

## An Arctic Strategy for Scotland

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*As Scotland moves increasingly to assert its position on the international stage, this paper asks whether Scotland should develop its own Arctic strategy, comparable to those developed by the eight Arctic states and if so, what the contents of such a strategy might be. This paper will introduce the main reasons why Scotland might pursue an Arctic strategy, taking into account its international audience, its domestic audience and, not of least importance, the audience in Westminster. It will identify Scotland's distinct historical, social, economic and political interests in the Arctic and show how these differ from the United Kingdom. Some potential contents for a Scottish Arctic strategy are outlined, with an emphasis on governance and cooperation, economic development, and environmental and scientific cooperation. The paper concludes that there are both costs and benefits in publishing a formal Arctic strategy, but nevertheless, a coherent, unified and holistic approach to the Arctic is wanting in Scotland and the Scottish government should begin by establishing a dedicated Arctic division within its international department to conduct further research into what Scotland can offer the Arctic and what opportunities the Arctic presents.*

### Introduction

Depledge and Dodds (2011) discussed the perspective of the United Kingdom (UK) on the High North and the potentials for a UK strategy. Elsewhere in this inaugural *Arctic Yearbook*, Depledge continues this theme examining potential governmental participants in such a programme. What has not yet been discussed to any significant degree is the possibility that notwithstanding complacency in Whitehall, Scotland might develop its own Arctic strategy. Although an intrinsic constitutional part of the UK, Scotland has quite distinct historical, social, economic and political interests in the Arctic which will form the subject matter of this article.

Following this introduction, section two will outline in general terms the interests of Scotland in the High North and the pertinent competencies of the Scottish government. Some of the potential contents of a Scottish Arctic strategy are examined in section three, with an emphasis on governance and cooperation, economic development and on environmental and scientific cooperation.

The paper ends with a brief evaluation of the costs and benefits of preparing a formal strategy and concludes that whether or not such is developed and published, some kind of coherent approach to the Arctic is wanting in Scotland.

### **Why Scotland?**

The current Scottish Parliament was created by the Scotland Act 1998 of the United Kingdom Parliament in Westminster. Under it, certain matters are reserved for Westminster and any attempts by the Scottish Parliament to pass law on these will be *ultra vires* and hence ineffective (s. 28(2)(b)). The reserved matters are outlined in Schedule 5 of the Act and these include “international relations including relations with territories outside the UK, the European Communities... and other international organisations” (Scotland Act, Schedule 5, Part I, s.7(1)) and military defence, including naval, military and air forces (Scotland Act, Schedule 5, Part I, s. 9(1)). For these reasons, issues of military security and search and rescue are not extensively covered in this analysis although they would be prime candidates for a UK strategy. Most energy governance is likewise reserved for Westminster, pointedly the oil and gas supplies lying off Scotland’s shores. But, nuclear aside, renewable energy is not reserved in the Scotland Act and cooperation in this field is considered below (Scotland Act, Schedule 5, Part II, Head D).

The pro-independence Scottish National Party (SNP) majority government intends to hold a referendum on independence in 2014, possibly with an additional option of enhanced devolution (Scottish Government, 2012). Increased devolution and even full independence would impact both the contents and tone of any Scotland Arctic strategy, most notably on military security. However, as both these possibilities remain hypothetical and in any event, are some years off, they remain outside the scope of this article.

Under the leadership of the SNP, Scotland has already drawn up a broad International Framework, as well as more detailed plans for the USA and Canada, effectively “strategies” with defined objectives, areas for action, planned actions, and follow-up (Scottish Government, 2008; Scottish Government, 2010c; Scottish Government, 2010d). Less developed plans for India and Pakistan have also been developed (Scottish Government, 2010a; Scottish Government 2010b). In the International Framework, Scotland looks to its “comparators” in the “Arc of Prosperity” (Denmark, Finland, Iceland, Ireland, and Norway) as exemplars of high educational and economic achievement (Scottish Government, 2008, para. 19(2)). Scotland’s International Framework was published in April

2008; four months later, as the international banking crisis devastated Iceland and Ireland, this “Arc of Prosperity” language caused much mirth amongst the Scottish opposition parties who pointed to the collapse as “evidence” of the vulnerability of small economies. In retrospect, while the Irish economy remains in a woeful condition, the recovery in Iceland might be drawn on by the SNP to demonstrate the resilience of small, independent nations and further encourage depictions of Scotland’s “Nordic” identity.

It is not inconceivable that a fully fleshed out Arctic plan will follow, although this is not currently in the making and there is no Arctic division comparable to the other regional divisions within the Scottish international department (R. Dunn, [personal communication, December 9, 2011]; Scottish Government, 2011a). Other sub-national statal and non-statal entities have prepared or are preparing comparable strategies so Scotland would not be unusual in this regard (Inuit Tapiriit Kanatami & Circumpolar Council, 2008; Rovaniemi, 2011; Lapin liitto, 2011; Nordic Council, 2012). Further, as evidenced by the diverse contributions to this Yearbook, numerous non-Arctic States are coherently pursuing their interests in the High North.

Strategies of Arctic states and the European Union (EU) begin by justifying themselves: identifying their respective organs as having valid interests in the Arctic and explaining the need for a dedicated Arctic strategy. The statements become stronger as one moves away from the Arctic five towards the peripheries: for example, Sweden devotes one of only four chapters to Sweden’s Arctic connections (Sweden, 2011); the European Commission’s Communication proclaims that the EU is “inextricably tied to the Arctic Region... by a unique combination of history, geography, economy and scientific achievements” (European Union, 2008: 2). By contrast, Norway, more secure in its Northern identity, considers its links only fleetingly in a two-page foreword, within a ten chapter, 73-page document (Norway, 2006) and Russia’s strategy contains one brief section defining its own Arctic region and its particular characteristics (Russia, 2008, Section I). Scotland, not being a state, let alone an Arctic state, let alone a littoral state, would likely devote an extensive chapter explaining the reasons why Scotland of all places should have an Arctic strategy at all. Some factors for consideration here follow. The most northerly town on mainland Scotland (Thurso) sits at 59° North; the Shetland Isles at 60° North. Shetland lies 324 nautical miles from the Arctic Circle but the theoretical possibility of a continental shelf branching into the Arctic Circle is not borne out by ocean floor maps (Earle, 2009: 104-5). Clearly then, Scotland is not within the Arctic Circle and cannot describe itself as an Arctic nation. However, as the Arctic Council has recognised, Arctic

ecosystems and biodiversity have impacts well beyond the Arctic (CAFF 2010, Finding 7). In current times, changes in the High North are influencing fish migration patterns, creating resource governance tensions, such as that over the mackerel. Meanwhile, climate change has the potential to affect the ecological and physical parameters of Scotland's marine and terrestrial ecosystems. Historical, economic and cultural connections are longstanding, Caithness having been fought over with the Norse until 1266; Orkney and Shetland remaining in Norwegian jurisdiction until the 15<sup>th</sup> century. Living marine resources have been and continue to be shared. Northern Scottish dialects are replete with Norse words that are unknown further south and the second most northerly mainland county, Sutherland, is so named as the "land to the South." Cultural ties are maintained through Viking festivals such as Up Helly Aa (Shetland) and Da Doonie Day (Thurso); and arts partnerships such as North Highland Connections. On the other side of the Atlantic, Scottish emigrants settled in Atlantic Canada, most famously in Nova Scotia where Scottish traditions, including folk music and the Highland Games, are still widely celebrated. Scientific and political exchanges are well established, historically through Scots explorers such as John Rae and Alexander MacKenzie and in contemporary academic and intellectual links through, for example, the Northern Periphery Programme (European Regional Development Fund, 2008), university cooperation, and Nordic Horizons.

Scotland shares contemporary challenges with other non-independent Northern nations. Economic difficulties include population sparsity; population decline in a state elsewhere concerned to "contain" immigration; leakage; dependence<sup>1</sup> on a market to the South over which it has little control; and macro-economic policy led by distinct Southern interests and objectives (Duhaime, 2004; Huxley, 2010). Scotland can learn from the experiences, both positive and negative, of other Northern economies in managing conflicts over land and marine use between traditional activities and resource extraction such as energy production, and to ensure that the benefits of development remain in the North and are equitably distributed, especially as the current Scottish government views renewable energy as a key to a self-reliant Scottish economy (Scottish Government, 2011f). Political interests are shared with other self-governing regions, both indigenous and non-indigenous, in particular, those seeking greater autonomy.

An introduction pointing to Scotland's interests in the Arctic must be subtle so as not to appear as though Scotland is demanding something. This might be politically easier for Scotland than it would be for a UK strategy given the latter's military capacity and colonial legacy. Nevertheless, with regard

to High North sensitivities, the headline of Canada's *National Post* to a Scottish politician's proposal for a Scottish Arctic Strategy is telling: "Scottish MP Pipes Up with Arctic Claim" (Boswell, 2011). The "Claim" was a mere proposal that Scotland develop an Arctic strategy (Robertson, 2011). But Arctic strategies, whilst sending important signals to other Arctic players, also have domestic audiences and must bow to domestic political expectations. An Arctic strategy, especially one led by the SNP, would play to Scottish identity politics, highlighting Scottish difference; but it will have an additional audience, namely, the government of the UK to whom the message of speciality of interests is equally important.

## **Strategic Themes**

Of the many potential areas of enhanced cooperation between Scotland and the Arctic states, three broad themes are selected for the main focus of this article, namely: governance and cooperation; economic development; and environment and science. The five littoral states all emphasise defence of sovereignty and military security (Heininen, 2011) but as long as Scotland remains a part of the United Kingdom, these issues do not have a significantly "Scottish" as opposed to "British" hue and are dealt with succinctly by Depledge and Dodds (2011). A few brief comments are nevertheless offered at the end of this section.

### ***Governance and Cooperation***

Multilateral governance is to be preferred by Scotland, particularly within institutions where Scotland has a voice. In Arctic fora such as the Arctic Council (AC) and the Barents Euro-Arctic Council (BEAC), any special interests of Scotland must be represented through the UK which itself is a permanent observer with no vote. Nevertheless, even representation through the UK's Foreign and Commonwealth Office (FCO) is preferable to no representation at all, as is the case at the Arctic five meetings. Currently, consultation between Holyrood and Whitehall in international affairs, including EU business, where Scottish interests are at stake or where Scotland has independent powers (i.e. unreserved matters) is steered by a non-binding memorandum of understanding and concordats (United Kingdom, 2010b). However, the Scottish and UK parties cooperate on a distinctly unequal footing where ultimately Whitehall decides when, how and to what extent the Scottish government is involved (United Kingdom, 2010b: B.1 and D.1). Devolution has not made a substantive difference to a process that has continued "in similar circumstances to the arrangements in place prior to devolution" (ibid: B.1.4). In any case, the concordats are "binding in honour only" (ibid: B.1.2;

D.1.2) and although it is usual that a Scottish representative be included in UK-EU delegations, the Scottish government has protested its exclusion from at least one significant EU forum (Scottish Government, 2011g). In respect of the EU, the Scottish government has proposed an amendment to the Scotland Act to guarantee a representative of the Scottish government on UK-EU delegations on a statutory basis (United Kingdom, 2011b) but only the Westminster Parliament has the power to amend the primary legislation. Meanwhile, the Scottish government should rely on the general concordat on international relations (United Kingdom, 2010: D.1) to push for full inclusion in Arctic policy development and might even renegotiate the concordat on international relations to formalise Scottish inclusion in FCO delegations to Arctic bodies, comparable to that enjoyed, for example, by Greenland.

Scotland has not yet sought inroads into the Nordic Atlantic Cooperation group (NORA), with whose members it shares many pressing interests: for example, living marine resource management, search and rescue, out-migration from rural communities, and transport challenges (NORA, 2011; OECD, 2011; NBSS, 2011). NORA is currently funded by the Nordic Council and full Scottish participation would depend upon some arrangements by which Scotland could pay its way. The SNP has mooted full membership in the Nordic Council for an independent Scotland, but as long as Scotland remains an integral part of the UK, this is unimaginable (Nordic Council Membership, 2009). Neither Scotland nor any of its regions are members of the Northern Forum but if Scotland continues to develop its northern connections, membership would be an opportunity to strengthen ties, exchange experience and give it another route to the AC where the Northern Forum is an observer (Heininen, 2010b). Participation in either NORA or the Northern Forum would not threaten the careful constitutional balance of the Scotland Act.

Cooperation with the Arctic's indigenous inhabitants is always legally desirable (ICCPR, 1966; ICESCR, 1966; UNDRIP, 2007) but it is also economically pragmatic to integrate respect for the rights of indigenous and other Arctic peoples. There can be no stable access if land or maritime claims are unsettled. Thus, it is in the interests of non-Arctic states and regions with Arctic-orientated private business ventures to clarify ownership of Arctic resources. Scotland can afford to be more proactive in defending indigenous peoples' rights than the UK which, although "welcoming" the UNDRIP (2007), took the occasion to confirm its views that the rights of indigenous peoples to self-determination are *sui generis* and do not apply to any of the minorities within the UK (United Kingdom, 2007: 20-22). Despite an attempt to depict the Highland crofters as an "indigenous people"

comparable to the Saami, there is no serious discussion of indigenoussness in Scotland (MacKinnon, 2008). A pro-independence Scottish administration is likely to focus more on the right of *all Peoples* to self-determination and the corollary right to “freely dispose of their natural wealth and resources” as it is first to claim the same in respect of Scotland’s off-shore oil wealth and on-shore renewables (ICCPR, 1966, article 1(2); ICESCR 1966, article 1(2)).

In contrast to the United Kingdom’s Polar Regions Unit (devoted to both poles), Scotland’s international department contains no devoted Arctic section and it would be a simple and relatively cheap administrative step to establish an office to sit alongside its Edinburgh based Europe division.

### ***Economic Development***

A key priority of the Scottish government in any international cooperation is to promote business interests (Scottish Government, 2008). Furthermore, for the SNP to win the referendum, it must convince the Scottish electorate that its economy is both large and stable enough to stand alone.

### *Hydrocarbons*

Scotland remains a net exporter of oil and gas in contrast to the United Kingdom which as a whole is a net importer but hydrocarbon resources are reserved as a UK asset (Continental Shelf Act 1964; Scotland Act 1998, Schedule 5, Part II.D; United Kingdom 2011a). Extraction in the High North is still vastly more expensive than in more temperate regions but commercial opportunities are nevertheless opening and Edinburgh-based Cairn Energy holds 11 of Greenland’s 20 oil exploration licences (Offerdal, 2009; Cairn Energy, 2011). Supporting the Greenlanders’ claims to self-determination in an Arctic Strategy is not only good policy in terms of asserting the SNP’s own claim to independence, but is also an astute economic move as long as the Greenlandic administration continues with its very pro-extraction approach.

Scottish industry has opportunities beyond exploration and exploitation, with possibilities for Scottish ports to be used as transit hubs (see below) and for crude processing at the refinery at Grangemouth in the Forth Valley (the rest of the UK has a further eight refineries). Even if resources are as hoped, Greenland might still lack the human and capital resources to build its own refinery; construction may be prohibitively expensive given the high cost of importing materials, limited internal transport networks, short construction season and increasingly unstable permafrost (Eskeland & Flotorp, 2007) or a Greenlandic on-shore refinery might simply be unwelcome. Grangemouth would be in direct competition with numerous other refineries (in particular

Norwegian plants) and an Arctic strategy would have to demonstrate why Scotland should be preferred, perhaps emphasising relatively low labour costs and good transport connections to European markets.

### *Renewable Energy*

Scotland currently meets 1/3 of electricity supply through renewable energy and the Scottish government has a target of 100% by 2020 (Scottish Government, 2011c). The SNP is fundamentally opposed to the construction of new nuclear power stations, in contrast to plans to build a further eight elsewhere in the UK (ibid; New UK Nuclear Plant Sites Named). An Arctic strategy for Scotland would seek to develop cooperation and the exchange of technologies with the Arctic states in particular in wind and hydro-power. Subsea power cables connecting Scotland to the High North are also mooted (Scottish Government, 2011b). Scottish renewable energy businesses should be encouraged in developments in the High North but Scotland must also be reciprocally open to accepting investment and technology from its northern neighbours.

### *Living Marine Resources*

Scotland's longstanding fisheries currently constitute 68% of the UK's catch (compare 8.4% of the UK population) and contribute over 400 million GBP annually to the Scottish economy (SNP 2007; Scottish Government, 2011b). They are governed through the EU's Common Fisheries Policy (CFP) where Scotland does not have an independent voice or vote. Scotland's fisheries have traditionally been based in the rich territorial waters and exclusive economic zone (EEZ), in contrast to the distance water fisheries based in North East England which creates at best divided loyalties in the UK's negotiations in Brussels. The SNP's expressed policy is to defend Scottish interests against further centralisation of control in Europe and, as long as the current constitutional settlement stands, to fight for better representation at the EU (SNP, 2007).

The Scottish government has a dedicated Action Plan for the Marine and Fisheries Sector under its broader Climate Change Adaptation Framework which addresses threats and opportunities – from unpredictable weather, new species (some of which may be harvestable; others a threat to existing stocks), changes to migration patterns and potential loss of indigenous species (Scottish Government, 2011d). Scotland hopes to influence the CFP seeking “increased flexibility and adaptability” (ibid: 10). Certainly, the CFP will have to respond quickly to increasing and depleting stocks, and changed migratory routes in and out of EEZs and the high seas (Eskeland & Flottorp, 2007). Although there



is no Scottish control over quotas, Scotland's fishing ports, particularly Peterhead and Scrabster, are important landing hubs not only for Scottish vessels but also Faroese and Icelandic boats. An Arctic strategy might consider actions to increase the level of activity.

### *Shipping and Transport*

Notwithstanding the gradual melting of the Arctic Ocean's ice-sheet, the development of the Arctic Ocean as a regular thoroughfare is still some way off, given the persistent difficulties of the routes, the unpredictability of the weather (and consequent seasonal melting and freezing of the ice), and the lack of adequate port services en route (Lasserre, 2009). Nevertheless, given the time involved in constructing deep-water harbours and associated infrastructure, the Scottish government, having devolved control over transport, would be wise to assess the costs and benefits of developing its own harbours as potential transshipment hubs. By way of comparison, Norway's Arctic strategy contains well-developed analysis and policy regarding transport and infrastructure in its North (Norway, 2006: 68-70).

Further development of Scrabster along current lines, for example, would in some way compensate Caithness for the gradual decommissioning of the county's main direct and indirect source of employment, the Dounreay nuclear site (Scrabster Port Services, 2011a; Scrabster Port Services, 2011b). However, Scrabster will only become a viable port to connect to wider European markets if major investment is made in road and rail networks. Meanwhile, Invergordon and Aberdeen are more realistic for freight connections. At this point, a strategy could point to actions to review the economic feasibility of developing Scotland as a shipping hub, taking into account competition from neighbouring countries. Both Denmark and Iceland show interest in developing their own shipping support industries to serve the Arctic (Iceland, 2011; Denmark, 2011). In respect of access, Scotland would be unlikely to deviate from the UK's position that the Northwest Passage (NWP) and the Northern Sea Route (NSR) are international straits, but there is no major Scottish freight shipping fleet.

Scotland should take a keen interest in the development of a Polar Code, not least to protect its fisheries although any formal treaty would have to be ratified at UK level (IMO, 2011). An oil spill in the Arctic can do as much economic damage through perceptions of contamination as from physical pollution (compare Heininen, 2010a: 234, on nuclear contamination). Strict, mandatory measures would also support the use of Sub-Arctic harbours as transit shipping hubs.

### ***Environmental and Scientific Cooperation***

If in terms of economic development Scotland's interests as outlined appear to be largely focussed on what Scotland can get out of the Arctic, scientific exchange, in particular relating to the environment, provide opportunity for reciprocity.

Scotland's environmental law and policy is distinct from that in the rest of the UK, being a devolved matter, but the Scottish government shares the UK's four priority areas: (i) sustainable consumption and production; (ii) climate change and energy; (iii) natural resource protection and environmental enhancement; and (iv) sustainable communities (Scottish Government, 2011e).

The Scottish government portrays itself in its International Framework as a leader in "climate change and natural resource protection" (Scottish Government, 2008, para. 15) and the environment constitutes one of five core campaign themes for the SNP (SNP, 2011a). Environmental protection would therefore be a priority of any Scottish Arctic strategy to reinforce this message internationally and domestically. The main environmental risks to Scotland come from climate unpredictability (particularly increasing flood risk) and marine pollution (United Kingdom, 2010a). Sea-level rises put at risk low-lying Scottish coastal towns and villages. Nevertheless, the SNP also views climate change as providing a "wealth of opportunity" in terms of potential business and employment opportunities (SNP, 2011b). Traditional and contemporary Scottish activities are not under any major threat from climate change, though tourists might suffer from increased precipitation and a longer midgie season.

The Climate Change (Scotland) Act 2009 specifies a mandatory target of 80% reduction in greenhouse gas emissions by 2050, with an interim target of 42% by 2020 (s.1). Scotland anticipates that renewable energy will be a key factor in meeting this target. A comparable 2050 national target exists for the UK but Westminster seems to have shifted the emphasis from tackling the causes of climate change (Climate Change Act 2008, s.1; Taylor 2009) towards response and adaptation (United Kingdom 2010a). At UK level, interest in reducing consumption of fossil fuels, both domestically and internationally, is based on concern for energy security, not carbon emissions (United Kingdom, 2010a).

Climate change research and exchange of findings are priorities for Scotland. A strategy would emphasise Scottish participation in this research and identify actions to increase Scotland's contribution. Scotland cannot hope to compete with the resources of the United States in this regard, but might at least join the latter in "promot[ing] the sharing of Arctic research" and supporting

“collaborative research that advances the fundamental understanding of the Arctic region in general and potential Arctic change in particular” (United States, 2009, III.E.2).

Scottish universities and other research institutes, such as the Scottish Association for Marine Sciences, are involved in a number of collaborative research programmes and education technology transfer projects in the High North, including through the EU’s Northern Periphery Programme (European Regional Development Fund, 2008) and Leonardo da Vinci funds (Net-University Project, 2008). The University of the Highlands and Islands is an associate member of the University of the Arctic (full membership being reserved for institutions located within the Arctic Eight) and there is longstanding cooperation between Aberdeen and Stavanger (Norway) in the oil and gas industry in part through their respective universities (Wood, 2007).

Finally, Scottish expertise in nuclear decontamination at the Dounreay site and surrounding coastline could be shared with Norway and Russia, not least since it appears much of the nuclear contamination around the Norwegian coast emanates from the Dounreay and Sellafield (England) sites (Boelskifte 1986, Figure 3.2; Archer, 2009). Two decades’ experience in land reclamation with proven results at Dounreay could also serve Russia in cleaning up the Kola Peninsula.

### ***Residual Issues***

Military assets and consequently search and rescue capacity remain under UK control and cuts currently being implemented to facilities in Scotland will make it more complicated for the UK to support search and rescue in the High North (Maritime and Coastguard Agency, 2008; Johnson, 2011; Robertson, 2012); yet another indication that Westminster’s defence priorities remain focussed elsewhere. Military security does not feature in Scotland’s International Framework (Scottish Government, 2008).

### **Conclusion**

A decision to develop and publish an official Scottish strategy must be based on careful analysis of the political repercussions of such a move, taking into account its three most significant audiences. From the perspective of the Arctic States and their populations, it must be balanced to suggest that Scotland seeks not only to profit from the North but also brings something to the Arctic table. For this reason, a balance between economic opportunities and scientific cooperation might be struck. To the domestic Scottish audience, including those who favour the constitutional status quo, it will be a statement of self-identity and must justify Scottish interests in the High North, explain what

Scotland has to offer and what it has to gain, inside or outside the UK. And finally, but not of least importance, it will be a clear political statement to the London based government about Scotland's ambitions and distinct national identity. It may indeed be that on careful evaluation, a conclusion is reached, as has been for the UK, that it is not in Scotland's best interests to pursue an Arctic strategy *per se*.

Nevertheless, some efforts towards a coherent set of policy approaches to the High North would be of benefit to Scotland and a first step would be to establish an Arctic division within its international department. Archer (2009) argued that it is not so much the UK's disinterest in the Arctic that has led it to relative negligence of that region, but rather that the UK has more pressing concerns elsewhere and that other states have much stronger Northern interests to defend. This argument is less convincing with respect to Scotland which faces a much lesser (though not negligible) terrorist threat and does not bear responsibility for interventions in trouble zones of the Middle East and elsewhere. Scotland's geographical, historical and cultural connections to the Arctic are stronger than those in the rest of the UK and to that end, it is harder to say that Scotland's priorities lie elsewhere or even that many other countries (at least outside the Arctic eight) have stronger interests.

## Notes

1. Dependency is not here intended to suggest an economy relying on simple transfers from South to North, but rather to indicate lack of local control over the economy. This arises from decoupling of production and consumption: they export what they produce and import what they consume. Hence, demand and pricing is determined outside of the region.

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