

Empire and Imperialism: A Debate Still Open?

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Introduction

Over the last few years we have seen a huge upsurge of books, articles, pamphlets, working papers and conferences dealing with the idea of empire, especially with regard to the United States. Many times we have read comparisons with ancient Rome, Athens, or nineteenth-century Britain. Quite often the term ‘empire’ has been associated with criticisms; sometimes with approvals – to the surprise of citizens who are supposed to have a democratic set of mind.

Is the US an empire? Several experts have tried their best to answer this question. Many of them have gone back to rather ancient books about much older empires and attempted to revive aged definitions. Aged, because up to a few years ago the topic of empires seemed of relatively little interest to social scientists. Empires belong to the past. Political scientists mainly focused on nation-states, their domestic features, dynamics and relations. In the last few years, however, the rise of the American ‘lonely superpower’ (Huntington, 1999), the challenge of emerging continental states and polities¹ and the unleashing of ‘global’ economic, social, political and cultural forces have contributed to the return of an imperial discourse long abandoned.

What I address here is not, however, the question of whether the US, the EU or globalisation itself is an empire. My aim is rather to focus on the ongoing theoretical debate on the idea of ‘Empire’ and to shine a light on several intellectual contributions and shortcomings. I will argue that the older concept of imperialism is more relevant to an understanding of international behaviours which now seems more fashionable to label ‘imperial’. Empires – it will be

argued – belong mainly to the past. Certainly the USA has been characterised by several imperial elements, for many decades, if not centuries.² Certainly documents such as the now familiar 2002 *National Security Strategy* underpin projects which have much deeper roots than just vague dreams. In order to understand them we do need a dynamic historical theory. Moreover, we have to grasp fully the relations between political actors and the structures which condition their achievements. Static notions of ‘Empire’, such as the ones we have often encountered in books and journals in recent times, are clearly not enough. The interpretations I have chosen to discuss, though not exhaustive of the available literature, are characterised by a common focus on long-term perspectives and analyses, sometimes in a sociological, sometimes a more philosophical framework. Furthermore, the writers I have selected, while broadly representative of various intellectual traditions, stand out for the originality and topical relevance of their insights and proposals. Starting with a classical interpretation by a political scientist, I will conclude with Ellen Wood’s Political Marxism, which paves the way for a theory that keeps together structures and agency, and provides a basis for further investigation and research.

I will start with the contribution of a liberal IR scholar, Michael Doyle. He wrote in the 1980s, when the vocabulary of ‘empires’ was not yet fashionable, and his study covers millennia of human history. Despite a rich and detailed account, he does not provide a fully-fledged theory. His work is also conceptually overstretched. Looking for a tighter framework, I will switch to two more recent interpretations: the ‘critical’ one by Negri and Hardt, and Ferguson’s conservative perspective. Both deserve attention, especially as *political* interventions. Ferguson draws comparisons among the Roman, British and American empires. Negri and Hardt, who propose a kind of manifesto, work out a theory which contains several interesting insights and relies on many different intellectual sources. Though they locate the ‘Empire’ in the history of the modes of production and accumulation regimes, their general framework is too abstract to be heuristically helpful.

I will then discuss the German lawyer Carl Schmitt (1888-1985), who paved the way for a *Renaissance* of a more realist idea of empire. His deeply *political* interpretation of life is part of a philosophy of history, in which ideas and institutions are more important than the underlying productive forces. From a totally different perspective, as we will finally see, Canadian political scien-

tist Ellen Wood mainly relies on historical materialism. She explains G.W. Bush's policies with a theory, which encompasses extensive stretches of history and stresses how current international affairs are firmly rooted in their capitalistic and imperialistic origins. It is probably the clearest attempt to understand present events through the lens of an historical sociology of imperialism, though her analysis of contemporary America raises doubts and questions which deserve further attention and investigation. First of all, it is important to look at the earlier and more classical readings of mainstream International Relations, in its American and liberal version.

The early contribution of International Relations Theory

In 1986 an American scholar, Michael W. Doyle,³ published *Empires*, a large, ambitious and dense volume, which offers a deep comparative analysis of imperial experiences from ancient to present times. Doyle aims to provide a more scientific interpretation of phenomena that have usually been studied by scholars of humanities or political writers. An empire, in his view, is the effective control exercised by a political society upon other societies, be it formal or informal. Imperialism is the process by which such control is established and maintained. At first we find ourselves confronted with a rather abstract notion. Ideas such as 'political society' or 'effective control' are all too vague, and therefore unhelpful. Nonetheless, the author tries to explain the rise, maintenance and collapse of empires through three key-variables (Doyle, 1986: 123-38):

1. The drive of a metropolis, an expanding centre of power (but where does this power come from?).
2. The conditions of the periphery, an allegedly backward and powerless region.
3. The dynamics of the international system, which is understood in rather traditional terms according to a broadly realist interpretation.

After setting up his theoretical framework Doyle continues with a detailed analysis of ancient empires, starting with Athens and Sparta. He then moves to a long description of more recent Spanish, British and French colonial conglomerates.

Despite the accuracy and originality of some of the insights, Doyle's general framework does not offer a convincing hypothesis of what empires actually are. Crucial concepts – such as the 'Augustan threshold'⁴ or 'social differentiation' – deserve a more profound theoretical reflection. The analysis of the theories of imperialism is rather superficial and incomplete too. Most of all, his account is static, for he does not find a thread to link ancient Greeks with contemporary Britons or Americans. More than an overarching theory, he delivers a sequence of pictures. His efforts to match economic and social issues with diplomacy and war must be deeply appreciated, but he scarcely provides an interpretation of the structural origins and developments of the empires he studies. Furthermore, he stretches his analytical tools so much that in the end the whole construction seems rather fragile. On the one hand, Doyle's volume is still the most serious and best-documented English account of a comparative history of empires. On the other, he unifies under a single label political communities which are probably too distant in time and space – while he doesn't supply convincing instruments to link them with the underpinning structures or connect them throughout the centuries.

In a totally different vein, Michael Hardt and Antonio Negri concentrate on the present, and in a rather prophetic fashion try to scrutinise the future. Let us move to them, in order to see whether they have envisaged that common link which is apparently missing in Doyle's earlier research.

Negri and Hardt's empire

Empire is a giant intellectual construction, built in 2000 with the publication of the homonymous book, by American literary critic Michael Hardt and Italian political theorist and leftist militant Antonio 'Toni' Negri. In just a few years it has raised lively debates, stimulated prompt replies (Balakrishnan, 2003) and a 'follow-up' on the issue of 'the multitude' (Hardt and Negri, 2005). In the authors' view, the era of imperialism is over, as well as its agents, the nation-states. We have entered a new world, dominated by an impressive conglomerate, a global *empire* of worldwide extension, made up of 'a series of national and supranational organisms united under a single logic of rule' (Hardt and Negri, 2000: xii). A new kind of sovereignty is arising: nation-states relied on a transcendental one, based on the construction of an external legitimising authority, be it God, the Leviathan king, or Rousseau's

general will; the sovereignty of capital is immanent and borderless. It oppresses and exploits individuals with the might of a totalitarian, penetrating, and hence biopolitical, power of control. Such an imperial constellation includes the oligarchy of multinational corporations, a new legal order – represented by the G-8, the WTO, the IMF and other international organisations – and an overarching military power, the United States of America. Finally, the empire does not have boundaries, either in space or in time: it is everywhere and for eternity. Who can then resist it? A *multitude*, in Negri's sophisticated philosophical language. That is, a radically democratic global network of trade unions, new proletarians, excluded people, in a world where the Leviathan has left no outsiders and incorporated and deprived most of its population. The multitude resists the empire's attempts to re-shape it as a People, that is, 'an organized particularity that defends established privileges and properties' (Hardt and Negri, 2000: 316). While 'the People' is a by-product of the nation-state, the multitude has the potential to promote constituent and revolutionary projects at a global level and to overthrow both the agonising nation-states and the imperial colossus.

Hardt and Negri's impressive work draws on a multiplicity of references: from the classics, represented by Polybius,⁵ Saint Augustine, Machiavelli, Spinoza and Marx, to Foucault, Deleuze and Guattari. The authors of *The Federalist Papers* are often referred to as the proponents of the imperial American Constitution. Despite such a richness of ideas and sources, however, *Empire* can hardly help us with any historically grounded sociology of empires. The language is highly-conceptualised, abstract, sometimes obscure to the reader and problematic for social scientists. Even though Negri and Hardt capture some features of the emerging world order, no clear sociological account of it is provided. Owing especially to the lack of empirical evidence, it is also difficult to assess whether historical nation-states and traditional proletarian workforces have lost their once crucial political role. Both states and social classes seem to have suddenly disappeared.

We could on the contrary argue that nation- and territorial states still play a role in world politics. Several authors think that they are actually facing a transformation, rather than undergoing a demise or crisis. Especially after the neoliberal turn of the 1980s new paradigms are on the rise (Cerny, 1990; Bobbitt, 2003). States are probably still important players of the global game, inasmuch as they are getting lighter, more flexible and are capable of draining wealth to the benefit of the richer elites. Some of them – mainly in

Eastern Asia – are evolving towards a kind of *developmental* model, while the emerging regional organisations can be read as attempts to renew the qualities and functions of the states themselves before new challenges. It might well be the case that – rather than facing an overarching global empire – we are currently at the dawn of an era of business-friendly, capitalistic and imperialistic territorial states.⁶ Perhaps they are just being re-shaped at a continental or regional level.

Other aspects of Hardt and Negri's theory are as yet unconvincing. The concept of 'multitude', despite its crucial role, remains obscure. A clear analysis of its evolution is missing; who are its exponents? Where do they come from? Do they share a strategy, or at least common aims? While it seems reasonable to recognise that increasing numbers of people (the working poor, migrants, diasporic communities) are sharing experiences at a transnational level, the kind of political role they play is still hard to understand. Furthermore, are they part of a multitude or should we rather speak of 'multitudes' in the plural form? Similar considerations apply to the dynamics of capitalism, which is interpreted in a rather undefined fashion, despite its centrality: where is it heading to? Is there one capitalism, or many? Who are its leading actors? Shareholders, or managers and cadres? The possibility of tensions among different capitalisms, and the nation-states which are linked with them, is rather neglected. The transformation of the United States from an imperialistic power to the possible future military branch of a 'global' empire deserves a deeper analysis, too. Besides some interesting insights, Hardt and Negri are at odds when facing current international politics. The 2003 Iraq war shows how the 'empire' split on what might be seen as its expansion in the Gulf area: up to the point that we have subsequently read about a 'divided' West (Habermas, 2004).

To sum up, a teleological flavour, the use of rather abstract concepts and poor empirical evidence suggest we look for other interpretations of what is currently at stake in the relations between global capitalism and 'the political' itself. In Hardt and Negri's perspective the *locus* of 'the political' is rather neglected, and subsumed within the general, overarching empire. Let us therefore move to hypotheses which try to return to political agents a more central role. And let us move then to the place where the core of contemporary political power resides, Washington, DC.

A new American empire?

The clearest advocate for an American empire has so far been a young British historian, Niall Ferguson, especially in his 2004 *Colossus*.⁷ Drawing on a rather simplistic taxonomy (Ferguson, 2004b: 11), he argues that imperial rule contains by both formal and informal elements. The USA is not a proper empire for 'Americans themselves lack the imperial cast of minds' (2004b: 29); that is, they tend to reject the possibility of taking on world responsibilities and ruling the planet. Strong internal opposition to both Vietnam and Iraq wars seem to confirm this assessment. Furthermore, America has been home to a tradition of isolationism which dates back to the rejection of the League of Nations in 1920.

To put it euphemistically, Niall Ferguson is a neoliberal historian, who calls for a world governed by a benign American empire, inspired by such principles as liberal democracy and the free market. These thoughts are shared by exponents of both the British and American establishments.⁸ In his works we do not find any record of social class analysis, let alone any theory of social property relations. His main concern, apart from accurate historical reconstructions, is to explain why US citizens should endorse a truly imperial American role in the world. 'Global' capital, which comes mainly from North American, European and East Asian countries, requires a political and military authority to enforce its position and exploitation (in our words) throughout the world. In the absence of other powers, the US is the best candidate for such a leadership. American primacy by far outweighs that of Britain in the nineteenth century and poor developing countries 'require the imposition of some kind of external authority' (Ferguson, 2004b: 24). Unfortunately, in Ferguson's view, America is reluctant to assume global responsibilities; such an attitude arises from demographic limits, budget constraints and a public opinion that is usually uncomfortable with international military missions. These elements explain why a worldwide American empire is hardly feasible and why some room for domestic and global opposition is left.

Ferguson's publications on empires highlight a mentality which has gained ground in several intellectual circles: they are first of all important as political manifestos. The reader can detect the role which politicians (and the military) might have to play to defend and expand Western capitalism in a world of increasingly muddy 'global' waters. But how to reconcile such an imperi-

al attitude with liberalism, peace and democracy, that is, values which Ferguson would like to safeguard? Is an empire a guarantee of peace? Maybe. It seems all too easy to quote Tacitus '*ubi solitudinem faciunt, pacem appellant*'.⁹

Interestingly enough, at the beginning of a new millennium we are invited to resort to adaptations of Roman or British models. What about alternatives? Ferguson's appeal for a world governed by an enlightened American Leviathan hardly conceals the interests of at least part of the US establishment. The tragic events of the last few years have already shown the risks implied by a hegemonic attitude. It seems more fruitful, for Washington officers as well, to understand why American economic, military and political supremacy have been ever more contested and challenged.

Despite its theoretical poverty, Ferguson's proposal is at least topical, for he calls for a kind of 'world government'. The importance of global peace cannot of course be overestimated, as well as the problematic issue of the so-called 'global governance'. It is hard though to figure out how a world controlled by an American capitalistic empire could tackle some of the contemporary global issues, from poverty to environmental degradation. Moreover, Ferguson's theory is rather poor also from the viewpoint of the realism he claims to embody. In this sense it is probably more fruitful to go back to the core of the twentieth century and to continental Europe. Carl Schmitt might have something to suggest.

Back to Carl Schmitt?

Carl Schmitt was foremost a jurist and a philosopher of law; in political terms a broadly conservative and realist thinker. One of his main concerns was the crisis of the so-called 'Westphalian system' of international law and of the *jus publicum europaeum*, based on formally equal sovereign states. Especially in *Der Nomos der Erde* (1950), written in the early years of the Cold War, he expressed a deep concern about the rise of the United States. He saw America as an emerging universal empire, with the potential to unify the world and impose its own rule, interests, culture and language: '*Caesar dominus et supra grammaticam*' (Zolo, 2007: 159-62). He also envisaged a clear shift from the defensive posture of the early US, as expressed in the Monroe doctrine (1823), to the rising universal superpower of the twentieth century. Schmitt's preoccupation was the safeguarding of the 'pluriverse' of states against the imperial ten-

dency toward 'universe' and centralisation. In such a universal empire, the 'enemy', which is crucial to his idea of politics, would disappear. In its stead, we would witness the emergence of the 'criminal', a de-humanised and subjected new character. Without the 'enemy', *der Feind*, politics as we know it is no longer possible. Hence, Schmitt's call for the rise of regional *Großräume* led by regional powers and interpreted as the best instruments to protect the political 'pluriversity' of the world.

Schmitt's international thought returned to the fore in the 1990s, and especially after 9/11, as a reaction against the perceived threat represented by American supremacy (Odysseos and Petito, 2007). American military power has raised concern everywhere, particularly after the Iraq war and invasion. The establishment of regional arrangements, from free trade areas to the European Union, has reminded scholars of the concept of *Großräume* as instruments against the menace of a worldwide imperial unity. Moreover, the mediatic construction of 'the enemy', now an internal and criminalised one, like al-Qaeda or Islamic fundamentalists, points to transformations of politics which have not yet been fully understood. However, what is missing from Schmitt's fascinating insights is an analysis of the socio-economic conditions which support or promote the rise of states, empires and regional organisations. Apparently, 'the political' is understood in a kind of vacuum, devoid of its manifold connotations. The 'Monroe' and the 'Bush doctrine' are of course different, but share some common elements. Although linked to different societies and economies, they both give voice to capitalistic impulses. What Schmitt's theory disregards is a clearer definition of the forces ('structures') which interact with the state and condition its policies.

His approach is a far-sighted warning against the menace of a global superpower, but it does not provide us with a substantial historical theory to understand what is going on in international affairs. While the construction of a more balanced and plural international order is a political and moral imperative, it is impossible to imagine it without a sound understanding of the deep social forces which are shaping the contemporary one. Furthermore, thinking of a 'balanced' international order seems difficult if we do not consider the striking economic and social inequalities which are a constitutive element of the world system we are living in. It is precisely such inequalities, which Schmitt tends to disregard while sticking to a more traditional, legalistic view of international politics and 'balance'.

Ellen Wood's historical sociology

Turning to a very different intellectual and political background, Marxist scholar Ellen Meiksins Wood has sketched out a long-term historical sociology of empires, from ancient Rome to the USA. Although a relatively short publication (*Empire of Capital*, 2003), she has been able to keep together politics and the economy, social property relations and an overall geopolitical framework. Instead of explaining American imperialism by referring to 'imperial episodes' in US history, she concentrates on the separation between economy and politics which has characterised capitalism and modern imperialism.¹⁰ Until the rise of modern social property relations the world has witnessed the existence of several non-capitalist or pre-modern capitalist empires. Among them stands out the Roman empire, which was built by an ever-increasing group of landowners aiming at political and economic accumulation, which they gradually achieved by conquering new lands. An 'empire of private property',¹¹ as she labels it; the much more recent Spanish experience, characterised by the impulse of military landlords, premodern dynasts and soul-seeking bishops. In this case, too, the aim is to accumulate lands and resources, through military conquest and the establishment of pre-capitalistic patterns of social property relations. Other premodern empires (the Arabian, Venetia, the Portuguese, the Dutch) mainly aimed at commercial profit and the settlement of trade posts on the main routes. Modern capitalism – and with it, modern imperialism – was born later, in sixteenth-century England. Only in England did a capitalist class of landlords emerge and set up profit-orientated patterns of cultivation. With the rise of the agrarian proletariat, the least productive landowners fled to towns and cities, creating manpower for subsequent industrial exploitation. Furthermore, capitalism gave thrust to the earliest colonial expansion, starting with Ireland. Capitalist landholders – also relying on ideologies expressed by Thomas More and John Locke (Wood, 2003: 74-5 and 96-9) – persecuted or forced out unproductive Irish peasants and some of their English lords and staged the first modern imperialistic domination. A new kind of empire – an *empire of capital* – was gradually emerging.

Such a pattern spread to all continents, from America to Asia, and reproduced the British experience. In other countries – among them France, Germany and Japan – capitalism rose as an effect of state-led economic development, mostly in connection with military and geopolitical imperatives. The twentieth century then witnessed a different kind of imperialism, this

time driven by US capital, and its expansion throughout the world. Contrary to mainstream globalisation theories,¹² Ellen Wood argues that global capital structurally requires a system of more-or-less sovereign nation-states, with different legal, political and economic institutions. And it requires a global military power, such as that built up by the USA and launched in a 'total' and 'infinite' war in the first decade of the new millennium. Though some proponents of US military campaigns, like Bush and his fellows, might be 'inspired' by a rather unusual missionary spirit, the origins of American imperialistic policies are deeply rooted in the economic and political history of its capitalistic past.

Ellen Wood's historical theory is firstly remarkable as she offers us a *file rouge* to understand the imperial dimension through several millennia. Secondly, she explains the links between politics and the economy, property relations and international variables, extra-economic and economic exploitation, capitalist and pre-capitalist imperialism. She criticises Negri and Hardt's *Empire* on the grounds that nation-states are not yet giving way to new forms of sovereignty (Wood, 2003: 6), and, in general terms this interpretation holds; however, while the account of the origins of capitalism is clear and detailed, her analysis of imperialism in France, Germany and the US itself is more superficial. France and Germany's economic development is mainly explained by reference to external military pressures, according to a perspective which sounds rather realist. Nothing is said about nineteenth-century German domestic issues, let alone the combination of domestic and geopolitical elements which have been at play in French history. As far as America is concerned, Wood concentrates on the policies of the last few years, leaving aside more structural transformations. Something more could be said about the emergence of a new kind of capitalism, based on new technologies and giving birth to different forms of exploitation and coercion.

In earlier articles, Ellen Wood has nonetheless provided interesting clues for dealing with 'new capitalism' and 'new imperialism' (Wood, 1999). The emerging global economy requires new forms of political regulation. The United States and other possible future powers (Europe? Russia? China?) have to intervene globally to preserve a world 'safe for global (American) capital'. This certainly provides a possible explanation for the expansion of NATO, the need to control both the Near and the Far East, the invasion of Iraq, when EU leaders were simultaneously drafting a European Constitution, and so on? More than a 'transnational global empire' à la

Hardt/Negri, we are probably facing a 'would-be global American imperialism', which might assume even more authoritarian – and therefore imperial – traits. In this sense, Wood provides a dynamic account of phenomena which are understood in their actual economic and geopolitical roots and avoids the dry taxonomy delivered by other scholars of imperial vicissitudes. Moreover, she opens up room for a re-interpretation of imperialism that takes into account both the economic and political dimensions: capitalism and the geopolitical interplay.

Conclusion

Despite the variety of their backgrounds, the authors reviewed here share an interest in long-term reconstructions and have analysed empires and imperialism within macrohistorical frameworks. What can we draw from their insights? We will consider four main points.

First of all, the notion of 'empire' is *per se* rather unfruitful. It tells us little about phenomena which are sometimes very distant in time and space. One risks over-stretching¹³ this notion so as to use the same label with regard to very different historical realities. Secondly, studying empires requires a clear analysis of the relations between structures and agents, as well as international and domestic variables. Mainstream International Relations Theory overestimates the role of geopolitics, and sometimes makes use of vague and ill-defined concepts, as for instance the theory of international anarchy.¹⁴ States, empires, city-states, federations, etc. are embedded in historical patterns of social relations and linked with peculiar modes of production. Understanding them is a crucial step in order to locate the evolution of politics within the broad historical stream.

Thirdly, it therefore follows that explaining *contemporary* empires requires an interpretation of their relations with capitalism, that is, the way social relations are structured in the world we are living in. At least in the so-called 'West' capitalism has so far prevailed over other possible patterns of social property relations.

Finally, contemporary American foreign policy can be explained only within a theory of the evolution of the links between capitalism and international geopolitics. For such a goal, Ellen Wood's historical sociology offers an inter-

esting starting-point. However, several aspects need far deeper investigation and research. The larger autonomy of the 'political', for instance, cannot be disregarded. This holds true especially in the context of those states, such as France or Germany, where the role of public powers has been crucial to economic development,¹⁵ but can also not be neglected in the American case. Post 9/11 USA shows signs of a hardening of its democratic institutions and foreign policy choices that deserve further enquiry. Is America slowly moving towards a more 'Hobbesian', state-led posture?

Writing about empires makes sense only within a long-term historical sociology, both the 'social' and the 'political' dimensions being included. We would otherwise risk introducing a vocabulary which could be suggestive but can hardly lead us towards a deeper understanding of current international events.¹⁶

Endnotes

¹ The European Union, too, has sometimes been read as an empire. See Beck and Grande, 2004; Zielonka, 2006.

² See the early anthology of writings on the American empire by Bairati, 1975.

³ He is mainly known as a proponent of the 'democratic peace' theory, where democracy is understood in liberal terms.

⁴ Augustus transformed the Roman imperial republic into a proper empire, promoting centralisation and some degree of bureaucratisation. According to Doyle, this kind of change explains the maintenance of empires across time. It is, however, unclear in social terms why such transformations might occur. See Doyle, 1986: 92-7.

⁵ His analysis of the mixed Roman constitution offers Hardt and Negri a sound model through which to understand the current imperial world order.

⁶ The role still played by nation-states, although to some extent weakened, as promoters and supporters of capitalism, is underlined by E.M.Wood. See Wood, in Balakrishnan, 2003.

⁷ Ferguson had already worked on the British empire. See Ferguson, 2004a.

⁸ See Cooper, close adviser to Tony Blair and promoter of a *liberal imperialism*, let alone the *benign empire* supported by American neocons, especially by Kagan, 1998. Cooper wrote a booklet on the issue in 2000.

⁹ Tacitus was referring – through the words of Caledonian general Calgacus – to the Roman empire, one studied and praised by Ferguson.

¹⁰ She follows a perspective laid out by Robert Brenner, 1985.

¹¹ The concept of ‘private property’ was deeply entrenched in Roman legal theory.

¹² See at least Held, 1995.

¹³ On conceptual stretching, see Sartori, 1970.

¹⁴ See Rosenberg, 1994, for a convincing critique of political realism.

¹⁵ See van der Pijl, 1998, and his theory of the relations between ‘Lockean’ and ‘Hobbesian’ states.

¹⁶ For a strong critique of the use of the vocabulary of ‘empire’ with reference to the US, see Teschke, 2006.

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