



## Exploring Reactions in Paris and Berlin to the US withdrawal from the JCPOA

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### Abstract

Germany and France are often viewed as the EU pillars in their common European foreign policy. After Brexit, their role has become even more significant. Consequently, the Euro-Atlantic relations have been affected by the ways these countries react to the US's foreign policies when they are against European values, including the tenets of the international rule of law. The US withdrawal from Iran's deal with 5+1 concerning Iran's nuclear program (known as the Joint Comprehensive Plan of Action and abbreviated as the JCPOA) is a case regarded as unlawful by the UN. It can be used to test how much these two countries show resistance to the US in case of disagreement. This article draws a comparison between Berlin's reaction to the US withdrawal from the JCPOA vis-à-vis Paris's response to the same event. The distinctions between these responses and the reasons behind them will be analyzed by drawing on the theory of neoclassical realism. Furthermore, it will be argued that while Germany's political structure and its historical developments speak volumes about its disposition to being more conservative and taking less restrictive measures towards countries like Iran, for France, tipping the balance of power is an important factor that accounts for the country's tendency to form an alliance with the hegemon in recent years.

**Keywords:** Comparative Foreign Policy, Counterhegemonic Foreign Policy, Euro-Atlantic Relations, French Foreign Policy, German Foreign Policy, Neoclassical Realism

## 1. Introduction

In May 2017, Donald Trump, the president of the United States, withdrew from the JCPOA<sup>1</sup>, an agreement signed in 2015 between Iran and six other countries. Since both Germany and France opined that the deal was promising for restricting Iran's nuclear program and thus had to remain in place, they refused to acknowledge the US's constant request to follow suit and spoke plainly against the US's new policy (Shinkman, 2018). However, as both countries had significant relations with the US, the Euro-Atlantic chasm could easily inflict significant harm on their domestic and foreign affairs. Now, the questions are: How did these two countries tackled this paradox, and what are the best explanations for the differences between their reactions? Any answer to these questions discloses the counterhegemonic tendencies in Berlin and France's foreign policy. That said, it is essential to note that this research does not explore the tenets of the JCPOA. Neither does it aim to investigate the US-Iran relations nor Iran's foreign policy.

Germany and France are EU pillars of the UN in its CFSP. After Brexit, the role of these two countries has become all the more critical. The US withdrawal took place when the UK was still a member of the EU, so the UK's ever-present effect on the JCPOA cannot be denied. However, to understand how the CFSP will unfold in the future, it is worthwhile to study these countries' foreign policy. Since France and Germany are similar in terms of geopolitics and normative concerns, this comparative study can reveal the role that history and domestic political structure play in foreign policymaking. As the domestic public are usually aware of

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1. Joint Comprehensive Plan of Action signed on 14 July 2015 between Iran and 5 permanent members of UNSC plus Germany, in Vienna after 2 years of negotiation.

counterhegemonic behaviors more than small technicalities of foreign relations, the role of these factors is more important to investigate.

Although Germany and France have adopted different approaches towards the US, they still need to forge a common policy in the EU in its relations with the US. After 9/11, France and the US strengthened their relations in their fight against terrorism in the Middle East and Africa. Even after Trump took office and proceeded to disregard democracy promotion and neoconservative interventionism, France's realist approach to foreign policymaking managed to adjust itself to the new US administration (Belin, 2018, p. 1). Against this backdrop, France's reaction to the US's withdrawal from the JCPOA is very important, especially because of its shared role with Germany in the making of the EU's CFSP.

Germany-US relations were of paramount importance during the Obama era, and the two countries managed to partner up to tackle many issues; such as the Ukrainian crisis, the Euro crisis, the Paris climate agreement, and the Iranian nuclear deal. During the Trump era, Germany-US relations reached their nadir (Langenbacher & Wittlinger, 2018, p. 180). Trump did not miss any chances to criticize Angela Merkel for a variety of reasons; such as her immigration policy, NATO, and Nordstream. However, the schism between Germany and the US was never as abysmal as France-US relations during De Gaulle's presidency (Larres & Wittlinger, 2018, p. 153). Not only the rise of Germany but also the decline of France promoted Germany's status in the US foreign policy (Szabo, 2018, p. 539).

This article compares the counterhegemonic tendencies of Berlin and Paris in their foreign policymaking. Hegemony, as defined by Encyclopedia Britannica, is "the dominance of one group over

another, often supported by legitimating norms and ideas” (Rosamond, 2016). The key concepts here are dominance, norms, and ideas. All these terms are highly abstract and intersubjective. The question here is: How can these notions be understood in concrete terms? Apparently, concrete measures and real-world examples are needed to separate hegemonic from counterhegemonic behavior. Kugler and Lemke (2000) reviewed some of the ways that an actor can defy hegemony, referring to allying with global powers and rapid growth in military expenditure as some examples (Kugler, Jacek; Lemke, Douglas, 2000). These measures indicate that a player is storing material resources for standing against the hegemon. But what about the willingness and desire?

As for intentions, Scott L. Kastner and Phillip C. Saunders applied an indicator invented by the number and duration of journeys that Chinese officials made to rogue states to investigate whether China is a status quo or a revisionist state. They categorized countries based on their policy towards the US, ranging from rogue states to countries that bandwagon the US, and then counted the number, duration, and intensity of leadership travel to these countries (Kastner, Scott L.; Saunders, Phillip C., 2012). Although this is a simple index, it needs an agreement over other players’ status in terms of their relations with the hegemon. The problem will be even more difficult to tackle when one compares two countries that have many historic and domestic similarities, such as Germany and France.

Ulrich Krotz is one of those scholars who has explored the differences between German and French foreign policy. Indicating that the historical construction of the two countries diverged between 1950 and 1990, he describes different role-views for them. According to Krotz, Germany relies on “civilianism” which consist of three elements: a) aversion of unilateralism, b) great respect for

the international rule of law as well as strict observation of the legality of foreign policy, and c) relying on non-military instruments and regarding use of force as the last-resort solution. As for France, he maintains that the country mostly promotes a type of “greatness” which includes a) independence in Foreign policy, b) “activism” in international affairs, and c) presence in every part of the world, a tendency that stems from the country’s historical “overseas empire” (Krotz, 2015, pp. 62-68).

In another case, to answer the question how Germany and France could have such extensive division over intervention in Libya, it has been argued that the German domestic debate was erratic but comprehensive and mainly centered on the legitimacy of intervention, which was the result of Germany’s traditional reluctance to initiate military action (Buchera, et al., 2014).

Combining this literature on the comparative study of foreign policymaking in Germany and France with the literature on hegemony, this article aims to discover the distinction between Germany and France in terms of the Euro-Atlantic division. It is comprised of five sections: In the first section, the theoretical framework of the study will be introduced, and the research design will be outlined in the second part. In the third and fourth sections, the economic and political aspects of the relations between these two countries and Iran will be discussed. In the fifth section, the research findings will be measured against each other to pinpoint their distinctions as well as the explanatory factors behind such differences.

### **1.1. Theoretical Framework**

The theory of neoclassical realism suggests that both domestic and structural factors must be considered when analyzing the foreign policy of a given nation. While neo-realism contends that

investigating international structure is enough to predict the behavior of interacting units (Waltz, 1979, p. 72), “neo-classical realists believe that because the influence of structural factors such as relative power is not always obvious even to political actors themselves ... the international distribution of power can drive countries’ behavior only by influencing the decisions of flesh and blood officials.” (Rose, *Neoclassical Realism and Theories of Foreign Policy*, 1998, pp. 152-157). Thus, the perception of a policymaker can be viewed as a significant structural variable. The framework of a neo-classic realistic analysis is as the following:

- “Independent variable: relative power distributions
- Intervening variable: domestic constraints and elite perceptions
- Dependent variable: foreign policy” (Taliaferro, Jeffrey W.; Lobell, Steven E.; Ripsman, Norrin M., 2009, p. 20).

One of these intervening variables that exerts a great impact on elite perception is the collective memory formed by a shared history. Eric Langenbacher and Ruth Wittlinger discussed the importance of collective memory. Apart from that, as they posit, history is merely a “chronology of previous events” (Langenbacher & Wittlinger, 2018, p. 174). In this article, history will be investigated to analyze the collective memory. The study will primarily focus on Germany, as the country’s foreign policy has been tremendously impacted by the aftermath of World War II.

Despite its significant contribution, it is not normal to study the European foreign policy through the paradigm of realism, because they usually see themselves as more of normative powers, rather than interest-based actors. However, employing the theories of neo-classical realism to investigate the European countries’ foreign policy is not unprecedented. Nicholas Ross Smith used neo-classical realism to examine the EU’s Deep and Comprehensive

Free Trade Agreement with Ukraine. He claimed that when making certain policies, and in particular geopolitical contexts, the EU acts in a more state-like manner. As he observes, the issue of the trade agreement and the case of Ukraine are suitable for realistic analysis (Smith, 2016, p. 30). Neo-classical realism has also been used by Juneau to explain Iran's sub-optimal performance in its foreign policy (Juneau, 2015).

For several reasons, both non-proliferation and Iran are cases that can be examined to disclose the EU's realistic approach in international relations. First, so much like the historical development of IR theories, which occurred as a response to the advancement of real-world events, some theories are more applicable to the study of a given region. While post-Westphalian relations are formed in regions such as Western Europe and North America, relations in regions like the Middle East are more in Westphalia-like or even pre-Westphalian manner. Thus, when policymakers in Europe look into countries like Iran, they usually wear realist lenses. However, they put on more liberal-idealistic lenses when they investigate relations among countries like Canada or Japan. Second, the issue of non-proliferation itself appeals more to realists than liberals. Mearsheimer proposed that the idea of non-proliferation has features such as "rapid shifts in the balance of power" or the possibility of a "decisive defeat", which in his opinion can account for the "barriers to cooperation" (Mearsheimer, 1994/1995, p.13). So, again, Europeans prefer to observe this issue from a more realistic perspective.

In this study, foreign policy, which is the dependent variable, will be investigated by comparing France's and Germany's reactions to the US withdrawal from the JCPOA. In order to discuss counterhegemonic foreign policy, one needs to have an explicit idea about what hegemony is and what its components

contain. The term hegemony was first coined by Antonio Gramsci and was introduced to IR by Robert Cox. According to Cox, hegemony involves non-material elements (Cox, 1983, p. 172). Also, in the English school, legitimacy and hegemony are inseparable. Hegemony is not a mixture of different characteristics and features possessed by an actor. That would merely designate a superpower. In fact, the term refers to a situation where an actor is accepted by others as a hegemon (Clark, 2011, p. 34). Therefore, measuring hegemonic capacity is not an easy task. Due to the fact that hegemony is less quantifiable than hard power, its calculation is even more difficult than measuring hard power.

The concept of hegemony has evolved in two different, even opposite strands of scholarship: The first strand was introduced by Gramsci and came from the left. This implication has continually gone through further development due to its application in critical theory. The other strand began with Charles Kindleberger and his seminal work “The World in Depression: 1929-1939”, which was further expanded in liberal theories up to Keohane and Nye. In all of these delineations, acceptance by others is the key to distinguishing between hegemony and superpower. Supplying public goods contributes mainly to acceptance. France in the Napoleon era and Nazi Germany were both great powers, but they adhered to the doctrines of nationalism, lebensraum<sup>1</sup>, and white supremacy, instead of supplying public goods. In contrast, Great Britain managed to supply public goods by securing international shipping routes in a time when freedom of navigation was not even conceivable. According to Gramsci, hegemony refers to the power that other powers in its area of influence can adapt themselves to its

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1. Living space was a notion developed by Friedrich Ratzel in 1901, claiming that Germany needs the land and resources as far as Minsk in Eastern Europe to be self-sufficient (The United States Holocaust Memorial Museum, n.d.)



rulings (Cox, 1983, p. 171). For liberals, however, hegemony stands for a power that sets the agenda and defines decision-making procedures in international institutions (Siddi, 2018, p. 4). Based on this definition, in an anti-hegemonic foreign policy, the non-recognition of a hegemon is a major blow to its existence. However, lack of acknowledgement would not be a major issue for a superpower, because its existence does not rely on acceptance by others.

To investigate counterhegemonic intentions, one needs to separate interests from values. Even if an actor's interest lies in defying the hegemon, it cannot purely be called counterhegemonic. The difficulty is to find a way to separate hard and soft elements, namely national power from the power that comes from gaining acceptance by others. Erik Ringmar once applied a method to solve this problem. In his method, one should discover all possible material gains and then attribute all the remaining elements that have not yet been explained by material interests to soft elements, in his case, struggle for recognition. In his seminal work, "Identity, Interest and Action", he showed that Sweden's intervention in the thirty-year war cannot be explained by material interests. Therefore, it should be attributed to the country's struggle for recognition (Ringmar, 1996). Thus, disagreement with the hegemon can be called the contestation of hegemony if it does not follow any material interests.

## 1.2. Research Design

As was mentioned earlier, the primary aim of this research is to separate ideational factors from materialistic ones with regard to the foreign policy of German and France. To this end, the bilateral trade relations, namely the exports and imports between Iran and

these two European countries, have been examined as an indicator of Germany and France’s material interests.

To display how their interests changed after the JCPOA, Germany and France’s economic relations with Iran will be reviewed by comparing the statistics of imports and exports between the countries before and after the JCPOA. In addition, the differences in their foreign policies after the US withdrawal will be explored through analyzing the statements that were made by their government officials and published on the website of their foreign ministries. If the rejection of the US policy is in accordance with obtaining more benefits from Iran’s nuclear deal, it does not necessarily indicate a counterhegemonic policy. But if it is revealed that a country that received less benefit from the deal opposes the US withdrawal more vehemently than the other country, then it discloses a counterhegemonic policy. Table no. 1 displays the research design:

**Table 1: The structure of discussion**

	Part 1: Economic Analysis		Part 2: Political Analysis	Results
	Obama era		Trump era (2017)	
	Before the JCPOA (2015)	After the JCPOA (2016)		
1	Statistics for Trade between	Decreased or increased less than the other	opposes less	Not clear
2			opposes more	Relative challenger
3	Statistics for Trade between	Increased more than the other	opposes less	Relative follower
4			opposes more	Not clear
5	Statistics for Trade between	No change	opposes less	Mild follower
6			opposes more	Mild challenger

Since the research compares two countries (Germany and France), all calculations are relative. For example, it is widely known that both Germany and France expressed their dissatisfaction with the US several times. The question here is, which country is more antagonistic to the US policy? The table above demonstrates three situations. In the first scenario, it is predicted that the country's material benefits will decrease, or even increase after the JCPOA, but this change will not be as great as the effect exerted by the nuclear deal on the other country. In this case, the JCPOA would not be a lucrative deal for the country in question. Thus, opposing the US withdrawal in this situation would go hand in hand with lower economic interests and the two would become inextricable (row no. 1). But if a player who does not benefit much from the deal opposes the US withdrawal, it can be inferred that the player harbors counterhegemonic intentions (row no. 2).

In the second situation, if material benefits for one player exceed those of the other country, and the country in question still lodges a mild objection to the US withdrawal, we can conclude that the country is an ardent follower of the US policy, in a way that even in its economic loss, such a country would still ally itself with the hegemon (row no. 3). In this case, the hypothetical opposition to the US policy would indicate nothing significant, because it is probable that the country is simply following its own interests (row no. 4). In the last scenario, if there is no change in the bilateral trades after the agreement, it will be difficult to draw any conclusion. In such a case, which is shown on rows 5 and 6, one can maintain that at most, the country in question may be a mild follower or a mild challenger of the US policy.

## 2. Economic Discussion

In this section, the bilateral trade between Iran and Germany, and Iran and France will be compared. The data are drawn from the Tehran Chamber of Commerce (TCCIM), and cover the time period between 2009 (when Barack Obama took office) and 2017 (when Donald Trump pulled the US out of the JCPOA).

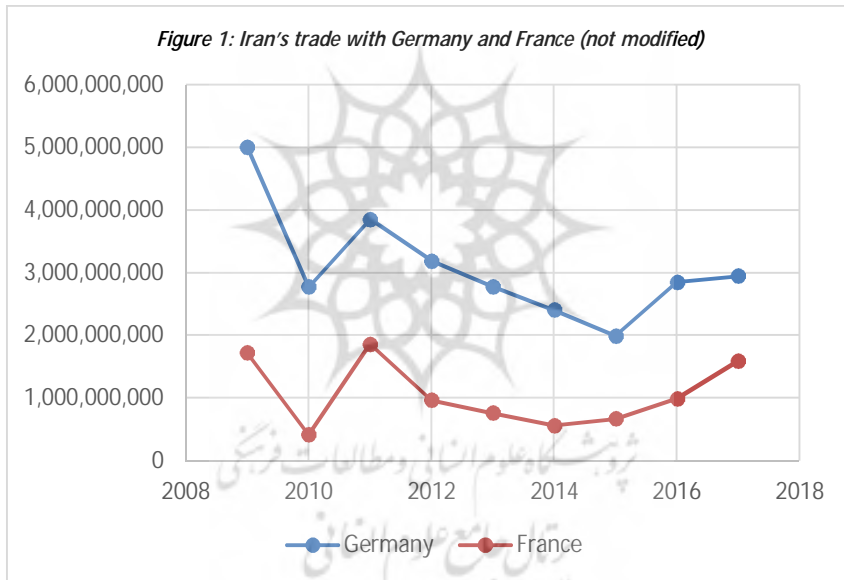
**Table 2: Iran's trade with Germany and France**

	Germany			France		
	Export (Dollar)	Import (Dollar)	Trade Between (Dollar)	Export (Dollar)	Import (Dollar)	Trade Between (Dollar)
<b>2009</b>	349,320,893	4,657,843,089	5,007,163,982	53,742,687	1,665,384,324	1,719,127,011
<b>2010</b>	346,562,614	2,424,909,443	2,771,472,057	58,915,061	352,215,735	411,130,796
<b>2011</b>	415,029,844	3,435,398,724	3,850,428,568	60,618,942	1,796,585,627	1,857,204,569
<b>2012</b>	355,882,068	2,833,378,114	3,189,260,182	36,743,611	929,443,877	966,187,488
<b>2013</b>	335,250,251	2,442,999,801	2,778,250,052	29,986,797	731,224,943	761,211,740
<b>2014</b>	371,888,419	2,035,890,970	2,407,779,389	31,829,202	528,923,357	560,752,559
<b>2015</b>	319,856,568	1,672,784,092	1,992,640,660	18,741,126	652,034,152	670,775,278
<b>2016</b>	316,077,679	2,533,492,029	2,849,569,708	36,253,768	955,683,529	991,937,297
<b>2017</b>	317,963,228	2,630,213,406	2,948,176,634	38,526,696	1,554,293,564	1,592,820,260

Source: [www.tccim.ir](http://www.tccim.ir)

It is demonstrated that, except for 2011, Iran's trade with Germany and France was declining. However, after 2015, the corresponding numbers started to grow. This graph shows that in all the years following the JCPOA, Germany's volume of trade with Iran increased as much as that of France. Therefore, the first proposition is:

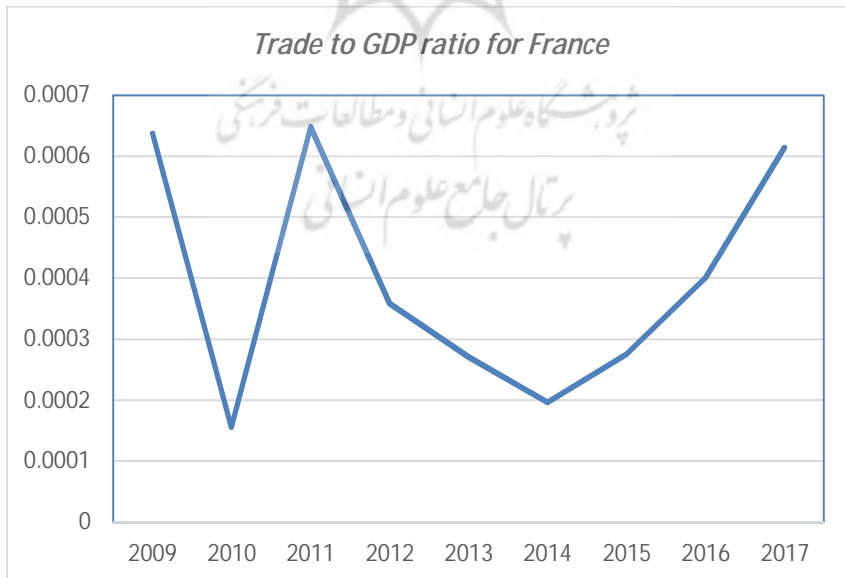
**Proposition 1: The German and French trades with Iran have been equally influenced by the JCPOA.**



Now, the question is, how significant are these changes? Although the absolute volumes of change is quite the same in both cases, we need to measure them against each other. One solution is to calculate the change in the trade-to-GDP ratio for both countries. Tables no. 3 and 4 demonstrate the corresponding ratios for France and Germany respectively.

**Table 3: Trade to GDP ratio for France**

	Trade	GDP Source: (IMF, 2020)	Trade/GDP	Export/GDP
<b>2009</b>	1,719,127,011	2,697,955,000,000	0.0006372	0.0000199
<b>2010</b>	411,130,796	2,647,348,000,000	0.0001553	0.0000223
<b>2011</b>	1,857,204,569	2,864,653,000,000	0.00064832	0.0000212
<b>2012</b>	966,187,488	2,685,371,000,000	0.0003598	0.0000137
<b>2013</b>	761,211,740	2,811,918,000,000	0.00027071	0.0000107
<b>2014</b>	560,752,559	2,856,701,000,000	0.00019629	0.0000111
<b>2015</b>	670,775,278	2,439,436,000,000	0.00027497	0.0000077
<b>2016</b>	991,937,297	2,472,282,000,000	0.00040122	0.0000147
<b>2017</b>	1,592,820,260	2,594,235,000,000	0.00061398	0.0000149

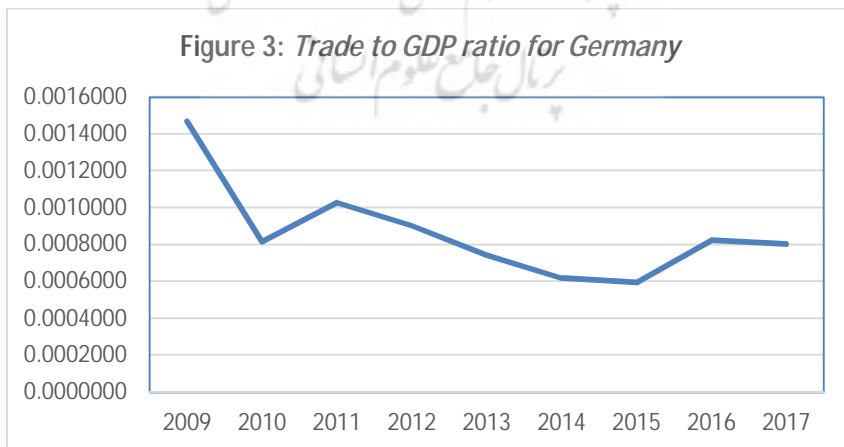


**Table 4: Trade to GDP ratio for Germany**

	Trade	GDP Source: (IMF, 2020)	Trade/GDP	Export/GDP
2009	5,007,163,982	3,407,557,000,000	0.0014694	0.0001025
2010	2,771,472,057	3,402,444,000,000	0.0008146	0.0001019
2011	3,850,428,568	3,748,655,000,000	0.0010271	0.0001107
2012	3,189,260,182	3,529,377,000,000	0.0009036	0.0001008
2013	2,778,250,052	3,733,859,000,000	0.0007441	0.0000898
2014	2,407,779,389	3,890,095,000,000	0.0006190	0.0000956
2015	1,992,640,660	3,357,926,000,000	0.0005934	0.0000953
2016	2,849,569,708	3,468,896,000,000	0.0008215	0.0000911
2017	2,948,176,634	3,681,303,000,000	0.0008009	0.0000864

Figure no. 2 shows that the share of trades with Iran increased in France’s GDP, but for Germany, the growth was not significant. The second proposition is:

**Proposition 2: France’s trade with Iran increased more significantly than Germany’s.**



### 3. Political Discussion

In this section, the results of searching the term “Iran” in statements and reactions published in the English version of the websites of the German and French foreign ministries are reviewed. The data cover the time period after 20<sup>th</sup> January 2017 (the day when Donald Trump took office in the United States) up to the end of March 30, 2018 (the succeeding months after the US withdrawal). The search brought up 824 results on the website of the German foreign ministry and 108 results on the website of the France foreign ministry. Among the results that have been summarized in attachment no. 1, those related to the JCPOA were compared. The recurring statements on the website of the German foreign ministry are as the followings:

- Germany remains committed to the nuclear agreement with Iran;
- Germany admits that Iran is abiding by its commitments under the deal;
- There are concerns about Iran’s role in the region as well as its missile program;
- The structured dialogue with Iran is to be continued;
- The Middle East will continue to be plagued by unrest if Iran does not pursue constructive policies;
- Alongside keeping up the significant pressure, Germany should initiate a dialogue with Iran;
- The termination of the deal with Iran would make the negotiations with North Korea on nuclear disarmament much more difficult;
- Donald Trump’s goal is to destroy everything his predecessor Barack Obama painstakingly built up: healthcare reform, the Paris Climate Agreement and, now, the agreement on the Iranian nuclear program;



- The Americans cannot denounce the agreement unilaterally, because it was adopted in the UN Security Council, and was also confirmed by the EU, France, the UK, Russia, China, and Germany;
- Trump does have the option to de facto terminate the agreement by imposing sanctions on Iran;
- Doing away with Iran's nuclear deal would increase the risk of war in Germany's immediate neighborhood;
- So far, Washington has adhered to what was agreed on, including those aspects relating to the easing of sanctions against Tehran. However, this can only continue if the Iranian side strictly abides by this agreement. The Americans will not tolerate any violations of the nuclear agreement by Tehran. That would also clearly be in line with Germany's interests;
- Trump's gigantic arms deals with the GCC monarchies increase the risk of a new arms race. That policy is completely wrong, and it is certainly not in accordance with Germany's policy;
- Although the political conditions are not always favorable, Iran remains an attractive target market for German companies.

For France, searching the statements related to the JCPOA yielded fewer results in comparison to Germany. France mainly focused on Iran's role in the region, and also sometimes reacted to the Iranian missile program. Here is a summary of the main points made by France:

- Iran's ballistic tests interfere with the confidence-building process, introduced by the Vienna agreement;
- France does not want the JCPOA to be renegotiated;

- Sanctions against the Islamic Revolutionary Guard Corps and Iran's ballistic missile program do not reintroduce sanctions that have been lifted under the agreement and therefore do not violate it;
- The USS Congress adopted a bill imposing new sanctions on Russia, Iran, and North Korea. The extraterritorial scope of this text appears to be unlawful under the international law;
- The Vienna agreement "could be supplemented by work on the post-2025 period, by essential work on the use of ballistic missiles";
- We do have concerns about Iran's ballistic missile program and its policies in the region. But these questions are separate from the issues concerning the JCPOA;
- The EU has already imposed sanctions on Iranian entities involved in the ballistic missile program. If necessary, new sanctions could be used;
- It is important for both France and Iran that the European trade and investment in Iran continue;
- France wants to continue its dialogue with Iran in the long term, across all areas.

If one compares the two groups comprising the main statements made about Iran, these similarities are recognizable:

- Both countries are committed to the JCPOA;
- Both are concerned about Iran's regional activity and its ballistic missile program;
- They see other problems with Iran's withdrawal from the nuclear program;
- Both consider Iran as an attractive target in terms of business and trade relations

- Both do not want the staples of the JCPOA to be renegotiated;
- Both emphasize the continuation of dialogue with Iran;
- Both regard the impact of JCPOA's termination as detrimental to future negotiations with North Korea;

Apart from the similarities, the differences between the stances adopted by the two countries are as follows:

- Germany regards Trump's policy as nothing but a personal issue concerning Obama's legacy;
- In comparison to France, Germany is more concerned about the destabilizing effects ensuing the termination of the JCPOA;
- Germany disagrees about the arms deal between the US and Saudi Arabia and observes that such a measure might potentially provoke the Islamic Republic of Iran, which may in turn escalate the tension.
- Although France sees Iran's deal as separated from other issues, Iran's ballistic missile tests might lead to a lack of trust between its partners, a measure that would be detrimental to the nuclear deal.
- France holds that negotiations can be conducted by working on post-2025 relations, while such an observation was not made by Germany.
- Compared to Germany, France emphasizes the importance of imposing sanctions on other conflicting issues between Iran and the West.

There are more statements that make these allegations more understandable. In May 2018, Angela Merkel reiterated that the JCPOA should remain in place, while its negotiating framework should be expanded (Reuters Staff, 2018). Addressing lawmakers

in the Bundestag lower house of parliament, she said: “The question is whether you can talk better if you terminate an agreement or if you stay in it ... we say you can talk better if you remain in it” (Sharafedin, 2018). In contradistinction to Merkel’s reaction, days before Trump walked out of the JCPOA, Macron clearly maintained that he wanted a new deal (Sen, 2018) although he called the US withdrawal a mistake (apnews, 2018). However, these differences vanish when it is revealed that the two countries have in fact adopted similar stances. Germany, along with France and the UK agreed that “concerns raised by US President Donald Trump must be addressed” (Anon., 2018). Although this contradiction did not bring any result for the deal and the US withdrawal, it speaks volumes about how much they can be outspoken when it might irritate the US.

In another statement, French President Emmanuel Macron recommended Donald Trump to be more consistent, demanding him not to pull the US out of Iran’s nuclear deal while engaging in negotiations with North Korea (Vela & Herszenhorn, 2019). Macron believed that exiting the existing deal with Iran would send a wrong message to North Korea (Dobson, 2018). One day after Donald Trump announced that he would pull the US out of the JCPOA, Macron, in a phone call with his Iranian counterpart, invited Iran to engage in wider negotiations that included concerns about the country’s missile program and regional activities, reaffirming Europe’s commitment to the deal nonetheless (Bell, et al., 2018).

It is not difficult to realize that France and Germany are nearly on the same page about the deal and their basic expectations of relations with Iran are quite similar. That said, France has paid more attention to Iran’s regional activities, while Germany has mainly focused on keeping the deal in place. Even for its regional activities, Germany believes that Iran must remain part of any

solution and the US should adopt a consistent stance towards Iran and its rivals in the region. For Germany, the observation that each issue should be dealt with as a separate matter means that parties involved in the agreement should not back out of the deal by using Iran's other activities as a pretext. In contrast, for France, it means that they can impose sanctions and contain Iran in other issues and that does not require to pull out of the deal. Although both countries have adopted similar perspectives about Iran's role in the region and in the world, Germany gives the priority to the nuclear issue, while France sees all issues as almost equally important. Germany has been more critical of the Trump administration and even relates his decision about the JCPOA to his domestic political objectives. In contrast, it can be observed that France has been less critical towards Trump.

#### **4. Analysis through the Lens of Neo-Classic Realism**

In this section, the differences discussed in earlier sections will be traced back to their domestic politics and the balance of power, both of which are regarded as central variables in neo-classic realism. To understand the reasons behind these differences and similarities, the theoretical framework of neo-classic realism can be applied. As explained before, two sets of variables are influential in this analysis: independent variables, which are related to relative power distributions, and intervening variables, which are centered on domestic constraints and elite perceptions.

##### **4.1. Relative Power Distribution:**

Before the Cold War, France enjoyed a wider scope of power in comparison with Germany. As the victor of World War II, France

also had access to nuclear weapons. The country also holds a permanent veto right in the UN Security Council. That said, only 15 years after the War, the tension between the US and USSR made European countries dependent on the United States for its nuclear umbrella. Nevertheless, after implementing the policy of détente between the US and USSR in the 1960s, European countries restored their independence and France started to challenge the US, the UK, international organizations like NATO, and the European Economic Community (EEC). With the US's declining role in 1970, and with the increasing tension between the two superpowers in the 1980s, European countries felt the urgent need for a cohesion policy which again sent France back in the driving seat. For four decades, it had the leading role in Europe.

After the Cold War and German reunification, the distribution of power in Europe took a dramatic turn, and the balance of power was tipped in favor of Germany. Reunified Germany began to grow more powerful, and as a result, its government wanted to have a stronger say on global affairs. For decades, Germany had been France's de facto ally against the UK and the US. Now, with its national power reinforced, the country could be an alternative candidate for the EU leadership. Ulrich Krotz argues that the tension between national aspirations in foreign policy and the biting reality of lacking resources to fulfill those aspirations are the "leading theme" in the French foreign policy at every turn (Krotz, 2015, p. 163). In 2007, Nicolas Sarkozy overturned the political tradition rooted in de Gaulle's antagonistic attitude towards the US (Rezkitha, 2010). Sarkozy has been the most pro-American president in the French Fifth Republic (Krotz, 2015, p. 137). This policy seemingly was the only option available for France, should it keep its influence on global affairs. That is why it was also adopted by Emmanuel Macron. Macron became the US's "go-to"

guy in Europe (Haglund & Quessard, 2018, p. 573). This shift in foreign policy and attitude towards the US can explain the mechanisms of France's relation with Iran and its differences with Germany in that regard.

Moreover, it should also be noted that countries like Lebanon and Syria that host groups affiliated with Iran, have historical ties with France as a result of their background as being among the country's protectorates. These countries are the main area for the exertion of France's influence in the region. This can explain why France has more concerns about Iran's regional role in comparison to Germany. On the other hand, Iran and Germany have a common ground for cooperation. France, the US, and the UK all have strong allies in the Middle East, and Iran is one of the few governments that has not forged ties with these countries. Therefore, Iran is the only major nation in the Middle East that Germany can make an alliance with without having to compete with the aforementioned countries.

#### **4.2. Domestic Constraints:**

German domestic politics is heavily influenced by the history of Weimar and its failure to stop the Nazis, namely when it failed to interfere with the election in 1930 that ended up in Hitler's rise. It has taught many lessons since then. In that election, the results were surprising even to Hitler himself. He had hoped to win sixty seats at best. But the number of the people who voted for him rose from 810,000 in 1928 to 6,409,600 in 1930, and in the Reichstag, seats occupied by his party increased from 12 to 107. Consequently, the Nazis became the second party in the state while previously they had ranked nine. The communists also did exceptionally well in the election. They gained 4,592,000 votes

whereas they had 3,265,000 votes in 1928, and were assigned 77 deputies in the Reichstag in comparison to 54 in the past. These two subversive parties together won one-third of the votes and the seats in the House. The other three bourgeois parties lost more than a million votes. Germany slid into Fascism, and the point is it was predictable and many elites including communist leaders did know that (Bullock, 1964, p. 155).

This inability to establish a coalition to support the Republic had bedeviled German politics ever since 1930. In spite of violent clashes between communist groups and the NSDAP, Hitler's party, "the Communists", wrote Bullock, "openly announced that they would prefer to see the Nazis in power rather than lift a finger to save the republic" (Bullock, 1964, p. 253). If that coalition between communist groups and liberals had been formed, Hitler could not have seized power, and World War II would probably never have occurred. Consequently, the Soviet Union would not have had dominance over Eastern Europe, and the intensity of the Cold War would have been appeased. Most importantly, Germany could have military clout and could grow as a world superpower. The country could also have had veto power in the UNSC or any other international arrangements. The world could have gone to an entirely different direction, and by all accounts, it could be by far more favorable to Germany. But none of these happened.

It is no surprise that German politics should be affected by such tragedy (Krotz, 2015, p. 65). So, the political inclination is conservatively towards the center. Under the impacts of that bitter experience, any permutation of the coalition could possibly happen in German politics. For example, the Free Democratic Party (FDP) joined the CSU and the CDU to form a government between 1949 and 1957, and from 1961 to 1969, but from 1969 to 1982, they joined the SPD against the CDU to form a government. In 1982, it



turned back to its old ally to form a different government up until 1998. In 2005, Angela Merkel from the CDU founded the government in collaboration with the SPD and the CSU, but in 2009, she built a coalition with the FDP and the CSU (Martin, 2017). For a country that was a cradle for many political ideologies, it is ironic that almost any form of coalition between parties has become a possibility. That historical failure to establish a coalition of liberals and communists taught them painful lessons that empower the center of German politics which makes German politics more conservative, with lots of anti-war sentiments. Therefore, the German foreign policy supports long-term negotiations instead of offering a quick solution to war and this was the lesson learned from their history in the years before WWII.

On the other side, French politics are totally different from the policies adopted by Germany. The French government has been heavily influenced by the country's Great Revolution. Throughout its history, instability became the most significant feature of French politics. After the French Revolution in 1789, two groups rose with opposite ideologies: leftist groups which were Republicans, and rightist groups which were loyalists to both the monarchy and Catholic Church. This dualism continued in various shapes throughout history. Contrary to Germany's stable political environment, France was mostly agitated, turbulent, and restless throughout the course of its history. Seeking national pride is a central characteristic of French politics. For many decades, the French regarded themselves as a role model for the world. The French Revolution and the country's human rights declaration were admired by the public as well as the elites all over the world. The French language was the chief medium of diplomacy (Krotz, 2015). The combination if all these factors has propelled the French

government to take the lead and get involved in riskier actions, such as participating in wars, once it is regarded as necessary.

#### **4.3. The structure of the Government:**

German politics emphasizes the importance of law with all its painstaking details in any political affairs. In comparison with the federalism in the US, the German Federal Government is more centralized in legislation while being decentralized in administration. Most state governments are unicameral (Dalton, 2010). Germany's constitution is established by the idea of "limited government, checks and balances, and a dispersion of decision-making authority through the principle of federalism" (Smith, et al., 1996, p. 18). This precludes its foreign policymakers from taking extreme actions. Federalism and integration in the EU impact German's national interests. But in French politics, the president is powerful and has more agency over making harsh and extreme decisions. According to article 20 of the constitution, they "shall have at [their] disposal the administration and the armed forces" and "shall determine and conduct the policy of the Nation" (Knapp, Andrew; Wright, Vincent, 2006). Thus, this gives a great deal of power to a person as the nation's leader, which can in turn increase the unpredictability of French politics.

#### **5. Conclusion**

This article used the JCPOA as a litmus test to differentiate German and French foreign policy in terms of their relations with the US and how much they stand in the way when the US adopts a policy, not so much in accordance with the EU. Against the backdrop, if one compares Germany's stronger reaction to the US

withdrawal of the JCPOA with France's milder response, it will become evident that while Germany has benefited less from Iran's nuclear deal, the country can be concluded to be more counterhegemonic than France. Germany placed itself in the second row in table 1. In comparison with Germany, France was shown to be less resistant to the US policy at the time when it was a party to the deal. This comes from the fact that France has benefited from the JCPOA less than Germany and therefore, the country is expected to be more resistant to the US withdrawal than Germany. The third row in table 1 represents France's stance in this regard.

To understand the reasons behind the differences in the policies adopted by Germany and France, the theory of neoclassical realism has been employed in this study. By exploring the shift in the balance of power, it can be concluded that France is now more compliant to the US than before, and because of its internal political structure that gives enormous power to the president, France is less reluctant to resort to war and could be more compliant with the policy of using force, while Germany knows that whatever Iran's nuclear program is, the US should not take actions that might end in war, because neither its political structure nor its political culture would allow the leaders to start a war.

This conclusion is significant because it shows that the historical background of timid Germany and revolutionary France does not explain some of the current policies implemented by the two countries. However, this does not mean that these changes do not have roots in history. Germany's counterhegemonic agendas are enacted only when they prevent extreme actions like war, and France seeks to build strong relations with the US only when these relations can help to promote France's global presence. Both of them have origins in their history, as explained in this article.

It also was shown that neoclassic realism is capable to explain the mechanisms of the two countries' foreign policy, owing to its panoramic view of foreign policy which takes into account both domestic politics and foreign relations. If one does not take the internal dynamism into consideration, they may conclude that Germany is rising against the US and France is going to jump on the US bandwagon to contain Germany. Neo-classic realism reveals that these predictions should be modified by internal dynamism.

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