), *Europa e Mediterraneo. Le regole per la costruzione di una società integrata*, Naples, 2009, p. 35. For an overview of the different definitions of the Euro-Mediterranean region, see M. CIOLA, «Il Piano Mattei e il ruolo dell'Italia nell'UE: una strategia per rafforzare la cooperazione euromediterranea», in F. ANGHELONE, A. UNGARI (eds), *Sicurezza europea integrata: il Piano Mattei nel Mediterraneo allargato*, Rome, p. 47.

and conclude by setting out a research agenda to investigate this trend and its profound implications for the future of European integration.

Our inquiry is situated at the intersection of several critical debates in European legal and political studies. It draws, first, on the EU law scholars that have extensively analysed the fragmentation of the EU's external action framework post-Lisbon.³ The work of scholars who have highlighted the 'disquieting coexistence' of competing legal orders and the constant tension between unity and fragmentation provides the legal-doctrinal foundation for our analysis of the 'permissive structures' that enable unilateralism. Second, we engage with the rich literature on differentiated integration. While this body of work has traditionally focused on formal opt-outs or negotiated variable geometry,⁴ we extend its logic to encompass informal and unilateral practices that produce *de facto* differentiation. Third, our analysis is informed by the critical scholarship on the EU's external policies in the Mediterranean, which has consistently pointed to the limited effectiveness, credibility gaps, and governance deficits of successive EU frameworks.⁵

Finally, our paper engages with the most recent literature on the 'geopolitical turn' in EU external action⁶. This scholarship diagnoses a shift from a foreign policy ostensibly driven by norms and values towards one more explicitly focused on power, strategic interests, and geoeconomics.⁷ Our contribution is to demonstrate how this same geopolitical logic is now being replicated at the Member State level, creating a dynamic of 'competitive

³ M.E. BARTOLONI, «Disciplina dei Trattati e prassi evolutiva nelle relazioni internazionali dell'Unione europea», in *Diritto dell'Unione europea*, 2022, p. 605.

⁴ See, for instance, E. LANNON, «The European Political Community in the EU's wider neighbourhood: A new element of the differentiated pan Euro-Mediterranean integration framework», in *European Law Journal*, 2024, p. 595; R.D. KELEMEN, «Epilogue: A Note of Caution on Differentiated Integration», in *Swiss Political Science Review*, 2021, p. 672.

⁵ This critique is a central theme in the literature. See S. BLOCKMANS, «The ENP and 'more for more' conditionality: plus que ça change...», in G. FERNÁNDEZ ARRIBAS, K. PIETERS, T. TAKÁCS (eds), *The European Union's relations with the Southern-Mediterranean in the aftermath of the Arab Spring*, CLEER Working Papers 2013/3; U. VILLANI, «Le responsabilità dell'Unione europea nell'area mediterranea», in *Studi sull'integrazione europea*, 2009, p. 577.

⁶ See M. NEUMAN, R. A. WESSEL & T. DE ZEE (eds), *A Geopolitical Europe in the Making? The EU's Actorness in a (De-)Globalising World*, The Hague, 2025; M.E. BARTOLONI, «Customary International Rules Addressed to Member States and EU: Mapping Out the Different Coordination Models», in *European Papers*, 2024, p. 377; E. CANNIZZARO, «The Value of the EU International Values», in W. TH. DOUMA ET AL. (eds), *The Evolving Nature of EU External Relations Law*, The Hague, 2021, p. 3.

⁷ B. SZENT-IVÁNYI, D. PIROSKA, «Geopolitics on a Shoestring? Unpacking the EU'S Geopolitical External Assistance to Central Asia», in *JCMS: Journal of Common Market Studies*, 2025, p. 3.

coherence’ where national and EU strategies, while ostensibly aligned, are driven by distinct institutional and political interests. By examining the Mattei Plan, we provide initial but compelling evidence of how Member States are becoming ‘unilateralists’ within the EU’s own sphere of influence, leveraging the Union’s normative language while pursuing nationally-defined strategic ends.

The Mattei Plan provides a particularly rich case study for this preliminary inquiry. Formally presented as a “programmatically-strategic document” to “promote development in African States,”⁸ it is an ambitious initiative with six operational pillars: education, health, agriculture, water, energy, and infrastructure.⁹ Its official narrative is steeped in the language of a new, non-predatory partnership, aiming to foster holistic development and social cohesion.¹⁰ This language is not accidental; it deliberately mirrors the EU’s own development discourse, which has moved beyond purely economic metrics to embrace a multidimensional understanding of poverty and exclusion.¹¹ However, behind this normative façade lie clear national strategic imperatives, primarily the diversification of Italy’s energy supplies to position it as a “hub” for Europe, and the management of migration flows from the African continent.¹² It is this complex interplay between a borrowed normative discourse and hard national interests that makes the Mattei Plan such a compelling object of study. It is a microcosm of the value-interest dilemma that has long defined the EU’s own struggle to be a ‘Normative Power’.

This working paper builds its initial argument through a focused structure. The subsequent sections diagnose the systemic pathologies of EU external action that have created the permissive conditions for the Mattei Plan to emerge. We first analyse the EU’s constitutional framework, arguing that its structural fragmentation and the normative

⁸ Law No. 2/2024, converting Decree-Law No. 161/2023, Art. 1.

⁹ For an official overview of the Plan’s objectives and pillars, see Presidenza del Consiglio dei Ministri, *Piano Mattei per l’Africa*, (Rome 2024).

¹⁰ The concept of a new, non-predatory partnership was the central theme of the Prime Minister’s opening speech at the Italy-Africa Summit. See G. CARBONE, L. RAGAZZI, *Il Piano Mattei: verso nuove relazioni Italia-Africa?*, Policy Paper ISPI, Milan, Febbraio 2025, p. 6.

¹¹ The concept of ‘social cohesion’ and its distinction from mere poverty reduction has a complex intellectual history. See A. MADANIPOUR, M. SHUCKSMITH, H. TALBOT, «Concepts of poverty and social exclusion in Europe», in *Local Economy*, 2015, p. 723; H. SILVER, «Social exclusion and social solidarity: Three paradigms», in *International Labour Review*, 1994, p. 531.

¹² The dual focus on energy and migration as strategic priorities is evident in the official government documents and accompanying policy papers. See Presidenza del Consiglio dei Ministri, Dipartimento per il programma di Governo, *Focus - Piano Mattei per l’Africa*, (Rome 2024); G. CARBONE, L. RAGAZZI (eds), *Il Piano Mattei*, cit., p. 7.

ambiguity of its guiding principles provide a permissive architecture for unilateralism. We then turn to the EU's policy history in the Mediterranean, demonstrating how successive policy failures have systematically constructed a governance void. The main body of the paper then deconstructs the Mattei Plan itself, showing how its governance and objectives function as a strategic response to this void. Acknowledging the limitations of this single-case analysis, the paper concludes not with definitive assertions, but by outlining a forward-looking research agenda. It frames the challenges posed by Member State unilateralism in terms of four key puzzles – comparative, constitutional, external, and democratic – thereby inviting a broader and necessary scholarly inquiry into this critical and evolving dimension of European integration.

2. The EU's constitutional framework: a permissive architecture for unilateral action

The Lisbon Treaty's ambition to forge a coherent external actor was a direct response to the manifest weaknesses of the previous pillar structure. The centrepiece of this constitutional architecture, Article 21 TEU, sets out a comprehensive and sophisticated array of principles and objectives intended to guide all facets of the Union's external action, from democracy and the rule of law to solidarity and respect for international law.¹³ It is a normative statement of profound constitutional significance, aspiring to ensure consistency across the Union's diverse policy fields and project the image of a unified, value-driven global actor.¹⁴

Yet, the promise of coherence enshrined in Article 21 TEU coexists uneasily with a constitutional reality defined by fragmentation. The Treaty, in a foundational compromise, preserved the legal and procedural distinctiveness of the Common Foreign and Security Policy (CFSP), insulating it from the supranational 'Community method' that governs most other external policies.¹⁵ This inherent dualism is not a mere technical flaw but a permanent constitutional tension that creates the space for Member State unilateralism to emerge as a seemingly effective alternative to institutional gridlock. This systemic deadlock has fuelled a rich debate on legal and political avenues for reform,

¹³ P. VAN ELSUWEGE, «EU External Action after the Collapse of the Pillar Structure: In Search of a New Balance between Delimitation and Consistency», in *Common Market Law Review*, 2010, p. 987.

¹⁴ T. RAMOPOULOS, L. HAVAS, «Article 21 TEU», in M. KELLERBAUER, M. KLAMERT, J. TOMKIN (eds), *The EU Treaties and the Charter of Fundamental Rights: A Commentary*, Oxford, 2024, p. 242.

¹⁵ E. CANNIZZARO, M.E. BARTOLONI, «Unitarietà e frammentazione nel sistema dell'azione esterna dell'Unione», cit., p. 531.

primarily focusing on leveraging existing Treaty provisions such as Qualified Majority Voting (QMV) and *passerelle* clauses to enhance decision-making efficiency.¹⁶ However, this article argues that alongside these formal reform debates, a more subtle, practice-driven phenomenon is emerging, which we term *de facto* differentiated integration. On one hand, the CFSP remains a domain of intergovernmental decision-making, often requiring unanimity and limiting the powers of the Commission and the Court of Justice. On the other, policies such as trade, development, and neighbourhood are driven by the supranational method. This structure creates a ‘grey area’ of competence and political authority where neither the Commission can impose a fully supranational line nor can the Council always act with the speed and flexibility of a unitary executive.¹⁷ It is within this zone of institutional ambiguity that unilateral action by a powerful Member State can be framed as a pragmatic and necessary step to overcome systemic inertia.

The second permissive feature of the EU’s constitutional framework lies in the language of its guiding principles. The normative ambiguity of principles like ‘solidarity’ in Article 21 TEU thus functions not as a weakness of the constitutional text, but as a strategic resource for Member States. Concepts such as solidarity, human dignity, and sustainable development are intentionally broad, reflecting a consensus on values rather than a detailed policy programme. While legal scholarship has worked to give these principles concrete legal meaning – defining solidarity, for example, as a concept that transcends mere cooperation to entail common action for common goods¹⁸ – their application in external policy remains highly contextual and politically mediated. The Court of Justice itself has recently and forcefully affirmed the constitutional status of solidarity, declaring in a Grand Chamber judgment concerning the internal energy market that it ‘underpins the entire

¹⁶ For a comprehensive overview of these legal options, see V. SZÉP, R. A. WESSEL, «Legal Challenges to Enhancing Coherence and Effectiveness in EU Foreign and Security Policy», in *European Foreign Affairs Review*, 2025, pp. 369-386. Their analysis focuses on formal mechanisms like QMV, *passerelle* clauses, and the use of non-CFSP legal bases to achieve foreign policy objectives.

¹⁷ M.E. BARTOLONI, «Disciplina dei Trattati», cit., p. 605.

¹⁸ On the principle of solidarity in international law see R. PISILLO MAZZESCHI, «Solidarietà: un principio generale del diritto internazionale?», in L. CASTALDI, F. LENZERINI, F. ZINI (eds), *Le dimensioni del principio solidaristico nel terzo millennio*, Florence, 2024, pp. 159-164, where the author develops a more precise legal definition of solidarity based on common actions for common goods, distinguishing it from mere cooperation. See *inter alia* E. KÜÇÜK, «Solidarity in EU Law: An Elusive Political Statement or a Legal Principle with Substance?» in *Maastricht Journal of European and Comparative Law*, 2016, p. 6; K. LENAERTS, S. ADAM, «La solidarité, valeur commune aux États membres et principe fédératif de l’Union européenne» in *Cahiers de droit européen*, 2021, p. 307.

legal system of the European Union’,¹⁹ yet its concrete legal effects in the external sphere remain diffuse and contested. Article 21, therefore, can be read as a ‘menu of legitimation’. It provides a pre-approved, value-laden vocabulary that Member States can strategically appropriate to frame national interest-driven policies in the language of common European objectives, effectively borrowing the EU’s legitimacy for unilateral ends.

This normative flexibility is particularly potent when applied to the concept of ‘social cohesion’, a key, albeit implicit, goal of the Union’s neighbourhood and development policies. Originating in a rich and contested intellectual tradition, as masterfully outlined by Silver, social cohesion is a polysemic concept that can be interpreted through various ideological lenses – be it the Republican emphasis on a shared moral bond (the *solidarity* paradigm), the liberal focus on interdependence (the *specialisation* paradigm), or the social-democratic concern with inequality and power (the *monopoly* paradigm).²⁰ The EU’s external policies draw on this ambiguity, using the promotion of social cohesion as a holistic objective that justifies intervention across a wide range of sectors.²¹ When a Member State like Italy launches a plan explicitly designed to foster ‘social cohesion’ in Africa, it is not merely adopting EU terminology; it is engaging in a strategic act of normative appropriation, using a concept that the EU’s own framework has left deliberately open to interpretation.

These structural and normative ambiguities are exacerbated by a practical governance deficit. The EU’s external action has been critically described as a system of ‘governance without government’ – a highly developed apparatus of rules and networks that lacks a single, democratically legitimated centre of political authority.²² In the Southern Mediterranean, this deficit is particularly acute. Despite a plethora of policies, from the European Neighbourhood Policy (ENP) to the Global Gateway, the EU’s action is often perceived as a reactive ‘patchwork’ of initiatives.²³ The ENP’s core methodology of

¹⁹ Case C-848/19 P, *Germany v Poland* ECLI:EU:C:2021:598, para 38. In this landmark judgment concerning the principle of energy solidarity, the Grand Chamber of the Court of Justice affirmed the foundational nature of solidarity as a principle that “underpins the entire legal system of the European Union”.

²⁰ H. SILVER, «Social exclusion and social solidarity: Three paradigms», cit., p. 539.

²¹ For critique of the instrumental use of ‘common values’ in the ENP, see P. LEINO, R. PETROV, «Between ‘Common Values’ and Competing Universals – The Promotion of the EU’s Common Values through the European Neighbourhood Policy», in *European Law Journal*, 2009, p. 663.

²² C. SHORE, «‘Government Without Statehood’? Anthropological Perspectives on Governance and Sovereignty in the European Union», in *European Law Journal*, 2006, pp. 709-717.

²³ S. BLOCKMANS, «The ENP and ‘more for more’ conditionality: plus que ça change...», cit., p. 53.

conditionality has been widely criticised as a ‘weak pledge’, insufficient to catalyse deep reforms in the absence of a membership perspective.²⁴ This has created a significant disconnect between the EU’s stated development goals and its tangible impact, particularly in the protection of human rights. Compounding this, empirical studies of on-the-ground diplomatic practice reveal a ‘crowded diplomatic landscape’ where EU Delegations struggle to establish a clear strategic agenda, leading to a ‘thin multilateralization’ that fails to supplant the primacy of Member States’ bilateral interests.²⁵

Therefore, the post-Lisbon constitutional architecture itself contains the seeds of its own fragmentation. By creating both structural gaps in governance and providing a flexible normative lexicon, it establishes the legal and political preconditions for the emergence of *de facto* differentiated integration. It is a system that, while aspiring to coherence, inadvertently provides powerful Member States with the tools to pursue parallel policy tracks. The unilateral action of a Member State is not necessarily an act of defiance against the Union; rather, it can be understood as a strategic exploitation of the spaces and ambiguities that the constitutional framework itself creates and sustains. It is this systemic feature that enables an initiative like the Mattei Plan to exist: not in opposition to the EU’s external action, but in a complex, parallel relationship with it, simultaneously challenging its coherence while borrowing its legitimacy.

3. The pathologies of incoherence: how EU external action systemically creates a governance void

The emergence of a national strategic initiative as encompassing as the Mattei Plan cannot be understood merely as a consequence of recent geopolitical shifts. Rather, its foundations are deeply embedded in the long-standing and systemic dysfunctions of the European Union’s own external action in the Mediterranean. These dysfunctions have been exacerbated by the Union’s recent ‘geopolitical turn’, which has intensified the tension between interest-driven policies and value-based principles, leading to what has been described as a form of ‘geopolitical pragmatism’.²⁶ This section moves beyond a

²⁴ A. MAGEN, «The Shadow of Enlargement: Can the European Neighbourhood Policy Achieve Compliance?», in *Columbia Journal of European Law*, 2006, p. 383.

²⁵ See F. BICCHI, «The European Cooperation in the Southern Mediterranean: The Multilateralization of Bilateral Relations?», in *The Hague Journal of Diplomacy*, 2018, p. 117-130.

²⁶ The concept of ‘geopolitical pragmatism’ and the broader debate on the EU’s geopolitical ambitions are central themes in the recent collection edited by M. NEUMAN, R. A. WESSEL & T. DE ZEE (eds), *A Geopolitical Europe in the Making? The EU’s Actorness in a (De-)Globalising World* (2025), cit.

chronological review of EU policies to diagnose three recurring, interconnected pathologies that have actively constructed a profound governance void in the region. These pathologies are: (1) the unresolved dilemma between multilateralism and bilateralism, which has created a vacuum of strategic coordination; (2) the chronic contradiction between declared values and strategic interests, which has produced a deep credibility vacuum; and (3) the structural gap between geopolitical ambition and bureaucratic capacity, which has resulted in a debilitating agility vacuum. It is by understanding how these pathologies have fostered an environment of strategic oscillation, normative inconsistency, and implementation inertia that the Mattei Plan can be seen for what it is: not an anomaly, but a direct and logical response to the Union's own structural weaknesses.

3.1 The multilateralism-bilateralism dilemma

At its core, the EU's engagement with the Mediterranean has been defined by a perpetual and unresolved oscillation between two competing strategic logics: the ambition to construct a region-wide multilateral order and the pragmatic reliance on a hub-and-spokes model of bilateral relations. This decades-long oscillation is not merely a sign of policy evolution, but a symptom of a deeper strategic paralysis. By failing to commit durably to either a multilateral or a bilateral logic, the Union projects an image of strategic unpredictability that actively constructs a coordination vacuum. This constant flux disincentivises long-term investment by partner countries in regional frameworks and, crucially, signals to its own Member States that the 'EU common framework' is inherently unstable. In such an environment, pursuing national bilateral strategies becomes not an act of defiance, but a rational response to the Union's own chronic indecisiveness.

The Euro-Mediterranean Partnership (EMP), launched with the 1995 Barcelona Declaration, represents the apex of the EU's multilateralist ambition.²⁷ It envisioned a comprehensive, tripartite partnership that would bind the shores of the Mediterranean together through shared political, economic, and social frameworks, aspiring to build a genuine regional community based on co-ownership and dialogue.²⁸ This grand design was a normative project of immense scale, but it lacked the political and institutional tools to manage the region's deep-seated conflicts and power asymmetries. The failure to establish a robust and genuinely co-owned multilateral architecture, coupled with the intractability

²⁷ F.S. HAKURA, «The Euro-Mediterranean Policy: The Implications of the Barcelona Declaration», in *Common Market Law Review*, 1997, p. 337.

²⁸ A. DI STASI, «La sécurité régionale dans l'espace euro-méditerranéen. Processus de Barcelone et Union pour la Méditerranée», in *Revue juridique de l'Ouest*, 2010, p. 183.

of the Israeli-Palestinian conflict, led to the gradual hollowing-out of the EMP's multilateral core.²⁹ The EU's response was not to remedy the institutional deficits of the multilateral project, but to retreat to the opposite pole.

The European Neighbourhood Policy (ENP), launched in 2004 and now constitutionally anchored in Article 8 TEU,³⁰ was the institutionalisation of this retreat³¹. The ENP effectively abandoned the pretence of regional multilateralism in favour of a more manageable bilateral model based on the principle of differentiation.³² While this 'hub-and-spokes' approach offered greater flexibility, allowing the EU to tailor its relationships to the specificities of each partner, it came at a significant cost: it further fragmented the region, disincentivised South-South cooperation, and reinforced an asymmetric dynamic with the EU at the centre of a series of disconnected bilateral relationships.³³ It signalled a strategic choice for control over community-building. The subsequent creation of the Union for the Mediterranean (UfM) in 2008 was a 'soft' attempt to re-inject a dose of multilateralism into this framework, primarily through a project-based, co-governed structure.³⁴ While the UfM has proven institutionally resilient and has achieved some success in facilitating technical cooperation, its limited political clout and its inability to address the region's major security and governance challenges have only confirmed the EU's enduring incapacity to sponsor a robust regional architecture.³⁵

This strategic oscillation between two poles – a multilateralism it cannot sustain and a bilateralism that fails to build a region – is the first pathology. The Union has proven

²⁹ U. VILLANI, «Le responsabilità dell'Unione europea nell'area mediterranea», in *Studi sull'integrazione europea*, 2009, p. 577, who provides a critical assessment of the Barcelona Process's limited results.

³⁰ D. KOCHENOV, «Article 8 TEU», in M. KELLERBAUER, M. KLAMERT, J. TOMKIN (eds), *The EU Treaties and the Charter of Fundamental Rights: A Commentary*, Oxford, 2024, p. 128.

³¹ This strategic shift from a multilateral to a bilateral logic has been widely analysed in the literature. For a critical assessment of this evolution, see S. POLI, «La revisione della Politica Europea di Vicinato e il controverso rapporto tra condizionalità e geometria variabile», in *European Papers*, 2016, p. 273; E. LANNON, «The European Political Community in the EU's wider neighbourhood» cit., p. 595, who describes this as the 'progressive dilution of the multilateral cooperation framework'.

³² S. POLI, «La revisione della Politica Europea di Vicinato», cit., p. 269.

³³ S. LAVENEX, «Concentric circles of flexible 'EUropean' integration: A typology of EU external governance relations», in *Comparative European Politics*, 2009, p. 372.

³⁴ G.E. Corsaro, «Contrasto alla povertà e cooperazione internazionale nell'area euro-mediterranea», in *Freedom, Security & Justice: European Legal Studies*, 2025, p. 255-270.

³⁵ F. BICCHI, «The European Cooperation in the Southern Mediterranean: The Multilateralization of Bilateral Relations?», cit., p. 117.

itself unable to choose, seeking the broad legitimacy of a regional approach while retaining the control afforded by bilateralism. This indecisiveness has tangible costs. It fosters an environment of strategic uncertainty where partner countries are hesitant to invest political capital in EU-led regional frameworks that may be abandoned or superseded in the next policy cycle. More importantly, it sends a clear signal to the EU's own Member States that the Union lacks a stable, long-term vision for the region. The result is a governance void where regional coordination is weak and where bilateral relations – both between the EU and its partners, and among the Member States themselves – remain the primary mode of interaction. The analysis of this indecisiveness leads to the conclusion that this void actively invites Member States to pursue their own bilateral or plurilateral initiatives, which can be framed as complementary to, or even more effective than, the Union's wavering and unpredictable approach.

3.2 The value-interest contradiction

The second, and arguably most corrosive, pathology of the EU's external action in the Mediterranean is the chronic contradiction between its declared normative agenda and its pragmatic strategic interests. Since its inception, the Union has sought to project itself as a 'Normative Power Europe', an actor whose legitimacy and influence on the world stage derive from its commitment to a set of universal values: democracy, human rights, and the rule of law.³⁶ This normative identity is constitutionally embedded in Article 21 TEU, which explicitly mandates that the Union's external action shall be guided by these principles. However, in the complex geopolitical landscape of the Southern Mediterranean, this normative project has consistently been subordinated to the pursuit of more immediate and tangible interests in security, stability, energy supply, and, above all, the external management of migration³⁷. This pathology does more than expose the Union to

³⁶ I. MANNERS, «Normative Power Europe: A Contradiction in Terms?», in *Journal of Common Market Studies*, 2002, p. 235.

³⁷ For a detailed analysis of this dynamic through the lens of the EU Trust Fund for Africa, see E. FRASCA, «The EU's Legal Influence on Migration in the African States: The Normative Content of Development Cooperation Projects», in M. NEUMAN, R. A. WESSEL & T. DE ZEE (eds), *A Geopolitical Europe in the Making?*, cit., chap. 10. Frasca's contribution offers a powerful case study of 'geopolitical pragmatism' in action. She deconstructs how the EU uses development funding not primarily to reduce poverty, but to persuade African states to adopt and enforce migration control frameworks aligned with EU interests. This process, facilitated by informal agreements and soft law, effectively reshapes domestic legal orders in third countries while bypassing the EU's formal constitutional checks, a dynamic that mirrors the instrumentalisation of normative language this article identifies in the context of the Mattei Plan.

accusations of hypocrisy; it actively devalues its primary foreign policy asset – its claim to be a different and better partner – and, in doing so, creates and legitimises a marketplace for transactional foreign policy in which initiatives like the Mattei Plan can flourish.

The European Neighbourhood Policy (ENP) provides the paradigmatic case study of this value-interest contradiction. Its central mechanism, the ‘more for more’ principle, was designed as a tool of normative leverage: the promise of a deeper partnership, including enhanced market access and financial assistance, was offered as a reward for tangible progress on democratic reform and human rights.³⁸ In practice, however, this principle has been systematically undermined. The EU and its Member States have consistently deepened cooperation with autocratic and illiberal regimes in the region on matters deemed of vital strategic interest, particularly counter-terrorism and migration control, irrespective of their domestic human rights records.³⁹ This has taught partner countries a crucial lesson: that the EU’s normative framework is not a set of non-negotiable core principles, but rather an opening bid in a transactional negotiation. When cooperation on migration control can unlock financial aid and political support, the incentive to undertake politically costly domestic reforms is significantly diminished.⁴⁰

This dynamic was starkly illustrated in the aftermath of the Arab Spring. While the EU initially hailed the uprisings as a vindication of its normative agenda and recalibrated its ENP to better support democratic transitions, this commitment soon waned in the face of regional instability and the 2015 refugee crisis.⁴¹ The turn towards the ‘informalisation’ of migration deals, exemplified by the EU-Turkey Statement and a series of less visible arrangements with North African states, marked the culmination of this trend. By operating outside the formal Treaty framework, these arrangements not only bypassed democratic and judicial oversight but also signalled a clear prioritisation of the interest in migration containment over the value of the rule of law.⁴² This approach has created what

³⁸ S. BLOCKMANS, «The ENP and ‘more for more’ conditionality: plus que ça change...», cit., p. 53.

³⁹ U. VILLANI, «Le responsabilità dell’Unione europea nell’area mediterranea», cit., p. 578, who highlights the EU’s tendency to prioritise its security interests over the promotion of democracy.

⁴⁰ See P. LEINO, R. PETROV, «Between ‘Common Values’ and Competing Universals – The Promotion of the EU’s Common Values through the European Neighbourhood Policy», cit., p. 654.

⁴¹ S. POLI, «La revisione della Politica Europea di Vicinato», cit., p. 267.

⁴² T. STRIK, «EU External Cooperation on Migration: In Search of the Treaty Principles», in *European Papers*, 2023, p. 905-910, analysing the shift to informal arrangements to bypass legal and democratic scrutiny.

has been described as a “systemic rule of law crisis at the EU’s external borders”,⁴³ fundamentally compromising the Union’s normative identity.

This chronic inconsistency has had profound functional consequences. It has eroded the EU’s credibility and destroyed its transformative leverage, a disconnect between rhetoric and practice that has been a long-standing feature of the international development debate. By demonstrating that its values are conditional upon its interests, the EU has lost its unique selling proposition as a normative power. It can no longer credibly claim to offer a partnership based on a shared commitment to a higher set of principles. Instead, it is increasingly perceived as just another global actor pursuing its interests, albeit one that does so behind a veil of normative rhetoric.

It is precisely this credibility vacuum that provides the fertile ground for Member States national plans. The EU, through its own practices, has created and legitimised a marketplace for transactional foreign policy in the Mediterranean. In this marketplace, what matters is not the consistency of one’s values but the credibility of one’s offer. The Mattei Plan thrives in this environment not by offering a different logic, but by offering a more efficient and candid version of the EU’s own revealed preferences. It presents a clear, interest-based proposition – energy resources and migration control in exchange for targeted investment and political partnership – unburdened by the pretense of a complex and often inconsistently applied normative conditionality. For African partners long frustrated by the EU’s perceived double standards, the Italian approach may appear more direct, more predictable, and ultimately, more honest. The Mattei Plan is therefore not an alternative to the EU’s model; it is its transactional essence, distilled and pursued with the singular focus that only a national actor can achieve.

3.3 The ambition-capacity gap

The third pathology that has constructed a governance void in the Mediterranean is the structural gap between the Union’s grand geopolitical ambitions and its limited institutional and bureaucratic capacity for swift implementation. This agility deficit is arguably an inherent feature of the Union’s nature as a consensus-based polity of 27 sovereign states. Its institutional machinery, designed for deliberation, compromise, and the painstaking construction of legal and political consensus in internal law-making, becomes a significant liability when deployed in the fast-paced geopolitical arena. While this deliberative process is a source of legitimacy for the EU’s internal order, it translates into a

⁴³ L. MARIN, M. GKLIATI, S.F. NICOLSI, «Guest editorial: The external borders of the European Union: Between a rule of law crisis and accountability gaps», in *European Law Journal*, 2024, p. 2.

cumbersome and often sluggish external action that struggles to compete with more agile global actors. The resulting implementation gap is not a flaw in any single policy, but a predictable outcome of the EU's institutional DNA. This systemic slowness creates a 'first-mover advantage' for unilateral actors, whose nationally-steered initiatives can promise the speed and political directness that the EU, by its very nature, finds difficult to deliver.

This ambition-capacity gap is a recurring theme throughout the history of the EU's Mediterranean policy. The Barcelona Process, with its monumental ambition to create a regional area of shared prosperity and security, was a case in point: a grand vision unmatched by the political tools and institutional capacity required for its realisation.⁴⁴ The same can be said for subsequent policies, which have often been long on strategic pronouncements and short on rapid, tangible results on the ground. However, it is the EU's latest flagship initiative, the Global Gateway, that provides the most striking and contemporary manifestation of this deep-seated pathology. Conceived as a €300 billion geopolitical answer to China's Belt and Road Initiative, its ambition is nothing short of transformative.⁴⁵ It represents a laudable attempt to harness the EU's collective economic weight for strategic ends. Yet, the Global Gateway is an attempt to wage geopolitics using the cumbersome tools of bureaucratic multilateralism.

Its delivery mechanism, the 'Team Europe' approach, requires complex and time-consuming coordination between the European Commission, the European External Action Service, 27 Member States with their own diverging interests and priorities, and a host of European financial institutions such as the European Investment Bank (EIB).⁴⁶ Each project must navigate a labyrinth of programming cycles, multiannual financial frameworks, and joint implementation procedures. This institutional complexity inevitably leads to significant delays between a project's announcement and its actual implementation. Consequently, the Global Gateway has been criticised for being slow off the mark and for primarily consisting of a 'repackaging' of existing funds and pre-planned projects, rather than a rapid deployment of new, strategic investments.⁴⁷ The initiative, while geopolitically ambitious in its aims, remains fundamentally bureaucratic in its means.

⁴⁴ U. VILLANI, «Le responsabilità dell'Unione europea nell'area mediterranea», cit., p. 577.

⁴⁵ S. TAGLIAPIETRA, «The European Union's Global Gateway: An institutional and economic overview», in *The World Economy*, 2024, p. 1327.

⁴⁶ A. JONES, C. TEEVAN, «Team Europe: Up to the Challenge?», (January 2021) *ECDPM Briefing Note*, 128, p. 1. The concept itself was an effort to manage the complexity of mobilising the EU institutions and the Member States.

⁴⁷ D. CABALLERO-VÉLEZ, F. SIMONELLI, «Good Intentions in Need of Good Governance: The Unclear State of the Mattei Plan», (July 2025) 25 *IAI Commentaries*, p. 1. The authors highlight the "persistent

This agility deficit creates a tangible opportunity vacuum in the Union's external relations. Partner countries in Africa, faced with urgent development needs and courted by other global powers offering faster, albeit often more conditional, financing, may perceive the EU's processes as too slow and too complex. It is into this vacuum that the Mattei Plan strategically positions itself. By contrast to the perceived inertia of the EU's multi-actor machinery, a nationally-driven initiative offers the allure of speed, agility, and a direct political line of communication. Governed by a small, executive-led steering committee in Rome, the Mattei Plan can, in theory, make decisions, allocate resources, and launch projects far more quickly than a comparable EU-led initiative.⁴⁸ It presents itself to African partners not as a complex bureaucratic process, but as a direct political partnership with the Italian government and its national industrial champions.

Therefore, the Mattei Plan is not merely an alternative to the Global Gateway; it is a strategic response to its perceived weaknesses. It capitalises on the agility deficit inherent in the EU's institutional structure. It offers a model where geopolitical ambition is matched by a streamlined, national capacity for action. This is not to say that the Mattei Plan will necessarily be more effective or sustainable in the long run; indeed, its own governance has been criticised for its opacity and lack of inclusiveness.⁴⁹ However, in the competitive arena of global infrastructure politics, the *promise* of speed and directness is a powerful diplomatic asset. By offering a seemingly faster and less bureaucratic path to project implementation, Italy can position itself as a more responsive and pragmatic partner, thereby carving out a distinct sphere of influence. In this sense, the Mattei-Plan's very existence is a testament to the EU's ambition-capacity gap. It thrives not in opposition to the EU's goals, but in the implementation void that the Union's own institutional complexity inevitably creates.

Ultimately, these systemic pathologies of EU external action in the Mediterranean – strategic oscillation, normative inconsistency, and implementation inertia – converge to create a single, overarching deficit: a vacuum of credible strategic leadership. An actor that is strategically unpredictable, normatively unreliable, and operationally slow cannot effectively lead. The EU's inability to commit to a consistent regional strategy has

lack of operationalisation” and the fact that the plan “mostly repackages prior initiatives”. This critique directly mirrors those directed at the Global Gateway.

⁴⁸ R. CADIN, V. PIERGIGLI, «Mattei: il Piano che visse due volte», in *federalismi.it*, 2024, p. iv, who note the novelty of the Mattei Plan as “un nuovo strumento di azione governativa” (a new instrument of government action) that is more agile than traditional foreign policy channels.

⁴⁹ D. CABALLERO-VÉLEZ, F. SIMONELLI, «Good Intentions in Need of Good Governance: The Unclear State of the Mattei Plan», cit., p. 2, noting that the Plan's governance remains “fragmented and opaque”.

undermined its role as a stable anchor for coordination. Its failure to consistently uphold its declared values has devalued its normative currency and eroded its credibility. Furthermore, its structural inability to act with agility has created a perception of ineffectiveness in a rapidly changing geopolitical environment. It is this void of leadership that Italy's Mattei Plan is designed to fill. It presents itself not merely as a collection of projects, but as an act of decisive strategic agency in a region where the Union's own has been perceived as irresolute and ineffective. The Plan is therefore not an anomaly, but the symptomatic and rational exploitation of the leadership vacuum that the Union's own structural dysfunctions have meticulously constructed over decades. The following section will deconstruct the Mattei Plan in detail, demonstrating how its very architecture and objectives serve as a direct response to these pathologies.

4. A paradigm case of unilateralism: deconstructing the Mattei Plan

The Mattei Plan for Africa represents the most significant strategic initiative in Italian foreign policy in decades. Presented by its architects as a “new paradigm” for relations with the African continent, it eschews a “predatory” or “charitable” approach in favour of a partnership among equals.⁵⁰ While this official narrative resonates strongly with the EU's own value-based discourse, a critical deconstruction of the Plan's governance architecture and geopolitical objectives reveals a more complex reality. Far from being a simple development programme, the Mattei Plan emerges as a sophisticated instrument of national foreign policy, designed to operate in the spaces left vacant by the EU's fragmented external action. It serves as a compelling case study of how a powerful Member State can pursue core national interests by creating a parallel policy track, thereby operating as a form of *de facto* differentiated integration.

4.1. The geopolitics of governance: a national-centric architecture

The most telling feature of the Mattei Plan – and the most significant departure from EU-led frameworks – is its governance structure. The legal basis of the Plan establishes a centralised, national-centric institutional architecture that places the initiative firmly under the control of the Italian executive, effectively side-lining both EU institutions and the African partners it purports to serve. The primary decision-making body is the “*Cabina di*

⁵⁰ Italian Government, *Piano Mattei per l'Africa*, (Rome 2024), p. 3. The official document states the intention to “imprint a paradigm shift in relations with the African Continent” by rejecting a “paternalistic and charitable approach”.

Regia” (Steering Committee), chaired by the President of the Council of Ministers and composed exclusively of Italian ministers, heads of public agencies (like Cassa Depositi e Prestiti), and representatives of Italian state-owned enterprises.⁵¹ This institutional design is the starkest expression of the Plan’s unilateral nature. Whereas EU frameworks such as the ‘Team Europe’ approach are, at least in theory, built on complex joint programming and co-decision mechanisms involving the Commission, the EEAS, and all participating Member States,⁵² the Mattei Plan’s governance is deliberately streamlined to ensure rapid and coherent national action.

This national-centric model stands in direct tension with the Plan’s proclaimed principle of “equal partnership”. The structure ensures that the strategic definition, implementation, and monitoring of all projects remain unequivocally an Italian prerogative. African partners are positioned as recipients and interlocutors in a process they do not structurally co-own. This lack of co-decision was a point of immediate contention, voiced publicly by the Chairperson of the African Union Commission, Moussa Faki, at the Plan’s inaugural summit, who lamented the lack of prior consultation on the initiative’s conception.⁵³ The Italian government’s declared methodology – “ascoltare, rispettare, costruire insieme” (listen, respect, build together)⁵⁴ – is thus undermined by an institutional reality that prioritises consultation over genuine co-creation. This approach replicates one of the most persistent criticisms levelled against the EU’s own Neighbourhood Policy: that its rhetoric of ‘joint ownership’ often masks a fundamentally Eurocentric and donor-driven process.⁵⁵ In the case of the Mattei Plan, this dynamic is amplified, as the process is not merely Eurocentric but unequivocally Italo-centric. This behaviour mirrors the approach of other Member States in different geopolitical contexts, where national interests in engaging with major global powers often lead to bilateral initiatives that run parallel to, and sometimes

⁵¹ Law No. 2/2024, converting Decree-Law No. 161/2023, Art. 2. The *Cabina di Regia* is composed of the Prime Minister, relevant Ministers, and representatives from state-owned enterprises like Eni, Enel, Snam, and public financial institutions like Cassa Depositi e Prestiti (CDP), SACE, and SIMEST. For a critical overview of this structure, see R. CADIN, V. PIERGIGLI, «Mattei: il Piano che visse due volte», cit., p. vi.

⁵² A. JONES, C. TEEVAN, « Team Europe: Up to the Challenge», cit., p. 1. The TE approach was designed to pool “contributions of EU institutions, EU member states and their implementing agencies, development finance institutions (DFIs)”.

⁵³ Speech by H.E. Moussa Faki Mahamat, Chairperson of the African Union Commission, at the Italy – Africa Summit: A Bridge for Common Growth, available at <https://au.int/sw/node/43449>.

⁵⁴ Presidency of the Council of Ministers of Italy, *Focus - Piano Mattei per l’Africa*, (Rome 2024), p. 2.

⁵⁵ See P. LEINO, R. PETROV, «Between ‘Common Values’ and Competing Universals – The Promotion of the EU’s Common Values through the European Neighbourhood Policy», cit., p. 655.

undermine, a unified EU stance.⁵⁶ The structure does not seek to establish a framework for multilateral cooperation but rather to create an efficient delivery mechanism for a national strategy, thereby challenging the very essence of a common, unified EU external policy.

The geopolitical objectives embedded within this governance structure are equally revealing. While the Plan is formally presented as a multi-pillar “programmatic-strategic document for the development of African states”,⁵⁷ its primary drivers are transparently rooted in Italy’s core national interests: energy security and migration management. These two issues, while intertwined with broader European concerns, are framed and pursued through a distinctly national lens. The energy pillar is not merely about fostering sustainable development in Africa. It is explicitly about transforming Italy into “an energy hub for Europe, a bridge between Europe and Africa”.⁵⁸ This ambition, directly linked to Italy’s need to diversify its energy supply away from Russia following the invasion of Ukraine, instrumentalises African resources to serve a strategic European goal, with Italy positioning itself as the key geographical and political intermediary. The Plan’s narrative skilfully adopts the contemporary language of ‘just energy transition’, aligning itself with African demands for a development-focused approach to decarbonisation.⁵⁹ However, this normative framing serves a clear geoeconomic purpose: to secure long-term gas supplies and develop infrastructure for green hydrogen that will primarily benefit European energy markets, reinforcing a pattern of resource extraction, albeit under a new, greener guise.

The same instrumental logic applies to migration. While the official documents present the Plan as a means of guaranteeing the “right not to be forced to emigrate” by

⁵⁶ Cristina Pinna provides a compelling analysis of this dynamic in the context of EU-China relations, demonstrating how the national approaches of Hungary, Italy, and the Netherlands to the Belt and Road Initiative have fragmented the EU’s collective position. See C. PINNA, «Member States’ Influence in Shaping the EU as a Global Actor: Hungary, Italy, and the Netherlands in China’s Belt and Road Engagement», in M. NEUMAN, R. A. WESSEL & T. DE ZEE (eds), *A Geopolitical Europe in the Making?*, cit., Chap. 3.

⁵⁷ Italian Government, *Piano Mattei per l’Africa*, cit., p. 3.

⁵⁸ Giorgia Meloni, President of the Council of Ministers, *Discorso di apertura del Vertice Italia-Africa*, 29 January 2024, Rome.

⁵⁹ E. STEFANELLI, «L’incontro tra la “formula Mattei” e la “transizione energetica giusta” in Africa», in *federalismi.it*, 2025, p. 2. The paper highlights how the Plan adopts the ‘just transition’ language, which is central to the African partners’ own discourse on climate change.

tackling the root causes of irregular migration,⁶⁰ the operational focus reveals a strong securitarian undertone. The initiative is explicitly linked to Italy's efforts to combat human trafficking and manage migration flows, building upon pre-existing bilateral arrangements with North African countries. In effect, the development projects of the Mattei Plan function as the 'positive' side of a broader strategy of externalisation, where aid and investment become leverage for securing cooperation on border control and readmission.⁶¹ This approach mirrors the EU's own controversial practice of migration conditionality, where development aid is often tied to migration management objectives, a policy that has been widely criticised for undermining both development principles and human rights.⁶² By creating its own national framework for this nexus, Italy seeks greater flexibility and control, but in doing so, it contributes to a fragmented and often incoherent European approach to migration diplomacy, where multiple actors engage with partner countries with potentially competing demands.

This national-led approach to governance and geopolitics places the Mattei Plan in a complex relationship with the EU's own strategic frameworks, particularly the Global Gateway. Officially, the narrative is one of perfect synergy. The June 2025 Rome Summit was orchestrated to showcase the Mattei Plan as a key contribution to, and an integral part of, the Global Gateway and the broader 'Team Europe' spirit.⁶³ This framing is strategically advantageous for both parties: for Italy, it provides an EU stamp of approval, conferring legitimacy and potentially unlocking further European funding; for the European Commission, it allows the co-optation of a major Member State initiative, bringing it under the EU's branding to project an image of unity and increased financial firepower.⁶⁴

⁶⁰ G. CARBONE, L. RAGAZZI (eds), *Il Piano Mattei*, cit., p. 7, where the goals are explicitly linked to guaranteeing "new energy supply routes" for Europe.

⁶¹ Our previous research has noted the increasing securitisation of EU-Mediterranean relations, where migration control often becomes the dominant logic. See G.E. CORSARO, «Contrasto alla povertà e cooperazione internazionale nell'area euro-mediterranea», cit., p. 266.

⁶² T. STRIK, «EU External Cooperation on Migration: In Search of the Treaty Principles», cit., p. 905-923, who argues that "the prioritization of own migration interests in external relations poses three challenges to key principles of the EU", including effectiveness and coherence.

⁶³ Presidency of the Council of Ministers of Italy and the European Commission, Joint Press Release, 'The Mattei Plan for Africa and Global Gateway: A common effort with the African Continent', Rome, 20 June 2025.

⁶⁴ This dynamic is a central feature of the 'Team Europe' architecture. As noted by A. JONES, C. TEEVAN, op. cit, p. 11, the TE brand "responds to the desire of member states to still highlight their own visibility".

However, this narrative of seamless alignment conceals underlying tensions. The Mattei Plan, while thematically complementary to the Global Gateway, operates as a ‘competitively complementary’ initiative. It focuses on the same strategic sectors – energy, digital, infrastructure – but its governance remains national, designed to steer opportunities towards the ‘Sistema Italia’ of public and private companies. This creates a risk, as recent analyses have pointed out, of a fragmented implementation landscape, potential duplication, and a lack of coherent regulatory oversight.⁶⁵ The Plan thus embodies the paradox of the ‘Team Europe’ approach itself, which, while promoting a common brand, struggles to overcome the reality that its initiatives are often driven by the particular interests of the most active Member States in their traditional spheres of influence.⁶⁶ In conclusion, the governance and geopolitical drivers of the Mattei Plan reveal it to be a creature of strategic unilateralism. It is a response not only to external challenges but also to the perceived institutional constraints and inefficiencies of the EU system. By creating a national institutional framework to pursue geostrategic objectives, Italy is not acting against the EU, but rather alongside it, creating a *de facto* differentiated policy track that the Union’s constitutional framework is forced to accommodate and legitimise *ex post*.

4.2. Normative instrumentalism and the cohesion dilemma

While the governance and geopolitical objectives of the Mattei Plan clearly reveal its national-centric logic, it is the Plan’s normative discourse that most profoundly situates it within the dilemmas of the EU’s external action. The Italian government has deliberately framed the initiative using the core concepts of the Union’s own value-based lexicon: solidarity, partnership, and, most notably, a strong emphasis on fostering social cohesion and shared prosperity. This strategic co-optation of normative language is not merely rhetorical embellishment, it is a sophisticated act of legitimation that serves to align a unilateral national strategy with the constitutional principles of the EU’s external action framework. By deconstructing this discourse, we can uncover the instrumental function of

⁶⁵ D. CABALLERO-VÉLEZ, F. SIMONELLI, «Good Intentions in Need of Good Governance: The Unclear State of the Mattei Plan», cit., p. 1. The authors highlight a “lack of operational clarity on how the Plan’s ambitious objectives will actually be achieved”.

⁶⁶ A. JONES, K. SERGEJEFF, «Half-time analysis: How is Team Europe doing?», (September 2022) *EC-DPM Briefing Note*, 149, p. 1. They conclude that “member states remain mostly engaged in countries and regions where they have interests or previous affiliations”.

values in contemporary European foreign policy and highlight the systemic tensions that arise when such narratives are deployed at the Member State level.

The Mattei Plan's architects have presented it as a manifestation of a new form of solidarity with Africa. This is not the solidarity of aid, rooted in a post-colonial logic of assistance, but a 'strategic solidarity' based on the co-production of security and prosperity.⁶⁷ This narrative deliberately echoes the evolution of solidarity within the EU's own legal and political discourse. As Article 21 TEU makes clear, solidarity is a foundational principle of the Union's external action.⁶⁸ However, as legal scholarship has extensively debated, solidarity is an essentially contested concept. It can be interpreted in a robust, community-oriented sense, implying legally binding common actions for common goods, or in a weaker, intergovernmental sense, amounting to little more than enhanced cooperation.⁶⁹ The Mattei Plan's discourse strategically navigates this ambiguity. It invokes the powerful moral and political resonance of solidarity to frame its objectives – securing energy supplies and controlling migration – not as transactional interests, but as contributions to a shared Euro-African public good of stability and sustainable development.

This instrumental framing becomes evident when examining the Plan's operational focus. The emphasis on energy infrastructure, for instance, is presented as an act of solidarity that helps Africa achieve its development goals and just energy transition. Yet, as critical analyses have underscored, the primary logic is one of diversification for European markets, with the Plan functioning as a vehicle to secure gas and hydrogen corridors that primarily serve Italy's ambition to become a European energy hub.⁷⁰ In this context, solidarity is reframed as a by-product of interest-driven geoeconomics, rather than its guiding principle. Similarly, the Plan's focus on tackling the 'root causes of migration' is presented as an act of solidarity with both African nations and European partners. However, this narrative aligns perfectly with the securitarian logic that has come to dominate EU external migration policy, where development tools are increasingly

⁶⁷ Giorgia Meloni, President of the Council of Ministers, *Discorso di apertura del Vertice Italia-Africa*, 29 January 2024, Rome. The narrative of moving beyond a donor-recipient relationship is central to the Plan's official presentation.

⁶⁸ Art. 21(1) TEU lists solidarity as a guiding principle. See T. RAMOPOULOS, L. HAVAS, « Article 21 TEU », cit., 242; A. SANGIOVANNI, « Solidarity in the European Union » in *Oxford Journal of Legal Studies*, 2013, p. 213.

⁶⁹ R. PISILLO MAZZESCHI, « Solidarietà: un principio generale del diritto internazionale? », cit., p. 159, 162.

⁷⁰ E. STEFANELLI, « L'incontro tra la "formula Mattei" e la "transizione energetica giusta" in Africa », cit., p. 2.

repurposed as instruments of migration management.⁷¹ This form of conditionality risks undermining the very principles of equality and sincere cooperation it purports to uphold, and can lead to a dynamic of ‘reversed conditionality’ where partner states use their leverage on migration to extract concessions from the EU.⁷² The Mattei Plan, by creating a national channel for this same logic, does not resolve these tensions but rather reproduces them at the bilateral level, further complicating a coherent EU-wide approach.

Perhaps the most sophisticated normative claim of the Mattei Plan lies in its emphasis on fostering ‘social cohesion’ in partner countries. This concept is not chosen at random. While less prominent than ‘solidarity’ in the general discourse of international relations, ‘cohesion’ is a cornerstone of the EU’s internal legal order and its external projection. However, the very meaning of cohesion within EU law has been the subject of a profound transformation. As recent legal scholarship has powerfully demonstrated, the EU’s own cohesion policy has been progressively detached from its original egalitarian mandate of reducing disparities, becoming an instrument for competitiveness, economic stabilization, and crisis management.⁷³ This “hollowing out” of cohesion has turned the concept into a highly flexible and polysemic tool.

It is precisely this conceptual ambiguity that the Mattei Plan strategically exploits. The promotion of social cohesion is intrinsically linked to the Union’s foundational objective of fostering a “social market economy” and is a key goal of its development policy. It implies a holistic approach that moves beyond simple poverty reduction to address structural inequalities, strengthen social bonds, and ensure inclusive access to rights and services for all members of society. The Mattei Plan explicitly adopts this holistic language. Its multi-pillar structure, spanning education, health, agriculture, and infrastructure, is presented as an integrated strategy to build resilient and cohesive societies, thereby

⁷¹ G.E. CORSARO, «Contrasto alla povertà e cooperazione internazionale nell’area euro-mediterranea», cit., p. 255, 266.

⁷² T. STRIK, «EU External Cooperation on Migration: In Search of the Treaty Principles», cit., p. 905, 925, who analyses the phenomenon of “reversed conditionality” in which partner states use their leverage on migration control.

⁷³ For a deconstruction of this process, see L. DÍEZ SÁNCHEZ, «Why Cohesion Policy Is Not About Cohesion», in *Common Market Law Review*, 2025, p. 13-48. Díez Sánchez meticulously traces how the cohesion mandate in the Treaties has been “gradually diluted” through legislative changes, political choices, and judicial interpretation, turning Article 175(3) TFEU into a legal basis for “virtually any economic instrument”.

creating sustainable alternatives to irregular migration.⁷⁴ In doing so, it leverages a term whose original redistributive meaning has been diluted within the EU's own legal practice, making it a perfect vehicle for an interest-driven national strategy presented under a veneer of shared European values.

However, it is precisely this claim to be a promoter of social cohesion that reveals the deepest tensions. The concept of social cohesion in European political thought is fundamentally linked to a specific model of state-society relations, one that presupposes a strong role for public institutions, democratic governance, and the rule of law.⁷⁵ The EU's own efforts to promote social cohesion externally, for all their flaws, are embedded within a complex framework of political dialogue, human rights conditionality, and support for civil society. The Mattei Plan, by contrast, operates through a largely executive-led, state-to-state framework. Its governance is opaque, and its implementation relies heavily on large Italian state-owned and private corporations.⁷⁶ As critics have pointed out, there is a “persistent lack of operationalisation”, with “African civil society, SMEs and diaspora communities still relegated to the margins of decision-making”.⁷⁷ This approach risks reinforcing elite-level bargains rather than fostering broad-based, inclusive development. The focus on large-scale energy and infrastructure projects, while potentially beneficial, can exacerbate inequalities and create new dependencies if not managed within a transparent and accountable governance framework, a concern that has been central to the critique of large development projects for decades.

This creates a profound paradox. The Mattei Plan uses the language of social cohesion to legitimise an approach that may inadvertently undermine the very conditions necessary for genuine social cohesion to flourish. By prioritising strategic projects and engaging primarily with state and corporate elites, it risks neglecting the bottom-up, participatory processes that are essential for building trust, strengthening social contracts, and fostering resilient communities. It thus highlights a fundamental dilemma in the EU's

⁷⁴ Presidency of the Council of Ministers of Italy and the European Commission, Joint Press Release, ‘The Mattei Plan for Africa and Global Gateway: A common effort with the African Continent’, Rome, 20 June 2025. This document explicitly links the initiatives to a “360° approach that empowers local economies and promotes inclusive regional integration”.

⁷⁵ C. SHORE, «‘Government Without Statehood’? Anthropological Perspectives on Governance and Sovereignty in the European Union», cit., p. 709, 712, where the author discusses how ‘European governance’ is framed in terms of building a new form of polity that transcends the nation-state. The Mattei Plan's emphasis on social cohesion draws from this very discourse.

⁷⁶ G. CARBONE, L. RAGAZZI (eds), *Il Piano Mattei*, cit. p. 6,

⁷⁷ D. CABALLERO-VÉLEZ, F. SIMONELLI, «Good Intentions in Need of Good Governance: The Unclear State of the Mattei Plan», cit., p. 2.

“geopolitical turn”: the new emphasis on strategic sectors and rapid project delivery, both in the Global Gateway and the Mattei Plan, may come at the expense of the slower, more complex, but ultimately more sustainable work of supporting democratic governance and civil society.⁷⁸

In conclusion, the normative discourse of the Mattei Plan is a masterclass in strategic alignment. It skilfully deploys the core concepts of the EU’s value-based external action to frame a national strategy as a common European endeavour. However, this analysis demonstrates that such language functions instrumentally, providing a veneer of principled action for a policy driven by clear national interests. This is not to say that the Plan’s objectives are illegitimate or that its projects will not produce benefits. Rather, the point is that this unilateral co-optation of the EU’s normative framework has significant systemic consequences. It contributes to the devaluation of these concepts, turning them into flexible signifiers that can be adapted to fit any geopolitical agenda. More importantly, it creates a *de facto* differentiation in the very substance of the Union’s normative power. It suggests that there is not one, but multiple, ‘European’ approaches to partnership and solidarity in Africa – one articulated through the complex, bureaucratic, and value-laden processes of Brussels, and another, more agile and interest-driven, enacted by a major Member State. This fragmentation of the normative message is perhaps the most subtle, yet most profound, challenge that the Mattei Plan poses to the coherence of the Union as a global actor.

5. Towards a Research Agenda on Member State Unilateralism and EU External Action

This working paper has advanced a preliminary argument: Italy’s Mattei Plan for Africa should not be viewed as an isolated national policy, but as a paradigm case of strategic unilateralism operating as a form of *de facto* differentiated integration within the EU’s external action. We have contended that such an initiative is a symptomatic and rational response to the systemic pathologies that have long afflicted the Union’s external governance in the Mediterranean. By analysing the EU’s fragmented constitutional framework, its history of incoherent policies in the region, and the governance architecture of the Mattei Plan itself, we have argued that this phenomenon represents a structural evolution towards a more complex, multi-layered, and potentially more fragmented mode of

⁷⁸ B. SZENT-IVÁNYI, D. PIROSKA, «Geopolitics on a Shoestring? Unpacking the EU’S Geopolitical External Assistance to Central Asia», cit., p. 4, who argue that the new geopolitical focus in EU external assistance may come at the cost of normative objectives and poverty reduction.

European foreign policy. The analysis presented here, however, is a first step. While the Italian case provides strong initial evidence for our thesis, fully grasping the scope, nature, and long-term consequences of this trend requires a broader, systematic, and comparative research agenda. This concluding section, therefore, moves from analysis to prognosis, outlining four key puzzles that future scholarship must address to build a comprehensive theory of Member State unilateralism in EU external action.

The first and most pressing area for future inquiry is the comparative puzzle: determining whether the Mattei Plan is an Italian exception or the forerunner of a wider European trend. Future research should systematically investigate the external strategies of other Member States to identify similar or divergent patterns. For instance, a comparative analysis of France's evolving post-Sahel policy in Africa, Spain's strategic framework for Latin America, or Germany's engagement in Eastern Europe could reveal whether this model of 'competitive coherence' – whereby national initiatives run in parallel to EU frameworks like the Global Gateway – is becoming a generalised feature of the Union's external action.⁷⁹ Such research would need to identify the variables that trigger this form of strategic unilateralism. Is it primarily a function of a particular government's political ideology, a response to specific national economic interests in sectors like energy, or is it a tool more readily deployed in certain geographical areas where a Member State holds historical and linguistic advantages? Answering this comparative question is essential to understanding whether the EU is facing a series of isolated national projects or a systemic shift in how its Member States conduct their foreign policy.

Second, future scholarship must confront the constitutional puzzle: exploring the legal limits and the ultimate resilience of the EU's constitutional framework in the face of such unilateralism. While this paper has argued that the framework is 'permissive', its capacity to contain or discipline these practices remains largely untested. A crucial line of inquiry must focus on the principle of sincere cooperation under Article 4(3) TEU. Legal scholarship needs to investigate whether and how this principle could be invoked to discipline or at least coordinate these national plans, defining the legal standard required to demonstrate a breach that undermines the Union's objectives.⁸⁰ Furthermore, the role of the Court of Justice warrants deeper examination. Could indirect actions, perhaps related

⁷⁹ For a broader discussion on Member State unilateralism in the context of differentiated integration, see R.D. KELEMEN, «Epilogue: A Note of Caution on Differentiated Integration», in *Swiss Political Science Review*, 2021, p. 672.

⁸⁰ The duty of sincere cooperation is a cornerstone of the EU legal order, but its application to Member State foreign policies that run parallel to EU objectives is a complex and contested area of law. See M.E. BARTOLONI, «Customary International Rules Addressed to Member States and EU», cit., p. 377, for an analysis of the coordination models between EU and Member State competences.

to the use of EU funds within these national plans or the application of competition and state aid law to the state-owned enterprises that lead them, be used to police the boundaries between national and EU competence?⁸¹ Addressing this constitutional puzzle is vital to determine whether the EU legal order possesses the tools to manage this *de facto* differentiation or whether it is destined to merely accommodate the strategic choices of its most powerful constituents. The challenge is to translate normative principles of solidarity and cohesion into precise and enforceable legal obligations capable of governing these new forms of inter-state and EU-State interactions.⁸²

Third, a comprehensive understanding requires tackling the external perception puzzle. Our analysis has, by necessity, adopted a largely ‘inside-out’ perspective. A critical future research path must reverse this lens and systematically investigate the ‘outside-in’ view, asking how African partners and other international actors perceive this phenomenon.⁸³ Do they see Member State unilateralism as an opportunity to engage in ‘forum shopping’, playing national capitals against Brussels to secure more favourable deals? Or do they perceive it as a symptom of European disunity and weakness, ultimately eroding the EU’s collective credibility and bargaining power? Does a more direct, transactional approach, as offered by the Mattei Plan, appear more attractive than the EU’s often cumbersome and value-laden conditionality? Answering these questions requires extensive field research, moving beyond the analysis of EU documents to engage directly with the perspectives of officials, civil society, and business actors in partner countries. Such an approach is essential to assess the real-world impact of this fragmented European presence on the EU’s international standing and its long-term ambition to be recognised as a coherent and principled global actor.

Finally, this trend raises a significant democratic accountability puzzle. The shift towards nationally-governed strategic initiatives, often developed and implemented with limited transparency, creates a new layer of external action that risks falling into an accountability void.⁸⁴ While EU policies are subject to the scrutiny of the European

⁸¹ S. TAGLIAPIETRA, «The European Union's Global Gateway: An institutional and economic overview», cit., p. 1326, 1328, highlights the use of various financial instruments and the key role of development banks, areas where EU competition and state aid law could theoretically apply.

⁸² The translation of principles into binding obligations, equipped with effective accountability mechanisms, remains an open challenge. See C. MOSER, «The Concept of Accountability and Human Rights Violations», in *MPIL Research Paper Series*, 2023, p. 1.

⁸³ J. ODERMATT, R.A. WESSEL, «The European Union’s external action: views from the outside», cit., p. 1, is a call for more research adopting this ‘outside-in’ perspective.

⁸⁴ L. MARIN, M. GKLIATI, S.F. NICOLSI, «Guest editorial», cit., p. 2.

Parliament, the Ombudsman, and the Court of Auditors, these national plans operate within a different, often more opaque, framework. Future research should investigate whether national parliaments possess the capacity and political will to exercise meaningful oversight over these complex, geopolitically sensitive initiatives. What is the role of the European Parliament when an initiative like the Mattei Plan is ‘co-branded’ as part of the Global Gateway? Can its budgetary powers or its role in scrutinising the implementation of common instruments like the NDICI-Global Europe be used as a lever to demand transparency and accountability for these hybrid national-EU endeavours?⁸⁵ Exploring these mechanisms is crucial to ensuring that the move towards a more flexible and differentiated external action does not come at the cost of democratic legitimacy, a core value proclaimed by the Union in Article 2 TEU. Pursuing this research agenda is not merely an academic exercise. The rise of strategic unilateralism represents a critical juncture for the European Union. How it chooses to manage this phenomenon—whether by attempting to rein it in, formally accommodate it through new governance mechanisms, or simply allowing it to proliferate—will profoundly shape its future as a global actor. It will determine whether the aspiration for a coherent, value-driven foreign policy remains a credible constitutional project or becomes a relic of a less contested geopolitical era.⁸⁶ It is our hope that this working paper, by providing a preliminary conceptualisation and a clear set of research questions, can stimulate the urgent scholarly and policy debate that this challenge demands. Ultimately, the success of initiatives like the Mattei Plan will depend on their ability to authentically embody the principles of solidarity and partnership, moving beyond short-term interests to build a future of genuine interdependence and mutual respect.⁸⁷ A real ‘architecture of solidarity’ for the wider Mediterranean requires a concerted effort, founded on a vision that transcends unilateral logics to build true coherence. Such

⁸⁵ A. JONES, C. TEEVAN, «Team Europe: Up to the Challenge?», cit., p. 5, raise concerns over the governance and legitimacy of the Team Europe approach due to the bypassing of formal Council working parties.

⁸⁶ E. LANNON, «The European Political Community in the EU’s wider neighbourhood», cit., p. 595, discusses the evolution of the EU’s external action architecture towards more flexible, multi-layered models.

⁸⁷ See Presidency of the Council of Ministers of Italy and the European Commission, Joint Press Release, ‘The Mattei Plan for Africa and Global Gateway: A common effort with the African Continent’, Rome, 20 June 2025.

coherence, as we have argued, remains the Union's most pressing and unresolved challenge.⁸⁸

⁸⁸ As we argued in the introduction, this quest for coherence remains the central dilemma. See E. CANNIZZARO, M.E. BARTOLONI, «Unitarietà e frammentazione nel sistema dell'azione esterna dell'Unione», cit, p.531.