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Taming of the shrews? The (non-)enforcement of informal norms in the European Council

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ABSTRACT

The European Council is arguably one of the European Union's (EU) most dynamic decision-making bodies. Both scholars and practitioners attribute its effectiveness to an informal norm of diffuse reciprocity. The norm encourages members to extend goodwill to others, expecting the same in return when needed. This article investigates whether, and under what conditions, governments in the European Council uphold this norm, despite frequent temptations – rooted in domestic politics – to violate it or exploit its inherent ambiguity. It finds that governments maintain this norm by presenting a unified front against the violator, particularly when the breach is politically costly at home and gains salience in national media. Through two empirical case studies – focusing on British Prime Minister David Cameron and Hungarian Prime Minister Viktor Orbán – the article examines perceived attempts either to exploit or to withhold goodwill in the European Council. The analysis traces how their peers sought to assess whether a violation had occurred, to coordinate a unified response, and to agree on appropriate punishment. Empirically, the article sheds new light on how the European Council manages norm violations; theoretically, it advances research on informal governance by identifying domestic political salience as a key condition for norm enforcement.

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KEYWORDS Cameron; European Council; norms; Orbán; reciprocity

Introduction

The European Council, composed of the European Union's (EU) twenty-seven Heads of State or Government,[1] is widely regarded as one of its most dynamic decision-making forums. Although it operates by consensus,[2] it has

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consistently made far-reaching decisions shaping the EU's internal development and foreign policy. This surprising efficiency can be attributed to an informal norm, referred to as 'diffuse reciprocity' (Keohane, 1986; Lewis, 2005). This norm encourages individual members of the European Council to demonstrate goodwill toward others seeking agreements, in the expectation of receiving similar support when needed.

Even if practitioners themselves do not explicitly use the language of norms, diffuse reciprocity is evident in members' shared expectation that they will refrain from exaggerating their need for concessions or exploiting their veto power to obstruct an agreement (Interview #5). The purpose of these concessions is often to ensure that final agreements are more acceptable at the domestic level by encouraging members of the European Council to consider each other's domestic political situation (Kleine, 2013a). Consequently, the norm is essential for the operation of the European Council and for the EU as whole (Novak, 2013; Werts, 2021), as it enables member states to achieve outcomes that go beyond the lowest common denominator (Puetter, 2014, pp. 32, 60).

While numerous studies have described the operation of informal norms (e.g., Bickerton *et al*., 2015b), few scholars explore the puzzling question of *why* and *how* the European Council manages to sustain it (see, however, Müller & Slominski, 2025). As the prime representatives of their countries, deeply embedded in domestic politics, national leaders regularly face the temptation to refuse compliance. Moreover, enforcing an informal norm is inherently challenging, as non-compliance does not violate any formal rules and therefore cannot trigger centralized enforcement through official sanctions.

Drawing on political economy approaches to the enforcement of informal norms (Milgrom *et al*., 1990) as well as liberal theories of European integration (Kleine & Pollack, 2018; Moravcsik, 1998), this article argues that norm enforcement in the European Council is fundamentally shaped by domestic political incentives. Governments respond to norm violations when these become politicized by national media and thereby generate significant political costs at home. In the absence of such incentives, responses are less likely, leaving the norm more vulnerable to violation and, ultimately, erosion. The consequence might be stalemate in the European Council, with implications for the Union's functioning and stability.

The next section reviews the literature on diffuse reciprocity in the European Council before assessing its theoretical and empirical implications. The theory section describes the enforcement challenges of this norm and identifies the conditions under which it can be upheld. A methodology section describes the analytical approach and data sources. The study then evaluates empirical expectations in two cases in which the Prime Ministers of the United Kingdom (UK) and Hungary, David Cameron and Viktor Orbán, respectively, were considered to have violated the norm. In both

situations, accommodating Cameron or Orbán risked undermining the norm of diffuse reciprocity – Cameron by *seeking to exploit* it, and Orbán by *refusing to extend* it. The analysis shows that other European Council members rallied to uphold the norm only when such actions increased the issue's salience domestically, posed potential political repercussions at home, and thereby necessitated a decisive response to the violations. The conclusion summarizes the findings, considers their theoretical and practical implications, and suggests avenues for future research.

Given the inherent data limitations in assessing motivations behind backroom negotiations, the argument is best understood as a plausibility probe that offers new insights into the question of why and how the European Council upholds reciprocity within its ranks. By arguing that the enforcement of informal norms depends on the domestic political salience of norm violations, the article advances two related strands of scholarship. First, it extends the literature on informal governance (Kleine, 2014; Stone, 2011; Vabulas & Snidal, 2013) by identifying when and why informal norms are defended in the absence of formal enforcement mechanisms. Second, it contributes to research on the domestic foundations of compliance (e.g., Chilton & Tingley, 2020) by arguing that leaders' responses to norm violations are shaped not only by information about an infraction but also by the political visibility it generates in domestic arenas.

Reciprocity in the European Council

The article first outlines the existence and functioning of a norm of reciprocity in the European Council, before turning to the challenges of its enforcement in the next section. As the EU's most powerful executive body and 'supreme decision-maker' (Van Middelaar & Puetter, 2021; Werts, 2021), the European Council plays a central role in shaping the Union's direction. It nominates and, in some cases, selects the presidents of various other EU institutions; it defines the Union's general direction and priorities; and, more often than not, national leaders get involved in the daily routine of the Council of ministers (Kleine, 2013a). Given its responsibility for the Union's most consequential decisions, regularly touching upon 'core state powers' (Genschel & Jachtenfuchs, 2016), decisions in the European Council are usually based on consensus (Art. 15(4) TEU).

And yet, despite each of the 27 national leaders holding a veto over any decision, the European Council is often regarded as one of the Union's most dynamic decision-making forums (e.g., Cloos, 2023; Van Rompuy, 2014; Wessels, 2015). Its ability to remain effective against the odds has drawn significant interest from EU scholars, who widely agree that a practice of self-restraint among its members underpins the European Council's surprising efficiency. Wessels (2015), for instance, describes a collective

'problem-solving instinct' among the Heads of State or Government, where leaders strive to find common solutions despite their inherent 'national sovereignty reflex' as state representatives. Others highlight the central role of deliberation at the core of the European Council's functioning (Bickerton *et al*., 2015a; Puetter, 2014).

The purpose of this 'problem-solving' approach to the European Council is often to make European solutions more palatable at the domestic level (Kleine, 2013a). To achieve this, national leaders employ various strategies to navigate domestic constraints, which, in a multi-level system like the EU, can limit their discretion at the European level (Moravcsik, 1998; Putnam, 1988). These strategies may include timing decisions to coincide with politically opportune moments or granting exemptions from certain obligations to mitigate adjustment costs for key domestic groups (Genschel *et al*., 2023; Kleine & Minaudier, 2019; Schimmelfennig & Winzen, 2020). The academic literature is rich with examples of national leaders in the European Council assisting one another in selling European decisions to their domestic audiences and bolstering their national standing at home (Puetter, 2014; Van Middelaar, 2013; Wessels, 2015).

These practices in the European Council are best conceptualized as 'diffuse reciprocity'. Following Keohane (1986), this can be contrasted with 'specific reciprocity', which refers to the standard give-and-take in negotiations, where decision-makers exchange clearly defined concessions of equal value, either within the same or across parallel negotiations (Davis, 2004; McKibben, 2010). Specific reciprocity is the routine mode of intergovernmental negotiations, allowing actors to reach efficient outcomes by conceding on less critical issues to gain on those they value more highly.

'Diffuse reciprocity', by contrast, arises when mutual concessions are less precise and occur asynchronously – expressed as goodwill toward negotiating partners in politically difficult situations, with the expectation that similar goodwill will be extended in the future. When such exchanges become routine, as they have in the European Council, they foster stable expectations and evolve into a norm. This norm reinforces a problem-solving orientation by discouraging actors from overstating their needs or exploiting their veto to block agreement.

The two forms of reciprocity are not distinct practices but operate in tandem, with specific reciprocity embedded in the norm of diffuse reciprocity. The latter defines the acceptable limits of specific reciprocity by requiring leaders to calibrate their demands in light of one another's domestic constraints and the imperative of maintaining consensus. Additional manifestations include the consistent avoidance of formal votes (similar to the Council of ministers), and the development of a 'club culture' (Smeets & Beach, 2023) characterized by informality, discretion, and acommodation. In this way, diffuse reciprocity provides the permissive environment in

which transactions based on specific reciprocity advance the broader purpose of making European compromises sustainable at the domestic level (Ruggie, 1982, p. 404).

In short, diffuse reciprocity differs from specific reciprocity not in kind but in degree:[3] mutual concessions in the form of 'goodwill' in bargaining are less precisely defined and may unfold over extended periods rather than occurring simultaneously. Yet, this very diffuseness, combined with the long timeframe of exchanges and the vagaries of domestic politics, increase the risk that governments will face incentives to deviate from the norm.

The enforcement of diffuse reciprocity in the European Council

How does the European Council sustain the norm of diffuse reciprocity when its inherent ambiguity, along with the undefined timeframe for mutual concessions, heighten the risk of violations? This section first examines this risk, develops hypotheses about when and how European Council members unite to uphold it, and then identifies the empirical implications of the argument.

Puzzle

The first reason why European Council members may face incentives to deviate from the norm stems from the difficulty of distinguishing norm-compliant and non-compliant behavior, particularly in the absence of a written rule (Abbott *et al*., 2000, p. 414; Ruggie, 1982). This challenge is exacerbated by the fact that governments have better insight into their own domestic political situation than their peers (Putnam, 1988). The norm's ambiguity incentivizes governments to exploit goodwill by exaggerating or aggravating their domestic political challenges to secure concessions that enhance their standing at home. This issue parallels the problem of moral hazard, where the very existence and perceived robustness of a norm can incentivize further norm-violations (Kleine, 2013b). A second challenge arises from short-term domestic considerations, such as pending elections or pressure from special interest groups, which may tempt governments to withhold goodwill and instead obstruct agreements to extract concessions from their peers (Fearon, 1998).

However, because the norm of diffuse reciprocity is unwritten, governments that exploit or refuse to engage in it remain technically within their legal rights. They do not violate any formal rules because, by definition, the norm embodies an informal practice. Moreover, since there are no objective criteria to identify a violation, central enforcement mechanisms – such as the Court of Justice of the EU or the European Commission – cannot intervene. As a result, the European Council must rely on its own mechanisms to enforce diffuse reciprocity.

Few scholars have examined why and how the European Council addresses unilateral challenges to shared norms. Walter (2021) explores

what she calls the 'accommodation dilemma', which arises when governments must decide whether to tolerate unilateral challenges to international cooperation in order to keep the challenger within the system – at the risk of undermining the system's credibility. The present article extends this dilemma to the context of joint informal norms, where the absence of formal enforcement rules complicates both the identification of violations and the coordination of responses.

Focusing specifically on the European Council, Müller and Slominski (2025) argue that the success of a norm violation, such as veto abuses, hinges on the credibility of the threat, though the factors shaping that credibility are introduced inductively rather than defined systematically from the outset.[4] Building on their work, this article advances the argument in two key ways. First, it highlights the intersubjective nature of identifying violations of an inherently ambiguous norm. Second, it further unpacks the domestic political costs and benefits that shape whether governments choose to respond. In particular, it examines how the salience of a norm violation in national media may create incentives for leaders to push back against transgressions.

Argument

To examine how and when members of the European Council respond to violations of reciprocity, this article draws on political economy approaches to 'decentralized enforcement' (Milgrom *et al*., 1990) – the maintenance of norms in the absence of central enforcement[5] – as well as liberal theories of EU politics, which emphasize how domestic dynamics shape government behavior (Moravcsik, 1998). It argues that European Council members are more likely to respond to norm violations when domestic political dynamics create strong incentives to present a unified front against the perpetrator.

Political economy approaches suggest three challenges that must be addressed to sustain informal norms under such conditions: identification, coordination, and enforcement (Milgrom *et al*., 1990, p. 19). The first challenge is *identifying violations of an inherently ambiguous norm*. European Council members must assess whether exaggerated demands for goodwill or the refusal to extent it stem from genuine domestic constraints or strategic exploitation. If a member is suspected of exaggerating or even aggravating domestic challenges, peers will seek to determine whether this government is exploiting the norm's ambiguity. Similarly, if a member obstructs an agreement by exploiting its veto power, others will assess whether this stems from substantive concerns that should be addressed. In such cases, information from governments that are already opposed to the suspected violator is less credible. Consequently, European Council members are more likely to challenge breaches of the norm when actors generally sympathetic to the government in question call out a violation (Kleine, 2013b).

The second and main challenge is *coordinating and maintaining a united front* against the violator. It arises from the fact that European Council members may have short-term incentives to overlook norm violations, particularly if these align with their own interests (Drezner, 2000; Martin, 1993; Pape, 1997). As a result, leaders face a dilemma: whether to accommodate the violator for immediate gains or to confront the breach in order to deter future transgressions (Walter, 2021). If in such cases national media politicizes the potential domestic costs from a norm violation, the expectation is that governments under public scrutiny either take the lead or delegate enforcement (Kleine, 2013b), enabling more indifferent states to follow suit.[6] Thus, European Council members are more likely to oppose violations of diffuse reciprocity when it risks causing politicized domestic fallout in partner countries.

Once a norm violation is identified and a united front established, the third challenge for the European Council is to *select and apply appropriate disciplinary measures* to realign the violator's incentives toward compliance. These may range from symbolic actions, such as naming, shaming, and shunning (Risse *et al*., 1999), to material penalties like withholding funds or blocking other decisions (Hafner-Burton, 2005, 2008).

Alternative explanations

An alternative interpretation of the observed dynamics inside the European Council is that they reflect routine political bargaining rather than enforcement of a shared norm. From this perspective, individual leaders did not violate collective expectations but simply employ tough, albeit conventional, negotiating tactics. However, our case studies – by focusing on peer assessments – show that these tactics, while consistent with the logic of specific reciprocity, were perceived by other leaders as exceeding the acceptable bounds. In doing so, they breached the norm of diffuse reciprocity, which relies on mutual restraint and goodwill in the face of domestic constraints.

Another alternative explanation is rooted in political divergence. A member may be isolated not for breaking a norm but due to a lack of ideological alignment with the majority, such as a commitment to liberal norms (Schimmelfennig, 2001). The empirical analysis addresses this alternative explantion by examining the behavior of potential ideological allies: if even members of the same or ideologically adjacent political group close ranks against the alleged norm violator, this suggests that isolation cannot be attributed solely to ideological distance in routine bargaining.[7]

Finally, even when a norm violation is called out, other leaders may refrain from responding – not due to domestic constraints, but because the violating member state is too large or powerful to be sanctioned meaningfully. The case selection involving the UK allows us to explore whether size affects

the likelihood of a response. Moreover, the conclusion considers a scenario in which the norm violator is backed by a powerful external actor.

Methodology

The previous sections demonstrated that the norm of diffuse reciprocity is important for the functioning of the European Council but that it is challenging to maintain, as individual members often face short-term incentives to exploit its ambiguity and violate it for domestic political gains. Without a formal enforcement mechanism, governments must uphold this norm collectively. It is argued that responses to norm violations – the dependent variable – are more likely when the violator's actions risk generating high negative salience and provoking domestic backlash in other countries – the independent variable – which prompts pressure on their state representatives to hold the violator accountable.

Evaluating this argument is inherently challenging due to the informal working patterns of the European Council and the ambiguity of the norm of diffuse reciprocity. Broadly, a norm violation occurs when a refusal to engage in reciprocity risks generating domestic political repercussions for others, thereby undermining the norm's purpose of facilitating the domestic acceptance of EU decisions. However, because the norm lacks a precise behavioral definition, identifying a violation is inherently intersubjective and situational (Ruggie, 1982, p. 205; Kratochwil & Ruggie, 1986, p. 774). What constitutes a norm violation depends not only on observable actions but also on how peers interpret and react to them. This ambiguity makes it impossible to delineate a clear universe of cases *ex ante*, and thus precludes conventional case selection based on an objective measurement of the dependent variable.

This article therefore deliberately selects two case studies on the dependent variable – responses to norm violation. This variable itself consists of three components: identification, coordination, and enforcement. Both cases score high on the dependent variable, as they exhibit peer engagement with all three dimensions of norm enforcement, albeit with varying intensity across the components.[8] The first case focuses on Cameron's demands, notably for suspending the free movement of people within the EU's single market – a demand widely perceived as exploiting goodwill within the European Council by exacerbating domestic popular opposition to the EU. The second case focuses on Orbán's obstruction of financial and military aid for Ukraine for domestic political purposes, which was perceived as a refusal to extend goodwill for the sake of an effective and coherent EU foreign policy. Both cases span over several years and can be divided into distinct episodes. This enables us to exploit temporal variation to observe how changes in the hypothesized factors influence the likelihood of opposition to norm

violations (King *et al*., 1994, p. 208). At the same time, the inclusion of a powerful member state, the United Kingdom, serves to control for the role of power in shaping responses to norm violations.

To identify perceived norm violations, the article looks at remarks by European Council members, as reported in press statements and newspaper coverage, that identify unusual digressions from perceived standards of appropriate behavior. It traces the negotiation process during and between European Council meetings using European Council conclusions, newspaper reports, and national policy documents. To assess the validity of these sources, this information is triangulated with six background interviews[9] conducted with academic experts and EU officials, and cross-verified with specialized secondary literature.

To gauge domestic pressure on national leaders to respond to norm violations, this study combines leaders' own assessments of anticipated political costs with a media salience analysis of French and German newspapers across the ideological spectrum. These two countries were selected because of their central role in shaping the European Council's collective responses (Schramm & Krotz, 2023). Given their influence, reactions in these two member states often shape, or at least signal, the likelihood of coordinated peer enforcement. Using the search terms 'Cameron' and 'Orbán' in conjunction with 'European Council', the analysis examines the amount and sentiment of media coverage in the run-up to all relevant European Council meetings to gauge the prominence of the issue in public discourse.

Nonetheless, there are limits to what this analysis can show due to the fact that relevant negotiations occurred behind closed doors, as is customary in European Council deliberations. Although the European Council is a formal EU institution, its decision-making processes remain highly informal (Schramm & Wessels, 2023). While data are triangulated to enhance reliability, significant uncertainty persists regarding the exact details of what transpired.

Overstepping the mark: Cameron and the new settlement

On 23 January 2013, in a speech at *Bloomberg* in London, the British Prime Minister David Cameron (2013) announced his intention to renegotiate the terms of British membership in the EU. Cameron pledged that, if his Conservative Party won the upcoming general elections in 2015, he would hold an in–out referendum on the future of the UK's EU membership. While Cameron had long been described as skeptical toward the EU (Adam, 2020; Glencross, 2016; Webber, 2018),[10] the call for a national referendum represented an escalation in his demands.

The EU had never been a particularly salient topic in the British domestic political arena, but the proposed referendum promised to change that. Cameron leveraged the politicization of British EU membership to pressure

other members of the European Council into granting the UK unprecedented exemptions, notably from the principle of free movement of people, to bolster his political standing at home. This approach violated the norm of diffuse reciprocity, as he amplified domestic issues while disregarding the potential political fallout that his strategy might cause in partner countries.

While much has been written about Cameron's gamble and the referendum's outcome, this case study shifts focus to the European Council's response to what was perceived as a norm violation. In examining the strategies – ultimately unsuccessful – employed to bring Cameron back in line, it pays particular attention to the behavior of Cameron's potential allies, the anticipated domestic costs of accommodating his demands, and the nature of sanctions employed – whether material or symbolic.

Identifying the norm violation

Observers quickly noted that Cameron's call for a renegotiation of British membership was driven more by domestic party-politics than by actual concerns about the EU (Bale, 2022; Menon & Salter, 2016). Cameron found himself in a difficult situation, facing pressure on two fronts: from the EU-hostile United Kingdom Independence Party (UKIP) and from a faction of Eurosceptic members within his own Conservative Party. The latter feared that UKIP could erode the Conservative's electoral base in key contested constituencies. UKIP's strong showing in the 2014 European elections had intensified these concerns. Although the majority of his party supported continued EU membership, a small but increasingly vocal group of MPs believed that adopting a more hostile stance toward the EU could counter the growing threat posed by UKIP.

Yet, in the months following his *Bloomberg* Speech, Cameron did little to assuage the Eurosceptic faction within his party in order to lay the groundwork for a potential compromise at the EU level. On the contrary, he sought to appease the Eurosceptics by intensifying his own criticism of the EU.[11] For instance, in an article written for the *Daily Telegraph*, he blamed the EU for the rising number of EU and non-EU immigrants to the UK and demanded the repatriation of policy competences to the national level (Cameron, 2014). The attack on the principle of the free movement of people, as a key pillar of the EU's single market, was the most contested among Cameron's demands, not least because it implied EU treaty changes and unpredictable political dynamics in many member states.

After securing a comfortable majority in the 2015 UK general elections, Cameron formally initiated negotiations on 'A new settlement for the United Kingdom in a Reformed European Union' with a letter to the European Council President, Donald Tusk (Cameron, 2015). In this letter, he demanded a 'formal, legally binding and irreversible' opt-out from the treaty-based

obligation of an 'ever closer union of the peoples of Europe' (Cameron, 2015). Though largely symbolic, this demand challenged another fundamental EU principle and again suggested the need for treaty revision. Cameron's peers in the European Council quickly highlighted the inappropriateness of his demands for at least two reasons: his tactic of politicizing and aggravating the British domestic situation, and his disregard for the interests of other members. The Dutch Prime Minister, Mark Rutte, reportedly remarked: 'You cannot be serious, you cannot be serious, you cannot be serious' (FT, 3/12/2015).

First, British demands for the repatriation of policy competences were widely seen as excessive, especially given that the UK already benefitted from a record number of 'opt-outs' from key EU policies, including the Eurozone and the Schengen area's migration policy (Möller & Oliver, 2014; Oliver, 2016). More critically, several European Council members expressed deep concerns that conceding to what they viewed as largely self-inflicted domestic pressure would set a dangerous precedent – rewarding one set of demands would only embolden further ones. For instance, France's President, François Hollande, made this fear explicit by firmly rejecting such negotiations, warning that yielding to what he called British extortion would open a 'Pandora's box' of ever-escalating demands for special treatment (as cited in Glencross, 2016, p. 28).

Second, and even more consequential, Cameron's tactics provoked disapproval from his European counterparts because they threatened to trigger destabilizing political repercussions across Europe. His decision to escalate requests for special treatment came at a particularly fragile moment, as the EU was still reeling from the Eurozone crisis and the unfolding 2015 migration crisis. Crucially, leaders feared that conceding to British pressure could set a dangerous precedent that would encourage other governments facing Euroskepticism following suit. A successful British strategy, they warned, risked unleashing a domino effect[12] of national exit referendums that would further fracture the EU at a time of heightened vulnerability (Adam, 2020, pp. 78–83; Glencross, 2016, pp. 27–29). In the words of Schimmelfennig (2018), Cameron's demands were perceived as an 'attack' on the European polity itself.

Coordinating a unified front

Even though many leaders recognized the political costs of conceding to what they saw as a clear norm violation by Cameron, they were nonetheless faced with a strategic dilemma: would resisting his demands prove more costly than antagonizing a key powerful member state? In this context, the surge of negative media coverage of Cameron's maneuvers in French and German newspapers ahead of the October 2015 summit likely proved

decisive. This heightened scrutiny amplified domestic pressure on European leaders to reject Cameron's overtures (see Figure 1).[13] As a result, British demands were given only cursory attention at the meeting. In a clear snub to Cameron, European leaders addressed the issue in just two sentences under 'other items', noting they would revert to it in December (European Council, 2015).

Notably, Cameron's disregard for the interests of the Union and its members alienated potential key allies, including Poland, a crucial security partner. Despite the British and Polish governments' shared Euroskeptic affiliation in the European Parliament's ECR group, his push to curb intra-EU migration by restricting benefits for recently arrived workers directly impacted the large Polish community in the UK, further straining relations (Weiss & Blockmans, 2016). In response, the Polish Prime Minister, Beata Szydlo, set aside ideological alignment and rejected Cameron's demands, arguing that he had gone too far by pushing for a referendum. *Agence Europe* cited a Polish diplomat who confirmed that while the Polish government was willing to go to great lengths to keep the UK in the EU, it was firmly opposed to any measure that discriminated against Polish migrants, stating: 'This is a red line for us' (AE, 1/12/2015).

Like Poland, Germany might have been seen as a natural ally of the UK, given the significant volume of bilateral trade and its interest in keeping the UK inside the EU's single market. Many observers believed that Cameron gambled on Chancellor Angela Merkel's willingness to accommodate him and, as leader of the EU's largest country and economy, on her facilitating generous EU-level concessions (Webber, 2018, p. 195). However, Merkel swiftly and unequivocally ruled out any legal changes to freedom of

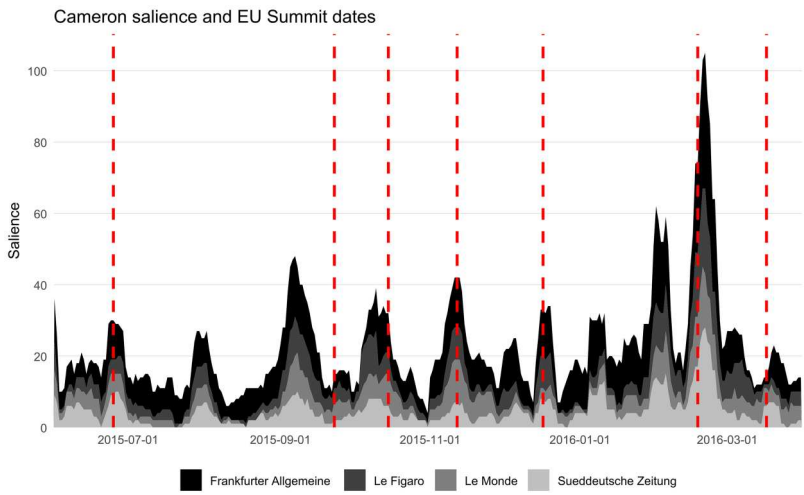

Figure 1. Salience of Cameron's behavior in relation to the European Council, 2015–2016.

movement, warning that such demands marked a 'point of no return' and that 'this would be it' for the UK's EU membership (Guardian, 2/11/2015). The *Financial Times* reported her as noting: 'It goes without saying that we will work constructively with the British government […] But it also goes without saying that there are things that are non-negotiable. That there are achievements of European integration that cannot be haggled over, for example the principle of free movement and the principle of non-discrimination' (FT, 15/10/2015). She was reportedly disappointed by Cameron's blunt prioritization of national party politics over broader European interests (Adam, 2020, p. 80; Webber, 2018, p. 195).

As his strategy faltered, Cameron escalated the pressure. In a November 2015 speech, he warned that he would 'think again' about Britain's EU membership if his demands were not met (AE, 11/11/15). By then, reports suggested that he had lost hope of securing a deal ahead of the December European Council summit (FT, 3/12/2015). Frustrated, he even hinted at leading the referendum's *Leave* campaign if other national leaders continued rejecting his demands (cf. Adam, 2020, p. 85).

Cameron's European counterparts criticized him for lacking clarity on what the UK was willing to concede. His refusal to engage in reciprocity reinforced the perception among European Council members that they were subject to extortion rather than genuine negotiation. While prepared in principle to make concessions and help Cameron, his peers insisted that his demands remain within reasonable bounds so as not to impose prohibitively high domestic costs on themselves. Merkel reportedly advised him 'to go out there and make some friends' (as cited in Korski, 2016) and urged him to advocate for reforms that would benefit the entire EU, rather than just the UK (Shipman, 2016, pp. 11–12).

As the Brexit referendum approached, European Council President Tusk worked to assess the flexibility of the British position while coordinating a unified stance among other members. Key to maintaining this common front was the refusal of other national leaders to enter into bilateral negotiations with the UK. According to Cameron's then EU advisor, Daniel Korski (2016), all major leaders declined to discuss Cameron's demands. Tusk embarked on a tour of various European capitals to solidify this front. Informal discussions revealed significant concerns over Cameron's tactics and his demands, particularly regarding the free movement of European citizens and restrictions on their access to social benefits (AE, 24/11/15).

While the European Commission handled the technical details of the 'new settlement' negotiations (Laffan & Telle, 2023), the European Council retained control over the political guidelines and communication. In a letter to European Council members on 7 December 2015, President Tusk acknowledged the difficulty of meeting British demands but stressed that any agreement must '[cement] the foundations on which the EU is based' (Tusk, 2015).

On 2 February 2016, two weeks before the decisive European Council meeting, Tusk circulated a draft decision on the new settlement, accompanied by another letter to European Council members (Tusk, 2016). He reiterated key themes from earlier communications: the gravity of the challenge; the need to maintain unity; and the importance of compromise without undermining the Union's core principles. Tusk (ibid.) emphasized:

> Keeping the unity of the European Union is the biggest challenge for all of us and so it is the key objective of my mandate … [The proposal] goes really far in addressing all the concerns raised by Prime Minister Cameron. The line I did not cross, however, were the principles on which the European project is founded.

As Figure 1 shows, national media in France and Germany devoted significant coverage to Cameron's behavior in the European Council in late 2015 and February 2016, the majority of which cast Cameron's behavior in a critical or negative light.[14] This heightened media salience likely increased the pressure on national leaders to take a clear and public stance.

Enforcement

On 18–19 February 2016, the European Council (2016) agreed on a 'new settlement' for the UK in the EU. With members having coordinated their positions and set red lines, the deal fell far short of Cameron's original demands, leaving him to return to London almost empty-handed. While leaders declared that 'the references to ever closer union do not apply to the United Kingdom' (ibid.), this was largely symbolic as it did not exempt the UK from the rules of the EU's single market (Glencross, 2016, p. 25). On freedom of movement, the European Council introduced a temporary 'emergency brake' on EU migrants' access to benefits and allowed child benefit payments to be indexed for children living abroad. However, these measures required prior EU authorization and could not be applied retrospectively. These limited concessions reflected the fact, as the UK's Permanent Representative to the EU at the time noted, that there was zero preparedness in national capitals, as well as in the EU institutions, for treaty changes (Rogers, 2019).

Despite face-saving congratulatory remarks following the European Council summit (Korski, 2016), the 'new settlement' was widely seen as a major rebuke to Cameron. While he insisted he had secured 'the overwhelming majority of what I set out to achieve' and described the deal as enshrining Britain's 'special status' in the EU (ibid.), his victory rang hollow. Cameron had intended to use the agreement to placate Eurosceptics, but it fell significantly short of achieving that objective. Both the rebels within his party and the British public remained largely unimpressed – only 21 per cent of respondents in one poll thought he had secured a good deal, while almost one in

two respondents believed he had obtained a poor deal (cf. Shipman, 2016, p. 127). Cameron had set domestic expectations he could not meet.

Moreover, Cameron overplayed his hand at the European level, severely underestimating other leaders' reaction to what they saw as the UK's violation of European Council norms. Other leaders were not prepared to let him score supposed domestic gains at the cost of themselves creating domestic repercussions. Cameron might have also hardened their determination to maintain unity in the face of such infractions (Korski, 2016; Shipman, 2016, p. 11). As a result, he struggled to make a compelling case for continued EU membership. In June 2016, with the *Remain* campaign failing to mobilize broad public support, a majority of British voters chose to leave the Union.

In sum, as Cameron's demands risked creating very high political costs across the Union and within domestic constituencies, even the UK's closest allies called out his behavior and refused to accommodate what they saw as inappropriate and excessive demands. Key decision-makers inside the European Council like the German chancellor relegated short-term material interests of their countries to second place, while disproving the popular assumption that powerful members in the EU always get their way. As a consequence, leaders coordinated a united front and ultimately snubbed Cameron by taking a hard line – even at the risk of losing an important member and ending up with a smaller but more integrated EU (Webber, 2018, p. 196).

Refusing goodwill: Hungary, the national veto, and EU foreign policy

While Cameron's case illustrates how goodwill can be exploited to demand special treatment, Orbán's case presents the reverse challenge: a leader who systematically withholds goodwill to extract concessions. Since Prime Minister Orbán and his Fidesz party came to power in 2010, they have progressively curtailed Hungary's democratic standards, including freedom of expression and judicial independence.[15] For a long time, these actions went unchecked, and it was only as Orbán increasingly used his veto that European leaders gradually began to openly call out his behavior (Blauberger & Sedelmeier, 2025).[16] In the following, this article focuses on the response to Orbán's behavior regarding the EU's foreign policy to assess when and how his counterparts, and his potential allies in the European Council in particular, identified norm violations, coordinated a united front, and employed significant material sanctions.

Identifying the norm violation

Orbán violated the norm of diffuse reciprocity in at least three ways: by obstructing – and at times actively undercutting – the European Council's

policy toward Ukraine; by conditioning his support on concessions unrelated to this issue; and by fueling domestic opposition to the EU. These actions threatened to undermine the effectiveness of the EU's Ukraine policy, an effort that enjoyed broad public backing across the Union, particularly among some of Hungary's key allies.

The backdrop to Orbán's norm violation in the European Council has been the ongoing dispute over the rule-of-law conditionality clause, which was introduced together with the EU's Covid-19 recovery plan 'Next Generation EU' in late 2020 (Schramm *et al.*, 2022). Intended to prevent misuse, the clause links fund disbursement to compliance with the EU's rule-of-law standards. As a result, Hungary faced the suspension of substantial EU funds due to deficiencies in its justice system. In response, Orbán increasingly weaponized his veto to obstruct common EU decisions systematically (Müller & Slominski, 2025). Over the past years, Hungary has exercised its veto more than ten times as often as the average member state (see Figure 2), frequently blocking crucial EU foreign policy decisions.

Orbán's obstructionism in the European Council became particularly damaging during the EU's response to Russia's war against Ukraine – a policy that a large majority of member states and the European public regarded as existential for the Union. After the Russian full-scale invasion in February 2022, the European Council swiftly prepared sanctions aimed at crippling Russia's financial liquidity. While most European Council members agreed on these measures, Orbán repeatedly obstructed proposals – blocking them temporarily, limiting their scope, or securing

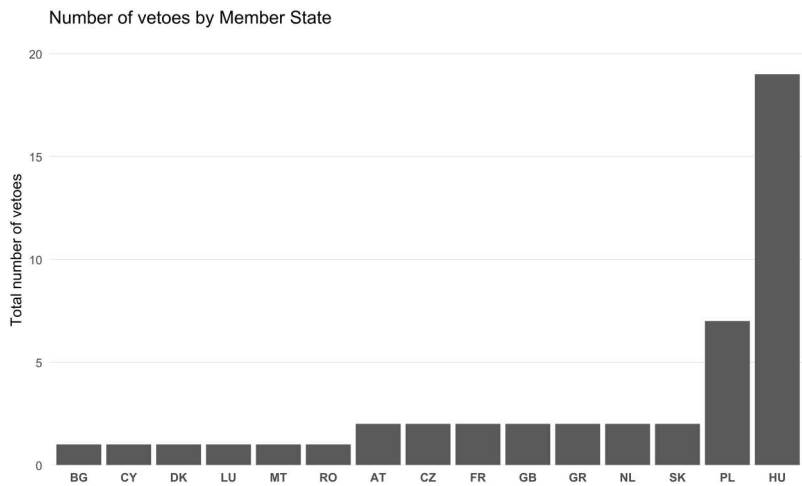

Figure 2. Number of vetoes in the European Council by country since June 2011. Source: Michal Ovádek, https://michalovadek.github.io/eu-veto-tracker/ (accessed on 15 August 2025).

exemptions for Hungary (Winzen, 2025). Energy emerged as a central point of contention. Unlike other EU member states that sought to reduce reliance on Russian gas, Hungary even deepened its dependence, thereby indirectly financing Moscow's war chest and undermining the sanctions' core objective (Petit, 2022).

In addition to counteracting the EU's approach to Ukraine and linking his vote to unrelated issues, Orbán also actively fueled domestic opposition to the EU, as Cameron had done before (Interview #6). During Hungary's 2022 parliamentary elections, he made gas security a central campaign theme (Petit, 2022), claiming Hungarians could not afford to support sanctions on Russian fossil fuel imports. Framing his stance as defending national interests, he accused EU institutions and other member states of undermining European unity – despite the European Commission already granting Hungary, together with Slovakia, a two-year derogation (AE, 7/5/2022). A year later, he launched a 'national consultation' that explicitly tied EU aid to Ukraine to the release of Hungary's frozen funds. One suggestive question in the 18 November 2023 plebiscite read: 'Brussels wants even more money to support Ukraine […] We should not pay more to support Ukraine until we get the money we are owed' (FT, 21/11/2023).

Other European Council members openly criticized Orbán's tactics as both unacceptable and a blatant breach of common norms.[17] Josep Borrell, the High Representative of the Union for Foreign Affairs and Security Policy and a non-voting member of the European Council, openly condemned this approach:

> We can argue about the number of years needed to adopt an oil embargo, but it is unacceptable to link an embargo to something that has nothing to do with it, such as funding through Next Generation EU [without any policy justification]. (AE, 7/5/2022)

As Orbán's obstructionism escalated, other leaders became more outspoken. Lithuania's President Gitanas Nauseda openly accused Orbán of 'misusing the unanimity principle', and Estonia's then Prime Minister Kaja Kallas remarked: 'I don't want to use the word blackmail, but I don't know a better word' (Liboreiro, 2024).

Coordinating a (fragile) unified front

Despite recognizing and calling out a breach of European Council norms, national leaders struggled to coordinate a united front. They faced a strategic dilemma: whether to uphold institutional integrity by decisively countering Hungary's obstruction – at the risk of escalating the standoff – or prioritize a swift response to an urgent geopolitical crisis. In November 2022, Orbán blocked an €18 billion financial support package for Ukraine in an attempt to pressure his peers into unblocking frozen funds (Hernández & Closa, 2024). In response, some national leaders reportedly urged the Commission

to approve Hungary's Covid-19 recovery plan (AE, 13/12/2022) and the Council of ministers to ease the freeze by more than €1 billion. Hungary then lifted its veto (Müller & Slominski, 2025, p. 13; Tamma, 2022).

European Council members who played a key role in unblocking some of Hungary's frozen funds faced considerable domestic backlash in national media. As Figure 3 shows, the amount of media coverage of Orbán in France and Germany as well as in other international newspapers considerably surged in the week leading up to the December 2022 summit, in many cases doubling compared to the previous two years. The coverage was highly critical of Orbán's approach. For example, on the day of the December European Council summit, Le Figaro reported that Orbán intended to redirect these unfrozen EU funds away from their original purpose to cover a budgetary shortfall caused by the sharp increase in public-sector salaries that were designed to secure an easy re-election amid high inflation (LF, 15/12/2022).

Importantly, Orbán's obstructionism increasingly alienated potential allies (Interview #5). Poland, under the far-right PiS party, might have been a natural partner but viewing Russia's aggression as an existential threat, its government showed little sympathy for Orbán's obstructionism. After the 2023 election, the new liberal government under Prime Minister Tusk quickly distanced itself from Hungary and signaled its commitment to addressing its own rule-of-law deficiencies (Holesch & Kyriazi, 2022). Italy, despite its past strong reliance on Russian fossil fuels, also broke ranks as Prime Minister Giorgia Meloni distanced herself from Orbán (Interview #3). Moreover, leaders of member states that faced equal or even

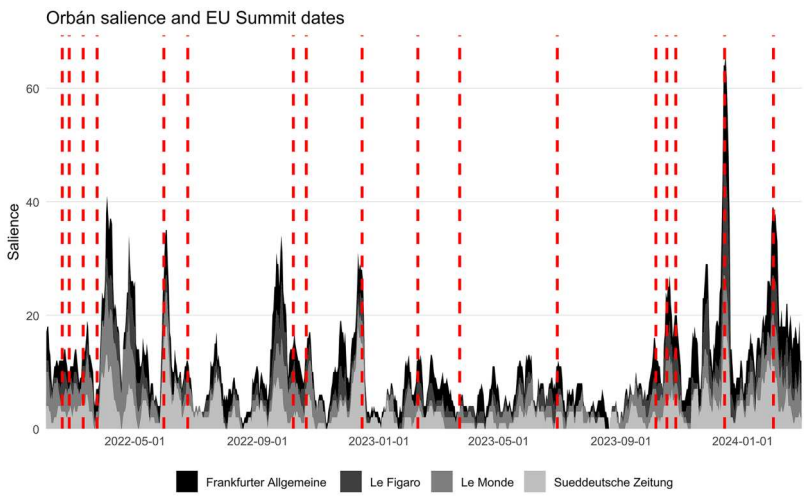

Figure 3. Salience of Orbán's behavior in relation to the European Council, 2022–2024.

greater economic and political costs in severing energy ties with Moscow grew increasingly exasperated with Orbán's defiance. Czechia and Latvia were almost entirely dependent on Russian natural gas, while Slovakia, Lithuania, Poland, and Finland all imported more Russian oil than Hungary (Redeker, 2022). These numbers further underscored Orbán's breach of the diffuse reciprocity norm, as his bargaining tactics of refusing to extend goodwill was not perceived as driven by legitimate domestic concerns. Although some other national leaders also voiced concerns about the scope of EU sanctions (Hernández & Closa, 2024), none systematically obstructed them as Orbán did (Interview #3).

As the war continued, leaders sought to step up their support for Ukraine. They pledged military and financial support – which required revising the EU's Multiannual Financial Framework (MFF) – and backed a €50 billion Ukraine Facility (AE, 27/10/2023). In addition, they recommended granting Ukraine the status of candidate country for EU accession, as an important commitement to integrating Ukraine into Europe's political and security architecture. At the same time, in the second half of 2023, media attention of Orbán's obstructionism in the European Council intensified (see Figure 3) and gradually raised the political costs of accommodating Orbán's demands.[18] For instance, on 12 December 2023 the *Frankfurter Allgemeine Zeitung* reported about the ongoing strong political and economic ties between Russia and the Hungarian government which risked undermining the EU's united stance and its commitment, as stated several times in the European Council conclusions, of a 'steadfast' support of Ukraine (FAZ, 12/12/2023).

Faced with the dilemma of either encouraging further obstruction to reach swift agreement or confronting the norm violation to end the blackmail, some members remained inclined to accommodate Orbán to avoid a potential veto. Following judicial reforms widely seen as superficial, the European Commission – despite strong objections from the European Parliament – released over €10 billion in cohesion funds (FT, 3/10/2023). On 27 November 2023, European Council President Charles Michel traveled to Budapest in an effort to persuade Orbán to support financial assistance to Ukraine. Yet the gesture backfired: apparently emboldened by the earlier concession, Orbán resisted and seized the moment as another opportunity to leverage his position to unfreeze the remaining funds (AE, 25/11/2023 and FT, 13/12/2023). In the lead-up to the December 2023 summit, he declared his intention to veto the Ukraine Facility (Moens *et al*., 2023), claiming it would harm Hungary's financial interests: 'They want to give the money of the Hungarians to continue the war […] This is not acceptable' (FT, 14/12/2023). By that point, a surge in negative media coverage of Orbán's demands[19] likely reinforced the perception among most European Council members that he was prepared to exploit

Hungary's veto indefinitely to advance his domestic political agenda (see also Müller & Slominski, 2025), which in turn increased the political costs of accommodating him.

Enforcement

The December 2023 summit marked a turning point, as national leaders, frustrated by Orbán's continued obstructionism, were now prepared to sideline him and apply more drastic measures (Interview #1). France's President Emmanuel Macron made it clear that Orbán's approval was not needed to extend Ukraine's funding, declaring,

> We have the means […] We won't be blocked by the decision today. [We expect Orbán] to behave like a European and not take the political process hostage. (FT, 15/12/2023)

EU institutions and individual member states began exploring ways to bypass Orbán's veto by providing financial aid to Ukraine on an intergovernmental basis outside the EU's regular framework. Officials emphasized the need to pressure Orbán by exposing the 'full costs' of Hungary's isolation. A senior EU official at the European Council summit underscored this shift, telling the *Financial Times*:

> Maybe Hungary can create more trouble […] Maybe Hungary can force us to use a few different tools. But ultimately Hungary cannot stop us providing money to Ukraine. (FT, 18/12/2023)

Despite his earlier threats, Orbán did not block the opening of accession negotiations with Ukraine at the December summit (European Council, 2023). Instead, he left the room – reportedly for a coffee – allowing the other leaders to adopt the conclusions in his absence. His retreat suggested he had overplayed his hand. However, while he conceded on accession talks, his continued veto of the Ukraine Facility forced the European Council to schedule an extraordinary summit for 1 February 2024.

In the lead-up to that February 2024 summit, EU institutions and national governments issued unprecedented threats. For example, the Council secretariat drafted a plan to exploit Hungary's economic vulnerabilities. The proposal warned that

> in the case of no agreement in the February 1 [summit], other heads of state and government would publicly declare that in the light of the unconstructive behaviour of the Hungarian PM […] they cannot imagine [any further EU funds, beyond those already provided]. (FT, 28/1/2024)

Given the supposed club culture, shared norms, and emphasis on deliberations in the European Council (Smeets & Beach, 2023), the mere fact that such plans were considered marked a significant departure from usual

practice. Media reporting remained intense and highly negative,[20] and Orbán had lost the backing of even his closest allies. Notably, Italian Prime Minister Meloni is reported to have played a key role in securing the final European Council agreement (Raman, 2024). Even Robert Fico, Slovakia's new Eurosceptic Prime Minister and a presumed ally, rejected Orbán's call for a joint bilateral statement (Interview #2). A senior European diplomat captured the moment:

> Orbán came to [the December summit] expecting to find silent allies around the table who would emerge and say, 'Viktor has a point here' […] But none emerged. (FT, 1/2/2024)

Ultimately, under intense pressure, the threat of significant retaliation, and abandoned by his allies, Orbán did not block the €50 billion Ukraine support package or the revision of the MFF. Unlike in previous negotiations, he also failed to extract further concessions for Hungary (European Council, 2024). This was largely because, contrary to Orbán's initial demands, the agreement ensured that no single member could veto the ongoing flow of financial aid to Ukraine. Instead, there would only be an annual review of its implementation (FT, 31/1/2024). The expected standoff between Orbán and the other 26 leaders never materialized – he dropped his veto just before the 1 February summit began. The growing frustration among national leaders – and their willingness to sanction Orbán, including through substantial material measures – appeared to have had an effect on the Hungarian prime minister.

In sum, most European Council members saw Orbán's refusal to show goodwill as a blatant violation of their institution's core norm. By exploiting his veto power, Orbán rejected the principle of reciprocity, prioritizing his own narrow domestic interests over the Union's vital interests and the domestic concerns of other national leaders. Their initial response had been to accommodate him in order to retain a unified stance regarding Ukraine. However, as leaders realized that Orbán was not going to stop exploiting his veto power, frustration grew and the response became stronger. The tipping point came when this intransigence threatened the EU's ability to support Ukraine financially in its fight against Russia's war of agression. The fact that Orbán's peers closed ranks in response to his behavior signals not only a shared understanding of a norm violation but also a willingness to enforce the norm through collective sanction. Like Cameron, Orbán disregarded the repercussions of his behavior for the Union and individual member states and threatened to disrupt the functioning of the European Council – Cameron by demanding too much, Orbán by refusing to give.

Conclusions

The European Council, often regarded as the EU's most important and dynamic decision-making forum, relies on informal norms to maintain

cohesion and effectiveness despite its consensus-based structure. At the heart of its functioning lies the norm of diffuse reciprocity, which enables national leaders to make concessions with the expectation that goodwill will be extended in return when needed. However, this norm is neither self-sustaining nor immune to exploitation. Instead, it requires active enforcement by its members.

This article examined two cases in which diffuse reciprocity was challenged – one where it was exploited (David Cameron's demands for a 'new settlement' with the EU), and one where it was withheld (Viktor Orbán's systematic obstruction of EU decisions on Ukraine). In both cases, the European Council was confronted with a violation that risked undermining its modus operandi. Cameron's demand for special concessions, driven by self-inflicted domestic pressures, alienated real and would-be allies and was ultimately met with a hardline response that left him almost empty-handed. Similarly, Orbán's repeated use of the veto as leverage for national concessions reached a breaking point when it jeopardized the EU's ability to support Ukraine. In both instances, leaders ultimately chose to defend the integrity of the European Council's norm over accommodating short-term individual demands – even at the risk of a smaller EU in Cameron's case, and an unprecedented confrontation with Orbán in the Hungarian case.

Yet, responses to norm violations in the European Council were neither automatic nor guaranteed to succeed across the challenges of identification, coordination, and enforcement. This article's findings suggest that leaders coordinated a united response only when domestic political incentives compelled them to take a stand. In probing the plausibility of this argument, it contributes to two strands of scholarship: studies on informal governance in international politics and liberal approaches to compliance. While existing work on informal governance often focuses on the emergence and behavioral effects of norms, this study highlights the conditions under which inherently ambiguous informal norms are actively enforced. Moreover, by underscoring the role of domestic politics in norm compliance, the study moves beyond institutionalist accounts centered on legal mechanisms or information asymmetries in norm enforcement. It suggests that leaders are more likely to defend the norm of diffuse reciprocity when violations threaten to undermine common policies they must justify at home – either because reciprocity is exploited (as in Cameron's excessive demands) or withheld (as in Orbán's obstructionism).

Like any plausibility probe, this study has limitations that point to avenues for future research. The two cases examined in this study lie at the high end of the dependent variable, as they display peer engagement with all three components of norm enforcement – identification, coordination, and enforcement – albeit to varying degrees. However, the broader universe of cases also includes instances where norm violations were recognized but failed

to generate a unified response or result in meaningful sanctions. Future research could therefore examine the limits of norm enforcement in the European Council and whether factors such as ideology or asymmetric power prevent some cases from advancing through all three stages. Norm violations may therefore be more frequent than the selected cases suggest and cast doubt on the resilience of informal governance in the European Council in the face of mounting internal divisions and external pressures on EU unity. Beyond case selection, further research could test our argument more systematically by assessing whether significantly higher levels of domestic media salience or more negative sentiment toward other member states' violations of intergovernmental norms are associated with stronger enforcement responses. Such dynamics may be particularly pronounced in issue areas where concentrated interests exert limited pressure and governments depend on broader domestic mobilization to justify taking action.

The response to Orbán's obstructionism illustrates that a determined coalition can marginalize even a persistent violator. At the time of writing, Orbán remains increasingly isolated in the European Council. With Ukraine accession requiring multiple rounds of unanimous approval, however, the threat of further vetoes continues to challenge the EU's unity (Interviews #1 and 2). In response, EU institutions have embedded conditionality clauses into new funding regulations to counter Hungary's obstructionism (Interview #4; see also Scheppele & Morijn, 2025). Yet this enforcement dynamic could shift if more leaders were to adopt obstructionist strategies or if they received support from powerful external actors. Orbán's close relationship with Russia's President Vladimir Putin (Orenstein & Kelemen, 2017) as well as concerns about his potential alignment with U.S. President Donald Trump highlight how outside backing could further undermine EU unity from within.

Ultimately, this study underscores a paradox: the informality that underpins the European Council's effectiveness also makes it susceptible to exploitation. Leaders are continuously faced with the dilemma of whether to accommodate challenges to shared norms in the name of unity and short-term efficiency – at the risk of undermining these very norms over time. The elite-level norm of diffuse reciprocity, this article argues, is only as robust as the political salience that its violation generates domestically. As the EU confronts mounting internal populist and external geopolitical pressures, understanding the conditions under which leaders defend or weaken informal norms will be critical to the future of European governance.

Notes

1. Jointly with the full-time President of the European Council, the President of the European Commission, and the High Representative of the Union for Foreign

Affairs and Security Policy (Art. 15 TEU). Established informally in 1974, the European Council only became a formal EU institution with the 2009 Lisbon Treaty, alongside the Commission, Parliament, and Council (of ministers).

2. The European Council typically operates on the basis of consensus. When it votes, decisions require unanimity, except in specific constitutional matters, such as convening intergovernmental conferences and nominating or appointing top EU personnel.
3. Although the norm of 'diffuse reciprocity' evokes a sense of common identity, it remains, like 'specific reciprocity,' fundamentally rooted in self-interest and mutual benefits (Keohane, 1986, p. 21).
4. Müller and Slominski (2025, p. 15) mention media salience briefly, without systematic treatment.
5. A classic example is the 'Law Merchant'. The Law Merchant was a decentralized, transnational system of private commercial law developed by medieval merchants to facilitate long-distance trade. It provided mechanisms for contract enforcement, dispute resolution, and standardization of trade practices, operating through informal merchant courts. The system relied heavily on reputation and community enforcement rather than state authority, thereby reducing transaction costs and risks.
6. While a broader test of this argument lies beyond the scope of this article, future research could evaluate it systematically. The argument would be challenged if governments failed to respond to violations even when, in the run-up to a European Council meeting, national media coverage of the perpetrator was either significantly higher and equally negative, or at a similar level but more negative, than in comparable instances.
7. Although Orbán's Fidesz is not officially affiliated with any transnational party group, there is a close alignment between Fidesz and several members of the European Conservatives and Reformists (ECR) group (FT 25/06/2024).
8. Future research could examine instances in which not all three conditions of norm enforcement – identification, coordination, and enforcement – were met. These include cases where a norm violation was recognized but coordination failed, or where no shared understanding of a violation emerged in the first place. See also the discussion in the conclusion.
9. In line with established ethical standards for qualitative research (e.g., American Political Science Association, 2022), all interviewees were granted anonymity to encourage open and candid reflection. Snowball sampling was employed (Biernacki & Waldorf, 1981), beginning with purposively selected initial contacts and expanding through referrals, to access a network of senior actors with direct insight into informal negotiations. This method is particularly suited to elite, hard-to-reach populations, despite its susceptibility to selection bias. Given these limitations – and the politically sensitive nature of the cases – interviews were used primarily to triangulate and corroborate information drawn from official documents, media reports, and secondary literature.
10. In 2009, Cameron took his party out of the EU-integration-friendly European People's Party in the European Parliament. Around the same time, he declared to oppose any further transfer of national sovereignty to the EU. In late 2011, at the height of the Eurozone crisis, Cameron vetoed the fiscal compact, leading the other national leaders to realize that treaty on an intergovernmental basis.
11. A referendum, Cameron hoped, might quell this internal unrest for the time being. Thus, he decided to confront his 27 fellow national leaders and prioritize

internal Conservative party politics over EU politics. Reports confirmed that his strategy was primarily driven by domestic party politics, with Cameron explaining his motivation to Nick Clegg, the leader of the Liberal Democratic Party and his coalition partner at the time: 'It is a party management issue. I am under a lot of pressure on this. I need to recalibrate' (as cited in Webber, 2018, p. 193).

12. For an empirical investigation into the 'domino effect', see Walter (2021).
13. Note that the dotted vertical lines in Graph 1 and 3 mark the dates of European Council summits.
14. On a scale from 1 (positive) to –1 (negative), the average sentiment across all articles, according to our own assessment, is –0.26. More than half of the articles were neutral (mainly descriptive), 44.2 per cent were critical or negative, and only 4.7 per cent were interpreted as positive.
15. In recent years, Hungary has further shifted away from a liberal democracy toward increased authoritarianism. The erosion of judicial independence, fair electoral competition, and transparency has contributed to a marked increase in levels of cronyism and corruption (Kelemen, 2017).
16. Beginning in 2021, the European Commission withheld several funds from Hungary, citing concerns about corruption. In December 2022, member states approved the Commission's first-ever application of the new conditionality clause, freezing €6.3 billion in cohesion funds earmarked for Hungary (Priebus & Anders, 2024; Scheppele & Morijn, 2025).
17. Orbán himself denied that he was taking decisions on Ukraine hostage, alluding to expectations of goodwill and reciprocity: '[We've] never accepted … the idea of linking EU matters that are different in nature … [If] you link one issue with a completely different issue, you're not acting with loyal cooperation … I don't support this approach because once someone's actions lend it legitimacy, where will it end? Next time it won't be applied for our benefit, but will be used against us. We'd be making ourselves vulnerable if we adopted such an approach' (Orbán 2022, as cited in Müller & Slominski, 2025, p. 13).
18. Contributing to the sustained media pressure, national media had identified other norm violations by the Hungarian government beyond foreign policy. A widely-reported case concerned a new Hungarian law that openly discriminated sexual minorities. In a rare case of disputes from within the European Council becoming public, the law led the Prime Minister of Luxembourg, Xavier Bettel, to shout at Orbán (FT, 25/6/21).
19. The sentiment score of the reporting at this point was –0.69.
20. The sentiment score at this point was –0.74.

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Interviews

Interview #1: Interview conducted by the authors with a U.S. scholar, October 28, 2024.
Interview #2: Interview conducted by the authors with a Hungarian scholar, November 4, 2024.
Interview #3: Interview conducted by one of the authors with a former senior European Council official, November 28, 2024.
Interview #4: Interview conducted by the authors with a European Parliament official, December 2, 2024.
Interview #5: Interview conducted by one of the authors with a senior Council official, December 10, 2024.
Interview #6: Interview conducted by the authors with a Hungarian opposition activist, December 10, 2024.