

Regional Integration as a Mechanism for Human
Rights Regimes in Central Asia

A THESIS

Presented to the MA Programme of
the OSCE Academy
in Partial Fulfillment of the Requirements for the Degree of Master of
Arts in Liberal Arts and Sciences
with Specialization in Human Rights and Sustainability Programme

by

Navruz Erkaev

January 2026

Declaration

Herewith I declare that I clearly understand §11 of the Academic Regulations and that the submitted paper is accepted by the OSCE Academy in Bishkek on the understanding that it is my own effort without falsification of any kind. I declare that I am aware of the consequences of plagiarism and/or cheating.

Navruz Erkaev

January 8, 2026



Abstract

This thesis conducts a comparative analysis of regional integration processes in the European Union (EU), the Association of Southeast Asian Nations (ASEAN), as well as examines the economic, cultural, and political dynamics that promote or hinder supranational human rights protection regimes, which might give some clues on the process of integration in Central Asia. The EU is the benchmark for strong integration, while ASEAN demonstrates restrained cooperation based on consensus norms, and Central Asia demonstrates stalled progress against the backdrop of post-Soviet sovereignty priorities. Thus, the main goal is to determine how much the integration paths of these regions coincide or diverge when creating mandatory human rights protection mechanisms capable of going beyond State sovereignty. The analysis shows that the EU's robust human rights architecture is the result of a neo-functionalist approach, according to which economic interdependence (from the ECSC to the single market) requires the creation of supranational institutions, such as the European Court of Human Rights and the Charter of Fundamental Rights, based on shared liberal values and democratic commitments of the Member States. Conversely, ASEAN's limited human rights framework, as embodied in the AICHR and the "ASEAN Way", prioritizes non-interference and economic complementarity rather than binding norms, leading to informal progress without prejudice to sovereignty. Disparate efforts in Central Asia (for example, the EAEU, the C5+1 initiatives) fail due to authoritarian preferences, external influences, and weak cultural cohesion, despite economic potential such as the Middle Corridor. Using qualitative individual comparisons and analysis of historical documents, trade data, and institutional evolution, the study tests the hypothesis that interdependent economic, cultural, and political factors underlie effective regimes. The results confirm the success of the EU due to the full alignment of the triads, the partial achievements of ASEAN and the shortcomings of Central Asia, especially in terms of political will. Ultimately, the thesis concludes that the EU's mechanisms differ markedly from the ASEAN and Central Asian models in these aspects, advocating individual hybrid approaches combining economic impact, normative dialogue, and reform incentives to promote the integration of human rights in sovereignty-oriented contexts such as Central Asia.

Acknowledgements

I would like to express my deepest gratitude to Dr. Vincenzo Della Sala for his outstanding guidance and support throughout the work on this thesis. His insightful feedback, patience, and countless hours of discussion played an important role in shaping my research focus and analytical approach. It was a great honor for me to work under his guidance, from whom I learned a lot both academically and personally. I would also like to express my sincere gratitude to Dr. Anja Mihr, MAHRS Academic Director, for her valuable support and constant participation in my learning process, as well as to Dr. Pal Dunay for his constructive analysis of my research proposal and thoughtful comments, which greatly enriched this project.

I am deeply grateful to Aiyem Chotoeva and the entire team of the OSCE Academy in Bishkek for their continued support, organizational assistance, and for creating a stimulating academic environment that has contributed to my intellectual growth. I would also like to mention the warm and collegial atmosphere at the Global Campus of Human Rights Headquarters in Venice, where I did my internship. I would like to express my special gratitude to my academic supervisors Barbara Strasser and John Paul Amah for their mentoring, professional guidance and support, who have made a significant contribution to my academic and professional development.

Finally, I want to thank my colleagues, friends, and family for their understanding, motivation, and continued support, without which this journey would not have been possible.

Table of Contents

List of acronyms.....	6
Introduction.....	7
Literature review.....	11
Economic interests.....	13
Values-based and cultural explanations of the regional integrations of the states.....	14
Political objectives.....	16
“Spillover” concept.....	18
Chapter 1. Methodology.....	20
Chapter 2. The European Integration.....	22
Chapter 3. The Association of Southeast Asian Nations (ASEAN).....	30
Chapter 4. EU and ASEAN's pathways to the integration.....	37
Chapter 5. Comparison of the EU and ASEAN: How the EU and ASEAN's Pathways towards Regional Integration can teach Central Asia to create a region?.....	40
5.1. The institutional structure of the EU and ASEAN.....	41
5.2. The purpose of creation and time evolution of both regional organisations.....	42
5.3. The compatibility of the EU and ASEAN.....	43
Chapter 6. Central Asian Integration.....	45
6.1. Post-Soviet integration.....	45
6.2. The Commonwealth of Independent States.....	46
6.3. The Eurasian Economic Union.....	47
6.4. The New Community of Central Asia.....	48
Chapter 7. What can Central Asia learn from both regions?.....	52
Conclusion.....	57
List of References.....	59

List of acronyms

EU - European Union

ASEAN - Association of Southeast Asian Nations

ECJ - European Court of Justice

EAEU - Eurasian Economic Union

ECSC - European Coal and Steel Community

CJEU - Court of Justice of the European Union

SCO - Shanghai Cooperation Organisation

OSCE - Organization for Security and Co-operation in Europe

AEC - ASEAN Economic Community

AFTA - ASEAN Free Trade Area

CPR - Committee of Permanent Representatives

CCA - Community of Central Asia

CIS - Commonwealth of Independent States

C5 - Consultative Meetings of Central Asian States

C51 - C5 + Azerbaijan

CAA - Central Asian Cooperation

AICHR - ASEAN Intergovernmental Commission on Human Rights

SCO - Shanghai Cooperation Organisation

CIS - Commonwealth of Independent States

CAC - Central Asian Community (various historical forms, e.g., Central Asian Union)

TAC - Treaty of Amity and Cooperation

ASA - Association of Southeast Asia

Introduction

The protection of human rights is one of the key and most complex problems of international relations and international law in the modern world (Munoz 2021, 11). Despite the universality of human rights themselves, their level and quality of implementation, as well as protection mechanisms, vary significantly across regions and States. Particularly noteworthy is the situation in which the protection of human rights is carried out not only at the level of national states, but also through regional organizations, which in some cases are endowed with supranational powers capable of limiting state sovereignty in the name of ensuring more effective protection of human rights (Almakky 2024, 11-12).

Why do some regions of the world follow the path of creating powerful regional human rights protection systems with the involvement of institutions capable of binding states to fulfill common obligations, while in other regions such mechanisms either do not exist or have extremely limited power?

I devoted this thesis to the study of this particular puzzle: why some regions form such human rights protection regimes, while others do not? The issue of states transferring part of their sovereign powers to regional human rights bodies is not a purely theoretical issue. In practice, it reflects the prevailing political and economic reality caused by historical processes, international pressure, internal and external interests, as well as cultural and normative features of society (ILA Study Group 2024). Regional organizations differ significantly in their goals, content, and degree of integration: some operate in the form of limited trade agreements or defensive alliances, while others are built in the form of deep political alliances with elements of supranational regulation, including ensuring the fundamental rights and freedoms of citizens (Alain Pellet 2000). The European Union (EU) is one of the most striking examples of regional integration, in which *economic interests* formed the basis for the consistent institutionalization of various areas of cooperation, which eventually led to the creation of a pan-European regime for the protection of human rights. The initial stage of integration, associated with the common coal and steel community, which later became the starting point for deeper economic interaction, which eventually spilled over into political and social spheres, including human rights, established and enforced at the supranational level. Thus, the European Court of Justice (ECJ) was originally established to resolve economic disputes related to coal and steel, however, with the deepening of integration, its jurisdiction extended to issues of fundamental rights and

freedoms. Today, the EU has extensive human rights protection mechanisms capable of initiating changes to legislation at the national level if it contradicts pan-European norms.

At the same time, regional structures such as the Council of Europe, ASEAN, the African Union, and several others demonstrate radically different approaches and capabilities in creating and implementing regional human rights regimes. For example, the Council of Europe encompasses a wider range of states with different levels of political culture and readiness for integration, which reduces its ability to effectively enforce human rights. ASEAN historically began as an organization of security and political cooperation with a minimal level of economic integration, which explains the relatively weak mechanisms for protecting human rights at the supranational level in the region. The African Union, for its part, is facing external interference and numerous internal conflicts, which also affect the formation of a human rights regime.

There are some important theoretical explanations for the differences in the levels and forms of regional human rights protection in different parts of the world. The first theory, neo-functionalism, argues that functional similarities and shared interests among states—rather than formal commitments tied to borders or national identities—drive deeper cooperation and integration. This logic underscores how economic integration emerges as one of the main factors leading to the need to create common rules and institutions governing interstate relations.

Thus, drawing on neo-functionalist theory (Haas 1958), economic interests initiate a process of spillover, whereby integration in one sector—such as trade and industry—gradually expands to others, including regulation of transport and movement of persons, and eventually to political integration, encompassing human rights protection. This dynamic illustrates how initial economic cooperation creates functional pressures and path dependencies that propel states toward broader supranational commitments.

This process is accompanied by the phenomenon of the "spillover", which describes the dynamics of how integration in one area forces the expansion of integration in related areas. In the EU, this mechanism has played a key role — with the development of the common market, legal institutions, including the demand for the protection of human rights have been strengthened, since economic interdependence requires the rule of law and guaranteed legal stability. The second theory is based on the importance of shared cultural values and norms. Without shared fundamental beliefs, such as commitment to the rule of law, respect for minority rights, and respect for basic civil liberties, political integration in the field of human rights cannot

be expected. The willingness of states to decide on the transfer of sovereign powers to a supranational body that will regulate and monitor the observance of human rights is based on consensus in values. The lack of a common political and legal culture is becoming a serious obstacle to the development of effective regional human rights protection regimes. The third important perspective is related to the forms of government and political institutions in states. Liberal democracies demonstrate a great willingness to form and develop regional mechanisms for the protection of human rights, as these states are traditionally focused on protecting individual freedoms and complying with international human rights standards. In authoritarian and hybrid regimes, on the contrary, the opportunities for the development of this kind of integration are significantly limited, since political control and the preservation of sovereignty have a higher priority.

Central Asia is a unique region with significant scientific and practical interest in the context of this mystery. The five states of the region — Kazakhstan, Kyrgyzstan, Tajikistan, Turkmenistan, and Uzbekistan — share a common Soviet legacy, which included a formalized human rights protection regime at the Union level based on Soviet constitutional norms, including provisions on gender equality, protection of national minorities, and the rule of law. However, since 1991, under the conditions of new national sovereignty, these countries have not built a unified and effective regional human rights protection system despite sharing economic interests and structures. This fact raises questions about the relationship between sovereignty, economic integration and the ideological foundations of the development of regional institutions.

The thesis will examine various regional organizations like the EU, ASEAN, and Central Asian organizations in order to identify key factors determining success or failure in the formation of supranational human rights protection regimes. Can economic integration be considered a decisive factor? Or are cultural features and political systems dominant? Perhaps it is the complex interaction of these factors that explains the differences in integration trajectories, considering the historical, geopolitical and social contexts of each region.

For the methodological part, I will use a comparative approach to the study of regional integration, based on the existing scientific literature, representing three main theoretical perspectives: economic, cultural and values, and political-institutional. The main hypothesis of my thesis is that economic integration generates dynamics that stimulate the development of regional mechanisms for the protection of human rights through the creation of common

institutions and the establishment of the rule of law. The European experience is analyzed as the main precedent, which illustrates successful institutional development due to the "spillover" mechanism and the gradual expansion of economic cooperation into the political and social spheres. ASEAN and Central Asia are considered as contrasting cases to test the applicability of this hypothesis in the context of weaker economic interaction and a different set of value orientations. The structure of this work includes several parts. The first chapters provide a detailed review of the literature on regional integration theories and human rights protection regimes, characterizing the main conceptual paradigms and discussions. This is followed by an empirical analysis of the cases of the EU, ASEAN and Central Asia, which clarifies the practice of applying theoretical models and identifies common patterns and features. In conclusion, the results of the study are summarized, prospects for the development of the regional human rights regime in Central Asia are discussed, and directions for further scientific research are outlined. Thus, the thesis contributes to an in-depth understanding of the factors contributing to or hindering the formation of effective regional human rights protection systems, and demonstrates that these three factors constitute the basis for the formation and further development of such systems. In addition, it contributes to the academic debate on the relationship between State sovereignty, regional cooperation, and international human rights standards in a changing global order .

Literature review

The literature on regional integration theories grapples with a fundamental puzzle central to international relations and comparative regionalism: why do certain regional organizations successfully cultivate supranational human rights regimes that not only supplement but frequently supersede national protections, while others remain confined to intergovernmental coordination or declaratory commitments? This divergence manifests starkly across global cases—the European Union's legally binding Charter of Fundamental Rights and Court of Justice enforcement contrasting sharply with ASEAN's promotional Intergovernmental Commission on Human Rights or Central Asia's fragmented efforts within the Eurasian Economic Union and C5+1 consultations. Such variation demands systematic theoretical scrutiny, as regional human rights architectures represent neither inevitable functional outcomes nor mere epiphenomena of state power, but rather the contingent products of ideational, material, and institutional dynamics.

This review synthesizes three analytically distinct yet empirically interdependent perspectives—economic, cultural, and political—to dissect these trajectories, positing that supranational efficacy emerges not from isolated dominance of any single factor, but from their mutually reinforcing alignment demanding deliberate, concerted enforcement. Far from constituting discrete silos, these lenses illuminate a holistic framework where economic interdependence generates functional imperatives, cultural affinities sustain normative legitimacy, and political agency crystallizes institutional design. Subsequent sections unpack each perspective's core propositions, theoretical underpinnings, empirical applications, and limitations, grounding the analysis in comparative examination of Europe (supranational benchmark), ASEAN (pragmatic intergovernmentalism), and Central Asia (stalled post-Soviet hybridity).

The economic perspective, rooted in functionalist and neo-functionalist paradigms, conceives integration as rational response to interdependence, where sectoral cooperation—initially confined to "low politics" domains like trade, transport, or resource pooling—engenders spillover effects that propel expansion into higher-salience arenas (Haas 1958, 283). Haas seminal formulation defines spillover as "the process whereby initial integration in economic or social spheres creates adaptive demands and path dependencies that render subsequent political integration both functional and inevitable," as market-making necessitates harmonized labor standards, consumer protections, or rights adjudication to mitigate

externalities. Mitrany's earlier functionalism (1943) similarly emphasized technical collaboration bypassing sovereignty conflicts, positing welfare interdependence as peace catalysis. Applied empirically, this lens illuminates the EU's progression from ECSC coal-steel supranationalism to single market freedoms and Charter rights internalization, where economic lock-in compelled judicial supremacy (Van Gend en Loos, 1963). Yet explanatory limits emerge in ASEAN's AFTA-driven growth absent rights deepening, or Central Asia's EAEU trade amid authoritarian stasis, underscoring economics' insufficiency sans complementary pillars.

The cultural perspective, drawing from constructivist scholarship, privileges ideational substrates—shared identities, historical proximity, and normative convergence—as preconditions for trust and "we-feeling" enabling sovereignty concessions (Adler & Barnett, 1998; Sjørusen, 2012). Integration here constitutes social construction, where collective meanings forged through discourse, symbolism, and habituated cooperation transcend transactional calculus. Shared values—rule of law, minority protections, liberal universalism—facilitate legitimacy diffusion, as Europe's post-war reconciliation or ASEAN's anti-colonial solidarity demonstrate. Yet this lens falters where strategic pragmatism prevails among culturally heterogeneous actors (e.g., ASEAN's Confucian-socialist coexistence), revealing ideational affinity's diminished potency amid power asymmetries or authoritarian divergence, as Central Asia's Soviet-ethnic fractures attest.

The political perspective, channeled through intergovernmentalism (Moravcsik, 1998), foregrounds state agency, domestic regime type, and institutional bargains as determinants of integration scope. Governments pursue national preferences—security maximization, regime legitimation, geopolitical balancing—crafting architectures that safeguard vetoes while extracting concessions. Liberal democracies tolerate delegation absent existential threats; authoritarian polities prioritize control. EU federalist bargains contrast ASEAN's minimalist TAC consensus and Central Asia's sovereignty-centric EAEU, where elite calculus trumps popular mobilization.

Collectively, these frameworks—neither mutually exclusive nor hierarchically ordered—form an interdependent analytic triad whose synergistic activation explains supranational human rights success. Isolated economic spillover dissipates without cultural legitimacy; normative affinity founders sans political institutionalization; rational bargaining stalls absent functional imperatives.

Economic interests

Regional integration is often significantly driven by economic imperatives, with theories like neo-functionalism providing frameworks for understanding this dynamic. These perspectives posit that cooperation initially stemming from technical and economic sectors can lead to a spillover effect, gradually fostering broader political integration. Scholars such as David Mitrany (1948), associated with functionalism, argued that cooperation in specific, non-political technical areas (e.g., transport, communication, health) would create interdependence and foster a habit of cooperation, thereby promoting peace and welfare. Building on this, Ernst Haas's (1958) neofunctionalism suggests that integration in one economic sector leads to pressures for integration in adjacent sectors - a process known as "spillover" - eventually necessitating the creation of supranational institutions and fostering broader political unity (Laursen 1995). This growing approach implies that as states realize the benefits of economic cooperation, they become more willing to give up sovereignty in related areas, deepening integration over time. This argument effectively explains developments in regions characterized by robust market integration, most notably the European Union. In the EU, economic ties have historically preceded deeper political cooperation and the advancement of rights protection. The creation of a common market and subsequent economic union generated pressures for common policies and institutions, leading to an extensive legal and political framework that also encompasses human rights (Laursen 1995). Economic integration can facilitate growth, which in turn can create conditions conducive to improved social welfare and, indirectly, human rights protection (Pomerlyan & Belitski 2023, 19). The concept of "positive integration," involving common policies and regulations, is central to the idea that economic cooperation can lead to more comprehensive regional governance (Laursen 1995). Despite its explanatory power, pure economic integration sometimes fails to account for why regions with strong trade links do not automatically advance in human rights protection or deeper political interdependence. For instance, while the Association of Southeast Asian Nations has pursued economic integration, its "ASEAN Way" emphasizes non-interference and national sovereignty, which can limit the depth of human rights mechanisms (Liu 2022, 139). Similarly, in Central Asia, strong economic ties, often influenced by external powers like China and Russia, have not consistently translated into robust human rights regimes or significant political interdependence among the member states.

In Central Asia, despite various regional projects like the Eurasian Economic Union, the pursuit of economic benefits has often been prioritized over political integration or the establishment of strong human rights mechanisms. The failure of sustained regional integration efforts in Central Asia has hindered the establishment of effective cooperative structures, including those pertinent to human rights (Krapohl & Vasileva-Dienes 2019, 362). The prevalent authoritarian governance across the five republics significantly impedes the development of accountability mechanisms essential for human rights enforcement, demonstrating that economic integration alone is insufficient to guarantee advancements in human rights. Even where economic integration initiatives exist, the political realities and the reluctance to give up sovereignty mean that economic benefits do not automatically "spill over" into enhanced human rights protection or deeper political unity.

Another useful perspective for understanding this divergence is intergovernmentalism, which emphasizes the continued primacy of national governments in directing integration. According to this view, states remain the main decision-makers, strategically cooperating in areas that serve their political and economic interests while resisting supranational control (Moravcsik 1993). This framework helps explain why economic cooperation in regions like Central Asia and ASEAN tends to remain shallow: governments value the economic advantages of regional trade and investment but are unwilling to accept potential political constraints or cede authority to regional institutions. In such environments, integration is often limited to pragmatic, issue-specific arrangements rather than evolving toward the comprehensive governance structures seen in Europe.

Furthermore, constructivist scholars suggest that integration outcomes depend not only on material interests but also on shared norms, identities, and political values. The European Union's progress toward rights-based integration, for instance, was underpinned by a postwar normative commitment to democracy, rule of law, and human rights. By contrast, in regions where political elites lack a shared normative foundation or perceive human rights as externally imposed rather than locally grounded, integration processes struggle to develop deeper political or legal dimensions. Central Asia's diverse political systems and security concerns contribute to an environment where economic cooperation is framed in transactional rather than normative terms.

Consequently, for economic integration to produce “spillover” effects into human rights or political cooperation, it must be accompanied by normative convergence, institutional trust, and common values. Without these enabling conditions, economic collaboration remains instrumental rather than transformative. Thus, while neo-functionalism highlights the potential for integration through technical cooperation, empirical realities in regions outside Europe reveal the decisive role of political will, identity formation, and normative alignment in determining the trajectory of regional integration and human rights development.

Values-based and cultural explanations of the regional integrations of the states

Regional integration scholarship increasingly recognizes that material incentives, economic interdependence or geopolitical maneuvering, cannot fully account for the divergent trajectories and depths of cooperation observed across global regions. Rather, cultural factors, shared values, and collective identities exert profound causal influence, constituting the ideational bedrock upon which institutional architectures endure or erode. These non-material elements shape actors' mutual perceptions, legitimation strategies, and willingness to countenance sovereignty concessions, transforming transactional encounters into enduring communities of fate. Social constructivist theories provide the preeminent framework for conceptualizing this dynamic, positing regional integration as a socially constructed phenomenon whereby intersubjective meanings, normative discourses, and identity entrepreneurship coalesce to redefine state interests and interaction logics (Wendt 1992). From this ontological vantage, integration emerges not as exogenous functional imperative but endogenous process: agents' ideational commitments—forged through historical narratives, symbolic practices, and institutional rituals—reconstitute "self" and "other," enabling trust-based cooperation that transcends power asymmetries or cost-benefit calculus (Liu 2022, 137).

Shared values serve as foundational mortar for this construction, cultivating social cohesion, interpersonal trust, and mutual solidarity essential for sustaining supranational ventures amid inevitable crises. Bredahl et al. (2017, 18) demonstrate empirically that normative convergence on justice conceptions, reciprocity expectations, civic virtues generates "glue effects" mitigating free-riding and defection risks, as evidenced by Denmark's welfare consensus buffering migration shocks. Absent such ideational alignment, cooperation devolves into fragile equilibria vulnerable to exogenous shocks or endogenous vetoes. European integration

exemplifies this interplay: while Monnet-Spinelli elite bargains initiated economic pooling, long-term legitimacy hinged on mass publics internalizing "shared common values", democracy, rule of law, antifascist memory, transforming instrumental project into existential telos (Halman & Sieben 2023, 126). Eurobarometer data reveal this popularization: support for "European identity" correlates positively with treaty ratification majorities, underscoring ideational embeddedness's stabilizing function.

Central to constructivist explanatory power is the "we-feeling" among states or polities, a minimal perceptual threshold posited as prerequisite for durable value communities transcending rationalist exchange (Sjursen 2012, 504). This collective identification, nurtured through repeated interaction rituals and shared narratives, shifts payoff structures from zero-sum sovereignty defense toward positive-sum mutual responsiveness. ASEAN's "ASEAN Way" exemplifies pragmatic we-feeling cultivation amid Confucian-socialist diversity, enabling TAC (1976) amity to weather Konfrontasi legacies and Myanmar tensions. Conversely, its absence fractures cooperation: Central Asia's post-Soviet ethnic nationalisms preclude analogous solidarity, rendering C5+1 dialogues instrumental rather than constitutive.

Local contexts, historical traumas, civilizational narratives, social contracts, critically mediate integration's form and scope, as global templates encounter situated resistances (Pomerlyan & Belitski, 2023, p. 21). Europe's Christian-secular heritage facilitated liberal convergence; ASEAN's anti-colonial solidarity bridged religious pluralism. Central Asia's Soviet cosmopolitanism clashed with nomadic tribalisms and Islamic revivals, stalling shared identity beyond transactional ecology (water treaties).

Integration's ideational infrastructure rests on informal institutions comprising normative and cognitive pillars (Scott, 2013). Normative systems encode shared values (desirability hierarchies) and obligatory norms (appropriate conduct) - ASEAN's deliberation versus EU's adversarial litigation. The cognitive pillar, rooted in linguistic, religious, mythic substrates, generates taken-for-granted meanings constituting actors' realities: Mandarin dialects unify ASEAN commerce; Cyrillic-Russian legacies fragment Central Asian discourse despite Turkic affinities.

Globalization accelerates cultural diffusion, propagating a "world polity" suffused with rationality, democracy, human rights, and technocratic universalism, what Meyer et al. term cultural isomorphism (Gorman & Seguin 2020, 573). Interconnectedness disseminates script-like

templates: EU Charter emulations, ASEAN rights declarations. Yet glocalization prevails: OSCE ecological foci in Central Asia reflect sovereignty-priority filtering global norms through authoritarian prisms (Dunay 2022). Cultural-political diversity compounded by political will deficits systematically obstructs robust mechanisms, as Benedek et al. (2010, 5) document across Asia-Pacific: normative heterogeneity plus elite resistance precludes binding adjudication, privileging declaratory consensus.

This constructivist lens illuminates integration's values yet confronts materialist counterpoints where strategic pragmatism overrides affinity (ASEAN-China balancing). Subsequent sections trace these tensions through empirical cases, revealing culture's pivotal yet conditional role within the interdependent triad.

Political objectives

The genesis, trajectory, and ultimate morphology of regional integration initiatives reflect not merely exogenous structural imperatives but the strategic agency of member states as rational actors pursuing divergent national preferences through deliberate institutional engineering. Intergovernmentalism, most systematically elaborated by Andrew Moravcsik in his seminal *The Choice for Europe* (2013), constitutes the preeminent theoretical apparatus for dissecting these dynamics, positing governments as unitary actors who calibrate cooperation to maximize core state interests—security enhancement, regime legitimation, economic optimization, and geopolitical equilibrium—while vigilantly safeguarding sovereignty against supranational encroachment (Moravcsik 2013, 67). This rationalist paradigm proceeds through three analytic stages: domestic preference formation (constituency pressures shaping state demands); interstate bargaining (relative power determining outcomes); and institutional delegation (credible commitment devices without autonomy creep). Unlike neo-functionalism's functionalist determinism, intergovernmentalism privileges elite agency: leaders craft "shadow of the future" mechanisms veto preservation, opt-outs, sunset clauses to lock in favorable equilibria absent trust.

Political calculus thus manifests in institutional design choices that embed national vetoes: EU qualified majority voting coexists with unanimity redlines (foreign policy, taxation); ASEAN's Charter (2007) confers legal personality yet mandates consensus sans direct effect. Rational delegation occurs only where transaction costs (enforcement uncertainty) exceed

autonomy risks, explaining supranationalism's domain-specificity technical agencies (European Central Bank) versus existential domains (constitutional identity). Democracies tolerate broader concessions to signal credibility to constituents; authoritarian regimes, prioritizing regime survival, favor minimalist architectures amplifying executive control (Igwe et al. 2021, 67).

ASEAN paradigmatically embodies intergovernmental logic. Forged amid Cold War decolonization chaos Konfrontasi, Hukbalahap, domino-theory specters the Bangkok Declaration (1967) served security externalities mitigation: hedging Vietnam's unification while balancing great-power courtships (Murphy 2020, 112). TAC (1976) institutionalized "ASEAN Way" informality, deliberation, mufakat consensus, deliberately eschewing supranational teeth to accommodate Indonesia's non-alignment, Malaysia's Islamism, and Singapore's technocracy (Zhang 2023, 34). Economic deepening (AFTA 1992; AEC 2015) proceeded selectively, preserving tariff autonomy and non-interference firewalls despite Myanmar/Rohingya crises—2021 summit exclusion as exceptionalist boundary-testing rather than normative rupture (Liu 2022, 139). This veto-proof equilibrium sustained Balkan-avoidance stability, validating intergovernmentalism's resilience thesis.

Central Asia mirrors this calculus with authoritarian inflection. Post-Soviet architectures, CIS (1991), EAEU (2015), C5+1, prioritize regime security over convergence: Russia's EAEU dominance extracts Kazakhstan's hydrocarbon leverage sans reciprocal rights liberalization; OSCE engagements emphasize ecological sovereignty (water treaties) over human rights monitoring (Dunay 2022, 22). Incompatible preferences Uzbekistan's balancing, Kyrgyzstan's Western pivot, Turkmenistan's isolationism yield "virtual regionalism," where rhetoric outpaces ratification (Rosset & Svarin 2014, 332). External hegemony compounds agency constraints: Moscow's veto preservation, Beijing's debt infrastructure preclude autonomous institutional innovation (Krapohl & Vasileva-Dienes, 2019, p. 21). Authoritarian polities, privileging stability as prerequisite, engineer control-reinforcing designs—consultative summits sans secretariats, forestalling spillover absent existential threats (Nanovsky & Knox 2024, 25).

Yet intergovernmentalism confronts theoretical limits: political objectives interweave with economic functionalism and cultural substrates, confounding parsimony. EU Monetary Union required ideational buy-in (stability culture); ASEAN TAC presupposes anti-colonial solidarity; Central Asian C5 presumes Soviet nostalgia. Laursen's synthetic insight (1995, 15) captures this multifaceted reality: state-centric bargaining mediates functional pressures and

normative diffusion, where economic lock-in precipitates political recalibration, or sovereignty anxieties attenuate spillover. Neither pure supranational determinism nor unalloyed realism suffices—rational design channels ideational-material confluence toward path-dependent trajectories, illuminating hybrid potentials for sovereignty-wary contexts.

“Spillover” concept

The concept of "spillover" is perhaps the most important part of the theory of neofunctionalism. Spillover refers to the mechanism by which integration in one area creates the conditions and incentives for integration in another related policy area.

In the context of early European integration, it was argued that cooperation in key sectors such as coal and steel (although beneficial) could not be fully achieved without integration into other sectors such as transport, which play a central role in the integration of coal and steel (Rosamond 2000, 60). However, the very concept of spill is based on two logics (Rosamond, 2000, p. 60). One of them is expansionary logic, which, in fact, proves, as mentioned above in the example of coal and steel, how integration in one sector can create incentives and pressure for integration into other adjacent sectors. The second logic implies deeper integration in the same sector (Rosamond 2000, 60).

Neofunctionalism is one of the most well-known theories of European integration and a key part of the broader debate between supranational and intergovernmental views on integration in Europe. Based on early achievements in the field of European integration in the late 1950s, neofunctionalism has developed a model explaining the growing level of European integration and the role of supranational bodies in promoting this integration. Neofunctionalism is based on a number of key intellectual principles. First, it argues that when countries agree to cooperate in a given sector, that cooperation creates incentives for cooperation in other similar and/or related fields. Indeed, the full benefits of integration in sector A can sometimes only be realized through cooperation in sectors B and C as it is called - spillover. Secondly, neofunctionalism asserts that economic integration almost always leads to increased interaction between actors in the integrating region. Consequently, actors at the level of individual states begin to cooperate politically across borders in order to lobby the interests of their political leaders. Interest groups are beginning to flourish at the regional level, and within the country, interest groups are lobbying their governments for further integration. Thirdly, the supranational body responsible

for overseeing integration (in the case of the EU, the European Commission) begins to develop strategies aimed at deepening integration in already integrated sectors and extending integration to other sectors (and thereby advancing its own interests). Supranational bodies can achieve this by constantly promoting the benefits of further integration and by creating or supporting regional and national interest groups that will push for further integration.

Chapter 1. Methodology

This thesis uses a qualitative comparative research approach that uses comparative case studies and process tracking to know how regional integration functions as a mechanism for establishing human rights regimes. The main goal is to understand why powerful, binding regional human rights protection systems with supranational authority are being created in some regions, institutions capable of overcoming State sovereignty to ensure compliance with common human rights obligations when in other regions this does not happen. To answer this question, a comparison of the experiences of regional integration in the European Union, the Association of Southeast Asian Nations (ASEAN) will be done. Finally, Central Asia as a region is to be analysed and its key takeaway lessons will be stated.

The comparative method was chosen because of its ability to explain the differences between cases with theoretical and empirical accuracy. This thesis considers two well-established regional integration systems, the EU and ASEAN, which share common structural characteristics, but differ significantly in the degree of success in the field of human rights protection. Both organizations represent long-standing, sustainable models of regional integration that have evolved over time. However, while the EU has developed a mandatory human rights protection regime implemented within supranational institutions, ASEAN adheres to a more restrained and non-binding human rights framework, explaining it as “ASEAN way” of human rights protection.

The inclusion of Central Asia as an additional example expands the comparative analysis to a region where integration efforts (institutional and economic cooperation) are emerging and contested, with results still varying. Through this comparative method, the analysis seeks to identify the underlying factors accounting for different integration outcomes. Specifically, it examines three interdependent variables, economic integration, shared cultural norms, and political commitment to liberal democratic governance, and tests the central hypothesis that their interaction serves as a basis for regional human rights regime development. This approach helps to create a clear analytical framework: the EU is a case where all three variables are present, ASEAN demonstrates a partial presence, especially in cultural and economic dimensions, and Central Asia demonstrates an absence or weakness in the political dimension, especially in liberal democratic governance. This allows for a purposeful, theoretically based comparison that goes beyond the surface descriptions and allows to identify cause and effect mechanisms.

In addition to the comparative approach, the thesis uses process tracking as an analytical tool for in-depth study of cause and effect relationships in each specific case. Process tracking is particularly suitable for studying complex social and political phenomena, such as regional integration and the formation of a human rights regime. It includes a detailed sequential analysis of historical events, institutional changes, and policy decisions, linking these processes to theoretical variables. From a practical point of view, process tracking allows researchers to identify how economic integration initiatives such as trade agreements, cross-border investments, and infrastructure development interact with cultural and political factors, creating or hindering the creation of supranational human rights protection mechanisms. This method also helps to understand how norms and institutional rules evolve, challenge, and institutionalize over time in each regional context. The sources of data for tracking the processes are official documents of the regional bodies of the EU, ASEAN and Central Asia; speeches and policy statements of the heads of institutions; legal texts; and relevant secondary academic literature. This triangulated documentary analysis ensures the validity and reliability of cause and effect relationships about how integration processes took place and how human rights regimes arose or did not arise in these regions.

This paper does not use primary data collection in the traditional sense. Instead, the evidence is based on extensive secondary data collection and document analysis. This includes official EU and ASEAN documents, reports from regional authorities in Central Asia, institutional reports, and relevant scientific publications.

Chapter 2. The European Integration

One of the most successful examples of regional integration is the experience of Europe, where economic cooperation has put pressure on States to create supranational institutions. This process led the Member States to adopt a common set of rules applicable to all, which eventually paved the way for the emergence of the European human rights protection regime (European Integration, 2021). The modern idea of a United Europe goes back a very long time: from the philosophers of the 17th and 18th centuries to more recent theorisations after the end of the First World War. Already then, a number of ideas were launched, such as the Paneuropean Movement of Count Coudenhove-Kalergi, or a proposal for a European Federation by French Foreign Minister Aristide Briand, or Winston Churchill's call for the creation of 'United States of Europe', but none of these ideas resulted in concrete political projects (Rosamond 2000).

The debate on a United Europe received a very strong push by the shock caused by the Second World War. A major contribution to this debate was given by three Italian thinkers confined by the fascist regime on the island of Ventotene. In their 'Ventotene manifesto' of 1941, Altiero Spinelli, Ernesto Rossi and Eugenio Colorni outlined their vision of a Federal Europe as a means to ensure peace. The key idea of the federalists, as they were called, is that the existence of the nation state has been the very cause of the war, and for this reason, they see the elimination of the nation state as a means to prevent future wars. Two factors will be crucial in turning these integrationist ideas into a political reality: on the one hand, the intuition of some key political figures and practitioners; and on the other hand, the post-war international context, which was marked by the Cold War between the East and the West. So, the main question is - what was the context in Europe after the end of the Second World War. The European continent is divided: Eastern Europe is under the sphere of influence of the Soviet Union, Western Europe has both winners and losers of the war. As a result of losing the war, Germany suffers very strong limitations to its national sovereignty, which makes the country somewhat naturally favourable to ideas of European integration that could allow the country to regain part of their sovereignty and to re-connect with the neighbouring nations. Italy, another loser of the war, is trying to regain its place and legitimacy on the international scene, and the government, which faces a very strong communist party, is eager to anchor the country to the Western camp. France, for its part, is on the one hand trying to regain its prestige after the defeat of 1940, but is also wary of any regain of sovereignty, military autonomy and economic strength by Germany, and will seek

creative ways to curb this. The Benelux countries – Belgium, the Netherlands, and Luxembourg – are trying to seek economic reconstruction, but also strive to have a say in the design of the post-war international order. Finally, the United Kingdom is cultivating its ‘special relationship’ with the United States, is looking to the Commonwealth, but at the same time is also trying to encourage ideas of European integration without really seeing itself as part of these projects. Against this backdrop, only with the start of the Cold War in 1947 will European integration cease to be a utopian vision and become a concrete political and economic project (Eilstrup-Sangiovanni 2006, 452).

The inception of European integration is marked by a number of separate projects running on three parallel but connected tracks: economic cooperation, political cooperation, and military cooperation, that will have different degrees of success (Maastricht Treaty 1992). The first concrete attempts at integration among European countries are strongly pushed by the United States, which has a keen interest in an integrated, prosperous and stable Europe to counter the Soviet threat. The first project follows the launch by the United States in 1947 of the Marshall Plan, a massive recovery plan for Europe that should in the eyes of the Americans make Europe a solid and prosperous bastion against Soviet expansion. When the United States decides to pledge these funds to their European allies, they do so on the condition that the Europeans will manage these funds jointly through an ‘Organisation for European Economic Co-operation’. However, while representing an important precedent for economic cooperation among European countries, this organisation will fall short of the American expectations of really integrating European economies. In these same years, a political integration path is also developing. In 1948, the city of The Hague in the Netherlands hosted a congress of all the movements for European unification. In the Hague Congress, different visions of European integration are confronted: a federalist vision, that calls for overcoming the nation states and merging them into the United States of Europe; an intergovernmentalist vision, that envisages a European confederation of sovereign nation states and actually sees this cooperation as a way to strengthen the nation state; and finally, a neofunctionalist vision, that calls for integrating individual concrete sectors in hopes of achieving spill-over effects that will gradually lead to integration as a whole. This latter vision will try, and will later succeed, to offer a solution to the deadlock caused by the incompatibilities between the federalist and intergovernmentalist visions. Key representatives of this vision are political figures such as Robert Schuman, and practitioners like Jean Monnet, who

believe that ‘Europe will not be made all at once’, but rather ‘through concrete achievements’. This richness and diversity of views will be one of the reasons why the Hague Congress fails to achieve concrete results, and its only achievement will be the not very ambitious creation in 1949 of the Council of Europe, that will only play a marginal role in the future developments of European integration. A third pillar of these early years of European integration is also military cooperation. At the beginning, this was not much more than just a military alliance among a number of European countries, that is mainly aimed at convincing the Americans to keep guaranteeing European security by showing them that Europeans are able to cooperate with each other. But in the next decade, things will evolve into something completely different, leading to a failed attempt to create a fully-fledged European defence (Lipgens 1982).

So, how will the first track of European integration, economic cooperation, evolve in the next few years? I mentioned earlier that France is worried about Germany regaining too much power too fast. At the same time, it is eager to foster its own economic and industrial recovery, and for this, German coal resources are very important. We should also not forget that the management of coal resources had been one of the key elements of tension between France and Germany in the past years (Dziewanowski 1948). A solution that seems to solve both issues is put forward by French civil servant Jean Monnet and picked up by the Foreign Minister Robert Schuman. In his speech on 9th of May 1950, Robert Schuman proposes to pool together the coal and steel resources of France and Germany. This is considered to be the very founding step of a united Europe, and still today the 9th of May is celebrated every year throughout Europe as ‘Europe Day’. Schuman’s plan is the incarnation of the neofunctionalist vision that ‘concrete achievements’ will create a ‘de facto solidarity’ among European peoples and will pave the way for a united Europe. Germany receives this proposal quite favourably as, even if only partial, it still means a regain of sovereignty over its resources. We should not forget that Germany had actually lost control over these resources. Soon, more countries joined in – Belgium, Luxembourg, The Netherlands, and Italy – and the Treaty of Paris was eventually signed in 1951, establishing the European Coal and Steel Community. In this phase, the United Kingdom tends to favour its relationship with the Commonwealth and decides to remain outside of this initiative. The European Coal and Steel Community is based on a number of institutions: most importantly, the High Authority, the most powerful institution. It is an independent, supranational executive whose task is to ensure the smooth functioning of the common market of coal and

steel. The most important feature and key innovation of this institution is its supranational character, but what does that mean? It means that Member States agreed to cede part of their sovereignty to a common institution that has the power to enforce its decisions. Other institutions are the Council of Ministers, that is an intergovernmental counterpart to the High Authority, and a Common Assembly where delegates of the national Parliaments sit. There is also a Court of Justice, that is tasked with ensuring the correct application of the Treaty, and finally, a Consultative Committee of social partners that is an ancestor to today's European Economic and Social Committee. Born as an economic project, the European Coal and Steel Community is a huge political success, as it seems to have solved decades of Franco-German rivalry, and by curtailing national sovereignty on resources that are key to war, it has made war virtually impossible.

In these years, we see a third track of European Integration - military cooperation, that starts to develop. Initially, this was not much more than a military alliance first among Western European countries and then between them and the United States: what we know today as NATO. But in the following decade, things evolved differently, leading to an attempt to create a fully-fledged European defence. It's the beginning of the 1950s, and the Cold War has been going on for a few years and in this time, the Korean War breaks out. What has happened there? Korea is divided in two states: the North, socialist and backed by the Soviet Union, and a US-backed, capitalist South. In 1950, North Korea invaded the South. This move spreads panic in the West, as the Korean situation dangerously reminds that of another country divided between a US-backed and a Soviet-backed state, this time at the heart of Europe: Germany. Therefore, the rearmament of Germany suddenly becomes an urgent priority for the United States. Of course, this meets the fierce opposition of France, but if the French want to avert this outcome, they need to come up with a counterproposal that is convincing enough for the United States, so applying the same logic of coal and steel, in 1950 the French Prime Minister René Pleven proposes the creation of a European Defence Community, in other words, a European army, in which the German rearmament should be framed. The Treaty establishing the European Defence Community was signed by the Six members of the European Coal and Steel Community in 1952. However, this community will never see the light. At this point, something quite interesting happens: the military and the political integration tracks start mingling together. The creation of a European army within the European Defence Community creates an important issue: under

whose authority will this army be, and who will ensure democratic control over it? Therefore, in 1952, starting from an initiative of the Italian government, the six members of the European Coal and Steel Community entrust the Common Assembly with the task of drafting what they call a European political statute: in other words, a Constitution for a European supranational political union. The project of the European Political Community, as it is called, is very ambitious and has a clear federalist flavour, including a Parliament that is partly elected by citizens, and the establishment of a common market based on the free movement of persons, goods and capital. However, this community will dramatically fail due to the defeat of the European Defence Community. Once signed, the European Defence Community Treaty needs to be ratified by the signatory states. However, in the meantime there have been some changes in the international context. First, a change in the US administration brings the Republicans to power, and the new President Dwight Eisenhower seems more reluctant than his predecessors to use the US budget for Europe's defence. This instils the fear in some European allies that, should the European Defence Community see the light, the US will use this as a pretext to abandon their role as guarantors of Europe's security. Secondly, on the other side of the world, Stalin's death also seems to make the Soviet Union a little bit less scary. Finally, the European Defence Community project faces quite some internal opposition in France, where support for the Treaty lies on a very precarious party constellation. Eventually, in 1954 the European Defence Community Treaty failed to be ratified by the French Assembly, and the Community, which was a French creation, was abandoned. When it comes to the military realm, Europe's territorial security will remain firmly under the responsibility of NATO and the United States. The defeat of the European Defence Community also seals the fate of the European Political Community project. This is the failure of the grand project of a political union for Europe, but it is not the end of the dream of an "ever closer union" among the peoples of Europe. Europe is therefore left with one successful integration project, the European Coal and Steel Community. Jean Monnet, the French civil servant who first launched this idea, is convinced that this cooperation could be extended to other sectors, such as for instance nuclear energy. The Benelux countries are also very much in favour of further integration, and possibly even extending it to all sectors of the economy. In 1955, these countries call on the other members of the European Coal and Steel Community to convene an intergovernmental conference in Messina in Italy to discuss the creation of a common market. The conference establishes a Committee of the Foreign Ministers of the six countries, chaired by

the Belgian Foreign Minister Paul Henri Spaak, that is tasked with sketching out a future European Economic Community and European Atomic Energy Community. A number of key questions are debated in this phase. One is the nature of the common market: should it be a mere free trade area, ultimately leaving to the Member States leeway as to how to deal with third countries? Or should there also be a common external tariff? Another question is the tension between the supranational character, that was central in the European Coal and Steel Community, and the intergovernmental character.

Finally, the debates also on whether and how the overseas territories of the Member States should be included in the scope of the common market. The work of the Foreign Ministers led to the signature in Rome in 1957 of two Treaties, one establishing the European Economic Community, and the other one establishing a European Atomic Energy Community, also known as Euratom. In this phase, the members of these two communities are the founders of the European Coal and Steel Community: France, Germany, Italy, Belgium, Luxembourg and the Netherlands. Euratom's mission, strictly limited to civil applications of nuclear energy, is to contribute to the joint development of Europe's nuclear industries by distributing and regulating the use of nuclear energy. The Treaty establishing the European Economic Community, on the other hand, is much more comprehensive. It establishes a common market protected by a common external tariff, it envisages the creation of a Common Agricultural Policy, and it sets out rules for the free movement of persons, goods and capital. A number of institutions are put in place. The European Parliamentary Assembly, with delegates appointed by the national parliaments, has deliberative and supervisory powers. The Council, which is made up of representatives from the national governments, is the key decision maker and adopts decisions mostly by unanimity. The Commission is composed of independent members appointed by the Member States and has the power to submit proposals to the Council. The Court of Justice ensures the correct interpretation and application of the Treaty. Finally, a European Economic and Social Committee is an advisory body that represents the social partners. So, in an attempt to limit the supranational character of this new Community, instead of a High Authority, and a 'Commission', and most decision-making powers are conferred to the Council of Ministers. Finally, the question of overseas territories is solved with a compromise. The Euratom institutional structure mirrors that of the European Economic Community, with the Assembly and European Economic and Social Committee being shared by the two Communities. The

European Economic Community will set the basis of the European Union as we know it today, and its success will strengthen the vision of those like Jean Monnet advocating for sectorial cooperation as the most effective way to achieve European integration.

The European Union's creation stems from post-World War II efforts to secure peace, stability, and economic cooperation among European states. Beginning with the European Coal and Steel Community (ECSC) in 1952, the EU evolved through successive treaties fostering economic integration that gradually spilled over into political cooperation. Spillover, as a neo-functionalist concept, describes how integration in one sector creates pressures and incentives for further integration in related fields, ultimately expanding into supranational institutions and common legal frameworks. This dynamic led to the establishment of the European Economic Community (EEC) in 1958, which later evolved into the current EU with robust supranational institutions including the European Commission, European Parliament, and the European Court of Justice (ECJ).

The EU's human rights regime is deeply rooted in its integration process. Human rights protection originally emerged through the Council of Europe and the European Convention on Human Rights (ECHR). Subsequently, the EU incorporated human rights protections directly into its legal framework via the Charter of Fundamental Rights, which the Court of Justice of the European Union (CJEU) guards. The ECJ ensures coherent application of human rights law within the EU legal order, thus creating common rules that all member states must follow. This supranational legal order transcends national sovereignty in areas where the EU has competence, notably strengthening human rights protection as a shared value and legal obligation. The mutual reinforcement between the ECJ and the European Court of Human Rights (a Council of Europe body) further solidifies human rights enforcement at the regional level.

The history and rationale behind the EU's powerful regional human rights protection system can be explained by three key variables: economic integration, political dynamics, and cultural factors. Economically, the initial focus on creating a common market and customs union made cooperation essential, which then spilled over into political and legal cooperation. Politically, the EU was motivated by a desire to prevent the catastrophic wars of the early 20th century, embedding democratic governance and rule of law as foundational principles. Culturally, European states share a tradition of valuing human rights and democratic norms, which facilitated the acceptance of supranational institutions and collective adherence to human

rights rules. The combination of these factors led to the establishment of binding regional policies and institutions that command compliance from member states, reflecting a unique supranational legal and political order in human rights protection.

The creation of the European Union was driven by the efforts made after World War II to ensure peace and stability through economic and political integration. Since the European Coal and Steel Community, economic cooperation has led to spillover effects that have spread to the political, legal, and human rights spheres. Guided by the neo-functionalist logic of the spillover, integration in one sector facilitated further cooperation, which led to the creation of reliable supranational institutions and a common legal order. Ultimately, this process has transformed Europe into a single space of common rules, values, and human rights protection that transcends national sovereignty.

Chapter 3. The Association of Southeast Asian Nations (ASEAN)

The Association of Southeast Asian Nations or ASEAN is an economic union between 10 southeast asian countries. These are Brunei, Cambodia, Indonesia, Laos, Malaysia, Myanmar, The Philippines, Singapore, Thailand and Vietnam. ASEAN was preceded by the Association of Southeast Asia, otherwise known as ASA, which was a smaller union between Thailand, the Philippines and Malaya, which in 1963 would become integrated into Malaysia. ASA was founded in 1961 with the purpose of creating peace and ensuring regional stability. At the time many countries in southeast asia were struggling to contain national communist influences. The filipino government was struggling with the communist hook “Balahap”, the Indonesian government was struggling with the Indonesian communist party and Malaysia was struggling with the “Sarawak” communist insurgency and they decided that they stood a better chance of ensuring stability if they cooperated with one another. ASA eventually collapsed in 1963 after Malaysia claimed Sarbag as part of Malaysia in the Malaysia agreement, before being replaced by Mafalindo which was composed of Malaysia, The Philippines and Indonesia. Mafilindo didn't really last largely because each country emphasized its own national interest and the plan sort of petered out by 1965. Despite these two previous failures in 1967 representatives from five southeast asian countries: Malaysia, Indonesia, Thailand, The Philippines and Singapore met in Bangkok to discuss a Southeast Asian Union, where they signed the declaration of Bangkok on August the 8th, creating ASEAN. Now originally ASEAN's objectives were pretty vague, it was about encouraging economic cooperation and promoting regional peace and security but there wasn't anything particularly substantial: no single market or any sort of military alliance, not much happened for the first 10 years or so (Acharya 2014, 67). In part thanks to a confusing and overlapping committee structure and the fact that countries only met once a year but mainly because there was mutual suspicion between various member states. The Philippines were still unhappy about Saba. Malaysia was supporting muslim separationists in Thailand, while Thailand was providing refuge for Malaysian communist party insurgents and there were suspicions that Singapore, which was at the time 75% ethnically Chinese, would turn into a third China supporting communist insurgencies in the region. Nonetheless, ASEAN held together because whatever suspicions they had against one another the ASEAN countries were more worried about the rise of communist insurgencies in the region, especially Vietnam. These anxieties were exacerbated by the then popular “domino theory” of communist geopolitics, which implied that

the successful communist takeover of Vietnam would guarantee a similar fate for other countries in the region and while ASEAN didn't have any real powers, it did help its member states overcome their various disagreements and avoid outright conflict with one another. Given that the rest of Southeast Asia was in almost constant political turmoil, the region is sometimes described as the “Balkans” of the East; this was a real achievement. For the first 10 years or so ASEAN did a pretty good job of ensuring regional stability, even if it didn't make any formal changes to its members' relations. Nonetheless, after the rise of the communist Khmer Rouge in Cambodia and the fall of Saigon in 1975 its members decided that ASEAN could do with a revamp. At the Bali conference in 1976, ASEAN revamped its committee structure and more importantly signed the Treaty of Amity and Cooperation, otherwise known as the TAC. The TAC had three important components: first it included the proviso, that the treaty shall be open for a session by other states in Southeast Asia, which eventually led to the integration of Cambodia, Laos, Myanmar and Vietnam; second it established a ministerial level high council for dispute settlements and third it expanded ASEAN to include cooperation on matters of national resilience, which was a sort of diplomatic euphemism for security matter. There was also a plan for a free trade area, but nothing really came of it. Over the next few years ASEAN member states, unlike their regional neighbors, enjoyed relative political stability and ASEAN became the region's leading voice on trade and security issues. Political stability enabled sustained economic prosperity and according to the World Bank data from 1976 until 1982 the cumulative GDP of ASEAN member states went from 91.1 billion dollars to 211.9 billion dollars, amounting to a seriously impressive average annual growth of 15%. Unsurprisingly, ASEAN became the “coolest club” in Southeast Asia and in the 80s its membership started expanding. In 1984 after gaining independence from the United Kingdom, Brunei became ASEAN's sixth member. In 1992 convinced by the merits of a free market economy, the ASEAN member states signed the ASEAN free trade agreement otherwise known as AFTA which involved the elimination of internal tariffs between ASEAN members, but importantly no common external tariff, which meant that ASEAN member states could set whatever tariffs they want for non-ASEAN imports. In 1995 after the cold war and a national transition from a planned economy to what was then known as a mixed economy Vietnam joined the group, followed quickly by Laos and Myanmar in 1997 and Cambodia in 1999. In 2007 ASEAN member states signed the ASEAN Charter with the aim of creating a single market for the region's 650 million or so people, which would be the

world's largest. Nonetheless, ASEAN was still relatively toothless and it did have a firm policy of non-interference, which essentially meant that it couldn't get involved in member states internal affairs. Interestingly this policy has been challenged recently by the ongoing genocide of Rohingya muslims and the military coup in Myanmar. You can't really have a policy of non-interference when one of your member states is committing genocide and oppressing its people because well it looks weak which is why in October 2021 for the first time ASEAN disinvited one of its member states by refusing to involve Myanmar in its annual summit. While this might not sound like much it has seriously undermined the legitimacy of Myanmar's military junta and in the eyes of the international community and it marks a turning point in ASEAN's neutral non-interference policy. Asean is interesting because it doesn't really have any legal powers. It's essentially just a forum for Southeast Asian countries. Nonetheless ASEAN has political weight and that matters despite its limited legal powers. ASEAN has successfully maintained relative peace amongst its member states for an impressively long time and might be able to stop the chaos in Myanmar sometime soon. However ASEAN is currently at a crossroads, it has to decide whether it wants to stick with the tried and tested non-interference policy and stand by while the military junta tightens its grip on power or scrap the non-interference policy and intervene more heavily in Myanmar even if that entails more responsibilities and difficult conversations about the relation between ASEAN and national governments.

Often hailed as one of the world's most rapidly growing regions, ASEAN is frequently cited as a potential rival to the European Union. Experts lend credibility to this view, undeterred by the difference in the number of member countries - ASEAN has 10, while the EU has 27. A key factor bolstering this perspective is ASEAN's population, which exceeds 600 million, compared to the EU's 448 million - a population that is also aging. Essentially, ASEAN's promising outlook is fueled by its expanding population and its strategically advantageous geopolitical position, particularly as Asia rises as the next economic powerhouse. But let us understand this better more through the rest of the video. Before we get started, let's get a brief understanding of what ASEAN and the EU are. ASEAN is a regional organization comprising 10 Southeast Asian countries: Brunei, Cambodia, Indonesia, Laos, Malaysia, Myanmar, the Philippines, Singapore, Thailand, and Vietnam. Established in 1967, ASEAN aims to promote economic growth, social progress, and regional stability among its member countries. On the other hand, the European Union is a political and economic union of 27 European countries.

Established in 1993 with the signing of the Maastricht Treaty, the EU's objectives include promoting peace, establishing a single market, and fostering economic, social, and territorial cohesion among its member states. First, let's take a look at the economic aspects of ASEAN and the EU. In terms of nominal GDP, the EU is the world's second-largest economy, with a combined GDP of around 15.2 trillion USD in 2021. Meanwhile, ASEAN's combined GDP was approximately 3.2 trillion USD in the same year, making it the fifth-largest economy in the world. Clearly, there's a considerable gap between the two in terms of economic size. However, ASEAN has been experiencing rapid economic growth in recent years, with an average annual GDP growth rate of around 5% between 2000 and 2020. This growth has been fueled by factors such as increasing foreign direct investment, a growing middle class, and strong domestic consumption. If ASEAN can maintain its current growth trajectory, it could eventually become a significant global economic powerhouse, although reaching the size of the EU will take time. One crucial factor that differentiates the EU from ASEAN is the level of economic integration. The EU has a single market, which allows for the free movement of goods, services, capital, and people among its member countries. This integration has led to increased trade and investment, fostering economic growth across the region. ASEAN, on the other hand, has made strides towards economic integration through initiatives like the ASEAN Economic Community (AEC), which aims to create a single market and production base in the region. However, the level of integration is still far from that of the EU, with barriers to trade, investment, and labor mobility remaining in place. This limited integration could hinder ASEAN's ability to reach the economic scale and influence of the EU. Now let's discuss the political and social aspects of ASEAN and the EU. One significant difference between the two organizations is the extent of political integration. The EU has a highly developed political structure, with institutions like the European Commission, European Parliament, and European Council that play crucial roles in decision-making and implementing policies across the region. Additionally, the EU has a common currency, the Euro, which further strengthens its economic and political ties. In contrast, ASEAN has a more limited political structure, characterized by the principle of non-interference in the internal affairs of its member countries. This principle allows for a high degree of national sovereignty and independence but also means that ASEAN's decision-making process is often consensus-based, which can lead to slow and inefficient policy implementation. Moreover, the political systems and ideologies of ASEAN member countries are highly diverse,

ranging from democracies to authoritarian regimes, which further complicates regional integration efforts. Socially, the EU and ASEAN also exhibit significant differences. The EU has made substantial progress in promoting social cohesion and harmonizing social policies among its member countries. For example, EU citizens have the right to live, work, and study in any EU country without the need for visas or work permits. Additionally, the EU has enacted numerous regulations to protect workers' rights, ensure gender equality, and promote social inclusion. In comparison, ASEAN faces significant social challenges, such as income inequality, human rights issues, and disparities in education and healthcare. While ASEAN has taken steps to address these issues through various social initiatives, progress has been slow, and the region still faces considerable social and developmental gaps. The diversity of cultures, languages, and religions in the region also presents additional challenges to social integration. So, can ASEAN become as big and influential as the EU? While ASEAN has made impressive strides in economic growth and regional cooperation, several factors may hinder its ability to achieve the same level of integration and influence as the EU. The first is due to limited economic integration. Although ASEAN has made progress towards creating a single market, significant barriers to trade, investment, and labor mobility remain. Overcoming these barriers will be crucial for ASEAN to fully harness its economic potential. Secondly, we also have what is known as Political diversity and limited political integration. ASEAN's diverse political systems and its commitment to non-interference in member countries' internal affairs could hamper the development of a more cohesive political structure and decision-making process. Thirdly, there are also social challenges and disparities. Addressing social and developmental gaps among its member countries will be essential for ASEAN to promote social cohesion and harmony within the region. Finally, Cultural, linguistic, and religious diversity are also key factors. The vast diversity within ASEAN can make it challenging to develop a common identity and foster a sense of unity among its member countries. While it may be challenging for ASEAN to achieve the same level of integration and influence as the EU, the organization undoubtedly has the potential to become a major global player. By continuing to promote economic growth, regional stability, and social development, ASEAN can strengthen its position in the international community and contribute to the prosperity and well-being of its people. As we look towards the future, it's essential to consider the potential economic trajectories of both the European Union and ASEAN. The two organizations face different challenges and opportunities, which will undoubtedly shape their

economic growth and development in the coming decades. For the European Union, one of the most significant challenges is addressing the economic disparities between its member countries. Although the EU has made strides in promoting economic convergence, some regions, particularly in Southern and Eastern Europe, continue to lag behind their more prosperous neighbors. In addition, the EU faces an aging population, which could impact labor markets, social welfare systems, and overall economic growth. To address these challenges, the EU will need to focus on promoting innovation, increasing productivity, and ensuring sustainable and inclusive growth across the region. Another challenge the EU faces is the uncertainty surrounding Brexit and its long-term impact on the European economy. The United Kingdom was one of the EU's largest economies, and its departure has left the bloc grappling with questions about its future trade relationships, financial stability, and political cohesion. While the EU has demonstrated resilience in the face of these challenges, it will be essential for the bloc to continue working towards greater integration and cooperation to ensure its long-term economic success. On the other hand, ASEAN's future economic prospects appear to be more optimistic. With a rapidly growing population, an expanding middle class, and increasing urbanization, the region is poised for significant economic growth in the coming years. ASEAN's young and dynamic population offers a distinct advantage over the aging populations of many advanced economies, including the EU. This demographic dividend could provide a significant boost to the region's labor force, consumer markets, and overall economic growth. Moreover, ASEAN has made significant progress in integrating its economies, with the implementation of the ASEAN Economic Community (AEC) in 2015. The AEC aims to create a single market and production base, facilitating the free flow of goods, services, investments, and skilled labor across the region. While there is still much work to be done, the AEC has the potential to significantly enhance ASEAN's economic competitiveness and attractiveness to foreign investors. However, ASEAN also faces challenges in its pursuit of economic growth. The region must address critical issues such as income inequality, environmental sustainability, and the need for infrastructure development. Additionally, ASEAN must continue to strengthen its economic integration and cooperation in the face of increasing global economic uncertainty and geopolitical tensions. In conclusion, while it is unlikely that ASEAN will become as big and influential as the EU in the near future, the organization still has the potential to play a significant role in the global economy and geopolitics. The journey towards greater integration and influence is a long one, and ASEAN

will need to address its economic, political, and social challenges to fully realize its potential. Nevertheless, the progress made so far is promising, and with continued effort and collaboration, ASEAN could become an even more prominent player on the world stage.

Chapter 4. EU and ASEAN's pathways to the integration

A distinctive feature of the EU is its high degree of supranationalism. Member States delegate a significant part of their sovereign powers to common institutions such as the European Commission, the European Parliament and the European Court of Justice. These institutions have unique powers to enact legislation and decisions that are legally binding on national governments and their citizens (Klecha-Tailets 2010, 35). EU integration is driven by a strong commitment to a comprehensive legal framework, including common rules and policies. Reliable, legally empowered supranational institutions play a central role in its functioning, ensuring consistent application and enforcement of decisions in all Member States (Klecha-Tailets 2010, 77). The EU's trajectory reflects neo-functionalist spillover, originating in the European Coal and Steel Community (1951) and evolving through the Single European Act (1986) into a comprehensive framework encompassing the single market (free movement of goods, services, capital, persons), Economic and Monetary Union (eurozone for 20 states), and Common Foreign and Security Policy (CFSP) (Raj 2025, 89). Supranational enforcement via infringement proceedings and ECJ activism ensures compliance, as evidenced by landmark cases like *Van Gend en Loos* (1963) establishing direct effect (Weiler 1991, 2410). This institutional embeddedness distinguishes the EU, enabling policy coordination that transcends national vetoes.

Unlike the EU, the ASEAN integration trajectory is characterized by a more gradual, informal and pragmatic approach. In this model, special attention is paid to national sovereignty and the principle of non-interference in the internal affairs of member States, which is the fundamental philosophy known as the "ASEAN Way" (Klecha-Tailek 2010, 47). Decisions are usually made by consensus between sovereign States, and there is a deliberate restriction on delegating authority to supranational bodies. This approach ensures that national governments retain ultimate control over policy decisions. The integration process is characterized by flexibility, informality, and strong reliance on diplomatic dialogue and consultations to address regional issues. This pragmatic approach ensures the coexistence and cooperation of different political systems within the bloc (Klecha-Tailets 2010, 59).

The European Union's legalized supranationalism constitutes a paradigmatic engine of institutional path dependency, propelling member states toward an inexorable "ever closer union" (Art. 1 TEU) through autonomous supranational organs vested with direct legislative initiative, enforcement prerogatives, and constitutional primacy (Raj 2025, 95). Originating in the

European Coal and Steel Community's (ECSC 1951) narrow sectoral delegation—resolving Franco-German resource rivalries via High Authority—the EU's architecture rapidly expanded through neo-functionalist spillover dynamics. The Treaty of Rome (1957) birthed the Economic Community with customs union ambitions; the Single European Act (1986) operationalized the internal market's four freedoms (goods, services, capital, persons) via qualified majority voting; Maastricht (1992) instituted Economic and Monetary Union with convergence criteria and European Central Bank autonomy; Amsterdam/Nice refined co-decision; and Lisbon (2009) constitutionalized the Charter of Fundamental Rights alongside enhanced Parliament powers. The Court of Justice's jurisprudence—Van Gend en Loos (1963) establishing direct effect; Costa v ENEL (1964) supremacy; Francovich (1991) state liability—transformed treaty provisions into a self-executing legal order, where 1,200+ annual infringement proceedings compel transposition and 27 disparate constitutional traditions converge under EU law's precedence. This embeddedness generates lock-in: opt-outs (Denmark, Poland on euro/rights) erode under market pressures, while spillover cascades from competition policy to data protection (GDPR) and citizen initiatives, rendering reversal politically untenable as domestic constituencies internalize supranational norms (Weiler 1991).

By contrast, ASEAN's consensual pragmatism - crystallized in the "ASEAN Way" of non-interference (*asean suka-muka*), unanimous decision-making, and personalistic diplomacy - privileges resilience amid profound heterogeneity over accelerated convergence, yielding chronic incrementalism that sustains cohesion without sovereignty rupture (Raj 2025, 95). The Bangkok Declaration (1967) launched a loose stability forum countering domino-theory insurgencies; Bali Concord I (1976) via Treaty of Amity and Cooperation (TAC) enshrined consultation norms with High Council (never invoked); AFTA (1992) slashed intra-tariffs (0-5%) sans common external tariff; Vision 2020 (1997) articulated socio-cultural aspirations; Concord II (2003) outlined three pillars; the Charter (2007) conferred legal personality and CPR; and AEC Blueprint (2009-2015) delivered single production base with partial mobility, yet all hinge on veto-proof consensus among ten ideologically eclectic members (technocracy to juntas). Lacking direct effect or infringement analogs, AICHR (2009) remains promotional, as Rohingya genocide and Myanmar coup (2021 summit exclusion as boundary-test) expose non-interference limits. This flexibility accommodates Vietnam's socialism, Brunei's monarchy, and Indonesia's democracy, fostering

ARF/EAS great-power management while intra-trade hits 25%, but precludes EU-style enforcement, preserving national vetoes amid creeping institutionalization (Acharya 2014).

These antithetical pathways—EU's judicialized lock-in versus ASEAN's diplomatic equilibrium—encapsulate divergent logics of regionalism: supranational constitutionalism harnessing spillover for convergence versus intergovernmental pragmatism trading depth for durability (Raj 2025, 95). The EU's trajectory reveals path dependency's double-edged sword: transformative efficacy amid "democratic deficit" critiques and enlargement fatigue; ASEAN's model underscores resilience's virtues—decades of Balkan-avoidance stability—yet incrementalism's opportunity costs in binding rights regimes. Theoretically, they refine neo-functionalism (EU exemplar), constructivism (ASEAN we-feeling), and intergovernmentalism (sovereignty firewalls), while empirically bracketing Central Asia's feasible middle ground: ASEAN flexibility minus EU overreach (Klecha-Talec 2010, 30).

Chapter 5. Comparison of the EU and ASEAN: How the EU and ASEAN's Pathways towards Regional Integration can teach Central Asia to create a region?

As Lombaerde says, many researchers in the area of EU and ASEAN integration view regional integration theories from a European perspective and the European integration as a sample when looking at the regions even outside of Europe. Each region has its own specificities and as result many regions including ASEAN and others in Asia are considered ineffective, not strong and informal (Lombaerde et al., 2010). It is crucial to an approach which would be suitable in comparing regions. Some of the selected scholars like Murray, Jetschke and Severino have a perspective which is suitable for comparing the EU and ASEAN.

Mr. Murrey, who has been studying the integration of the EU and ASEAN, focuses on the commonalities and variations of the EU and ASEAN and their institutional structures, the state and their sovereignty. Mr. Mirrey believes that there is no specific way of regional integration and the EU should not be a benchmark when studying the regions. As we all know, regional integration is not a zero sum game (Murray 2010) and both regions have completely separated characteristics including differences in the sovereignty, structures and institutions. The EU has a strong interstate political cooperation, which is not seen in ASEAN's nature. However, integration in the EU and ASEAN is linked to the amount and volume of the policies and national interests and rules. ASEAN needs more policies which are effective for the common market including for freedoms of goods, capital, services and labour, which are existing in the EU. The EU has a common currency which is EURO and Single Market and has reached full economic integration.

In addition, Severino, former SG of ASEAN, says that MS of the Association, don't use EU approach to the integration, but having their own which is more informal, no lo legally binding legislations and not having supranational institutions. The ASEAN way is effective to tackle issues which are specific to South East Asia and the aim is slowly reaching the creation of the regional community (Severino 2010).

The creation of the ASEAN Charter has led to the creation of institutional changes throughout the years. ASEAN has used some of the mechanisms and policies which were EU style, however rejecting the use of the European way of regional Integration (Murray and Jetschke 2012, 89). In line with that, the idea of ASEAN being a vital actor in the international

arena has led MS to put some changes on the Charter of the 2007. Changes in ASEAN's institutions have been influenced by the EU, but also by internal factors driven by the unique ASEAN way approach (Jetschke and Murray 2012, 66).

Finally, the discussion on the degree of integration and the specifics of the norms and mechanisms of regional organizations such as the EU and ASEAN needs a more diverse approach that goes beyond the European perspectives. Many above-mentioned scholars studied both regional bodies through non western lens, however two regional bodies have different institutions, characteristics and approaches to the cooperation and the Charter of ASEAN has led to the changes of the ASEAN.

5.1. The institutional structure of the EU and ASEAN

ASEAN's institutional design is more adaptable, meaning that it has more network style than the EU formal institutions and a large bureaucracy so that it can make and enforce common rules for its member states in a more organized way, (Caballero 1998; Börzel and Risse 2016). The creation of the ASEAN Charter in 2007, as we mentioned above, made some changes to the structure of ASEAN impacting the three to the understanding of those three dimensions which I set for this research.

ASEAN made several important changes: it created a Committee of Permanent Representatives (CPR) to supervise the ASEAN Secretariat and ministerial meetings, set up three ASEAN Communities (Economic, Political-Security, and Socio-Cultural), and agreed on a regional Human Rights Charter. These new ASEAN bodies are often compared to the EU's COREPER, its former three-component structure, and the EU Charter of Fundamental Rights, confirming the similarities that Jetschke and Murray (2012) have already pointed out in their previous work.

The new ASEAN bodies still operate on the basis of cooperation between governments, and their decisions are generally not legally binding, while in the EU, most decisions made by bodies such as COREPER, the main institutions of the Community, and those based on the Charter of Fundamental Rights have real legal force for the MS. As a result, the way its members integrate into the EU is deeper and more legal than in ASEAN, and the two regions still differ in institutions, political goals, and social policies, as they have different levels of power and influence, although they sometimes use similar regional mechanisms.

ASEAN, like the EU, has tried to create a single economic market. Its attempts can be seen in the creation of the ASEAN Free Trade Area (AFTA) and the 1992 CEPT scheme, which were supposed to eliminate tariffs and other trade barriers between member states. In fact, these early initiatives remained mostly on paper and were only partially implemented. However, later the creation of the ASEAN Economic Community (AEC) brought ASEAN closer to a real single market and a common production base. However, ASEAN's economic integration is limited by its political choices. As member states strongly defend the principle of non-interference and national sovereignty, they allow only modest regional institutions and weak law enforcement compared to the EU.

On the other hand, the EU has achieved a much deeper level of economic integration, with broad powers in the areas of monetary policy, customs union and foreign trade relations. Although responsibility for the internal market is shared between the EU and its member States, the Union has nevertheless created a single market that guarantees the free circulation of goods, services, capital and people.

ASEAN also strives to create a single market, but its refusal to create supranational bodies and rely on legalized mechanisms means that its model differs sharply from that of the EU. Scholars such as Caballero, Jetschke, and Murray argue that the "ASEAN Way" - with its emphasis on non-interference and the protection of national sovereignty is blocking the development of a stronger and more cohesive regional economic policy. Despite this, Severino suggests that the ASEAN Economic Community can still become a platform for deeper economic integration in the future.

5.2. The purpose of creation and time evolution of both regional organisations

The EU and ASEAN were created to achieve similar goals of peace and development, but they chose completely different paths to achieve these goals. The EU began with the European Coal and Steel Community in 1951, which combined coal and steel production between former enemies such as France and Germany to make another war “not only unthinkable, but also financially impossible.” Based on this economic core, European states have gradually created strong supranational institutions and a deeply integrated regional system with significant economic, political and social cooperation. ASEAN, established in accordance with the Bangkok Declaration of 1967, aimed to promote peace, progress and prosperity in Southeast Asia after the experience of colonization and internal conflicts. Instead of devolving authority to common

institutions, ASEAN relied on non-binding decisions, consensus, and strong protection of national sovereignty, making regional integration more limited and intergovernmental. Thus, while both organizations strive for peace, development and prosperity, the EU adheres to a rules-based, economically sound and highly institutionalized model of integration, while ASEAN prefers flexible cooperation, voluntary implementation and informal practices. Due to these different frameworks and decision-making styles, European-style regional integration tools do not quite match the ASEAN context, and the time gaps between the ASEAN agreements and their implementation have further increased the differences between the two regions.

Since its creation, the EU has steadily built strong supranational bodies such as the European Parliament, the Council and the Commission, and has repeatedly updated its treaties approximately every ten years to improve and deepen regional integration. The Union is based on a solid legal and constitutional order and uses procedures such as qualified majority voting and joint decision-making by Parliament and the Council to adopt and continuously improve policies in many areas. These repeated treaty changes and constant policy reviews have become a major factor in closer integration within the EU.

In contrast, ASEAN has developed much more slowly: it adopted its first true constitutional document, the ASEAN Charter, only in 2007, and it was not until 2015 that the ASEAN Community structure was officially established. Although these steps have strengthened the institutional framework of ASEAN, they still do not correspond to the level of legalization and delegation of powers to the EU, so ASEAN remains at an early stage of integration and needs further reforms to approach the EU level. This time lag, combined with ASEAN's focus on sovereignty, territorial integrity, and consensus-based cooperation, explains why its integration model and policy-making rhythm do not match the faster and more legally sound trajectory of EU integration.

5.3. The compatibility of the EU and ASEAN

The relationship between how the EU and ASEAN integrate their regions is complex and cannot be judged simply by applying the EU model to ASEAN. Both regions promote economic cooperation and the gradual removal of trade barriers, but they differ dramatically in institutions, governance, and policy objectives, so the EU model is not a suitable reference for ASEAN. In terms of long-term comparison, the EU's integration tools do not quite match the characteristics

of ASEAN. Research shows that the EU relies on highly formal, legally binding mechanisms and strong supranational bodies, while ASEAN mainly uses informal, consensus-based cooperation that protects state sovereignty.

From the very beginning, EU integration was based on formal rules and expanded the capabilities of common institutions, while ASEAN preferred flexible mechanisms that encourage cooperation rather than deep integration. Even in cases where ASEAN has established bodies resembling EU institutions, such as the CPR or the ASEAN Community, their decisions are less legally binding and leave more control to the member states, leading to completely different political, economic and social outcomes. In addition, the two organizations differ in their founding goals and timing. The EU prioritizes economic integration as a tool for development and peace, moving relatively quickly from one stage of reform to another, while ASEAN focuses on peace, progress and prosperity through non-interference and voluntary, non-violent norms, which slows down decision-making and implementation. Because of these different goals, legal traditions, and political rhythms, European-type mechanisms are ill-suited to guide ASEAN's integration strategy; ASEAN needs more time and its own model to develop an appropriate regional integration policy.

Following Suzuki's (2019) argument, ASEAN may need to relax or temporarily suspend its non-interference rule in certain cases so that it can collectively address internal issues that affect the entire region and adopt binding rules for the entire region.

Chapter 6. Central Asian Integration

Central Asia, a region strategically located at the crossroads of continents, has experienced a dynamic and often difficult path to integration. The history of Central Asian integration, starting with its unified, albeit externally controlled, past within the Soviet Union and ending with various attempts to strengthen regional cohesion after independence, is characterized by both common aspirations and constant obstacles. Before independence, the five Central Asian republics of Kazakhstan, Kyrgyzstan, Tajikistan, Turkmenistan, and Uzbekistan were an integral part of the Soviet Union. This era, spanning most of the 20th century, profoundly affected their political, economic, and social landscape (Scarborough 2021). Soviet policy, in particular national demarcation in the 1920s and 1930s, played a crucial role in defining the modern borders and national identity of these republics, often using "artificial borders" designed to prevent the spread of pan-Turkic ideologies and ensure Moscow's control (Artman 2022; Cao 2024). Under Soviet rule, Central Asia experienced rapid industrialization and collectivization of agriculture, which led to significant economic growth and improved living standards, although they were often below the Soviet average (Camp 2022; Scarborough 2021; Vasich et al. 2023). The Soviet system fostered a sense of shared regional identity while simultaneously applying a divide-and-rule strategy to maintain Moscow's control (Atid and Ozkan 2023; Dzhumabaev and Oyama 2018). The government of Central Asia experienced rapid industrialization and collectivization of agriculture, which led to significant economic growth and an increase in living standards, although they were often below the average for the USSR (Kamp 202; Scarborough 2021; Vasich et al. 2023). The Soviet system fostered a sense of shared regional identity while simultaneously applying a divide-and-rule strategy to maintain Moscow's control (Atid and Ozkan 2023; Dzhumabaev and Oyama 2018). Thus, this period has left a complex legacy: on the one hand, a shared history of centralized governance, economic interdependence, and a certain degree of cultural community; on the other hand, artificially constructed borders and the suppression of regional initiatives by indigenous peoples have left a void that will be difficult to fill after independence.

6.1. Post-Soviet integration

The collapse of the Soviet Union in 1991 presented the newly independent States of Central Asia with both an opportunity and a challenge to establish their own framework for

regional cooperation. The first years were marked by numerous efforts to strengthen integration due to the common historical context and the need to cope with the collapse of the former USSR (Linn & Pidufala 2008; E.V. 2018). One of the earliest institutional attempts was the creation of the Commonwealth of Central Asian Countries in 1993, followed by the Single Economic Space in 1994, initially involving Kazakhstan and Uzbekistan, and later joined by Kyrgyzstan. One of the earliest institutional attempts was the creation of the Commonwealth of Central Asian Countries in 1993, followed by the Single Economic Space In 1994, initially with the participation of Kazakhstan and Uzbekistan, and later Kyrgyzstan joined it. The Central Asian Union, created in 1994 by Kazakhstan, Uzbekistan and Kyrgyzstan, was a more ambitious initiative. It was aimed at creating a single economic space that promotes the free movement of goods, capital, services and labor, based on Western European integration models (Ateed & Özcan 2023, 43). Tajikistan joined the Central Asian Economic Community as an observer in 1996, later becoming a full member when the organization was renamed the Central Asian Economic Community (Ateed & Özcan 2023; 23). Turkmenistan, however, has maintained a neutral foreign policy and has not joined any regional integration initiatives (Krapohl & Vasileva-Dienes 2019). Despite these efforts, the CAA was eventually dissolved in 2004, and other organizations such as the Central Asian Economic Union, the Central Asian Economic Cooperation, and the Organization for Central Asian Cooperation also tried to create a common market and eventually merged with the Russian-dominated Eurasian Economic Community (Bárkányi & Vasa 2023, 21). The failure of these early indigenous integration projects was due to several factors, including competition for regional leadership, especially between Kazakhstan and Uzbekistan, The failure of these early indigenous integration projects was due to several factors, including competition for regional leadership, especially between Kazakhstan and Uzbekistan, as well as the prevailing influence of external players and their competing interests (Ateed & Özcan 2023). Despite the presence of various similarities in culture, social structure, and history, the region has largely failed to institutionalize dynamic regional integration (Atid & Ozkan 2023).

6.2. The Commonwealth of Independent States

The Commonwealth of Independent States was formed in 1991 as the legal successor of the Soviet Union and included 12 former Soviet republics, including all the States of Central

Asia at the time of its creation (Herbert 1997; Bezrukov et al. 2021). Its main goal was to promote the orderly disintegration of the USSR and regulate relations in various fields, from security to economics (Arslanov and Trifonova 2020; Bezrukov et al. 2021). For the Central Asian republics (with the possible exception of Turkmenistan), the CIS was a mechanism guaranteeing their integration in the context of the Central Asian republics (with the possible exception of Turkmenistan), the CIS was a mechanism guaranteeing their integration in the context of the uncertainty of the post-Soviet era (Arslanov and Trifonova 2020, 65). Russia, as the dominant member, has often advocated for a strong, integrated organization with broad capabilities in the fields of security, defense, and foreign policy (Herbert 1997). However, the CIS has faced significant challenges and crises that have prevented it from fully realizing its potential as a reliable integration mechanism. Many Central Asian states preferred less integration than Russia would have liked, and the organization's broad membership, extending beyond Central Asia to include countries such as Azerbaijan, Armenia, Moldova, and Belarus, meant that it not only represented the interests of or contributed to the unique regional integration of Central Asia (Ateed & Özcan 2023). Ultimately, the CIS turned out to be a more flexible and less integrated entity than some initially assumed, reflecting the diverse interests of its member States.

6.3. The Eurasian Economic Union

More recently, several Central Asian States have joined the Eurasian Economic Union, established in 2015 as a successor to earlier integration structures such as the Customs Union and the EurAsEC (Bárkányi & Vasa 2023). Currently, the EAEU includes Russia, Kazakhstan, Belarus, Armenia and Kyrgyzstan, while Uzbekistan, Moldova and Cuba have observer status (Bárkányi & Vasa 2023). The main purpose of the EAEU is to expand economic cooperation, ensure the free movement of goods, services, capital and labor, and implement a common customs policy among its members (Kashdyakova et al. 2021). Kazakhstan was an active supporter of this project, considering it as a way to restore the common economic sphere between the former Soviet republics (Ploberger 2022, 94). Membership offers various advantages, such as free movement of labor, the abolition of export duties on energy resources for some members, and the potential for increased foreign direct investment within the regional bloc (Volchkova et al. 2016, 29). Uzbekistan, for example, significantly increased the volume of

its trade with the EAEU countries and received observer status in 2020, which indicates its growing cooperation with the union. Despite its economic advantages, the EAEU represents a form of integration that is strongly influenced by Russia. Some analysts argue that although the Central Asian states are involved in this external project, "there is no genuine Central Asian integration project," and the EAEU does not fully correspond to the regional identity of the indigenous peoples of Central Asia (Ploberger 2022).

6.4. The New Community of Central Asia

Despite the absence of an official institutional body widely recognized as the "New Community of Central Asia," unlike previous iterations or external projects such as the EAEU, the concept of cooperation among the nations of Central Asia continues to evolve. Early attempts, such as the Central Asian Union and its successors (Atid and Ozkan 2023; Barkanyi and Vasa 2023; Krapol and Vasileva-Dienes 2019), demonstrated the desire of states to forge their own path. In November 2025, President of Uzbekistan Shavkat Mirziyoyev proposed forming a new regional bloc called the "Community of Central Asia", consisting of five post-Soviet Central Asian republics: Kazakhstan, Uzbekistan, Kyrgyzstan, Tajikistan and Turkmenistan, as well as Azerbaijan, a state of the South Caucasus located on the other side of the Caspian Sea. In addition to regular meetings, the community would also establish a rotating secretariat like the rotating presidency of the Council of the EU, a council of elders for cultural and humanitarian affairs, and the appointment of special presidential envoys for coordination. To explain Mirziyoyev's new proposal, I ask two questions: why is it being compared to the Central Asian EU and whether it can work. First, let's start with the context. The idea of regular high-level meetings between Central Asian countries originated at the UN General Assembly in 2017, when Mirziyoyev first proposed holding regular high-level consultations between Central Asian states, also known as C5. The first meeting was held in 2018 in Astana, the capital of Kazakhstan, and was devoted to reducing trade barriers and expanding cooperation in the field of water resources and energy. This is a big priority for Central Asia, which has significant energy potential due to its hydrocarbon resources and is experiencing regional tensions due to limited water reserves. About 70 million people live in the Amu Darya and Syr Darya River basins, which Central Asian countries have been fighting over for decades, and disputes over water resources control remain a source of geopolitical tension in the region.

Over the years, the C5 format has evolved from a summit focused primarily on crisis resolution to a platform for discussing broader regional ambitions. In 2023 and 2024, Azerbaijan, a South Caucasian state located on the other side of the Caspian Sea, joined this format as a guest, providing the Trans-Caspian Route, also known as the Middle Corridor, a shorter and more efficient trade corridor between Western China and Europe, bypassing the Russian northern corridor and the Suez Canal, access to the Trans-Caspian route. By involving Kazakhstan, which is primarily responsible for financing the middle corridor, in a closer dialogue with Azerbaijan, in which the volume of cargo transportation along the middle corridor has increased by 90% over the past 3 years. This expanded C5+1 format has allowed the Central Asian countries and Azerbaijan to better link things like customs procedures and digital data flows, making the region more competitive. Then, in November, the 2025 summit was held in Tashkent, the capital of Uzbekistan, at which five Central Asian states voted for the official inclusion of Azerbaijan in the group. The President of Uzbekistan called the decision to admit Azerbaijan a historic one, arguing that it would help build a solid bridge between Central Asia and the South Caucasus, paving the way for the formation of a unified cooperation space. Mirziyoyev also proposed the creation of an official regional unit called the Community of Central Asia, which would include a rotating secretariat, a Council of Elders to address cultural issues, and special representatives of the President. If this continues, it will be a significant step towards further regional integration and will be a bit like the Central Asian EU, since, according to Mirziyoyev, the group seeks to form a “Unified geopolitical and geo-economic region.”

So, what will this Central Asian EU really look like and will it be able to work? Well, there are not many details about the reaction of the other C5 states yet, but they are likely to provide support, given that all five Central Asian countries have stated in recent years that they want greater regional integration. In fact, Mirziyoyev is forming a bloc, which also includes Azerbaijan, as part of a broader Central Asian integration project that already runs through the Caspian Sea and which is now aimed at creating a transit and energy hub in the South Caucasus. At the November summit, Mirziyoyev proposed seven key proposals: a regional trade program until 2035, a common investment space (similar to the current EU project to create a capital markets union), cooperation on major transport corridors, including the China, Kyrgyzstan, Uzbekistan railway and the Trans-Afghan route, the adoption of a regional security plan, a plan for a decade of rational water management for the period from 2026 to 2036, the regional center

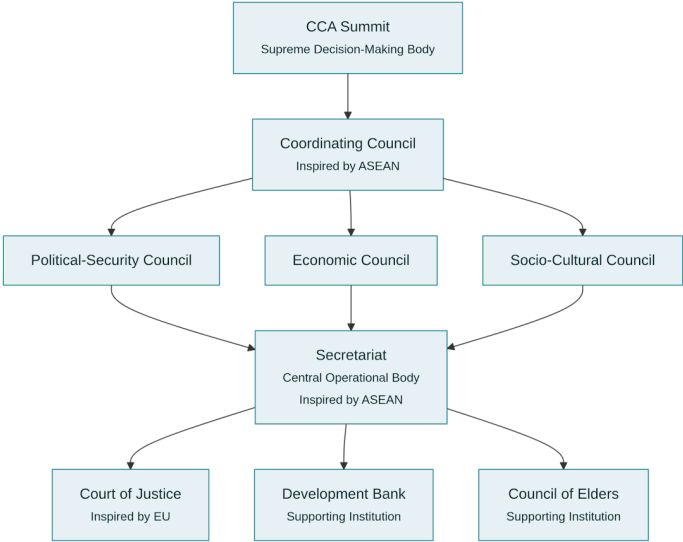
of excellence in the field of water resources and annual meetings, dedicated to spiritual heritage and new scientific initiatives.

In general, the proposed Central Asian Community seems to be aiming at two goals. Firstly, towards economic integration, and secondly, towards increased cooperation in other areas such as politics, security, water resources and the environment. The main reason for the creation of the Central Asian EU is economic integration. Since the start of the regional summits in 2017, Uzbekistan's trade with its neighbors has grown from 2.8 billion euros in 2017 to 6 billion euros in 2024, and the total GDP across Central Asia has doubled and amounted to 450 billion euros. Industrial growth in the region is also averaging 6% per year, which is twice the global average, and new cross-border trade zones are expected to drive further growth. Moreover, the rapidly growing population of Central Asia, which exceeds 80 million people and is expected to reach 100 million by 2050, also opens up opportunities for demographic-driven economic growth in the coming years. However, more broadly, a European-style Central Asian community would also give the region more influence in negotiations with world powers. Earlier this month, all five Central Asian leaders traveled together to Washington, D.C., for talks on crucial minerals with U.S. President Donald Trump after a bipartisan group of senators introduced a bill to lift Soviet-era trade restrictions on Central Asian countries that they claimed could deter American investment. For example, Central Asia has large reserves of rare earth minerals and produces about half of the world's uranium used to generate nuclear energy. Until now, its economic ties have been mainly with China and Russia, but now it is also being courted by the West. According to the Observatory of Economic Complexity, in 2023, Kazakhstan exported \$3 billion worth of key minerals to China, \$1.8 billion to Russia, but only \$544 million to the United States.

Thus, a European-style Central Asian community would give the bloc more leverage in negotiations, strengthening its influence in global supply chains. However, other forms of cooperation may be more difficult. Political relations between the Central Asian countries have not always been simple. After the collapse of the Soviet Union in 1991, the region was divided into five current countries along the former internal borders of the Soviet era, which crossed regions historically characterized by ethnic mixing. This led to the emergence of minority groups within the new nation-states, which led to tension and competition. For example, because of access to water between Uzbek, Kyrgyz and Tajik farmers. In fact, until recently, this year, there

was a brief skirmish between Kyrgyzstan and Tajikistan over the long-standing border conflict over Batken in Kyrgyzstan, which resulted in the deaths of about 100 people in September 2022. Although the dispute was finally resolved in March, the main tension remains, which may create difficulties for the Central Asian political union. Finally, there were also disagreements about how to deal with neighboring Afghanistan. Uzbekistan had previously proposed including it in the discussion of water issues due to its proximity to the Amu Darya, but the construction of the Kosh-Teppa canal in Afghanistan, which is due to be fully operational by 2028, has raised concerns, as it will divert about a third of river flow from other regions of Central Asia. Nevertheless, the inclusion of Afghanistan among the invited countries, as happened with Azerbaijan, could help the bloc to interact more constructively with the Taliban in the future.

Figure 1. Possible structure of the Community of Central Asia



Chapter 7. What can Central Asia learn from both regions?

Central Asia stands to gain critical insights from the European Union (EU) and the Association of Southeast Asian Nations (ASEAN) in advancing regional integration toward a supranational human rights regime. Comparative analyses and graphs from the thesis - depicting intra-regional trade volumes, institutional evolution, and normative convergence - reveal divergent trajectories shaped by economic, cultural, and political dynamics. For Central Asia, success hinges on three interdependent strategies: replicating the EU's robust economic integration, embracing ASEAN's shared values approach, and forging elite commitment to democratic institutions.

The EU exemplifies how economic interdependence catalyzes supranationalism. Through mechanisms like the single market and customs union, neo-functionalist spillover propelled initial sectoral cooperation into comprehensive governance, including human rights enforcement via the European Court of Justice (ECJ) and the Charter of Fundamental Rights. Thesis graphs underscore this: EU intra-trade exceeds 60% of total commerce, dwarfing ASEAN's 25% and Central Asia's mere 10-15% within frameworks like the Eurasian Economic Union (EAEU), hampered by external dependencies on Russia and China (trade rising modestly from \$2.8 billion to \$6 billion, 2017-2024). Central Asian states must thus establish a genuine economic union—encompassing free trade areas, harmonized standards, and connectivity projects such as the Trans-Caspian Middle Corridor - to cultivate interdependence that demands rule-of-law safeguards and paves the way for human rights institutionalization.

Complementing this, ASEAN's model offers lessons in normative cohesion amid diversity. The "ASEAN Way" of consensus-driven, non-interference cooperation has sustained integration despite cultural variances, facilitating incremental human rights progress through the ASEAN Intergovernmental Commission on Human Rights (AICHR). Draft visualizations contrast this pragmatic trust-building with Central Asia's post-Soviet frictions, including transboundary water conflicts and ethnic divides. Regional leaders should promote a shared identity via institutionalized forums - echoing Uzbekistan's 2025 Shanghai Cooperation Organisation (SCO) Community blueprint proposals for cultural dialogues and elder consultations - to bolster economic and political resilience.

Finally, political will remains pivotal, transcending pure economic or cultural determinism observed in both models. The EU's post-World War II elite pacts and ASEAN's

tolerance for authoritarian convergence succeeded by subordinating sovereignty to collective goals, unlike Central Asia's OSCE and EAEU experiences, where regime preservation prioritizes autonomy over accountability. Graphs tracing institutional maturity highlight this gap: EU supranational indices far outpace ASEAN's intergovernmentalism and Central Asia's nascent structures. Leaders must champion democratic reforms - transparent elections, minority rights protections, and oversight bodies - harnessing annual C5+1 summits to embed human rights in integration agendas.

By hybridizing these approaches - EU-style economic depth, ASEAN normative pragmatism, and resolute leadership - Central Asia's emerging Community of Interests can evolve into a viable platform for human rights advancement, as evolutionary graphs project potential synergies under aligned factors. This triad, enforced interdependently, addresses the region's unique authoritarian-Soviet legacy while leveraging geopolitical opportunities in a multipolar order.

This thesis establishes that economic integration, shared cultural values, and political commitment to democratic institutions constitute an indispensable triad for forging supranational human rights regimes, where no single factor suffices in isolation and their mutual reinforcement proves essential, as comparative analyses of the EU, ASEAN, and Central Asia demonstrate. The EU's neo-functionalist trajectory - from ECSC economic foundations via spillover to ECJ-enforced human rights - required cultural post-war reconciliation and elite resolve, while ASEAN's normative "ASEAN Way" sustains progress only through economic complementarity and pragmatic leadership, and Central Asia's fragmentation reveals how absent political will undermines even latent economic-cultural synergies.

Central Asia's path forward demands holistic application of this triad within the proposed Community of Interests: EU-modeled economic union via free trade and Middle Corridor infrastructure, ASEAN-inspired identity-building through cultural forums per Uzbekistan's 2025 blueprint, and resolute democratic commitments at C5 summits to surmount authoritarian inertia (Dunay 2022). Pursuing any factor alone - as in EAEU's economic focus without cultural-political depth - yields stalemate; only their integrated enforcement can institutionalize human rights advancement (Rosset & Svarin 2014).

Central Asia's regional integration trajectory remains ensnared within intergovernmental constraints characteristic of post-Soviet statecraft—consensus-bound forums like the C5+1

consultations and Eurasian Economic Union (EAEU) prioritize sovereignty preservation over institutional innovation. Yet transcending these limitations through qualified supranationalism offers a pragmatic pathway to operationalize the interdependent triad (economic integration, cultural norms, political commitment) validated across EU and ASEAN cases. Unlike the EU's comprehensive sovereignty pooling or ASEAN's purely declaratory cohesion, qualified supranationalism entails selective, sector-specific delegation—binding authority in technocratic domains (customs harmonization, transboundary infrastructure) while ring-fencing sensitive political competencies (internal security, electoral processes). This hybrid circumvents authoritarian sensitivities, leveraging economic functionalism to incrementally nurture normative-political evolution.

Drawing from neo-functionalist logic tempered by intergovernmental realism (Moravcsik 1998; Haas 1958), qualified supranationalism exploits spillover from "low politics" (trade corridors, energy grids) toward "high politics" (rights monitoring). The roadmap unfolds across triad pillars:

- Economic Pillar (EU-Inspired Depth): establish a Central Asian Economic Space with unified tariffs, mutual recognition standards, and joint Middle Corridor governance—mirroring ECSC sectoral origins. Binding secretariat authority over dispute arbitration would generate path dependency, as intra-regional trade (currently ~15%) compounds toward EU single-market thresholds (>60%).
- Cultural Pillar (ASEAN-Style Norm Building): Institutionalize "Central Asian Way" forums - annual cultural summits, multilingual education exchanges, nomadic heritage councils - fostering we-feeling beyond Soviet fractures. Uzbekistan's 2025 Community blueprint provides a template, with TAC-like amity treaty enshrining consultation norms sans interference vetoes.
- Political Pillar (Incremental Accountability): C5+1 evolves toward observer missions for electoral transparency and minority protections, with sunset clauses preserving reversibility. Graduated benchmarks (e.g., OSCE-aligned reporting) build legitimacy without existential sovereignty threats.

ASEAN's punctuated evolution—from loose security dialogue (1967) to economic community (2015) demonstrates qualified supranationalism's feasibility in diversity: green milestones (TAC, Charter) incrementally deepened cooperation without sovereignty rupture,

yielding economic dividends (red) that sustained political tolerance (blue). Myanmar's 2021 disinvitation signals normative maturation, critical lesson as Central Asia confronts analogous authoritarian tensions.

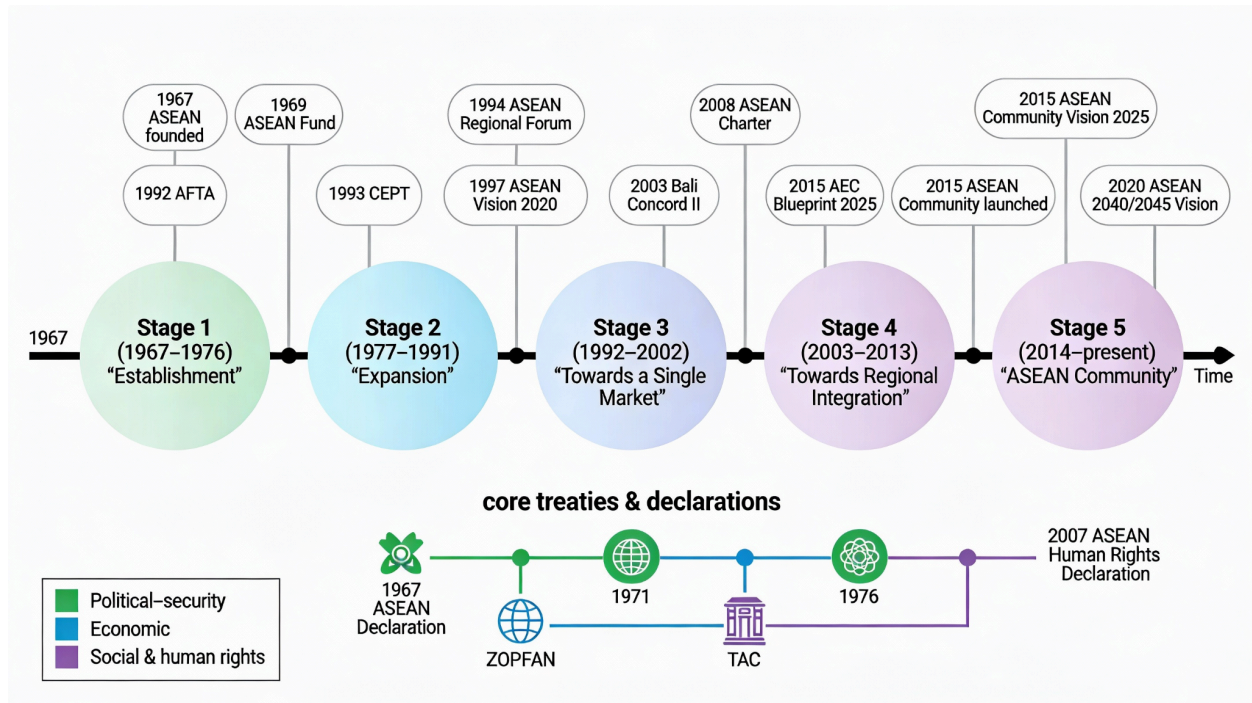


Figure 2: Stages of ASEAN's Regional Integration Development (1967–2025)

Figure 2 illustrates ASEAN's punctuated evolutionary trajectory through five chronologically sequenced stages, each demarcated by green-highlighted treaty milestones that catalyzed institutional deepening. The timeline traces progression from nascent political forum (1967) to projected Community consolidation (2025), with color-coded outcomes revealing the triad interplay: blue (political/security cooperation), red (economic integration), and purple (social/human rights dimensions). This visualization operationalizes qualified supranationalism's logic—incremental normative anchors (green) generating economic momentum (red) that sustains political resilience (blue) amid diversity constraints (purple gaps).

The 1967 Establishment phase launches with the Bangkok Declaration (green), creating a loose stability forum amid Cold War insurgencies. Initial blue political gains counter domino-theory threats, establishing ASEAN's foundational "peace through dialogue" ethos without economic substance.

1971–1976 Expansion pivots via ZOPFAN (1971, blue/green)—neutrality against great-power rivalry—and culminates in the Treaty of Amity and Cooperation (TAC, 1976,

green). TAC enshrines the "ASEAN Way" (non-interference, consensus), enabling membership growth while yielding blue normative consolidation and accession frameworks.

1992–2003 market-building marks economic takeoff through AFTA/CEPAT (1992, red/green), slashing intra-tariffs to 0–5%. Vision 2020 (1997, purple) articulates socio-cultural aspirations, driving red trade surges (25%+ intra-regional) alongside embryonic purple rights declarations.

2003–2015 regional integration institutionalizes via Concord II (2003, blue/green), Bali Concord II/Charter (2007, green)—granting legal personality—and AEC Blueprint (2009–2015, red). Outcomes span blue High Council dispute mechanisms, red single production base, and purple labor mobility foundations.

2015–2025 Community maturation launches the ASEAN Economic Community (AEC, 2015, red) while projecting 2025 Vision updates (green). Myanmar's 2021 exclusion tests purple evolution limits, highlighting non-interference tensions.

Figure 2 illustrates ASEAN's incremental regional integration across five evolutionary stages (1967–2025), offering Central Asia a replicable blueprint for qualified supranationalism through green-highlighted treaty milestones catalyzing triad-balanced progress (blue: political/security; red: economic; purple: socio-cultural). The 1967 Bangkok Declaration's stability forum (blue) mirrors C5 consultations, teaching consensus-first foundations; TAC (1976, green/blue) demonstrates sovereignty-preserving norms enabling expansion, adaptable via 2025 Community Treaty for Turkmenistan inclusion; AFTA (1992, red) proves tariff harmonization ignites spillover absent EU pooling, guiding Middle Corridor customs union targeting 20B/decade trade; the 2007 Charter/AEC (green/red) models chartered secretariats with sectoral arbitration, suitable for C5+1 water/energy disputes; and 2025 Vision maturation (purple evolution) amid Myanmar tests underscores normative forums' resilience. Collectively, ASEAN's green anchors unlocking red economics while sustaining blue tolerance—despite purple limits—demonstrates gradualism viable in diversity, enabling Central Asia to transcend virtual regionalism toward interdependent communities without sovereignty rupture.

Conclusion

This thesis has systematically addressed the central puzzle of why some regions successfully cultivate supranational human rights regimes capable of constraining sovereign authority to advance collective protections, while others remain trapped in intergovernmental inertia. Through comparative-historical analysis of the European Union (EU), Association of Southeast Asian Nations (ASEAN), and Central Asia, drawing on neo-functionalism, constructivism, and intergovernmentalism, the study rigorously tested a core hypothesis: economic integration, shared cultural norms, and political commitment to liberal democratic governance form an indispensable, interdependent triad whose synergistic interaction determines human rights regime development.

The EU stands as the gold standard of triad realization. Neo-functionalist spillover transformed the narrow European Coal and Steel Community (1951) into comprehensive supranationalism: a single market with four freedoms, Economic and Monetary Union (eurozone for 20 states), and binding human rights architecture via the Court of Justice's direct effect doctrine (*Van Gend en Loos*, 1963) and Charter of Fundamental Rights (2000). Post-World War II cultural reconciliation, rooted in shared liberal-democratic norms, underpinned elite bargains, while successive treaties (Maastricht 1992, Lisbon 2009) evidenced resolute political will to institutionalize accountability beyond national vetoes. ASEAN manifests partial, pragmatic triad operations. Economic complementarity through AFTA (1992) and the ASEAN Economic Community (2015) generated sustained growth (5% annual GDP 2000–2020), bolstered by "ASEAN Way" normative cohesion amid profound diversity. Yet non-interference codified in the Treaty of Amity and Cooperation (1976) deliberately limits the ASEAN Intergovernmental Commission on Human Rights (AICHR) to advisory functions, as the restrained Myanmar coup response (2021 summit exclusion) underscores. This intergovernmental equilibrium prioritizes stability over enforcement depth. Central Asia reveals triad disequilibrium and stalled potential. Post-Soviet architectures, the Commonwealth of Independent States, Eurasian Economic Union, and nascent C5+1 consultations, harbor economic promise, yet authoritarian consolidation privileges regime security over rights, compounded by normative fragmentation (Soviet legacies versus ethnic nationalisms) and external hegemony (Russia, China).

Cross-case patterns affirm the triad's non-substitutability and mutual reinforcement: economics catalyzes spillover (EU exemplar), culture sustains trust amid heterogeneity (ASEAN

stabilizer), and politics alone crystallizes binding enforcement (EU advantage, ASEAN/CA deficit). Monocausal pursuits falter EAEU economics without normative-political depth yields no rights regime; ASEAN norms absent supranationalism remain declaratory; Central Asia's authoritarianism nullifies latent synergies. This advances integration theory by wedding neo-functionalism's materialism to constructivism's ideational emphasis, while nuancing intergovernmentalism through regime-type mediation.

For Central Asia, the verdict prescribes a pragmatic hybrid: EU-inspired economic architecture (harmonized customs union, Trans-Caspian infrastructure) to ignite interdependence; ASEAN-style normative forums (cultural councils, elder consultations per 2025 blueprint) to forge "we-feeling"; and C5+1 platforms channeling incremental democratic commitments (electoral transparency, minority safeguards). External partners, US C5+1 minerals initiatives, EU normative persuasion, must prioritize triad-aligned incentives over transactional bilateralism, cultivating "qualified supranationalism" sensitive to post-Soviet sovereignty reflexes.

Scholarly contributions refine sovereignty-integration debates within multipolar flux, empirically operationalizing triad dynamics via novel Central Asian metrics and theoretically bridging regionalism literatures. The analysis cautions against EU emulation in authoritarian contexts, advocating contextual hybrids over universal blueprints. Future scholarship should pursue longitudinal triad quantification (gravity-model spillover thresholds), real-time C5+1 tracking amid US-China rivalry, and ASEAN-EU hybridization experiments.

In sum, this study illuminates supranational human rights not as utopian telos but attainable horizon-forged through deliberate triad stewardship. Where economics lays functional foundations, culture breathes normative life, and politics wields institutional hammer, regional orders transcend sovereign silos to safeguard dignity collectively. Central Asia, poised at this juncture, holds transformative potential if leaders transcend inherited constraints toward interdependent futures.

List of References

1. Acharya, Amitav. 1997. "Ideas, Identity, and Institution-Building: From the 'ASEAN Way' to the 'Asia-Pacific Way'?" *The Pacific Review* 10 (3): 319–346.
<https://doi.org/10.1080/09512749708719226>.
2. Acharya, Amitav. 2001. *Constructing a Security Community in Southeast Asia: ASEAN and the Problem of Regional Order*. London and New York: Routledge/Taylor & Francis Group.
3. Acharya, Amitav. 2012. "Comparative Regionalism: A Field Whose Time Has Come?" *The International Spectator* 47 (1): 3–15.
4. Almakky, Rawa Ghazy. "The Role of Regional Organizations in International Law: An Analytical Study." Unpublished research paper.
5. Anaya Muñoz, Alejandro. "Human Rights from the Perspective of International Relations."
6. Angelini, E. C. 2005. "The European Union's Institutional Design." In *The Elgar Companion in Law and Economics*, 261–279. Erfurt: Edward Elgar.
7. ASEAN. 1967. *ASEAN Declaration (Bangkok Declaration)*. Bangkok, 8 August 1967.
<https://agreement.asean.org/media/download/20140117154159.pdf>.
8. ASEAN. 1976. *Treaty of Amity and Cooperation in Southeast Asia*.
<https://asean.org/wp-content/uploads/2021/01/20131230235433.pdf>
9. ASEAN Regional Forum. 1994. *The First ASEAN Regional Forum, Bangkok, 25 July 1994*.
<https://aseanregionalforum.asean.org/wp-content/uploads/2019/01/First-ARF-Bangkok-25-July-1994.pdf>
10. ASEAN Secretariat. 2012a. *Declaration of ASEAN Concord II (Bali Concord II)*.
<https://asean.org/speechandstatement/declaration-of-asean-concord-ii-bali-concord-ii/>
11. ASEAN Secretariat. 2012b. *Agreement for the Establishment of a Fund for ASEAN: Rules Governing the Control, Disbursement and Accounting of the Fund for ASEAN, Cameron Highlands, 17 December 1969*.
<https://asean.org/agreement-for-the-establishment-of-a-fund-for-asean-rules-governing-the-control-disbursement-and-accounting-of-the-fund-for-the-asean-cameron-highlands-17-december-1969/>
12. ASEAN Secretariat. 2012c. *Treaty on the Southeast Asia Nuclear Weapon-Free Zone*.
<https://asean.org/treaty-on-the-southeast-asia-nuclear-weapon-free-zone/>
13. ASEAN Secretariat. 2015. *ASEAN 2025: Forging Ahead Together*. Jakarta: ASEAN Secretariat. <https://asean.org/book/asean-2025-forging-ahead-together/>
14. ASEAN Secretariat. 2020. "Significance of the ASEAN Charter."
<https://asean.org/asean/asean-charter/>

15. Balassa, Bela. 1961. *The Theory of Economic Integration*. Homewood, IL: Richard D. Irwin.
16. Benedek, Wolfgang, et al., eds. 2010. *The Role of Regional Human Rights Mechanisms*.
17. Bennett, Andrew, and Colin Elman. 2007. "Case Study Methods in the International Relations Subfield." *Comparative Political Studies* 40 (2): 170–195.
<https://doi.org/10.1177/0010414006296346>.
18. Börzel, Tanja A. 2016. "Regional Integration." In *The Oxford Handbook of Comparative Regionalism*, edited by Tanja A. Börzel and Thomas Risse, 41–63. Oxford: Oxford University Press.
19. Börzel, Tanja A., and Dirk Nolte, eds. 2010. *Regionalism and Governance in the Americas: Continental Drift*. Houndmills, UK: Palgrave Macmillan.
20. Börzel, Tanja A., and Thomas Risse. 2016. "Theorizing Regionalism: Cooperation, Integration, and Governance." In *The Oxford Handbook of Comparative Regionalism*, edited by Tanja A. Börzel and Thomas Risse, 3–39. Oxford: Oxford University Press.
21. Börzel, Tanja A., and Thomas Risse, eds. 2016. *The Oxford Handbook of Comparative Regionalism*. Oxford: Oxford University Press.
22. Börzel, Tanja A., and Thomas Risse. 2016. *The Oxford Handbook of Comparative Regionalism*. Chapter "Regional Integration," 41–63. Oxford: Oxford University Press.
23. Börzel, Tanja A., and Thomas Risse. 2016. *The Oxford Handbook of Comparative Regionalism*. Chapter "Theorizing Regionalism," 3–39. Oxford: Oxford University Press.
24. Börzel, Tanja A., and Thomas Risse. 2016. "Regional Integration" and "Theorizing Regionalism." In *The Oxford Handbook of Comparative Regionalism*. Oxford: Oxford University Press.
25. Breidahl, Karen N., Nils Holtug, and Kristian Kongshøj. "Do Shared Values Promote Social Cohesion? If So, Which? Evidence from Denmark."
26. Caballero-Anthony, Mely. 1998. "Mechanisms of Dispute Settlement: The ASEAN Experience." *Contemporary Southeast Asia* 20 (1): 38–66.
<https://doi.org/10.1355/cs20-1c>
27. Caballero-Anthony, Mely. 2008. "The ASEAN Charter: An Opportunity Missed or One that Cannot Be Missed?" *Southeast Asian Affairs* 2008 (1): 71–85.
<https://doi.org/10.1353/saa.0.0000>
28. Caballero-Anthony, Mely. 2022. "The ASEAN Way and the Changing Security Environment: Navigating Challenges to Informality and Centrality." *International Politics*. <https://doi.org/10.1057/s41311-022-00400-0>
29. Cerny, Philip G. *The Changing Architecture of Politics: Structure, Agency and the Future of the State*.
30. Chavez, Jere J. 2007. "Social Policy in ASEAN." *Global Social Policy* 7 (3): 362–372.
<https://doi.org/10.1177/1468018107082239>

31. Cockerham, Geoffrey B. 2009. "Regional Integration in ASEAN: Institutional Design and the ASEAN Way." *East Asia* 27 (2): 165–185.
<https://doi.org/10.1007/s12140-009-9092-1>
32. De Lombaerde, Philippe, Fredrik Söderbaum, Luk Van Langenhove, and Francis Baert, eds. 2010. *Theoretical and Methodological Approaches to Comparative Regionalism*. Tokyo: United Nations University Press.
33. De Lombaerde, Philippe, Fredrik Söderbaum, Luk Van Langenhove, and Francis Baert. 2010. "The Problem of Comparison in Comparative Regionalism." *Review of International Studies* 36 (3): 731–753. <https://doi.org/10.1017/S0260210510000707>.
34. Dodo, Mubarak K. 2014. "Historical Evolution of the Social Dimension of the European Integration: Issues and Future Prospects of the European Social Model." *L'Europe en Formation* 372 (2): 51–66. <https://doi.org/10.3917/eufor.372.0051>
35. Dunay, Pál. 2022. "The OSCE in Central Asia: Engagement, Presence, Problems."
36. Dosch, Joern. 2008. "ASEAN's Reluctant Liberal Turn and the Thorny Road to Democracy Promotion." *The Pacific Review* 21 (4): 527–545.
<https://doi.org/10.1080/09512740802294655>
37. Dunlop, Loek, and Inge Sieben. "Transformations in the Religious and Moral Landscape in Europe.", 125–130.
38. El-Agraa, Ali M. 2011. "A History of European Integration and the Evolution of the EU." In *The European Union*, 9 (24): 19–37. <https://doi.org/10.1017/CBO9780511844041.005>
39. Eilstrup-Sangiovanni, Mette, ed. 2006. *Debates on European Integration*. Basingstoke: Palgrave Macmillan.
40. European Commission. 2007. *European Social Fund*. Germany: European Commission.
41. European Commission. 2021. *The European Pillar of Social Rights Action Plan*. Brussels: European Commission.
<https://op.europa.eu/webpub/empl/european-pillar-of-social-rights/downloads/KE0921008ENN.pdf>
42. European Union. 2022. "Division of Competences within the European Union."
<https://eur-lex.europa.eu/EN/legal-content/summary/division-of-competences-within-the-european-union.html>.
43. Fawcett, Louise, and Andrew Hurrell, eds. 1995. *Regionalism in World Politics: Regional Organization and International Order*. Oxford: Oxford University Press.
44. Haas, Ernst B. 1958. *The Uniting of Europe: Political, Social, and Economic Forces, 1950–1957*. Stanford, CA: Stanford University Press.
45. Haas, Ernst B. 1971. "The Study of Regional Integration: Reflections on the Joy and Anguish of Pretheorizing." *International Organization* 24 (4): 607–646.
46. Halman, Loek, and Inge Sieben. "Transformations in the Religious and Moral Landscape in Europe." In *[Book title]*, 125–[pages].
47. Hatton, Lucy. 2011. "Social Europe." London: Institute for the Study of Civil Society.
<https://www.civitas.org.uk/eufacts>

48. Hettne, Björn, András Inotai, and Osvaldo Sunkel, eds. 1999–2001. *The New Regionalism* series. Houndmills, UK: Palgrave Macmillan.
49. Hussey, A. 1991. “Regional Development and Cooperation through ASEAN.” *Geographical Review* 81 (1): 87–98. <https://doi.org/10.2307/215178>
50. Jetschke, Anja. 2017. “What Drives Institutional Reforms in Regional Organisations? Diffusion, Contextual Conditions, and the Modular Design of ASEAN.” *TRaNS: Trans-Regional and -National Studies of Southeast Asia* 5 (1): 173–196. <https://doi.org/10.1017/trn.2016.30>
51. Jetschke, Anja, and Philomena Murray. 2012. “Diffusing Regional Integration: The EU and Southeast Asia.” *West European Politics* 35 (1): 174–191. <https://doi.org/10.1080/01402382.2012.631320>
52. Jones, David M., and M. L. R. Smith. 2002. “ASEAN’s Imitation Community.” *Orbis* 46 (1): 93–109. [https://doi.org/10.1016/S0030-4387\(01\)00108-9](https://doi.org/10.1016/S0030-4387(01)00108-9)
53. Jones, David M., and M. L. R. Smith. 2007. “Making Process, Not Progress: ASEAN and the Evolving East Asian Regional Order.” *International Security* 32 (1): 148–184. <https://doi.org/10.1162/isec.2007.32.1.148>
54. Keling, Mohd Faisol, et al. 2011. “The Development of ASEAN from Strategic Approaches.” *Asian Social Science* 7 (7). <https://doi.org/10.5539/ass.v7n7p169>
55. Krapohl, Sebastian, and Alexandra Vasileva-Dienes. “The Region That Isn’t: China, Russia and the Failure of Regional Integration in Central Asia.”
56. Kuhonta, Erik M. 2006. “Walking a Tightrope: Democracy versus Sovereignty in ASEAN’s Illiberal Peace.” *The Pacific Review* 19 (3): 337–358. <https://doi.org/10.1080/09512740600875119>
57. Laursen, Finn, ed. *The Political Economy of European Integration*.
58. Lee, Seokwoo, and Hee Eun Lee. 2020. *Asian Yearbook of International Law, Volume 23 (2018)*. Boston: Brill Nijhoff.
59. Leifer, Michael. 2013. *ASEAN and the Security of South-East Asia (Routledge Revivals)*. 3rd ed. London: Routledge.
60. Lenz, Tobias, and Fredrik Söderbaum. 2025. “Comparative Regionalism Beyond Europe versus the Rest.” *Review of International Studies* (forthcoming).
61. Liu, H. 2022. “Abuse of Human Rights in Myanmar: An Urgent Appeal to Reinterpret the ASEAN Non-Interference Principle.” [journal details to be completed].
62. Löffelholz, Martin, and Danilo A. Arao. 2011. *The ASEAN Guide: A Journalist’s Handbook to Regional Integration in Southeast Asia*. Germany: International Institute for Journalism. <https://www.researchgate.net/publication/28025229>
63. Mansfield, Edward D., and Helen V. Milner, eds. 1997. *The Political Economy of Regionalism*. New York: Columbia University Press.
64. Mattli, Walter. 1999. *The Logic of Regional Integration: Europe and Beyond*. Cambridge: Cambridge University Press.
65. Mitrany, David. 1943. *A Working Peace System*. Chicago: Quadrangle Books.

66. Moravcsik, Andrew. 1995. "Liberal Intergovernmentalism and Integration: A Rejoinder." *JCMS: Journal of Common Market Studies* 33 (4): 611–628.
<https://doi.org/10.1111/j.1468-5965.1995.tb00554.x>
67. Moravcsik, Andrew. 1998. *The Choice for Europe: Social Purpose and State Power from Messina to Maastricht*. Ithaca, NY: Cornell University Press.
68. Moravcsik, Andrew. 2013. *The Choice for Europe: Social Purpose and State Power from Messina to Maastricht*. New ed. [publisher details to be completed].
69. Murray, Philomena. 2010. "Comparative Regional Integration in the EU and East Asia: Moving beyond Integration Snobbery." *International Politics* 47 (3–4): 308–323.
<https://doi.org/10.1057/ip.2010.13>
70. Narine, Shaun. 2008. "Forty Years of ASEAN: A Historical Review." *The Pacific Review* 21 (4): 411–429. <https://doi.org/10.1080/09512740802294689>
71. Nugent, Neill. 2017. *The Government and Politics of the European Union*. 8th ed. Hampshire: Palgrave Macmillan.
72. Pellet, Alain. 2000. "'Human Rightism' and International Law." Lecture delivered 18 July 2000. In *Stylus Curiarum*. <https://styluscuriarum.org/uploads/2019/02>.
73. Pinder, John, and Simon Usherwood. 2018. *The European Union: A Very Short Introduction*. 4th ed. New York: Oxford University Press.
74. Pomerlyan, Evgeniya, and Maksim Belitski. 2023. "Regional Integration and Economic Performance: Evidence from the Eurasian Economic Union."
75. Ramcharan, Robin. 2000. "ASEAN and Non-Interference: A Principle Maintained." *Contemporary Southeast Asia* 22 (1): 60–88. <https://doi.org/10.1355/cs22-1c>
76. Rattanaseeve, Piti. 2014. "Towards Institutionalised Regionalism: The Role of Institutions and Prospects for Institutionalisation in ASEAN." *SpringerPlus* 3 (1).
<https://doi.org/10.1186/2193-1801-3-556>
77. Rosamond, Ben. 2000. *Theories of European Union Integration*. Basingstoke: Macmillan.
78. Schuman, Robert. 1950. *The Schuman Declaration*. 9 May 1950.
79. Scott, W. Richard. 2014. *Institutions and Organizations: Ideas, Interests, and Identities*. 4th ed. Thousand Oaks, CA: SAGE.
80. Severino, Rodolfo C. 2006. *Southeast Asia in Search of an ASEAN Community*. Singapore: Institute of Southeast Asian Studies.
81. Severino, Rodolfo C. 2007. "ASEAN Beyond Forty: Towards Political and Economic Integration." *Contemporary Southeast Asia* 29 (3): 406–423.
<https://doi.org/10.1355/cs29-3b>
82. Sjørnsen, Helene. "A Certain Sense of Europe? Defining the EU through Enlargement."
83. Söderbaum, Fredrik. 2009. "Comparative Regional Integration and Regionalism." In *The SAGE Handbook of Comparative Politics*, edited by Todd Landman and Neil Robinson, 477–496. London: Sage.

84. Söderbaum, Fredrik. 2016. *Rethinking Regionalism*. Houndmills, UK: Palgrave Macmillan.
85. Söderbaum, Fredrik, and Timothy M. Shaw, eds. 2003. *Theories of New Regionalism*. Houndmills, UK: Palgrave Macmillan.
86. Suzuki, Shogo. 2019. “Why Is ASEAN Not Intrusive? Non-interference Meets State Strength.” *Journal of Contemporary East Asia Studies* 8 (2): 157–176.
<https://doi.org/10.1080/24761028.2019.1681652>
87. Telò, Mario. 2011. “The European Union, Regionalism, and World Order: Five Scenarios.” *Fédéralisme* 11 (2): 1–12.
<https://popups.uliege.be/1374-3864/index.php?id=1090>.
88. The World Bank Group. 2023. “Regional Integration – Overview.”
<https://www.worldbank.org/en/topic/regional-integration/overview>.
89. United Nations International Law Association (ILA). 2024. *The International Law of Regional Organizations: Final Report*. Athens Conference 2024.
90. Zeitlin, Jonathan, Egidijus Barcevičius, and J. Timo Weishaupt. 2014. “Institutional Design and National Influence of EU Social Policy Coordination: Advancing a Contradictory Debate.” In *Work and Welfare in Europe*, 1–15.
https://doi.org/10.1057/9781137022622_1