

The Human Capital of Scandinavia?:

Citizenship Dilemmas in the Cross-Border Øresund Region

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Abstract

The Øresund Region of Eastern Denmark and Southern Sweden is an ambitious cross-border integration project, aiming to make the region “The Human Capital of Scandinavia”.

Integration has deepened to include cross-border social rights, with regional proponents heralding the emergence of “Øresund citizens”. Yet the two welfare states, despite their common attributes, have developed dissimilar attitudes towards the rise of a multicultural society in recent years, establishing divergent national citizenship policies in response. This thesis uses the Øresund region as a critical case study, which contributes to wider European debates about the tension between regional freedom of movement and national determination over citizenship. To explore this regional integration — national citizenship nexus, this thesis asks; *to what extent do divergent national citizenship models inhibit deeper cross-border integration and prospects for regional citizenship?* Drawing on a range of primary and secondary information sources, including interviews with regional political actors, this thesis reveals how divergent national citizenship policies rouse political debate about belonging and entitlement of foreigners in the cross-border region. Discordant national citizenship policies have reinforced organisation and conceptual borders along national lines, revealing that the cultural proximity of these Nordic neighbours is no guarantee of seamless cross-border movement and integration. This thesis demonstrates that citizenship policies not only have a domestic impact but can also become a point of tension *between* member states, with implications for regional integration and citizenship.

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Abbreviations

AEBR	-Association of European Border Regions
CBR	-Cross-Border Region
DF	- <i>Dansk Folkeparti</i> (Danish People's Party)
EGTC	-European Grouping of Territorial Cooperation
EU	-European Union
INTERREG	-Interregional cooperation (EU)
L-C	-Liberal Conservative Coalition
MIPEX	-Migrant Integration Policy Index
OECD	-Organisation for Economic Co-operation and Development
TCN	-Third Country National

Introduction

Border regions increasingly represent promising locations for the creation of functional, prosperous economies, transforming the concept of the border from one of division to one of dynamic transnational cooperation and participation. The cross-border Øresund¹ Region of Eastern Denmark and Southern Sweden, connected by the Øresund Bridge, is touted as one of Europe's leading border regions. This is not only because of the depth of integration, but also because of the linguistic, cultural and political ties of the two Scandinavian neighbours. This ambitious cross-border integration project aims to make the Øresund region "The Human Capital of Scandinavia". Indeed, if one were to predict the emergence of new forms of transnational citizenship and belonging in European border regions, the Øresund region would be a likely setting for such developments.

Yet the two welfare states, despite their common attributes, have developed dissimilar attitudes towards the rise of a multicultural society in recent years, and divergent national citizenship policies in response. These political differences have proven to be a key political tension as attempts to integrate the region have progressed. Cases such as this illustrate that efforts to normalise regional integration and transnational movement are often challenged by the persistence of territorial, organisational, and conceptual borders² between member states, which can hinder cross-border dynamics.

To explore this regional integration — national citizenship nexus this thesis asks;

To what extent do divergent national citizenship models inhibit deeper cross-border integration and prospects for regional citizenship?

Given the centrality of free movement and cross-border rights to the regional integration process, I hypothesise that divergent national citizenship policies will result in regional political conflicts when issues arise over the status and entitlements of foreigners in the

¹ The region's name has two versions: 'Øresund' (Danish) and Öresund (Swedish). For consistency I will use the Danish spelling throughout the main text of this thesis. However the Öresund Committee often uses the Swedish version so quotes and references may reflect this.

² Andrew Geddes, *Immigration and European Integration: Beyond Fortress Europe?* (Manchester University Press, 2008).

region. In this sense, the coexistence of different national regimes for managing migrant integration will act as barriers to the progress of deeper regional integration by reinforcing organisational and conceptual borders along national lines, thus limiting prospects for regional citizenship.

In order to attain evidence to test my hypothesis, I ask the following sub-questions: How have Denmark and Sweden diverged in their migrant naturalisation policies and politics over the years 2000-2010? What citizenship models do they respectively represent? Have these different frameworks for managing migrant integration, diversity and citizenship invoked political issues or tensions between the two countries as they attempt to move the integration process along? If so, do these have implications for deeper cross-border integration and regional conceptions of Øresund citizenship?

Wider significance

Given the extent of cross-border integration, as well as Denmark and Sweden's shared linguistic, cultural attributes and similar societal structures, one could expect the Øresund region to be an ideal site for migration policy to harmonise and a common identity to emerge. Yet despite the various initiatives at multiple levels of governance to promote the depth and breadth of integration and a common regional identity, the segregating effects of national borders continue to hinder many cross-border dynamics in this region.³ The problems encountered in the Øresund region are therefore indicative of the regional integration–national sovereignty paradoxes that exist in many different policy domains within the EU project.

The EU is experiencing that as integration efforts deepen, the coexistence of different national regimes for managing and responding to international migration is becoming politically tense. The free movement of people, often referred to as the “fourth freedom” of the EU's internal market, is touted as being central to wider economic, social and political goals of European integration and citizenship, and yet it has continued to be one of its most controversial aspects. EU states are yet to develop a common framework regarding the post-arrival rights of migrants – this remains a difficult policy area in which to gain

³TorbenDall Schmidt, 'Cross-border Regional Enlargement in Øresund', *GeoJournal* 64, no. 3 (2005): 251.

consensus due to the centrality of this policy domain to national sovereignty.⁴ This not only refers to each member states' work and welfare provisions but also to their migrant naturalisation policies, as each country's newly naturalised citizens become eligible for EU citizenship entitlements in the Single European Market. The right to free movement in the labour market might well be reserved for European nationals, but each country has its own criteria for how migrants become national, and thereby European, citizens.

This is important because it creates one of the warrants for my investigation, namely: how viable is regional integration, and the emergence of regional forms of citizenship, in the absence of harmonised national citizenship policies? The central paradox addressed in my research is that of promoting cross-border rights and regional belonging vis-à-vis regional integration, while at the same time maintaining the nation-state's sovereignty and autonomy over decisions relating to foreigners' access to rights and citizenship within its territory.

This thesis is innovative because it unites policy areas that have previously lacked a cohesive theoretical framework. Margheritis and Hummel (2010) note that despite the increased focus on both international migration and regionalism in recent decades, most academic and political analyses tend to neglect the interrelationship between them, focussing instead on the economic and political dimensions of the two processes independently.⁵ However, recent strains evident in the European Union over immigration issues have sparked new political and academic interest in understanding the interplay between regional integration and national responses to international migration, making this research a timely investigation.

Defining the variables

Already speaking to a relationship between the two policy areas, regional integration and migrant integration policies both refer to a process of "integrating". To "integrate" generally means to include, incorporate, or combine things to form a new whole. In political science, this generally refers to processes of integrating a social system like a society or an

⁴Boeri and Bruker (2005), "Migration, coordination failures, and EU enlargement" IZA DP No. 1600

⁵Ana Margheritis and William Hummel, 'Linking Regional Integration and Migration Policies in Europe and South America: Facts and Concepts in Comparative Perspective' (presented at the Fifth Pan European Conference on EU Politics, Portugal, 2010). Some exceptions include Geddes, *Immigration and European Integration*.; Roderick Parkes, 'Immigrant Integration Meets European Integration', n.d.

institution. The more a society is integrated, the more closely and intensely its constituent parts (groups or individuals) relate to one another.⁶ For example, in recent years social *cohesion* has been widely referred to in politics as being the benchmark of a well-integrated society.⁷

Regional integration: This refers to the political and economic processes by which states enhance cross-border cooperation with neighbouring countries through the promotion of regional initiatives, institutions and rules.⁸ Processes of regionalisation have stretched the functions of citizenship and governance from the confines of the nation-state to sub-national, supranational, and transnational levels,⁹ leading to significant interest from political scientists about the causes and consequences of these emergent multi-level economic and political spaces.¹⁰ Regional integration signifies a movement away from the presumed innateness of national territorial division, and towards the relevance of function and productivity in alternative political and economic spaces, as evidenced in the creation of regional economies or bi-national cities.¹¹ The cross-border Øresund region, for example, has been identified as a significant ‘Euro-region’ integration project because of the depth and breadth of economic, political and social integration.¹²

Migrant integration and citizenship: In Danish and Swedish domestic political discourse the term “integration” usually refers to the social adjustment of people recognised as “immigrants” – dominantly those who are non-Western and from the Middle East. There are various dimensions of migration policy and politics so the term “immigration” alone is too broad to be a useful analytical concept, though policies can be roughly divided into two

⁶ Han Entzinger and Renske Biezeveld, ‘Benchmarking in Immigrant Integration’ (ERCOMER, August 2003), 6.

⁷ Ibid.

⁸ Ernst B. Haas, ‘The Study of Regional Integration: Reflections on the Joy and Anguish of Pretheorizing’, *International Organization* 24, no. 4 (October 1, 1970): 607–646.

⁹ For example see: Étienne Balibar, *We, the People of Europe?: Reflections on Transnational Citizenship* (Princeton University Press, 2004).; Yasemin Nuhoğlu Soysal, *Limits of Citizenship: Migrants and Postnational Membership in Europe* (University of Chicago Press, 1994).

¹⁰ Edward D. Mansfield and Etel Solingen, ‘Regionalism’, *Annual Review of Political Science* 13, no. 1 (May 2010): 146.

¹¹ Joachim Blatter, ‘Debordering the World of States: Toward a Multi-level System in Europe and a Multi-polity System in North America? Insights from Border Regions’, in *State/Space: A Reader*, ed. Neil Brenner et al., 1st ed. (Wiley-Blackwell, 2003).

¹² AEBR, ‘Sail of Papenburg - Association of European Border Regions (AEBR)’, n.d., http://www.aebr.eu/en/sail_of_papenburg/region_award.php.

primary dimensions; “immigration” and “integration” policies.¹³ Immigration policy manages the cross-border movement of persons, such as politically determined quotas which plan and control the number and type migrants that will be allowed entry into the country.¹⁴ “Integration” policy on the other hand, determines the conditions provided to resident immigrants in the host society, such as settlement, language training, and citizenship acquisition, and the demands made of migrants in the process.¹⁵ In this sense, *integration* policies are interlinked but distinguishable from *immigration* policies.

The study of migrant integration assumes not only the significance of the numbers or types of immigrants accepted, but also how they are integrated into, and ability to participate in, the civic, economic, social, cultural, and political life of their host society.¹⁶ To clarify the terminology presented in this thesis, it must be noted that a country’s citizenship policies closely interacts with both its immigration and migrant integration strategies.¹⁷ As Hansen and Weil observe, “throughout Europe the politics of immigration have become the politics of nationality.”¹⁸ I therefore utilise the term citizenship more broadly as “a dynamic policy vehicle for promoting the political incorporation of immigrants and, by extension, their more complete integration.”¹⁹ This refers not only to specific citizenship policies, but at a deeper level extends to the social, political rights and obligations available to citizens and residents of the polity.

The empirical analysis in Chapter Three gives a comprehensive overview of one key subset citizenship policy, namely, migrant naturalisation. This is separate from *Jus soli* (birth-right) or *jus sanguinis* (lineage) nationality acquisition, where most people inherit their citizenship.

¹³ Adapted from the ‘Immigration’/‘Immigrant’ policy division established by Tomas Hammar, *European Immigration Policy: A Comparative Study* (Cambridge University Press, 2009).

¹⁴ Stephen Castles and Mark J Miller, *The age of migration : international population movements in the modern world* (Basingstoke [u.a.]: Palgrave Macmillan, 2010), 280.

¹⁵ Gary P. Freeman, ‘National Models, Policy Types, and the Politics of Immigration in Liberal Democracies’, *West European Politics* 29, no. 2 (2006): 228.

¹⁶ Rita Süßmuth and Werner Weidenfeld, eds., *Managing Integration: The European Union’s Responsibilities Towards Immigrants* (Migration Policy Institute and The Bertelsmann Foundation, 2005), xiv.

Per-Olof Berg, Anders Linde-Laursen, and Orvar Lofgren, *Invoking a Transnational Metropolis: The Making of the Oresund Region* (Copenhagen Business School Press, 2000), 18.

¹⁷ Rita Süßmuth et al., *Managing Integration: The European Union’s Responsibilities Towards Immigrants* (Migration Policy Institute, 2005), 3.

¹⁸ Randall Hansen and Patrick Weil, eds., *Towards A European Nationality: Citizenship, Immigration and Nationality Law in the EU* (Palgrave Macmillan, 2001), 1.

¹⁹ Transatlantic Council on Migration, ‘Transatlantic Council Statement: Delivering Citizenship’, April 2008, 2, http://www.migrationpolicy.org/transatlantic/Citizenship_TCMStatement.pdf.

Naturalisation policies set out the criteria which migrants need to fulfil in order to become a national, thereby reflecting the officially purported view of what it means to become a citizen. In this thesis, I therefore present naturalisation policies as an empirical indicator that exemplifies the broader national citizenship policy regime. The approach of this thesis is to explore the divergent national citizenship policies of Denmark and Sweden (*independent variable*), and to analyse the extent to which these have politically complicated current and potential cross-border integration and citizenship in the Øresund region (*dependent variable*).

Analytical framework

This thesis utilises the theoretical lens of citizenship and the analytical framework of territorial, organisational and conceptual borders²⁰ to identify the dynamic relationship between national citizenship policies and regional integration. Geddes distinguishes between different sites of borders and how they relate to the challenges of immigration, not only in terms of territorial location, but also in terms of organisational and conceptual forms of inclusion and exclusion.²¹ He differentiates between *territorial borders* as traditional customs and immigration controls, *organisation borders* of work and welfare that control post-arrival integration of migrants seeking residence, work and social rights, and *conceptual borders* encompassing normative ideas of identity, belonging, and entitlement within a particular political community. In Chapter One, I further elaborate on this border typology and how I use it to organise my theoretical framework of citizenship, examine my cases, and address my research question.

Geddes' classification serves as a useful analytical framework for my investigation as it applies not only to the barriers faced by external immigrants entering a nation-state, but also accurately captures the different national border obstacles that regional actors in the Øresund seek to overcome in their progressive advancement of a functional, transnational region. In this case, territorial borders are removed by passport-free travel areas, organisational borders are overcome by common labour markets and cross-border social rights, and conceptual borders are eroded by the emergence of regional identity and

²⁰ Geddes, *Immigration and European Integration*.

²¹ Ibid.

belonging. However, as I will explain in Chapter Two, such national borders are not so easily overcome in reality.

My research sets out to examine the cross-border Øresund region as a case study of this paradoxical trend; transnational forces of regional integration and cross-border mobility meeting national frameworks for determining belonging and entitlement. Citizenship makes the ideal theoretical lens through which to explore this dilemma as it is member state citizenship that determines full enjoyment of the rights and benefits of regionalism, yet it remains the prerogative of each individual state to set the conditions for how foreigners integrate to access this status. This thesis aims to contribute to understandings of how cross-border integration and regional citizenship can be affected by sensitive nationalized policy areas related to migrant integration.

Case study and Methodology

This thesis uses the Øresund region as a critical case study of these issues, from which more general hypotheses can be drawn about prospects for deeper integration and regional citizenship across the EU. The Øresund region has been selected as a case-study on this basis as one of Europe's leading cross-border integration efforts, supported by close historical, cultural and political ties. Regional leaders place strong emphasis on cultural integration, cross-border identity, and the notion of the "Øresund citizen", so one could expect that if regional citizenship were beginning to emerge in European border regions, the Øresund presents one of the clearest cases. The Øresund can therefore accurately reflect political challenges facing other regions wishing to establish deeper cross-border integration and the limits of integration in the context of divergent citizenship policies of member states.

The empirical research analyses Danish and Swedish policies and politics regarding migrant integration and naturalisation in the decade spanning 2000-2010. These draw on a range of primary sources including MIPEX (Migrant Integration Policy Index) data, national statistics, government documents and political material. Although government policy is only one of a number of factors which affects migrant integration, I argue that it is vital, as it sets the legal and political framework within which access to official status of citizenship and the associated rights can occur. The time period chosen includes not only a key period of

intensified regional integration following the opening of the Øresund Bridge, but also a decade in which Danish and Swedish citizenship policies diverged most dramatically following the election of the Centre-Right Danish government on a restrictive-immigration platform in 2001. This timeframe therefore provides an opportune and realistic scope for assessing the relationship between the two processes of cross-border regional integration and national citizenship policy development.

My analysis of regional issues draws on semi-structured interviews with several political actors involved in the Øresund region and on a range of other primary and secondary data sources including media reports, political documentation from various sources (official websites, press releases) and personal observation at political meetings. The analysis of interview responses and political discourse in this research is based on the assumption that elite discourses and perspectives are socially and politically significant as they contribute to the shaping of key cognitive and normative frameworks²² which guide the integration process and must therefore be considered a vital element of political decision making.

Statement of argument

My empirical analysis shows that while divergent national citizenship models are unlikely to affect some of the more immediate administrative concerns of cross-border integration, they do stand to inhibit the region's goal of attaining a "diverse yet cohesive labour market [that] makes better use of the resource represented by workers with non-Scandinavian backgrounds."²³ This is because divergent naturalisation policies create two conflicting sets of expectations of migrants in the region (organisational borders), which can lead to political friction. The freedom of movement inherent in regional integration can both erode and reinforce conceptual borders of identity, and this thesis shows how divergent national citizenship models can rouse political debates about belonging and entitlement in a cross-border region. The politics of national belonging and identity, which find their *de jure* and *de facto* expression policy and discourse on migrant integration and citizenship, also heighten conceptual borders between Denmark and Sweden, impeding efforts to foster a common citizenship in the cross-border Øresund region.

²²Pierre Bourdieu, *Language and Symbolic Power* (MA: Harvard University Press, 1991).;Norman Fairclough, *Language and Power* (Longman, 2001).

²³ Øresund Committee, 'ØRUS: Øresund Regional Strategy' (Øresundskomiteen, 2010), 7, http://www.oresundskomiteen.org/wp-content/uploads/2012/02/ORUS_EN.pdf.

Structure of thesis

This thesis is divided into five chapters:

Chapter One

This chapter develops a conceptual framework for considering the relationship between national citizenship and regional integration, taking its point of departure from literature on wider European integration. Theories of an emerging European citizenship are contrasted with examples of EU “citizenship dilemmas” suggesting an inherent tension between regional freedom of movement and the self-determination of national citizenship policies. This chapter also further develops Geddes’ *organisation* and *conceptual* border typologies, and how this framework will guide my analysis.

Chapter Two

Chapter Two contextualises the thesis case study by outlining the economic and political drivers of integration in the Øresund region and charting the progress of the region so far against its vision of becoming a “diverse, yet cohesive” common labour market which fosters regional citizens. I classify the various borders that the regional Øresund Committee has encountered in its integration efforts according to whether they represent territorial, organisational or conceptual boundaries for the region’s growing number of cross-border commuters.

Chapter Three

This empirical chapter explores differences in the domestic migrant naturalisation policies of Denmark and Sweden over the decade 2000-2010. I argue that the national political frameworks for policy making draw from different ‘models’ of citizenship, assimilationism and multiculturalism respectively, forming two contrasting sets of ideas about the correct framework for policy responses to immigration and diversity dilemmas.

Chapter Four:

This chapter assesses how migrant integration has manifested as an area of political conflict in the cross-border Øresund region, mapping out the regional frictions according to whether these represent organisational or conceptual borders to deeper regional integration and free movement. I show how divergent national political models of citizenship and migrant integration raise organisational barriers to a common labour market by problematizing the movement of non-European workers. More importantly, I argue that divergent national citizenship models act as a platform for national political and cultural “othering” which has implications for developing regional citizenship as envisaged by Øresund proponents.

Chapter five:

In the conclusion I step back from the Øresund region and bring my findings back to the citizenship literature raised in Chapter One. I conclude that the increasingly volatile nature of national citizenship policies have become increasingly problematic for regional integration, particularly as attempts to deepen integration raise questions of Third Country National²⁴ (TCN) free movement entitlements and rights. This suggests that fundamental political dilemmas of migrant integration and citizenship are not specific to the nation-state but can also manifest at the regional level.

²⁴ Non-EU foreign national

Chapter One: A “Borderless World”? Regional Integration and National Citizenship

This chapter develops a conceptual framework for considering the relationship between regional integration and national citizenship. Transnational theories suggest that freedom of movement and regional integration create strong pressures for harmonisation of national migrant naturalisation policies, potentially leading to new regional locations for citizenship. Yet despite these pressures, national citizenship policies continue to be developed independently, leading to a number of EU citizenship dilemmas such as “backdoor migration”. These examples suggest an inherent tension between regional freedom of movement and the self-determination of national citizenship policies, and that the latter can create problems for regional integration efforts. This chapter concludes by outlining an analytical framework by Geddes which highlights the organisational and conceptual borders of states, suggesting that national frameworks for citizenship continue to be durable in different ways despite the removal of territorial borders in the regional integration process.

1.1 Defining citizenship

In order to understand how citizenship could be challenged by immigration and regional integration, it is first necessary to map out how citizenship is commonly defined in its most basic sense. Citizenship as a status entails a legal and political relationship between individuals and a state or polity.²⁵ In its practical applications, citizenship is commonly thought of as a status, most visible through possession of a national passport. This determines legal residence and rights within a particular jurisdiction and can also permit or deny entry into other state territories. Citizenship of one country can also count as entry eligibility for another if the two countries have an arrangement for their respective citizens, though these are usually on a temporary ‘visitor’ basis. Regional free travel arrangements, like the EU’s Schengen agreement, allow passport-free travel for anyone within the region.

²⁵ Bauböck, Rainer, *Transnational Citizenship: Membership and rights in international migration*, (Aldershot: Edward Elgar, 1994), p. 23

In this sense, citizenship manifests as both an instrument for territorial border control, and for permission of passage.

For most people, citizenship is primarily attained by place of birth (*jus soli*), or parental lineage (*jus sanguinis*). For migrants however, citizenship is more often acquired through a process of naturalisation usually involving at least a certain length of legal residence in the host country and some proof of knowledge in the dominant national language. As a measurement of migrant integration, naturalisation therefore allows state to set the criteria by which immigrants are incorporated into society as fully-fledged nationals.

In this sense, citizenship signifies collective (usually national) membership and belonging across other social distinctions of class, gender, ethnicity, race and religion. Brochmann observes that, “citizenship law can in many ways be seen as a national presentation of self; what it takes to become naturalised, indirectly indicates what it means to be a member of the national community.”²⁶ This is why the terms “nationality” and “citizenship” are often similarly construed. As modern states aspire to be “nation-states”, citizenship is perceived to encompass all of these dimensions. Though while there are similar broad threads across countries about what citizenship entails, domestic legislation can vary significantly in their articulation of citizenship and definitions of non-citizens.²⁷

A deeper understanding of the concept includes the entitlements associated with citizenship, with Bauböck describing citizenship as a “bundle of rights”.²⁸ Within liberal democratic states in particular, there has also been an increasing focus on the protection of individual rights. The specific rights endowed by citizenship vary between states but in most cases citizenship entails full protection of civil liberties, political rights such as voting in national elections, holding public office, and entitlement to social security. Influential citizenship theorist T. H. Marshall established this notion of citizenship as being three sets of rights: civil, political and social.²⁹ Civil rights secure a person’s liberties, freedoms, and rights to justice and property. Political rights cover eligibility to vote and to be elected into political

²⁶Grete Brochmann and Idunn Seland, ‘Citizenship Policies and Ideas of Nationhood in Scandinavia’, *Citizenship Studies* 14, no. 4 (2010): 433.

²⁷Saskia Sassen, *Territory, Authority, Rights: From Medieval to Global Assemblages* (Princeton University Press, 2006), 282.

²⁸Rainer Bauböck, *Transnational Citizenship: Membership and Rights in International Migration* (E. Elgar, 1994), 23.

²⁹Thomas Humphrey Marshall and Tom Bottomore, *Citizenship and Social Class* (Pluto Press, 1992).

positions. Social rights entail the individual's right to adequate living standards, usually delivered through welfare, health and educational systems. The notion of citizenship-as-rights is conversely accompanied by the expectation of citizens' obligations and responsibilities. Duties to the state most commonly include abiding by the law, paying taxes, voting, and possibly obliging to some form of military conscription. In this sense, citizenship also has deep political connotations, with Faist asserting that "...citizenship comprises three important dimensions: the democratic self-determination of the people, equal individual rights and obligations, and membership in a political community."³⁰

These various dimensions of citizenship (legal status, rights and duties, political participation, identity, and belonging) are all interrelated and sometimes conflicting. Citizenship's complexities have been highlighted in recent decades as naturalisation policies are increasingly perceived by states as instruments for setting the standard of migrant integration and strengthening national affiliation. Such reassessments have brought to the fore an inherent tension between inclusion and exclusion. Particular implications have emerged for liberal democratic states which are beset by what Benhabib calls the 'paradox of liberal democratic citizenship', where the existence of exclusive territorial borders and social boundaries conflict with the liberal democratic principles of participation, freedom of movement, diversity and human rights.³¹ As such, the boundaries of citizenship are not only between states but within them, with the distinction between nationals and foreigners creating different entitlements to rights within the resident population.

As a result of these varying and often contradictory aspects of the rights, duties and meanings of citizenship, attempts to amend citizenship legislation are politically significant, because they "...open up fundamental questions about the collective identity of a political community"³² and how these can be reconciled with liberal principles of freedom and diversity. Citizenship's complexities have been particularly highlighted by the debates surrounding transnational processes of international migration and how national citizenship

³⁰ Thomas Faist and Peter Kivisto, *Dual Citizenship in Global Perspective: From Unitary to Multiple Citizenship* (Palgrave MacMillan, 2007), 136.

³¹ Seyla Benhabib, 'Borders, Boundaries, and Citizenship', *PS: Political Science & Politics* 38, no. 04 (2005): 45.

³² Jürgen Gerdes and Thomas Faist, "Varying Views on Democracy, Rights and Duties, and Membership: The Politics of Dual Citizenship in European Immigration States", in *Dual Citizenship in Global Perspective: From Unitary to Multiple Citizenship*, ed. Thomas Faist and Peter Kivisto (New York: Palgrave Macmillan, 2007), 136.

can and should be extended to these new groups via naturalisation.³³ Contemporary immigration issues therefore comprise a “bundle of concerns relating to movement of people, the prevention of such movement and the scope for inclusion of migrants and their descendants.”³⁴

1.2 Transnational challenges

Migration is not a new phenomenon, but one that has become increasingly intensified, accelerated, globalised and politicised in recent decades.³⁵ Fierce global competition for skilled labour pressures states to maintain open and mobile labour markets in this era of rapid change. Yet international efforts to enhance the free movement of labour remain strikingly limited when compared to those driving the liberalisation of trade in goods, capital and services, despite predictions of significant worldwide economic gains from liberalising migration.³⁶ Part of this reason is that the free movement of people is vastly different from the free movement of capital in that it challenges long held notions of citizenship within nation-state borders. The presence and activities of migrants have led some scholars to call into question the relevance of a single, state-centred notion of citizenship, instead conceptualizing citizenship beyond or across borders. Faist and Kivisto describe how the “expansion” of the citizenship concept to include multiple belonging within and between nation states challenges this “container concept” of state domination over citizenship and national belonging.³⁷ This challenges previous notions of exclusive national belonging and “breaks with the segmentary logic of the classic nation-state, according to which one could only belong to one state at a time.”³⁸

³³ Irene Bloemraad, Anna Korteweg, and Gökçe Yurdakul, ‘Citizenship and Immigration: Multiculturalism, Assimilation, and Challenges to the Nation-State’, *Annual Review of Sociology* 34, no. 1 (2008): 153–179.

³⁴ Adrian Favell and Andrew Geddes, ‘European Integration, Immigration and the Nation State: Institutionalising Transnational Political Action?’, *European Union Institute Working Papers* RSC No. 99/32 (1999): 7.

³⁵ Stephen Castles and Mark J. Miller, *The Age of Migration* (Guilford Press, 2003), 7–9.

³⁶ Joel Trachtman, ‘The Political Economy of International Labor Migration Law’, *Employment Research* 17, no. 2 (2010): 5, http://research.upjohn.org/empl_research/vol17/iss2/2.

³⁷ Peter Kivisto and Thomas Faist, *Citizenship: Discourse, Theory, and Transnational Prospects* (John Wiley & Sons, 2007), 102.

³⁸ Christian Joppke, ‘Citizenship Between De- and Re-Ethnicization’, *European Journal of Sociology / Archives Européennes De Sociologie* 44, no. 03 (2003): 441.

Historically, citizenship has been tied to the territorial and national boundaries of the nation-state, which is highlighted by the notion of citizenship as membership in a *national* community. Traditionally anchored in a particular geographic and political community, citizenship evokes notions of national identity, sovereignty, and state control. Yet the contemporary ability to maintain ties and contact with their country of origin has allowed migrants to belong in different countries, which several theorists argue opens up new forms of transnational citizenship to emerge. In this growing field of transnational study, researchers have begun to pose questions about the increasing complexity of citizenship in an environment where individuals frequently engage in cross-border migration and maintain transnational ties, challenging the concept of the state as the exclusive site for citizenship.³⁹ From this perspective, Rainer Bauböck argues that “...the new challenge for political theory is to go beyond a narrow state-centred approach by considering political communities and systems of rights that emerge at levels of governance above or below those of independent states or that cut across international borders”⁴⁰

Others go further to suggest that recent changes in the spatiality of power have not only altered the role of nation states, but are making them redundant as part of a new postnational reality. The postnational perspective sees these transnational processes as signifying the declining role and relevance of the nation-state system and state-based identity.⁴¹ Theorists generally argue that we are entering an era of post-Westphalian global order with national states competing with multiple actors, institutions and ideas for citizens’ loyalties. Soysal posits that international human rights norms mean that rights in liberal democratic states are based increasingly on personhood and place rather than on national citizenship, arguing that “in terms of its translation into rights and privileges [national citizenship] is no longer a significant construction”.⁴²

³⁹ Linda Bosniak, ‘Citizenship Denationalized’, *Indiana Journal of Global Legal Studies* 7 (2000).

⁴⁰ Rainer Bauböck, ‘Towards a Political Theory of Migrant Transnationalism’, *International Migration Review* 37, no. 3 (September 1, 2003): 704.

⁴¹ David Jacobson, *Rights Across Borders: Immigration and the Decline of Citizenship* (BRILL, 1996).

⁴² Soysal, *Limits of Citizenship*, 3., 208

1.2.1 Regional citizenship

Similarly, but less abstractly, processes of regional integration also signify a movement away from the presumed innateness of national territorial division. It has been suggested that this context of regionalism has led to a “hollowing out” of state citizenship functions, transferring them to other institutional levels and structures above and below the nation-state.⁴³ This rescaling is also seen as a wider movement away from the relevance of “territory” towards the relevance of “function” resulting in deterritorialisation of political space – what Castells refers to as a movement from “space as a place” to “spaces of flows”⁴⁴ where the basis for political action is not territorial jurisdiction but function specific issues which require cross-border cooperation.⁴⁵

Regionalisation has led to significant interest from political scientists about the causes and consequences of emergent multi-level economic and political spaces.⁴⁶ Given the depth, breadth and visibility of EU integration and free movement, much academic literature on the emergence of regional citizenship stems from the European context. This section elaborates on this concept of EU citizenship as an illustration of the nature, content, and purpose of regional citizenship.

Created by the Treaty of Maastricht, EU citizenship is clearly described as being complementary to national citizenship, not replacing it, and that it “comprises a number of rights and duties in addition to those stemming from citizenship of a Member State.”⁴⁷ In addition to regional rights and duties, European citizenship also encompasses a significant identity dimension. The EU Parliament describes Union Citizenship as the “primary tool that assists the development of a European identity.”⁴⁸ However, far from being mutually exclusive, Faist introduces the concept of “nested citizenship” to describe how EU, national, and local citizenship are interconnected across different levels and function in complementary ways. He states that “What has evolved in the EU is an extraordinarily intricate network of overlapping authorities and attendant social rights, in which Member

⁴³ Michael Keating and John Loughlin, *The Political Economy of Regionalism* (Frank Cass, 1997).

⁴⁴ Manuel Castells, *Rise of the Network Society* (John Wiley & Sons, Incorporated, 1996).

⁴⁵ Mansfield and Solingen, ‘Regionalism’, 146.

⁴⁶ Ian Bache and Matthew V. Flinders, *Multi-Level Governance* (Oxford University Press, 2005).

⁴⁷ European Parliament, ‘The Citizens of the Union and Their Rights’, July 2008, http://circa.europa.eu/irc/opoce/fact_sheets/info/data/citizen/citizens/article_7174_en.htm.

⁴⁸ Ibid.

States play a central but by no means exclusive role.”⁴⁹ Paasi also describes how notions of regional identity and citizenship implicitly represent a sense of social integration and cohesiveness within regional projects. He notes that the terms have become major buzzwords within the European integration project, particularly identified in the EU’s cohesion policy as an important element for regional development.⁵⁰

The emergence of EU citizenship has also been closely related to transnational processes of international migration, promoting intensified movement of people within these regional economic and political spaces. The free movement of Europeans within a common market was a central aspiration in the EU’s founding documents and is now touted as one of the major cornerstones of European citizenship.⁵¹ EU citizenship therefore emerges as both a functional and a normative concept. The former describes how citizenship rights are activated through the collective participation of European nationals in European integration process such as economic participation, cross-border mobility in the internal market, and supranational political representation.⁵²

As a normative notion, European citizenship reflects not only the need to maximise regional economic functionality, but also to create a sense of collective fate, part of a wider desire to defend the principles underpinning the European project and an inclusive identity for citizens and residents.⁵³ Grahl notes how regional citizenship therefore goes beyond minimal belonging to the market economy, towards regional “social responsibilities deriving from a common and equal relationship to political structures.”⁵⁴ For this reason, interest has emerged about the potential influence of European integration over member state

⁴⁹ Thomas Faist, ‘Social Citizenship in the European Union: Nested Membership’, *JCMS: Journal of Common Market Studies* 39, no. 1 (2001): 37.

⁵⁰ Anssi Paasi, ‘The Resurgence of the “Region” and “Regional Identity”: Theoretical Perspectives and Empirical Observations on Regional Dynamics in Europe’, *Review of International Studies* 35, no. Supplement S1 (2009): 121.

⁵¹ Ettore Recchi and Adrian Favell, *Pioneers of European Integration: Citizenship and Mobility in the Eu* (Edward Elgar Publishing, 2009), 8.

⁵² Claudia Aradau, Jef Huysmans, and Vicki Squire, ‘Acts of European Citizenship: A Political Sociology of Mobility’, *JCMS: Journal of Common Market Studies* 48, no. 4 (August 2010): 946.

⁵³ Dora Kostakopoulou, ‘Is There an Alternative to “Schengenland”?’ *Political Studies* 46, no. 5 (December 1, 1998): 886. Willem Maas, ‘Freedom of Movement Inside “Fortress Europe”’, in *Global Surveillance and Policing*, ed. Elia Zureik and Mark Salter (Devon: Willan, 2005), 242–243.

⁵⁴ John Grahl, ‘Regional Citizenship and Macroeconomic Constraints in the European Union’, *International Journal of Urban and Regional Research* 20, no. 3 (1996): 480.

citizenship law, and the possibilities of this new inclusive concept of European citizenship.⁵⁵ The notion of extending EU rights to resident migrants is promoted by postnationals as signifying the emergence of a more inclusive form of membership based on human rights rather than national rights.⁵⁶

1.2.2 Regional pressures for citizenship harmonisation

As the EU continues to promote free movement and a sense of European citizenship between its member states, the issue of how best to accommodate external migration has become increasingly salient. While there is a general recognition that immigration will be a permanent part of Europe's future, there is less agreement over how migrants are best integrated into national, and thereby European, members and citizens.⁵⁷ Over recent decades, Western Europe has become a net receiver of international migrants. More than half of the immigrants into EU Member States, (approximately 1.6 million people in 2009) were from non-EU countries, referred to as Third Country Nationals (TCNs). Many of these flows are also of a permanent or long-term nature, evidenced by the fact that more than 90% of those who acquired EU Member State citizenship in 2009 were previously citizens of a non-member country.⁵⁸ Süßmuth argues that "...one of the enlarged EU's biggest tests in the years to come will be how it manages immigration and integration."⁵⁹

While EU states have managed a level of harmonisation regarding external border controls and asylum legislation, member states are yet to develop a common framework regarding the post-arrival rights of migrants. Much of the debate therefore, focuses on the EU's ability to harmonize national migrant integration policies and conditions for TCNs.⁶⁰ Some initial steps have been taken in this direction and in the conclusions of the 1999 Tampere European Council, EU heads of state called for a "more vigorous integration policy" which

⁵⁵ Peo Hansen and Sandy Brian Hager, *The Politics of European Citizenship: Deepening Contradictions in Social Rights and Migration Policy* (Berghahn Books, 2010).

⁵⁶ Jacobson, *Rights Across Borders*.

⁵⁷ Sarah Spencer, 'The Challenges of Integration for the EU', *The Migration Information Source*, 2003, <http://www.migrationinformation.org/Feature/display.cfm?ID=170>.

⁵⁸ Eurostat, 'Migration and Migrant Population Statistics', *European Commission*, 2011, http://epp.eurostat.ec.europa.eu/statistics_explained/index.php/Migration_and_migrant_population_statistics.

⁵⁹ Süßmuth and Weidenfeld, *Managing Integration*.

⁶⁰ Ruud Koopmans, *Contested Citizenship: Immigration And Cultural Diversity in Europe* (University of Minnesota Press, 2005), 248.

“should aim at granting [TCN] rights and obligations comparable to those of EU citizens.”⁶¹

Possible directions for the EU to pursue migrant integration include the development of mechanisms for dialogue, coordination, promotion of informed debate and best-practice policy transfer among member states, in order to promote common understanding across states of barriers to, and goals of, migrant integration.⁶²

European integration processes have increased the interdependence of European Member State policies across a range of areas, and many decisions taken on the national level now have a cross-border impact as a result. This interdependence has led to a number of competencies being transferred from the national to the regional level, in what is described by neo-functionalists as a “spillover effect”.⁶³ Neo-functionalism posits that economic interdependence and freedom of movement have set in motion an on-going process of cooperation that creates pressures for formal policy harmonization across a range of areas. As issues of collective management arise, supranational institutions are viewed as the most effective means of solving common problems, beginning with technical and non-controversial issues like trade, but spilling over into the areas of high politics such as security, immigration and citizenship, to create a self-sustaining process of deeper integration and interdependence.⁶⁴ Davidson argues that, “Everything therefore points to an extension of European citizenship and a further reduction of the centrality of national citizenship as the supra-national polity assumes many of the responsibilities in association with national and regional representative bodies.”⁶⁵

1.3 National self-determination of citizenship

However the question of whether national citizenship is losing relevance and being superseded by transnational or regional forms of citizenship is still very much open to debate.⁶⁶ While the flow of capital, goods, services and people may be embraced by

⁶¹Parkes, ‘Immigrant Integration Meets European Integration’, 5.

⁶²Spencer, ‘The Challenges of Integration for the EU’.

⁶³Haas, ‘The Study of Regional Integration’.

⁶⁴Andrew Hurrell, ‘Explaining the Resurgence of Regionalism in World Politics’, *Review of International Studies* 21, no. 4 (October 1, 1995): 348.

⁶⁵Alastair Davidson, ‘Regional Politics: The European Union and Citizenship’, *Citizenship Studies* 1, no. 1 (1997): 46.

⁶⁶Koopmans, *Contested Citizenship*, 77.

European nations, and may indeed perforate state borders, the social and political meaning of national citizenship continues to reinforce the traditional notion of national borders.⁶⁷

Some argue that the movement of some immigration policy to the EU level has even “strengthened the will of the Member States to retain independence in the field of granting nationality”.⁶⁸

The recent salience of citizenship is evident worldwide, and notably so among many Western European countries who have undergone the rapid transition to net receivers of immigrants in recent decades.⁶⁹ A cursory glance over daily news headlines across the continent reveals the subject of immigration to be a hotbed of political debate, relating not only to the number of foreigners that enter Europe, but also about how these migrants are gradually integrated into society as rights-bearing residents and citizens.

Despite the collapse of traditional concepts of sovereignty through various processes of globalisation, Benhabib notes how a monopoly over territory and belonging continues to be exercised through the exclusive immigration and citizenship policies of nation-states.⁷⁰ A seminal paper by John Torpey argues that the regulation of migration constitutes the very “state-ness of states”, as immigration inevitably raises issues such as national security, population growth and composition, national identity; all areas which affect the role and legitimacy of the modern nation-state.⁷¹ Differences between the states’ interpretations of what migrant naturalisation entails, and how it should be carried out, can therefore lead to different objectives of their integration policies.⁷² Some argue that political understandings of citizenship are not uniform across states either as they are interpreted through individual national institutions and cultural frameworks.⁷³

⁶⁷ Anssi Paasi, ‘Generations and the “Development” of Border Studies’, *Geopolitics* 10, no. 4 (January 1, 2005): 669.

⁶⁸ Karolina Rostek and Gareth Davies, ‘The Impact of Union Citizenship on National Citizenship Policies’, *European Integration Online Papers* 10 (2006): 12.

⁶⁹ Christian Joppke, *Challenge to the nation-state : immigration in Western Europe and the United States* (Oxford [u.a.]: Oxford Univ. Press, 2007).

⁷⁰ Seyla Benhabib, ‘Borders, Boundaries, and Citizenship’, *PS: Political Science & Politics* 38, no. 04 (2005): 673.

⁷¹ John Torpey, ‘Coming and Going: On the State Monopolization of the Legitimate “Means of Movement”’, *Sociological Theory* 16, no. 3 (November 1, 1998): 241.

⁷² Entzinger and Biezeveld, ‘Benchmarking in Immigrant Integration’, 12.

⁷³ Rogers Brubaker, *Citizenship and Nationhood in France and Germany* (Harvard University Press, 1992).

William Kymlicka poses the question, “In an age of migration and transnational identities, should national citizenship be de-emphasised or re-valued?”⁷⁴ A number of scholars suggest that both are in fact occurring as national citizenship is de- and re-nationalised in response to pressures of immigration and regionalism.⁷⁵ Some, like Benhabib, have pointed to this ability of states to maintain a firm hold of immigration and citizenship laws. This has, on occasion, even affected intra-regional mobility of the European Union when questions of national border protection arise. For example, free movement between France and Italy was temporarily suspended in March 2011 after the Italian government offered residence permits to thousands of asylum seekers, which led to significant political tension between the two European countries and within the EU itself.⁷⁶

While a number of competencies have been transferred from the national to the regional level, the harmonisation of national citizenship regimes has always been heavily inhibited by the reluctance of individual member states to relinquish sovereignty over immigration and population control. This remains a difficult policy area in which to gain consensus due to the centrality of this policy domain to national sovereignty; even countries willing to integrate their economies wish to retain the right to determine the criteria and means by which foreigners become part of national society.⁷⁷ Highlighting the continued primacy of nationalism for key political functions, Rogers Brubaker asserts that “The politics of citizenship today is first and foremost a politics of nationhood.”⁷⁸ In contrast to theories of the “hollowing out” of state sovereignty, intergovernmentalists therefore assert the continued relevance and power of nation states to effectively challenge and limit regional integration processes.⁷⁹

Indeed, even in the context of regional integration, it remains the fact that holding nationality of an EU Member State is still a prerequisite for acquiring EU citizenship. Article 17 EC provides that “every person holding the nationality of a Member State shall be a

⁷⁴ Will Kymlicka, ‘Immigration, Citizenship, Multiculturalism: Exploring the Links’, *The Political Quarterly* 74, no. s1, (August 1, 2003): 196.

⁷⁵ Joppke, ‘Citizenship Between De- and Re-Ethnicization’, 430.

⁷⁶ Elizabeth Collett, ‘Faltering Movement: Explaining Europe’s Schengen Struggle’, *Migration Information Source*, November 2011, <http://www.migrationinformation.org/Feature/display.cfm?ID=859>.

⁷⁷ Tito Boeri and Herbert Brücker, ‘Migration, Coordination Failures, and EU Enlargement’ (IZA DP No. 1600, May 2005).

⁷⁸ Brubaker, *Citizenship and Nationhood in France and Germany*, 182.

⁷⁹ Martin A. Schain, ‘The State Strikes Back: Immigration Policy in the European Union’, *European Journal of International Law* 20, no. 1 (February 1, 2009): 93–109.

citizen of the Union. Citizenship of the Union shall complement and not replace national citizenship”⁸⁰ Yet due to differing national rules for the attainment of citizenship, even those who gain Union membership may still be subject to the scrutiny of other member states. This causes regional citizenship tensions and questions the apparent disjunction between intra- and extra-EU mobility.

1.4 Regional citizenship dilemmas

Rainer Bauböck argues that the tension between freedom of movement and self-determination of citizenship within the EU has the potential to create serious conflicts within the regional arrangement, leading to a number of ‘EU citizenship dilemmas’.⁸¹ National rules granting dispensatory citizenship to certain individuals or groups have caused some issues within regional travel arrangements, as these citizens automatically become Union citizens even if they have not resided in the EU for very long, if at all. Countries with present and former colonies, overseas territories, or overseas populations are notable in this regard. Bauböck illustrates how the extension of extraterritorial citizenship to South American citizens with Italian ancestry (*jus sanguinis*) saw a large number of these new Italian citizens not moving back to their motherland, but instead onto other Member States like Spain or the UK.⁸² Up until 2005, Ireland also automatically granted citizenship to children born in the country, regardless of their parents’ status (*jus soli*). This policy was perceived to have been the cause of a ‘foreign baby boom’ in the country, causing concern among other member states that this rule was being abused by foreigners wanting a legal claim to EU residence. Occurrences such as this, where citizenship of an EU member state was used as a means to gain access to others, led to accusations of “citizenship shopping” towards the new arrivals.⁸³

⁸⁰ Eur-Lex, ‘Treaty Establishing the European Community - Part Two: Citizenship of the Union - Article 17 - Article 8’, text/html; charset=UTF-8, *Official Journal C 325*, 24/12/2002 P. 0044 - 0044; *Official Journal C 340*, 10/11/1997 P. 0186 - Consolidated Version; *Official Journal C 224*, 31/08/1992 P. 0010 - Consolidated Version; n.d., <http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=CELEX:12002E017:EN:HTML>.

⁸¹ Rainer Bauböck, ‘Who Are the Citizens of Europe?’, *Eurozine*, 2007, <http://www.eurozine.com/articles/2006-12-23-baubock-en.html>.

⁸² Ibid.

⁸³ Rostek and Davies, ‘The Impact of Union Citizenship on National Citizenship Policies’, 16–18.

Differences in migrant naturalisation policies, the empirical focus of this thesis, have also resulted in regional issues within regions like the EU. As mentioned, migrant naturalisation requirements can vary from country to country according to length of residence, linguistic ability and cultural knowledge. The liberal naturalisation policies of one member state (A) may therefore grant citizenship more swiftly, and to a higher number of migrants, than a state with more restrictive naturalisation policies (B). Migrants who have received citizenship relatively easily in country A are free to live and work in country B, despite the fact that they would not yet be Union citizens had they migrated to country B initially.

For example, the general residence requirement for a migrant wishing to naturalise as a Swedish citizen is five years, while the equivalent residence period in Denmark is nine years. Due to a Nordic Social Security Convention⁸⁴, a newly naturalised Swedish migrant can move to Denmark with full access to social rights while a migrant who has resided in Denmark for five years does not have the same level of entitlement. In fact, if the migrant in Denmark does draw on social assistance during this time, he or she can later be denied access to citizenship on the basis that they have not exhibited “economic self-sufficiency.”⁸⁵ This creates an unequal situation whereby a migrant naturalised in Sweden has more social rights in Denmark than a migrant who has lived there for the same period of time. This citizenship discrepancy, and its effects on cross-border integration between the two countries, will be further examined in Chapter Four of this thesis.

A particular concern of this backdoor migration among welfare states, is that migrants will use their newly found status as regional citizens to move to member states with the most generous social support systems - extending the notion of “passport shopping” to “welfare shopping”. Tensions have arisen across Europe in such circumstances as countries with restrictive citizenship regimes perceive that migrants are able to take advantage of social and economic conditions in another member state through the “backdoor” of liberal citizenship laws. In addition to member state concerns, this situation also creates inequality of status and rights among TCNs in Europe. Bauböck also points out the paradox that

⁸⁴ Nordic Council, ‘1953-1971 — Nordic Cooperation’, n.d., <http://www.norden.org/en/nordic-council/the-nordic-council/the-history-of-the-nordic-council/1953-1971>.

⁸⁵ Eva Ersbøll, ‘Country Report: Denmark’ (EUDO Citizenship Observatory: European University Institute, Florence, 2010).

mobility within Europe may become an obstacle for TCNs access to European citizenship.⁸⁶ Non-Europeans who move frequently between member states, but never continuously stay in one country long enough to satisfy residence requirements, are essentially excluded from European citizenship even if they have lived in the EU for years. This highlights the discord between Union citizenship as encompassing mobility and national citizenship, requiring a sedentary population.

The scenarios outlined above create a common incentive for EU member states to harmonise their standards for the naturalisation of immigrants to prevent one state's rules from 'undermining' another. Diverse nationality laws result in clashing views about the status of citizens and the collective management of TCNs and, despite member state apprehension, a need for harmonisation has therefore emerged. Yet the principle of national self-determination has so far meant that harmonisation continues to be rejected as a favourable option. While territorial borders to free movement of Union nationals and TCNs have already been removed within the EU Schengen area, it seems that regional mobility can still create political issues over the mobility of certain types of EU citizens, and the rights and entitlements that they have across member states. These citizenship dilemmas show that while national citizenship is challenged by the regional free movement of people, national borders are still manifesting in different ways across different countries.

1.5 Shifting borders of citizenship

Geddes distinguishes between sites of national borders, not only in terms of territorial location, but also in terms of organisational and conceptual forms of inclusion and exclusion.⁸⁷ He differentiates between *territorial borders* as formal borders and controls, *organisation borders* as work and welfare that control the integration entry of migrants seeking residence, labour access and social rights, and *conceptual borders* encompassing normative ideas of identity, belonging, and entitlement. In this sense, migration is "...made visible by social and political process not only at the territorial borders of states, but also at key organisational borders at which access to work, welfare and other important social

⁸⁶ Bauböck, 'Who Are the Citizens of Europe?'.
⁸⁷ Geddes, *Immigration and European Integration*.

institutions such as citizenship are determined.”⁸⁸ I suggest all three territorial, organisational and conceptual borders are reflected in the various facets of citizenship, and can be roughly approximated to Joppke’s notion of citizenship as status, rights, and identity respectively.⁸⁹

1.5.1 Organisational borders of citizenship

Geddes describes these as “sites at which decisions are made about access by migrant newcomers to key social and political institutions, such as the labour market, the welfare state and national citizenship.”⁹⁰ This reveals how the boundaries of citizenship are not only between states but within them, creating the distinction between nationals, residents and foreigners, and the different levels of entitlement each are accorded. Migrant integration policies, determining when and how migrants can participate in the civic, economic, social, cultural, and political life of their host societies, therefore represent such post-arrival organisational borders. Often taken for granted by nationals, access to the labour market and education system, redistribution of social funds, legal protection, and political participation, all represent as citizenship-as-rights. In fact, such rights are not always confined to territory, as evidenced by cases of overseas voting, external social rights, and consular representation abroad.⁹¹

While immigration is advocated by some as a solution to Europe’s impending demographic imbalances and subsequent welfare state crisis, others see migrants as a net fiscal burden for European welfare states insofar as migrants tend to be poorer, less qualified and therefore more likely to depend on public welfare support.⁹² Different domestic rules regarding migrant’s welfare entitlements therefore represent organisational barriers for individual migrants trying to access those systems, and also organisational borders welfare system and labour market harmonisation in Europe. Despite international obligations, member states can still legitimately discriminate against Third Country Nationals through

⁸⁸ Andrew Geddes, ‘The Europeanization of What? Migration, Asylum and the Politics of European Integration’, in *The Europeanization of National Policies and Politics of Immigration: Between Autonomy and the European Union*, ed. Thomas Faist and Andreas Ette (Palgrave Macmillan, 2007), 54.

⁸⁹ Christian Joppke, ‘Transformation of Citizenship: Status, Rights, Identity’, *Citizenship Studies* 11, no. 1 (2007): 37–48.

⁹⁰ Geddes, *Immigration and European Integration*, 24.

⁹¹ Bauböck, ‘Towards a Political Theory of Migrant Transnationalism’.

⁹² Tito Boeri, ‘Migration Policy and the Welfare State’ (presented at the Reinventing the Welfare State, Tilburg, 2006), 2.

organisational barriers to residence, citizenship and the rights and responsibilities connected to these statuses, thus challenging the assumption that supranational rights are leading to better conditions for migrant populations.⁹³

What this suggests is that, despite significant developments in creating a unified European space, the existence of pressures for policy convergence, national ideas of sovereignty, border control and security continue to undermine regional goals. This also means that the apparent disjunction between intra- and extra-EU migration is flawed as free movement for EU nationals within the common market raises questions associated with entry, residence, rights and citizenship for TCNs.⁹⁴ While territorial boundary disputes are no longer the significant aspects of European politics that they used to be, it is increasingly argued that boundaries are not disappearing but are instead evolving to manifest in new forms of national division. Moves towards deeper EU integration and a more substantive European citizenship will make this an increasingly significant future issue with “speculation as to whether the momentum toward harmonisation of migration and citizenship regimes continue or whether national interests will reassert themselves.”⁹⁵

1.5.2 Conceptual borders of citizenship

Geddes depicts conceptual borders as the “more nebulous, but no less important, notions of identity, belonging and entitlement... that boil down to the question of ‘who are we’ and then, by extension the issue of how these self understandings affect attitudes to migrant new comers.”⁹⁶ This can be related back to Brubaker’s notion of citizenship “a powerful instrument of social closure”⁹⁷. National citizenship reveals not only the legal borders within and between nation states, but also their social boundaries of identity. Thus, fundamental questions about migrant integration and citizenship concern more than just

⁹³ Elspeth Guild, ‘Moving the Borders of Europe’ (University of Nijmegen, 2001), <http://cmr.jur.ru.nl/cmr/docs/oratie.eg.pdf>.

⁹⁴ Geddes, *Immigration and European Integration*, 66.

⁹⁵ Zig Layton-Henry, ‘Migrants, Refugees and Citizenship’, in *Governing European Diversity*, ed. Montserriat Guibernau (Sage Publications Ltd, 2001).

⁹⁶ Geddes, *Immigration and European Integration*, 26.

⁹⁷ Brubaker, *Citizenship and Nationhood in France and Germany*, 23.

practical measurements of adaptation, but also what Favell describes as the “glue” of a particular society across its wider cultural, religious and class divisions.⁹⁸

In his conception of “citizenship as identity”, Joppke notes that while national citizenship in developed states has been structurally decoupled from identity due to liberal principles, states have tried to load citizenship with new meaning in order to promote unity and national integration of migrant groups, usually couched in terms of nationhood.⁹⁹ Smith describes how this conceptual idea of the nation “defines and legitimates politics in cultural terms, because the nation is a political community only in so far as it embodies a common culture and a common social will.”¹⁰⁰

Conceptual notions of national belonging and identity have been reinforced by the rise of nationalist, anti-immigration parties across Europe. Domestic political debates have witnessed the growing influence of such parties including Italy’s Lega Nord, France’s National Front, the United Kingdom’s British National Party, and the Danish People’s Party which present the dual challenge of being anti-immigration and anti-EU integration. These parties have provided some of the key sources of opposition to free movement and the project of European citizenship.¹⁰¹ Such political groups view immigration, particularly from non-Western countries, as a fundamental challenge to national citizenship referring to a loss of national identity, the dilemmas of cultural pluralism, and flaws of multiculturalism. This discursive framing of migrants’ cultural diversity as a threat to social cohesion has helped to launch far right parties into powerful political positions. It is here that the idea of re-nationalizing citizenship and strengthening migrant integration has often been raised as a stake - what Favell calls the ‘reconceptualising of community.’¹⁰² These heightened national conceptions of citizenship and social stability challenge European ideas of free movement and diversity.

Territorial, organisation and conceptual borders are not mutually exclusive however, and dynamic relationships can exist between them. For example, political mobilisation against

⁹⁸ Adrian Favell, *Philosophies of Integration: Immigration and the Idea of Citizenship in France and Britain* (Palgrave Macmillan, 1998), 3.

⁹⁹ Joppke, ‘Transformation of Citizenship’, 44.

¹⁰⁰ Anthony D. Smith, ‘National Identity and the Idea of European Unity’, *International Affairs* (Royal Institute of International Affairs 1944-) 68, no. 1 (January 1, 1992): 62.

¹⁰¹ Maas, ‘Freedom of Movement Inside “Fortress Europe”’, 242.

¹⁰² Favell, *Philosophies of Integration*, 24.

migrants because of a perceived lack of cultural assimilation (conceptual borders) can result in claims that migrants should be less entitled to labour market or welfare rights (organisational borders). Conversely, welfare state and labour market insecurity could contribute to hostility towards migrants when they are conceptualised as a threat to the state.¹⁰³ This interplay of borders is also evident in the context of regional integration, where notions of belonging and identity can function as significant boundaries between national political communities, challenging the scope of supranational integration to penetrate domestic institutions. For example, the EU citizenship dilemmas and political tensions over “backdoor” migration outlined earlier are symptomatic of a deeper question about who does or does not belong to the region, and what TCN’s entitlements are. Bauböck suggests that these increasingly contested domestic conceptions of citizenship may become a source of conflict between European member states. Calling for the introduction of common European standards for the citizenship of member states he argues that, *“Taking European citizenship seriously means a shared understanding of who the future citizens of Europe are going to be”*.¹⁰⁴

In this thesis, I utilise Geddes framework of *organisational* and *conceptual* to guide my analysis. While territorial borders have been removed in the Øresund region, the continued presence of national organisation and conceptual borders has hampered cross-border progress. In exploring the development of the Øresund region in Chapter Two, I show how regional political leaders are working to overcome organisational borders to cross-border freedom of movement while also attempting to build “mental bridges” through an identity strategy which aims to overcome conceptual barriers to regional citizenship. My analysis of regional citizenship issues in Chapter Four also employs Geddes framework to examine my findings and answer my research question, highlighting the different organisation and conceptual borders that are raised by divergent national citizenship models in the region.

Summary

In setting out to contextualise the research question - *To what extent do divergent national citizenship models inhibit deeper cross-border integration and prospects for regional*

¹⁰³ Geddes, *Immigration and European Integration*, 26.

¹⁰⁴ Bauböck, ‘Who Are the Citizens of Europe?’.

citizenship?- this chapter first lay the conceptual ground work for examining the relationship between national citizenship and regional integration. It revealed practical and conceptual tensions between regional freedom of movement and national self-determination over citizenship, such as different national policies for migrant naturalisation. The desire to prevent national policies undermining each other creates pressure to regionally harmonise citizenship policy. However, the centrality of citizenship policy to national sovereignty has limited these efforts. Given that regional integration occurs not only at the supranational level, but also in the multiplicity of subnational regional projects, it is important to remember that the tensions outlined above have the potential to affect smaller cross-border projects like my case-study, the Øresund region.

Chapter Two: Building Bridges: Cross-border Integration in the Øresund Region.

“For us, the next millennium will be about building bridges and dismantling borders.

Let the Øresund Region set an example.”

– *Commerce Ministers of Denmark and Sweden, Pia Gjellrup and Leif Pagrotsky, 1998*¹⁰⁵

The opening of the Øresund Bridge between Denmark and Sweden in July 2000 marked not only an impressive feat of engineering, but a remarkable act of multilevel negotiation and planning for economic, political and social integration between the two countries. Since overcoming this natural geographical boundary, the efforts to integrate neighbouring municipalities across the sound have intensified. The aim of this chapter is to frame the Øresund case study by outlining the economic and political drivers of integration in the region, the multiple levels of actors involved, and the barriers and challenges encountered. I chart the progress of regional integration against the regional vision of becoming a ‘diverse, yet cohesive’ common labour market and explore the notion of a regional identity and citizenship that envisages the Øresund as a new transnational space for economic, social and political engagement.¹⁰⁶ For this chapter, I continue with Geddes’ framing of organisational and conceptual borders to identify the various administrative and mental national barriers that the Øresund Committee is seeking to overcome in its removal of obstacles to free movement for regional residents. However, I note that since the Øresund Bridge opening, these visions of a seamless cross-border growth region became quickly hampered by the realization that a myriad of unforeseen national borders existed between the outwardly homogenous Scandinavian states, particularly for immigrant populations in the region.

¹⁰⁵ Cited in Nilsson, Fredrik, “Insiders and Outsiders”, in Per-Olof Berg, Anders Linde-Laursen, and Orvar Lofgren, *Invoking a Transnational Metropolis: The Making of the Oresund Region* (Copenhagen Business School Press, 2000), 191.

¹⁰⁶ Anssi Paasi, ‘The Resurgence of the Region and Regional Identity: Theoretical Perspectives and Empirical Observations on Regional Dynamics in Europe’, *Review of International Studies* 35 (2009): 121.

2.1 Øresund as a critical CBR case study

Cross-border regions (CBRs) are being developed across Europe as a result of initiatives between regions that share geographic proximity but are divided by national territorial borders.¹⁰⁷ In this context, border regions are no longer peripheral and have come to represent promising locations for the creation of functional, prosperous border regions, transforming the concept of the 'border' from one of division to one of dynamic cross-border cooperation. The logic of CBR strategies is to soften arbitrary national borders and restructure border regions along functional lines for economic growth, as opposed to the Westphalian notion of border regions as peripheral areas that look inward towards central national activity.¹⁰⁸ The increasing prominence of border regions has led some to predict that future international competition in Europe maybe between regions and metropolitan areas rather than between nations.¹⁰⁹ Others describe CBRs as the "cement of the European House"¹¹⁰ alluding to their role as a key element of wider European integration.

In this context, the cross-border Øresund region of Eastern Denmark and Southern Sweden is promoted as one of Europe's leading border regions.¹¹¹ It is a prominent member of the transnational lobby group, the Association of European Border Regions (AEBR) which describes border regions as playing an "important part in the process of European unification".¹¹² The AEBR's annual "Sail of Papenburg" Cross-Border Award has been awarded to the Øresund Committee for the second year running (2010, 2011). The Award honours "outstanding programmes, strategies, projects and actions within the scope of cross-border cooperation that preferably can be seen as exemplary."¹¹³

The inclusion of a capital city makes the Øresund region stand out as a special case within the EU as it does not have the peripheral nature attributed to many border-regions. These

¹⁰⁷ AEBR, 'Association of European Border Regions', n.d., <http://www.aebr.eu/en/index.php>.

¹⁰⁸ Julie Mostov, 'Soft Borders and Transnational Citizens', in *Identities, Affiliations and Allegiances*, ed. Şeyla Benhabib, Ian Shapiro, and Danilo Petranović (Cambridge University Press, 2007), 151.

¹⁰⁹ European Institute for Comparative Urban Research, *National Policy Responses to Urban Challenges in Europe*, EURICUR Series (Aldershot, England: Ashgate, 2007), 116.

¹¹⁰ AEBR, 'Statement on the Proposal for a Regulation of the European Parliament and of the Council on Specific Provisions for the Support from the European Regional Development Fund to the European Territorial Cooperation Goal' (AEBR, November 4, 2011).

¹¹¹ Øresund, 'Øresundsregionen', n.d., <http://www.oresundsregionen.org/About.aspx>.

¹¹² AEBR, 'Association of European Border Regions'.

¹¹³ AEBR, 'Sail of Papenburg - Association of European Border Regions (AEBR)'.

unique features, including the social and cultural similarities of these Nordic neighbours, have led to high hopes about the potential breadth and depth of cross-border regional integration. Øresund Committee Secretariat member, Daniel Persson, believes that by combining the national capital Copenhagen with the knowledge intensive IT and manufacturing sector of Scania, the Øresund Region will “...be that critical mass that maybe can compete with other metropolitan regions in the world.”¹¹⁴

In addition to significant depth of structural and economic integration, “...there is a tendency to portray the region as differing radically from other regional experiments within the European Union by virtue of the heavy emphasis on cultural integration.”¹¹⁵ This strong focus on cross-border cultural exchange and regional identity building makes the Øresund an ideal case study for exploring the emergence of regional citizenship, and how it interacts with the politics of national citizenship.

In this case, the Øresund region can also be seen as a prime case study for European integration at the micro level. In his study of democracy in CBRs, Hall describes how these “political laboratories on the micro level may launch innovative ideas of how to overcome the overall democratic deficit within the Union. Stated differently, if the EU will not come to grips with issues of democratic legitimation on the micro level, it will not do so on the macro level either.”¹¹⁶ The region is already one of the most economically integrated border regions in Europe and regional politicians envision that this will deepen further over time, “making it the most competitive, attractive and effective region in Europe.”¹¹⁷ Indeed the Øresund region has been described by its proponents as not only one of the biggest construction projects in the history of modern Europe, but also one of Europe’s biggest social experiments.¹¹⁸ In this sense, it can be seen to represent one of the forerunners of intensive, multifaceted regional integration in Europe.

¹¹⁴ Daniel Persson, ‘Interview, Øresund Secretariat Public Affairs Spokesperson, Stockholm’, September 12, 2011.

¹¹⁵ Berg, Linde-Laursen, and Lofgren, *Invoking a Transnational Metropolis*, 17.

¹¹⁶ Patrik Hall, ‘Opportunities for Democracy in Cross-border Regions? Lessons from the Øresund Region’, *Regional Studies* 42, no. 3 (April 2008): 424.

¹¹⁷ Øresund Committee, ‘Øresundsregionen: The Human Capital of Scandinavia’ (Øresundskomiteen, 2005), 18, 23.

¹¹⁸ Øresund Committee, ‘Annual Review: 2010’ (Øresundskomiteen, 2011), 4.

2.2 Origins of the Øresund region

The opening of the Øresund Bridge in July 2000 established an instrumental and symbolic link between Copenhagen and Malmö that accelerated regional integration. Travel time between the countries was reduced from an hour-long ferry crossing to a ten minute car or train trip. Efforts to enhance free movement mean that a growing stream of the region's inhabitants now commute across the bridge, with their homes and workplaces on different sides of the sound.¹¹⁹ Since 2000, commuting across Øresund has increased six fold, with around 18,000 people commuting daily over the Bridge in 2010.¹²⁰

The concept of the Øresund has been around for decades, with the region deriving its name from the narrow Sound (*Sund*) of water separating Denmark and Sweden and connecting the North Sea to the Baltic Sea. Scania was a part of Denmark until 1658, when it was conquered by Sweden.¹²¹ The region broadly incorporates the Danish island of Zealand and the Southern Swedish region of Scania on either side of this Sound. Boasting the slogan 'The Human Capital of Scandinavia', this metropolitan agglomeration currently has a combined population of 3.7 million inhabitants; 2.5 million on the Danish side and 1.2 in Sweden.¹²²

¹¹⁹ Povl Hansen and Goran Serin, 'Rescaling or Institutional Flexibility? The Experience of the Cross-border Øresund Region', *Regional & Federal Studies* 20, no. 2 (May 2010): 202.

¹²⁰ Tendens Øresund, 'Commuting Across Øresund', n.d., <http://www.tendensoresund.org/en/en/new-trends/commuting>.

¹²¹ Hansen and Serin, 'Rescaling or Institutional Flexibility?', 203.

¹²² Øresundsbro Consortium Analysis Department, '10 Years: The Øresund Bridge and Its Region' (Øresundsbro Consortium, June 2010).

Figure 2.0: The Øresund Region



Image source: Øresundsbro Consortium¹²³

The vision set out in the 1999 document, 'The Birth of a Region', was one of developing new cross-border institutions for cooperation, based on the pursuit of joint economic and political objectives.¹²⁴ The Øresund region generates a quarter of the combined GDP of Sweden and Denmark, and many integration efforts are centred on the fact that the region hosts a high-tech, knowledge intensive economy. A cross-border integration initiative was attractive for Copenhagen, as it opened up a pool of skilled labour and the commercial benefits of Scania's high-tech science and IT industries. Incentives for Scania included lower unemployment and a chance to be part of a dynamic and expanding capital city region.¹²⁵ By combining the economic strength of Danish capital, Copenhagen, and the high-tech industry of Southern Sweden, it was believed that the Øresund region would generate unique

¹²³ Ibid.5

¹²⁴ Danish and Swedish Governments, 'Øresund - En Region Bliver Til' (State Publications, 1999), <http://www.evm.dk/resources/oem/static/publikationer/html/oresund/hele.pdf>.

¹²⁵ Hansen and Serin, 'Rescaling or Institutional Flexibility?', 205.

investment and employment opportunities, making the region a cohesive and competitive force in the international market.

Since the 1990s, there has been a conscious effort by regional and national authorities from both countries to extend and deepen the Øresund integration process. Support from multiple levels of government, financial and political, all contributed to high hopes for the Øresund region as the bridge construction started in 1995. The economic crises in the 1980s and early 1990s were the primary drivers for the building of the Øresund Bridge, as it was believed that the removal of this natural geographical boundary would enhance and broaden the potential for trade and bring economic benefits for the stagnating regional economies of Scania and Zealand.¹²⁶

Löfgren described this stage of regional development as “*The dreamscape*”, where the years leading up to the opening of the Bridge in 2000 were characterised by utopian visions of an Øresund region dominating public and political debate.¹²⁷ The completion of the project was marked by the symbolic meeting of Crown Prince Frederick of Denmark and Crown Princess Victoria of Sweden in the middle of the bridge. Developing the Øresund Region as an economic hub became a key part of both countries’ strategies and it was envisioned that the creation of an integrated system would enhance both regional and national development.¹²⁸

Consensus on the importance of such cross-border functionality has driven much of the cooperation and integration in the Øresund region. Building on the rhetoric of regional development in Europe, the Øresund region was viewed by the political-economic elite as the only way to compete in the global market. The centralised economic organisation of the modern nation-state was increasingly viewed as an obstacle to growth and prosperity, with more ‘natural’ economic regions increasingly being seen as endeavours that would relieve on-going tensions between the global and the local.¹²⁹

¹²⁶Ibid., 202.

¹²⁷O. Löfgren, ‘Regionauts: The Transformation of Cross-Border Regions in Scandinavia’, *European Urban and Regional Studies* 15, no. 3 (July 2008): 200.

¹²⁸Hansen and Serin, ‘Rescaling or Institutional Flexibility?’, 202.

¹²⁹Jesper Falkheimer, *Att Gestalta En Region: Källornas Strategier Och Mediernas Föreställningar Om Öresund*, Centrum För Danmarksstudier 4 (Makadam, 2004), 206.

2.3 Multilevel drivers of free movement.

Freedom of movement has a long history in the Øresund region. Since 1954 the Nordic countries have enjoyed one of the precursors to the European free travel Schengen area in the Nordic Passport Union,¹³⁰ a passport-free travel area that formalised long standing mobility between the Nordic counties. This was swiftly followed by a common Nordic labour market agreement and social security convention.¹³¹ Efforts to enhance integration and freedom of movement in the region is driven by multiple layers of governance spanning local, municipal, national, macro-regional and supra-regional spheres. This has provided a good example of 'multilevel' governance, which has been of key interest to political science scholars.¹³²

Local: Both Denmark and Sweden have experienced significant administrative restructuring over recent decades, with the devolution of more authority to regional and local governments.¹³³ These local authorities have taken a leading role in spatial and urban development in the Øresund region, steering integration through a regional plan drawn up by the municipalities on both sides.¹³⁴ Working on the belief that the region has "...everything that is needed to compete in attracting visitors, companies, investment and labour...",¹³⁵ regional politicians and businesses have worked systematically to influence the governments in Denmark and Sweden to protect the region's economic interests.

National: The national level still plays a key role in cross-border integration efforts, not least because of the executive authority of the Swedish and Danish governments. National sponsorship of the Øresund Bridge and other regional infrastructure investments has been sizeable. National authorities also help integration through the coordination of social and tax policies; although barriers prevail on these issues and in this sense national systems still constitute a barrier to integration efforts.¹³⁶ Debates about regional freedom of movement have also recently been evidenced in national politics. Concurrent national debates on the

¹³⁰ Member states include Denmark, Sweden, Norway, Finland, Iceland, and the autonomous territories of Åland, Greenland and the Faeroe Islands.

¹³¹ Nordic Council, '1953-1971 — Nordic Cooperation'.

¹³² Bache and Flinders, *Multi-Level Governance*.

¹³³ David Arter, *Scandinavian Politics Today* (Manchester University Press, 1999).

¹³⁴ Danish Municipalities=*Amter*, Swedish municipalities=*Län*. Both use the term *Kommuner* for local government.

¹³⁵ Öresund Committee, 'ØRUS: Öresund Regional Strategy'.

¹³⁶ Torben Dall Schmidt, 'Cross-border Regional Enlargement in Øresund', 251.

theme of Nordic freedom of movement were held across Scandinavian Parliaments during the month of April 2012, led by the Ministers for Nordic Cooperation from the respective countries.¹³⁷

Nordic: In addition to national and local actors, the macro-regional Nordic Council¹³⁸ has also been involved in Øresund integration efforts, particularly those related to the promotion of free movement between the Scandinavia neighbours. Established in 1952 to promote post-war cooperation, the inter-parliamentary Nordic Council, along with its intergovernmental counterpart, the Nordic Council of Ministers, aims to enhance policy coordination between the Nordic countries and to collectively lift the prosperity of the region. The right to free movement between the Nordic countries has been in force since 1954 with the creation of the Nordic passport union and common labour market,¹³⁹ so the Øresund region is seen by the Council as a strong symbol of Nordic cooperation and a strategic gateway between Scandinavia and the European continent.¹⁴⁰

The Øresund Committee receives support from the Nordic Council of Ministers, and collaborates in several key policy areas through a partnership programme for the regional sector.¹⁴¹ The Nordic Council of Ministers also supports specific projects in the Øresund region that it sees as likely to promote Nordic cooperation and be of international economic and political advantage for the region. In 2007 the Nordic Council of Ministers set up a 'Freedom of Movement Forum' tasked with identifying and removing further cross-border obstacles between the Nordic countries through constructive dialogue with national political and administrative bodies.¹⁴² This forum has worked closely with the Øresund Committee's own efforts to remove border barriers between Denmark and Sweden.

¹³⁷ Nordic Council, 'Theme Debate on Freedom of Movement in the Nordic Parliaments', April 11, 2012, <http://www.norden.org/en/nordic-council/organisation-and-structure/national-delegations/events/theme-debate-on-freedom-of-movement-in-the-nordic-parliaments>.

¹³⁸ Denmark, Norway, Sweden, Finland, Iceland and the three autonomous territories of Åland, Greenland and the Faeroe Islands are represented on the Nordic Council

¹³⁹ Nordic Council, '1953-1971 — Nordic Cooperation'.

¹⁴⁰ Øresund Committee, 'Øresund and the Nordic Countries', n.d., <http://www.oresundskomiteen.dk/Working-together/-resund-and-the-Nordic-countries/-resund-and-the-Nordic-countries>.

¹⁴¹ Nordic Council, 'Regional Policy — Nordic Cooperation', n.d., <http://www.norden.org/en/about-nordic-co-operation/areas-of-co-operation/regional-policy>.

¹⁴² 'Freedom of Movement — Nordic Cooperation', n.d., <http://www.norden.org/en/news-and-events/news/freedom-of-movement-1/>.

European: This desire to promote new and alternative forms for establishing cross-border cooperation has also followed continental European integration processes with many scholars pointing out the interdependencies between micro-regional and macro-regional (EU) processes of regionalisation.¹⁴³ Such “Euroregions” have been incentivised through the European Union’s programme of regional economic integration (INTERREG) which provides EU funding for cross-border integration projects that further EU integration goals. In addition to funding, Jerneck also suggests that the doctrine of regionalisation purported by the EU also legitimised political aspirations in the Øresund region for cross-border cooperation and self-governance.¹⁴⁴ The promotion and prioritization of European cross-border regions has also been solidified by associations such as the AEBR. The Øresund Region continues to intensify and deepen its integration efforts in collaboration with the EU, framing itself as one of Europe’s most advanced cross-border regions.¹⁴⁵

Cross-border: The main body dedicated to managing cross-border integration is the Øresund Committee, a cross-border forum for voluntary political cooperation constituting municipal and local politicians from both countries.¹⁴⁶ The goal of the Committee is to enhance the integrated development of the region and to promote cross-border cooperation to support this. It works with authorities, businesses and universities to facilitate the free movement of individuals and businesses within the region. The Committee also seeks to create platforms for formalised cooperation and to promote knowledge-based development in the region.¹⁴⁷ As a regional policy forum for political cooperation, the Committee lacks executive power, so one of its primary roles is information sharing and identifying barriers to integration.¹⁴⁸

The Øresund Committee also acts as a political lobbying organisation that defends the interests of the region before the two nations’ parliaments, the Swedish *Riksdag* and the

¹⁴³ Joachim Blatter, ‘From “spaces of Place” to “spaces of Flows”? Territorial and Functional Governance in Cross-border Regions in Europe and North America’, *International Journal of Urban and Regional Research* 28, no. 3 (September 1, 2004): 530.

¹⁴⁴ Magnus Jerneck, ed., *Integration Och Utveckling i Öresundsregionen: Möjligheter Och Utmaningar* (Lund: Lund University, 1999).

¹⁴⁵ OECD - Organisation for Economic Co-operation and Development and Organization for Economic Cooperation and Development, *OECD Territorial Reviews OECD Territorial Reviews: Oresund, Denmark/Sweden 2003* (OECD Publishing, 2003), 64.

¹⁴⁶ Øresund Committee, ‘Organisation’, n.d., <http://www.oresundskomiteen.dk/About--resundskomiteen/Organization>.

¹⁴⁷ Oresund.org, ‘Home-Øresund’, n.d., <http://www.oresund.org/>.

¹⁴⁸ Hansen and Serin, ‘Rescaling or Institutional Flexibility?’.

Danish *Folketing*, and also before the EU in Brussels. This requires increasing national commitment to the integration processes such as public investment in cross-border infrastructure and adjustment of national legislation to accommodate transnational activity. The Øresund Committee's cross-border vision document– the ØRUS development strategy– outlines how the region is to develop over the next ten years.

The ØRUS document focuses on four main themes: knowledge and innovation; culture and events; a diverse yet cohesive labour market; and accessibility and mobility. With the stated aim being that by “2020 the Öresund Region will be a model for other European border regions with a common labour market – free from obstacles that complicate life for those living and working on different sides of the Sound and for those in one country who want to employ people from the other country.”¹⁴⁹ Given these multiple drivers for integration and free movement, as well as the region's historical and cultural ties, the Øresund sets itself out as a leader in European cross-border integration efforts. Considering the transnational arguments laid out in Chapter One, the Øresund region should by all accounts be at the forefront of cross-border regional citizenship developments.

The next section explores how regional political actors are indeed attempting to foster a sense of regional citizenship as part of a wider strategy to overcome national, organisational and conceptual borders that still hinder regional development. Despite concentrated efforts however, some national borders have proven more difficult to overcome than others. The following section explores some of these challenges and how the Øresund Committee is attempting to overcome them. I also introduce particular issues relating to the growing migrant population in the region and possible implications for the regional vision.

¹⁴⁹ Öresund Committee, 'ØRUS: Öresund Regional Strategy', 8. 8

2.4 Overcoming organisational borders

While much hype and media enthusiasm surrounded the opening of the bridge in 2000, this sentiment quickly turned to disappointment in a second phase which Löfgren describes as the “steeplechase course”.¹⁵⁰ Øresund promoters realised that commuter numbers remained low and the appearance of unexpected obstacles to cross-border movement continued to increase. Expensive bridge tolls, double taxation and administrative confusion all hampered the Øresund vision and it became clear that previous territorial borders had been removed only to reveal a multitude of administrative obstacles.¹⁵¹ Different national currencies, and qualification standards, as well as complex Nordic social security systems and labour market structures, all hindered the realisation of a functional common labour market.

Central to both economic and political integration efforts has been the creation of a functional cross-border labour market with minimal barriers to cross-border freedom of movement. This is based on the neo-liberal assumption that if individuals are free to live, work and study in either country without hindrance, then the economic advantages of both economies could be fully exploited. In turn, this would result in maximum productivity for the region.¹⁵² A flexible cross-border labour market would therefore need to be guided by market forces and not by the rigid institutional structures of a territorial defined national system. It then became obvious that the labour markets on both sides of the Sound were deeply embedded in different national institutional set ups, which hindered cross-border labour mobility.¹⁵³

Because of this, the Øresund Committee’s main goal since the early 2000s has since been “...to eliminate as many as possible of the legal and regulatory obstacles that exist, so that it will become simpler to work, study, live or invest on the other side of the water.”¹⁵⁴ Given the absence of formal territorial borders for movement in the region, much of the focus of

¹⁵⁰ Orvar Löfgren, ‘Regionauts: The Transformation of Cross-Border Regions in Scandinavia’, *European Urban and Regional Studies* 15, no. 3 (July 1, 2008): 195–209.

¹⁵¹ Øresund Committee, ‘33 Hindringer, Udfordringer Og Muligheder: Oresundsmodellen 2010’, n.d.

¹⁵² Christoph Hermann, ‘Neoliberalism in the European Union’, *Studies in Political Economy* 79 (2007): 68, http://univie.academia.edu/ChristophHermann/Papers/839015/Neoliberalism_in_the_European_Union.

¹⁵³ Torben Dall Schmidt, ‘Cross-border Regional Enlargement in Øresund’.

¹⁵⁴ Øresund Committee, ‘Øresundsregionen: The Human Capital of Scandinavia’. 23

the Øresund Committee has been on the removal of these administrative barriers to work and welfare on each side of the sound.

The Scandinavian countries also pride themselves on their generous “Nordic Welfare Model” which they consider to be an integral part of their regional distinctiveness.¹⁵⁵ A related strand of the Øresund Committee’s work has therefore been to identify where Nordic citizens are not able to fully exercise their cross-border social entitlements deriving from the 1955 Nordic Social Security Agreement. Some of the identified barriers included difficulty in moving pension funds and claiming social benefits while working and living in different countries. In this sense, a common regional welfare arrangement is also a key part of the integration process, as a lack of security in social protection is identified as a key barrier to labour mobility.¹⁵⁶

The Nordic Freedom of Movement Forum and Øresund Committee published a joint report entitled, “33 barriers, developments and opportunities: the 2010 Øresund Model” which outlines the key obstacles to a common labour market, social rights, and free movement for all residents in the Øresund region. To meet these challenges, the Committee focuses on three types of organisational barriers: administrative procedures, mutual recognition of qualifications, and legislative frameworks.¹⁵⁷ Firstly, the Øresund Committee is committed to reducing the myriad of administrative inconsistencies. Efforts have focused on reducing the costs of commuting, such as lowering bridge tolls, and also on cross-national information sharing to ensure that the labour market, its rules and frameworks are more transparent.¹⁵⁸

Among information sharing initiatives has been the development of *Øresund Direct*, an online information portal advertising job opportunities on the other side of the strait, as well as comprehensive information about moving, commuting, taxation, housing, social security, living costs and education.¹⁵⁹ Other initiatives aim to promote cross-border activity through opportunities for cross-border collaboration and knowledge sharing. The Øresund University Network is a collaboration project between local universities, aiming to make the

¹⁵⁵ Eric S. Einhorn and John Logue, *Modern Welfare States: Scandinavian Politics and Policy in the Global Age Second Edition*, 2nd ed. (Praeger Paperback, 2003).

¹⁵⁶ Øresund Committee, ‘33 Hindringer, Udfordringer Og Muligheder: Oresundsmodellen 2010’.

¹⁵⁷ Development and Development, *OECD Territorial Reviews OECD Territorial Reviews*, 111–112.

¹⁵⁸ Øresund Committee, ‘ØRUS: Øresund Regional Strategy’, 22.

¹⁵⁹ ‘OresundDirekt’, n.d., <http://www.oresunddirekt.com/>.

Øresund Region “a stronghold for education, research, and administrative educational collaboration.”¹⁶⁰ Mutual recognition of qualifications has arisen as another area of difficulty, and negotiations aim to achieve a scenario where “people with different educational backgrounds, professional skills and practical experience have unrestricted access to all of the region’s workplaces, irrespective of whether their skills have been acquired in Sweden, Denmark or elsewhere.”¹⁶¹

The organisational barrier I address in most detail in this chapter is that of different legislative frameworks. These relate not only to inconsistencies in national labour market laws and welfare entitlements but also, crucially for this thesis, national legislation regarding the entry and integration of non-European migrants into work and welfare. A key function of the Øresund committee is to lobby national governments to address inconsistent national legislation which causes barriers to a common labour market. Negotiations so far have focused on reconciling the two country’s tax systems and social welfare institutions, though these have not been changed easily. Regional politicians assert that national political apathy towards the regional project and the urgency of national legislative change has been one key reason why integration has not progressed as fast as anticipated.¹⁶² Øresund Committee chair Pia Kinhult describes how complicated state legislation and public protectionism over national systems are some of the main political barriers to cross-border integration.¹⁶³

Most legislative challenges arose as the numbers of cross-border commuters increased, raising issues of contribution to, and redistribution of, national public funds and insurance schemes. Gradual progress has been made though, and some key achievements have included an agreement between Danish and Swedish Governments to prevent double taxation and changes to national legislation allowing people to be employed in both countries at the same time. However, one of the key barriers identified in the joint report that has not been resolved, and which is highly relevant to this thesis, is that of TCN rights to the common labour market.

¹⁶⁰ ‘Øresund University Network’, n.d., <http://www.uni.oresund.org/>.

¹⁶¹ Øresund Committee, ‘ØRUS: Øresund Regional Strategy’, 7.

¹⁶² Ole Stavad, ‘Interview, Stockholm’, September 12, 2011.

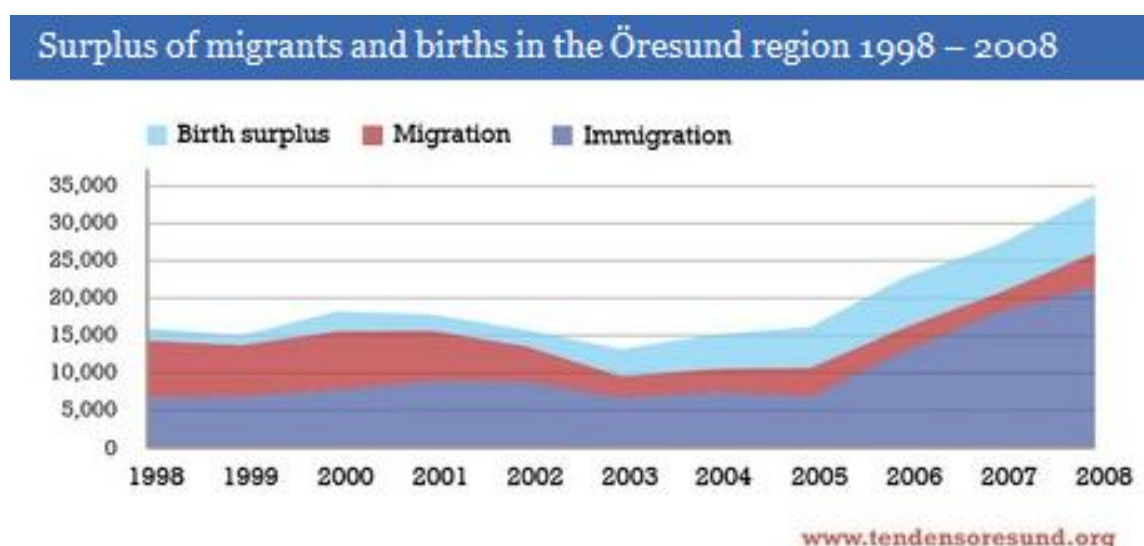
¹⁶³ Pia Kinhult, ‘Interview, Stockholm’, September 12, 2011.

2.4.1 TCNs in the labour market

While there has been some success in addressing national barriers to free movement of Danish and Swedish citizens, this has proven more difficult with regard to other nationalities in the region. Non-European nationals, ineligible to participate in the common European labour market, face particular barriers in participating in the Øresund region. The strong regional focus on integrating the Danish and Swedish labour markets has not extended as far as coordinating national policies for recruiting and integrating foreign workers. Recent calculations show that the region is missing out on half a billion Kroner because TCNs in the region are ineligible to work on the other side of the Sound.¹⁶⁴

This is made more salient because of the region's growing migrant population. Over the last 10 years, the Øresund has seen an increase in the number of foreign citizens living in the region. From 2000-2009, a net total of 100,000 persons migrated from countries other than Denmark and Sweden.¹⁶⁵ The OECD's report on the region noted that while an increase in foreigners could help alleviate economic tensions on the labour market, it would also require policies to facilitate the inclusion of these migrants.¹⁶⁶

Figure 2.1: Surplus of migrants and births in the Øresund region 1998-2008



¹⁶⁴ Folketinget, 'Nordisk Råd - Riv Grænsehindringerne Ned i Norden', April 19, 2012, http://www.ft.dk/folketinget/udvalg_delegationer_kommissioner/delegationer_og_kommissioner/nordisk_rad/nyheder/2012/04/nor_graensehindringsdebat_2012.aspx.

¹⁶⁵ Tendens Øresund, 'Migration Flows', n.d., <http://www.tendensoresund.org/en/migration-across-oresund>.

¹⁶⁶ Development and Development, *OECD Territorial Reviews OECD Territorial Reviews*, 30.

Image source: "Migration Flows" Tendens Øresund,¹⁶⁷ accessed 23 March 2012

As a result, one of the Øresund Committee's goals is to "make better use of the resource represented by workers with non-Scandinavian backgrounds", and to "devote particular attention to attracting researchers and specialists from other parts of the world."¹⁶⁸ The motivation behind extending regional mobility rights to foreigners is not only about economic growth, but also preparing for predicted labour shortages resulting from an ageing population and a need to maintain the generous Scandinavian welfare system.¹⁶⁹ The OECD's Øresund report also noted that in addition to attracting high-skill migrants, regional efforts should also focus on enhancing the skills of non-qualified immigrants, through the coordination of active labour market welfare policies.¹⁷⁰ Again this suggests that a level of pressure for immigration policy convergence, particularly regarding labour migration, should run parallel with deepening regional integration efforts.

Yet, national legislation on the issue of migrants post arrival rights remains very different between Denmark and Sweden. For example, since 2009, labour migrants who take up work in Sweden are automatically allowed to bring their families, who in turn are also given access to the Swedish labour market.¹⁷¹ The same rules do not apply in Denmark, where rules for family reunification for labour migrants have notably tightened over the last decade.¹⁷² A comparison between Denmark and Sweden is particularly interesting in this sense, as the two very similar welfare states have developed dissimilar attitudes towards the rise of a multicultural society. I examine this issue further in my comparison of the countries' migrant naturalisation policies in Chapter Three.

Efforts to remove barriers to cross-border movement within a common Øresund labour market are promoted not only as a way of maximising the economic productivity of the region but also as a vehicle for deeper social and political integration between the two

¹⁶⁷ Tendens Øresund, 'Migration Flows'.

¹⁶⁸ Øresund Committee, 'ØRUS: Öresund Regional Strategy', 22.

¹⁶⁹ Christian Ketels, *Global Pressure- Nordic Solutions? The Nordic Globalization Barometer 2010* (Nordic Council of Ministers, 2010).

¹⁷⁰ Development and Development, *OECD Territorial Reviews OECD Territorial Reviews*, 30.

¹⁷¹ Government Offices of Sweden, 'New Rules for Labour Immigration' (Regeringskansliet, 2009).

¹⁷² 'Ny i Danmark - All Immigrants Do Not Have the Same Prerequisites for Integration', n.d., http://www.nyidanmark.dk/da-dk/ministeren/artikler_debatindlaeg_og_taler/2011/all_immigrants_do_not_have_the_same_prerequisites_for_integration.htm.

countries.¹⁷³ This leads to the second part of this chapter which examines another key strand of the Øresund Committee's work, namely, to overcome conceptual borders or "mental barriers"¹⁷⁴ to cross-border integration and transnational movement

2.5 Challenging conceptual borders: The Øresund citizen

Although the primary aim of the new infrastructure across the Sound was to improve economic links, it became apparent that the integration of civil society was also important. More work was needed to facilitate the free movement of people and remove long engrained "mental barriers" to living and working across the confines of the nation state. This was an unexpected turn of events given the very similar cultural and social attributes of Danes and Swedes, and the fact that regional proponents believed that the integration process itself would naturally lead to the development of a common identity.¹⁷⁵

2.5.1 Regional identity strategy

Visions for deeper regional integration therefore include the emergence of a common Øresund identity, seen as instrumental for accomplishing the functional strategy.¹⁷⁶ The notion of regional identity has been widely promoted by regional politicians and businesses in order to foster an on-going sense of cross-border cooperation and to lower the perception of the national border as an impediment to interaction in the region.¹⁷⁷ Bucken Knapp described this as "... the development of a consciousness among Øresund inhabitants that they not only occupy a common bounded space, but that they have some degree of commonly shared values and interests deriving from inhabiting the Øresund."¹⁷⁸

Nevertheless, the question of identity and belonging is complicated in a region intersected by national borders and cultural dynamics. The removal of territorial barriers to free movement brought about a new awareness of national cultural differences.¹⁷⁹ These

¹⁷³ Øresund Committee, 'Annual Review: 2010', 2.

¹⁷⁴ Ilmar Reepalu, 'Interview, Stockholm', September 12, 2011.

¹⁷⁵ Danish and Swedish Governments, 'Øresund - En Region Bliver Til', 82.

¹⁷⁶ Øresundsbro Consortium Analysis Department, '10 Years: The Øresund Bridge and Its Region', 2.

¹⁷⁷ Gregg Bucken-Knapp, 'Just a Train-ride Away, but Still Worlds Apart: Prospects for the Oresund Region as a Binational City', *GeoJournal* 54, no. 1 (2001): 51.

¹⁷⁸ *Ibid.*, 58.

¹⁷⁹ Jan Buursink, 'The Binational Reality of Border-crossing Cities', *GeoJournal* 54, no. 1 (2001): 7.

different languages, work ethics, cultural practices and habits have proved to be unforeseen obstacles in daily life as a cross-border commuter.¹⁸⁰

Still, a regional identity is pursued by region actors both as a means of unifying the resident population, lowering mental barriers to transnational activity and promoting the Øresund region externally as an attractive destination for skills and investment.¹⁸¹ Regional leaders are clear on the necessity for regional identity, and that “a credible marketing of the Øresund region requires that the region will also develop a stronger feeling of togetherness and common identity,”¹⁸² Hall similarly points to the rise of regional branding as evidence of the emotional power of identity politics.¹⁸³

The Øresund Committee has therefore also started to pay more attention to the image that the region evokes in the outside world. Since 2000, the Committee has branded the region locally, nationally and internationally as “Øresund: The Human Capital of Scandinavia.”¹⁸⁴ In order to carry out this branding strategy, the Committee established, the Øresund Identity Network (since 2002 re-named as the Øresund Network AB) in order to “coordinate information about the Øresund, create a clear profile of the region and to further develop its image”.¹⁸⁵

¹⁸⁰ Gregg Bucken-Knapp, ‘Just a Train-ride Away, but Still Worlds Apart’.

¹⁸¹ Development and Development, *OECD Territorial Reviews OECD Territorial Reviews*, 26.

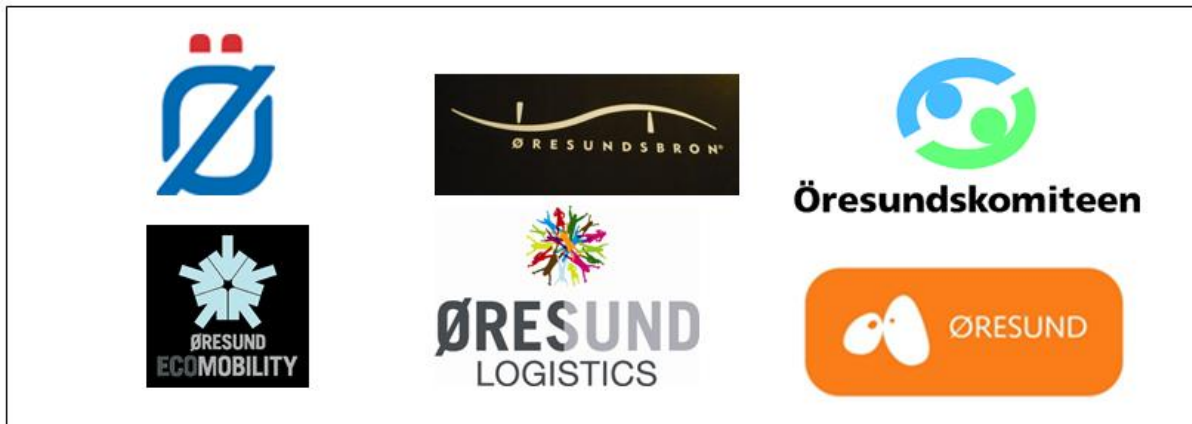
¹⁸² Gregg Bucken-Knapp, ‘Shaping Possible Integration in the Emerging Cross-Border Oresund Region’, *European Studies: A Journal of European Culture, History and Politics* 19, no. 1 (2003): 58.

¹⁸³ Hall, ‘Opportunities for Democracy in Cross-border Regions?’.

¹⁸⁴ Øresund Committee, ‘Øresundsregionen: The Human Capital of Scandinavia’.

¹⁸⁵ Gert-Jan Hospers, ‘Borders, Bridges and Branding: The Transformation of the Øresund Region into an Imagined Space’, *European Planning Studies* 14, no. 8 (2006): 1015–1033.

Figure 2.3: Øresund “brands”¹⁸⁶



Yet given that the construction of an Øresund region has largely been driven as a top-down process, one of the criticisms of integration efforts has been that the fact that political ambitions were not matched with a similar grass-roots enthusiasm or identification.¹⁸⁷ Hospers argues that if the “Øresund Region wants to continue its economic growth, it is important for the authorities to pay attention to the lacking regional identity among the population across the borders.”¹⁸⁸ Empirical research into regional identity has in fact shown Swedes identify more as Øresund citizens than Danes.¹⁸⁹ Even members of the Øresund Committee concede to the fact that a common identity is yet to fully emerge. “...if you go down and speak to the man on the street – do you feel identity for the Øresund? No... that’s tricky business.”¹⁹⁰ Other regional politicians expect regional identity to be more of a long-term development, enhanced through intermarriage and familial ties. “Yes, it will come. But that comes with the next generation. That comes from people coming from Sweden... and Denmark... getting married and having children and the families are mixed in that way...”¹⁹¹

¹⁸⁶ Image sources: Øresund EcoMobility (<http://www.oresundecomobility.org/>); Øresund Bridge Consortium (<http://uk.oresundsbron.com/page/976>); Øresund Committee (<http://www.oresundskomiteen.org/>); Øresund Logistics (<http://www.scandriaproject.eu/index.php?option=content&id=112>); Øresundshuset (<http://www.oresundshuset.nu/>)

¹⁸⁷ TorbenDall Schmidt, ‘Cross-border Regional Enlargement in Øresund’, 251.

¹⁸⁸ Hospers, ‘Borders, Bridges and Branding’, 1029.

¹⁸⁹ Gregg Bucken-Knapp, ‘Just a Train-ride Away, but Still Worlds Apart’.

¹⁹⁰ Mikael Stammering, ‘Interview, Stockholm’, September 12, 2011.

¹⁹¹ Reepalu, ‘Interview, Stockholm’.

2.5.2 Regional citizenship?

In addition to external branding, regional leaders have therefore also recognised the importance of how people *within* the Øresund Region identify with it. This is why an additional regional identity strategy aims to foster a narrative of solidarity, identity and *citizenship* among the region's population¹⁹² Due to this absence of popular participation, there is a hope that deeper integration will entail the development of different forms of regional political participation.

While hopeful for a future cross-border parliament, former Øresund Committee Director Mikael Stamming believes the region, for the moment, "can have other kinds of democracy...". For this reason, Øresund Committee visions for deeper regional integration therefore include the emergence of a common Øresund identity or 'citizenship' as a basis for future political integration. Yet democratic participation in the region still begs this question of regional citizenship, a concept which continues to be described through vague identity markers in Øresund Committee publications:

*"Across the region, many people now regard themselves as Øresund citizens. But what does it mean to be an Øresund citizen? What is the identity of those who live there? What is the soul of the Øresund Region? Perhaps we can find it in the commitment and dynamism that many people have invested in making their daily life function just as smoothly across national borders as it did before in the two parts of the region – those who feel passionate about the region and have never given up."*¹⁹³

Another question of regional citizenship and representation arises when one again considers TCNs in the region. The Øresund project is popularly portrayed as an effort to unite Danes and Swedes under the rubric of their shared ancestry and characteristics. However a portrayal of regional inhabitants as being predominantly Scandinavian does not reflect the shifting demographic realities of the metropolitan Øresund region. Löfgren warns that as Danish-Swedish differences and stereotypes are heightened in the integration process, a simplified notion of the region as being a product of two national cultures

¹⁹² Jan Buursink, 'The Binational Reality of Border-crossing Cities', 7.

¹⁹³ Øresundsbro Consortium Analysis Department, '10 Years: The Øresund Bridge and Its Region', 2.

emerges.¹⁹⁴ This has the consequence of playing down other identities within the region, such as gender, class, or the many non-Scandinavian nationalities that reside in the Øresund region. Particularly in Sweden, the large number of foreign-born residents in the city of Malmö makes any ethnic Nordic definition of the region's identity too exclusive for the multicultural region.¹⁹⁵

Summary

Since the opening of the Øresund Bridge, regional leaders have lobbied to remove national structures that inhibit cross-border freedom of movement within the region. These efforts have been reinforced by an explicit regional identity strategy not only to market the region to the world, but to foster a sense of community and belonging among regional residents. Regional actors are actively promoting the concept of the Øresund citizen and the region's branding is built on an explicitly cosmopolitan outlook. Given these multiple drivers for integration and free movement, the Øresund sets itself out as a leader in European cross-border integration efforts. Yet despite concentrated efforts, this chapter also illustrated that national barriers continue to hamper cross-border dynamics. In addition to some of the more immediate questions of removing organisational barriers to economic integration, this chapter highlighted that issues of cross-border entitlement and identity have proven more difficult to overcome than others. Additionally, the issue of migration stands out as an area of national policy discrepancy which could prove problematic as the Øresund Committee aims to enhance the mobility of TCNs in the region.

¹⁹⁴ OrvarLöfgren, 'Border Zones and Mobility- The Case of the Öresund Region' (presented at the 14th International Metropolis Conference, Copenhagen, 2009).

¹⁹⁵ Gregg Bucken-Knapp, 'Just a Train-ride Away, but Still Worlds Apart'.

Chapter Three: Divergent Citizenship Models in Denmark and Sweden

Despite sharing a very similar societal and cultural structure,¹⁹⁶ Denmark and Sweden have adopted different national policies over the last decade regarding non-European migrants' eligibility for settlement and the conditions for their legal and social integration.¹⁹⁷ This chapter identifies and explores the key policy area where Denmark and Sweden have diverged most in their national migrant integration models,¹⁹⁸ namely, access to nationality. It analyses the politics of national citizenship as they find their *de jure* and *de facto* political expression in divergent policy and discourse on migrant naturalisation in Denmark and Sweden. I find that the divergences reveal not only clear differences in official citizenship identities propagated by the states, but also a significant divide in political rhetoric, understandings of immigration and diversity, and how society should adapt to these transnational pressures.

Koopmans identifies four ideal type of conceptions of citizenship; segregation, assimilationism, universalism and multiculturalism.¹⁹⁹ I argue that their classification of the assimilationism and multiculturalism models represent the different conceptions of Danish and Swedish citizenship respectively, as reflected in their national political developments. The assimilationism model grants naturalisation only upon full acculturation to the majority culture, as seen by the more comprehensive requirements for naturalisation. Conversely, the multiculturalism model drops ethnicity as the formal basis of citizenship, and adopts one based on civic-pluralism, as shown by Sweden's acceptance of dual nationality and its commitment to "a community based on diversity".²⁰⁰ Developments in Sweden have also increasingly given equal rights to citizens and foreigners, reflecting a clear change to the core idea of citizenship.

¹⁹⁶ David Arter, *Scandinavian Politics Today (2ed)* (Manchester: Manchester University Press, 2008), 6.

¹⁹⁷ Christoffer Green-Pedersen and Pontus Odmalm, 'Going Different Ways? Right-wing Parties and the Immigrant Issue in Denmark and Sweden', *Journal of European Public Policy* 15, no. 3 (April 2008): 377.

¹⁹⁸ The focus in this chapter is on *national* migrant integration policies, rather than local implementation of these policies, as it is government policy that sets the legal and political framework within which other aspects of integration occur.

¹⁹⁹ Koopmans et.al, *Contested Citizenship*, 233.

²⁰⁰ Ministry of Industry, Employment and Communications, 'Integration Policy for the 21st Century (2001/02:129)' (Regeringskansliet, June 2002), 2.

I build the case that these political frameworks for policy making form two contrasting sets of ideas about the correct frame for policy responses to immigration and diversity dilemmas. The empirical illustrations in this chapter lay the foundation for Chapter Four, which analyses the extent to which divergent national models of migrant integration and citizenship inhibit regional efforts to deepen integration and foster a sense of common citizenship in the Øresund region.

3.1 Background to national migrant integration models

During the first half of the 20th Century, Scandinavia was a region of emigration, rather than a major destination for immigrants. Most migration during this time tended to be European or intra-Nordic, so it was taken for granted that these culturally similar migrants would easily integrate.²⁰¹ Migrant integration rules were minimal and rules about the adoption of citizenship by foreigners were harmonized across the Scandinavian countries. Following the Second World War, the newly formed Nordic Council even discussed the prospect of common Nordic citizenship. Although this was never realized, the desire for further Nordic cooperation remained, insisting that rules illustrating the mutual connection between the Nordic states should be adopted.²⁰²

It was in this context that freedom of movement between the Nordic countries was officially established in the form of a passport free area in 1952 and a common labour market in 1954, as well as access to social benefits and facilitated naturalisation in each other's countries.²⁰³ Around the same time, migration sources began to diversify with the arrival of war refugees and foreign 'guest-workers' to boost economic post-war recovery. The mass influx of new non-European immigrants, in turn, stimulated discussion about the need for regulated immigration and migrant integration strategies.²⁰⁴

Despite officially stopping non-Nordic labour migration in the early 1970s, the Scandinavian states soon found that a halt on foreign labour did not stop foreign immigration flows all

²⁰¹ Christine Ingebritsen, *Scandinavia in World Politics* (Maryland: Rowman and Littlefield Publishers, 2006), 89.

²⁰² Ersbøll, 'Country Report: Denmark', 11.

²⁰³ Ibid.

²⁰⁴ Charles Westin, 'Migration Information Source - Sweden: Restrictive Immigration Policy and Multiculturalism', n.d., <http://www.migrationinformation.org/Profiles/display.cfm?ID=406>.

together.²⁰⁵ Integration measures for guest worker migrants were not considered as it was assumed that they would return home when their labour was no longer needed. However, many of the 'guest' workers had spent so long in their host counties that they had settled, started families, or sought rights to family reunification. In addition, the arrival of asylum seekers from on-going wars or crises added to increasing immigration flows.²⁰⁶

Migration to Denmark and Sweden during the 1980s and 1990s was therefore dominated by asylum and family migration flows, and Scandinavian states have since become net recipients of immigrants from a range of European and non-European backgrounds.²⁰⁷ It was in this context of the intensification and diversification of permanent migration that Sweden and Denmark first became net receivers of immigration and began to establish official national policies for integrating migrants into society. By 2010, foreign-born migrants comprised 9% and 14.3% of Danish and Swedish populations respectively. The figures for non-European born are 6.3% and 9.2%.²⁰⁸

Sweden was the first Scandinavian country to establish a comprehensive immigration and integration policy. Due to its neutrality during the war, Sweden received war refugees much earlier than many of its European neighbours. As a result of this earlier experience in immigration and ethnic diversity, the Riksdag adopted a policy framework in 1975 for migrant integration based on three liberal principles of "equality, freedom of choice, and partnership".²⁰⁹ The policy was founded on an understanding that integration was not a one-way process of incorporating immigrants into mainstream society but instead represented a process of mutual adjustment for both migrants and Swedes.²¹⁰

Denmark was much later in developing national integration policies, though when finally developed they were comprehensive and legally enshrined. In 1999, Denmark became the first country in the world to introduce an Integration Act which completely reformed Danish

²⁰⁵ Peter Lawler, 'Loyalty to the Folkhem? Scandinavian Scepticism and the European Project', in *Political Loyalty and the Nation-state*, ed. Michael Waller (London: Routledge, 2003), 165.

²⁰⁶ Charles Westin, 'Migration Information Source - Sweden: Restrictive Immigration Policy and Multiculturalism'.

²⁰⁷ Freeman, 'National Models, Policy Types, and the Politics of Immigration in Liberal Democracies', 228.

²⁰⁸ Europa Press Releases RAPID, 'EUROPA - Press Releases - Foreign Citizens Made up 6.5% of the EU27 Population in 2010', July 14, 2011,

<http://europa.eu/rapid/pressReleasesAction.do?reference=STAT/11/105&type=HTML>.

²⁰⁹ Charles Westin, 'Migration Information Source - Sweden: Restrictive Immigration Policy and Multiculturalism'.

²¹⁰ Ibid.

integration policies. The new legislation brought a set of new rules to apply to all legal immigrants and refugees and also transferred the responsibility for implementing these migrant integration policies from the Danish Refugee Council to local authorities.²¹¹

While there are several domestic and exogenous factors which have influenced the development of each country's national citizenship legislation and politics, it would be outside of the scope of this thesis to explore all of these in detail. Instead this chapter outlines a select few differences in the political and institutional contexts of Denmark and Sweden's migrant integration models, including historical experiences with migration diversity and the strength of the far-right political parties. Thus, the aim of this chapter is not to explain *why* the two countries have diverged, but instead to identify and illustrate key legislative and political differences that have developed in each country's migrant naturalisation policies and politics from 2000-2010, in order to later analyse how these have affected, or could potentially affect, integration in the Øresund region.

3.2 Divergent migrant integration models 2000-2010

The rest of this chapter outlines the politics and policies of migrant integration and naturalisation in Denmark and Sweden. This chapter uses Migrant Integration Policy Index (MIPEX) data as well as national statistics and political documents to illustrate key divergences in Danish and Swedish government approaches to citizenship policy. MIPEX publishes annual reports and key findings that look at best practices in seven different strands of migrant integration policy based on surveys of the respective regimes in 33 countries²¹². I selected MIPEX over other integration indicators because it allowed for a clear comparison of policy indicators across six clear strands and a range of countries. Additionally, it is scientifically robust and has been subject to external assessment for reliability of scale.²¹³

²¹¹New to Denmark, 'A comprehensive integration initiative – and better integration', *New to Denmark.dk: The official portal for foreigners and integration*, June 8, 2006, http://www.nyidanmark.dk/en-us/Integration/a_comprehensive_integration_initiative/a_comprehensive_integration_initiative.htm.

²¹² MIPEX, 'Migrant Integration Policy Index | MIPEX', n.d., <http://www.mipex.eu/>.

²¹³Didier Ruedin, 'The Reliability of MIPEX Indicators as Scales', n.d., http://unine.academia.edu/DidierRuedin/Papers/1170994/The_reliability_of_MIPEX_indicators_as_scales.

As can be seen from the graphs below (1.0 / 1.1), there are striking differences between the policies and strategies of Denmark and Sweden concerning migrant integration; the higher the score, the more favourable the integration policy area is for migrants. Compared to EU averages, Sweden's migrant integration policies are relatively liberal while Denmark's tend to be more restrictive.²¹⁴ The integration policy area where Denmark and Sweden diverged most significantly 2007 was regarding "access to nationality".

Migrant integration models are not only related to legislative developments, but also how immigration and migrant integration is framed in policy discourse and political rhetoric. In addition to examining policy developments over the next section, I also draw on examples of elite discourse, arguing that these are useful for understanding how sharp the distinctions are towards immigrants in each of the two countries. Borrowing from Favell,²¹⁵ I argue that two very distinct political policies and discourses have emerged based on different "philosophies" or "public political theories" that reveal contrasting understandings of core concepts such as citizenship, nationality, pluralism, equality and tolerance.

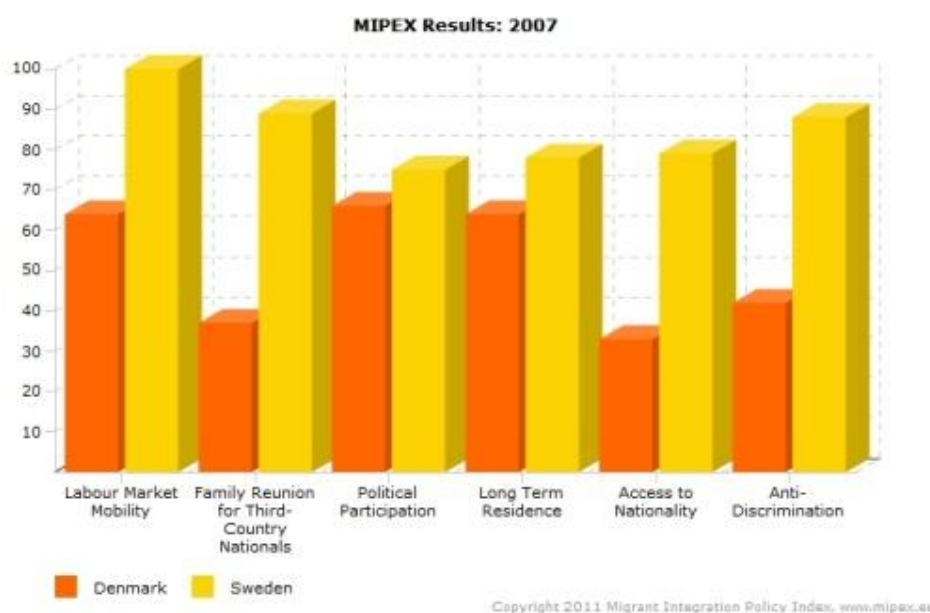
It is also important to note that despite the involvement of local and regional authorities in migrant integration, this thesis is largely focussed on developments in *national* citizenship models. Despite the heavy decentralisation of many policy realms to municipal and local authorities in both countries, citizenship is still strictly determined as a national affair. This applies to most aspects of migrant integration policy where, as stated by MIPEX, "Although government policy is only one of a number of factors which affects integration, it is vital because it sets the legal and political framework within which other aspects of integration occur."²¹⁶ Hence, the comparison and analysis below will reflect state-level priorities and political discourse and will be less expressive of the practical implementation of policies at the regional and local level.

²¹⁴ Martin Bak Jørgensen, 'Dansk Realisme Og Svensk Naivitet? En Analyse Af Den Danske Og Svenske Integrationsspolitik', in *Bortom Stereotyperna? : Invandrare Och Integration i Danmark Och Sverige*, ed. Ulf Hedetoft, Bo Petersson, and Lina Sturfelt, Centrum För Danmarksstudier 12 (Stockholm: Makadam Förlag, n.d.), 295.

²¹⁵ Favell, *Philosophies of Integration*.

²¹⁶ MIPEX, 'MIPEX Methodology', n.d., <http://www.mipex.eu/methodology>.

Figure 3.1: Comparison of migrant integration indicators in Denmark and Sweden 2007 ²¹⁷



Source: MIPEx, graph created 29 March 2012

3.2.1 Denmark

Immigration has had high political salience in Denmark. The Liberal-Conservative (L-C) Government that came into power in Denmark in 2001 enacted some of the most restrictive immigration legislation in Europe over successive terms.²¹⁸ During the 2001 election campaign it made explicit promises to its voters that it would “...change the premises and objectives of the integration and migration policy...”²¹⁹ At the start of 2002, the L-C coalition presented its “New immigration politics” (*En Ny Udlændinge politik*) which included a radical change in the country’s migrant integration approach and introduced new provisions which were some of the most restrictive in Europe. A new Ministry for Refugees, Immigrants and Integration was formed, assuming responsibility for the Aliens Act, the Integration Act,

²¹⁷ MIPEx, *Play with the data*, <http://www.mipex.eu/play/> graph created on 29 March 2012 ; MIPEx Indicator key: critically unfavorable – 0; unfavorable – 1-20; slightly unfavorable – 21-40; halfway favorable – 41-59; slightly favorable – 60-79; favorable – 80-100.

²¹⁸ Peter Davies, *The Far Right in Europe : an Encyclopedia* (Oxford: Westport Conn. ; Greenwood World Press, 2008), 366.

²¹⁹ Goli, M and Rezaei, S., ‘Chapter 6: Denmark’, in *European Immigration: a Sourcebook*, ed. Triandafyllidou, A and Gropas, R (Aldershot: Ashgate, 2007), 83.

migrant statistics, diversity management and naturalisation, as well as Danish language and civics education.²²⁰

The direction of government policy in immigration and integration was significantly influenced by the populist anti-immigration party, the Danish People's Party (*Dansk Folkeparti*) (DF). From 2001, this became Denmark's third largest political party²²¹ and provided key parliamentary support for Denmark's Centre Right governments over the 2000s, putting it in the position to heavily influence national immigration policy.²²² It has been noted that DF has had influence across the whole political spectrum, even compelling the Centre-Left Social Democrats to adopt stricter rhetoric and policy on immigration issues.²²³

The main aims of these changes were to lower the overall number of immigrants, to increase the labour-force participation and social integration of migrants, and to introduce a new set of conditions for family reunification and marriage.²²⁴ In 2004, a new Integration Act entered into force, fully implementing these integration policies and objectives.²²⁵ A year later the Government launched another, more comprehensive integration plan "A New Chance for Everyone" (*En Ny Chance Til Alle*), in agreement with DF.²²⁶ Building on previous policy to increase the labour market participation of migrants and make welfare a less attractive option, the policy included a further differentiation with regards to migrants' social rights. Changes to the Consolidated Act of Danish Nationality in 2004 also imposed several restrictions on eligibility for naturalisation. These changes were due to pressure from DF, which insisted that "... as a condition for its support, the government must act tough on issues related to nationality."²²⁷

²²⁰Ulf Hedetoft, 'Denmark: Integrating Immigrants into a Homogeneous Welfare State', *Migration Information Source*, 2006, <http://www.migrationinformation.org/feature/display.cfm?ID=485>.

²²¹Davies, *The Far Right in Europe*, 255.

²²²Einhorn and Logue, *Modern Welfare States*, 113.

²²³Tim Bale et al., 'If You Can't Beat Them, Join Them? Explaining Social Democratic Responses to the Challenge from the Populist Radical Right in Western Europe', *Political Studies* 58, no. 3 (June 2009): 410–426.

²²⁴Goli, M and Rezaei, S., 'Chapter 6: Denmark', 78–79.

²²⁵ Danish Ministry of Refugee, Immigration and Integration Affairs, 'Consolidated Act on Integration of Aliens in Denmark' (Ministry of Refugee, Immigration and Integration Affairs, September 2005), http://www.nyidanmark.dk/NR/rdonlyres/52136BD4-FA62-4818-AABB-5709AABAC6A6/0/consolidation_act_no_422_7_june_2004.pdf.

²²⁶New to Denmark, 'A comprehensive integration initiative – and better integration'.

²²⁷Davies, *The Far Right in Europe*, 256.

Denmark and Sweden show some significant differences in their definitions of what defines a migrant and how to measure integration. In Denmark, negative language associated with immigration issues, like the term “Ghetto”, is acceptable and frequently used in political and public discourse.²²⁸ Another phrase embedded in Danish political discourse over the last decade is that of a “parallel society,” used to describe the emergence of immigrant communities who live outside mainstream society by associating only with their own networks, cultures and languages.²²⁹

The “assimilation” model of migrant integration which the Danish government adopted explicitly rejects multiculturalism and maintains the ideal of a culturally and linguistically homogenous state. “Over the last decade, leading Danish politicians, from all agenda-setting parties... have repeatedly stressed that Denmark is not and does not intend to be a multicultural society.... cultural diversity more broadly is frowned upon as an alien, “un-Danish” notion.”²³⁰

3.2.2 Sweden

Then Swedish Prime Minister Goran Persson responded to the passage of the Aliens Consolidation Act, and subsequent immigration legislation, by announcing that his government had doubts and reservations about the new Danish asylum laws and expressed concern that tightening immigration laws might present problems when Denmark took over the six-month European Union presidency in 2002. Sweden was also concerned that the restrictive policies could overstretch Sweden's own capacity for immigration, with Danish couples crossing the border in search of a place to live while in a mixed marriage.²³¹

In a 2001 report on its integration policies, Sweden conversely maintained its commitment to multiculturalism asserting that migrant integration policy was founded on “A community based on diversity”.²³² Sweden’s integration programme in 2006 (*Instegsjobb*) also had the objective of getting migrants into work but focussed on language acquisition, job training,

²²⁸Ministry of Refugee, Immigration and Integratin affairs, ‘A New Chance for Everyone- the Danish Government’s Integration Plan’ (Ministry of Refugee, Immigration and Integratin affairs, May 2005).

²²⁹Goli, M and Rezaei, S,, ‘Chapter 6: Denmark’, 84.

²³⁰Ulf Hedetoft, ‘Multiculturalism in Denmark and Sweden’ (Danish Institute for International Studies, December 2006), 1.

²³¹Lindsey Rubin, ‘Love’s Refugees: The Effects of Stringent Danish Immigration Policies on Danes and Their Non-Danish Spouses’, *Connecticut Journal of International Law* 20 (2005 2004): 336.

²³²Ministry of Industry, Employment and Communications, ‘Integration Policy for the 21st Century (2001/02:129)’, 2.

and tackling discrimination. Unlike the Danish government which directed incentives and penalties towards migrants, the Swedish government geared their policies toward employers.²³³

Anti-discrimination measures have been prominent in Sweden to enhance the public's awareness of diversity issues and to ensure equal access to education, work and leisure.²³⁴ Many of the government's efforts to tackle integration issues have been centered on removing structural discrimination; such as a 2001 government commission report entitled "Extended Protection against Discrimination" (*Ett utvidg at skydd mot diskriminering*). This resulted in a special anti-discrimination law in 2003. The Swedish approach to migrant integration is thus based on a political acknowledgement that social and structural discrimination in Swedish society is one of the main barriers to migrant integration and that policy measures need to be based on tolerance, awareness and on understanding of diversity and inclusion.²³⁵

While Sweden has also had a centre right government for much of the period examined, the lack of a credible anti-immigration party, and an agreed cross-party consensus not to mobilise on immigration issues, have largely limited the restriction of migrant integration policy.²³⁶ Due to general consensus across the Swedish political spectrum about the benefits of immigration, most Swedish politicians consider it wrong to canvass voters or seek public sympathy from an anti-immigrant platform.²³⁷

For example, much of the rhetoric evident in Danish immigration debates is generally considered, in Swedish political discourse, to be taboo and bordering on prejudiced. Benito notes that in Sweden, "it is not widely accepted in the media to argue against immigration and almost any criticism is labelled as racism."²³⁸ The word "ghetto" is largely condemned in

²³³ Martin Bak Jørgensen, 'National and Transnational Identities: Turkish Organising Processes and Identity Construction in Denmark, Sweden and Germany' (Phd, Aalborg University, 2008). (pg. ref)

²³⁴ Anne Britt Djuve and Hanne Cecilie Kavli, 'Integrering i Danmark, Sverige Og Norge: Felles Utfordringer – Like Løsninger?' (Nordic Council of Ministers, 2007).

²³⁵ Jørgensen, 'National and Transnational Identities: Turkish Organising Processes and Identity Construction in Denmark, Sweden and Germany'.

²³⁶ Jens Rydgren, 'Radical Right-wing Populism in Denmark and Sweden: Explaining Party System Change and Stability', *SAIS Review* 30, no. 1 (2010): 57–71.

²³⁷ Ulf Hedetoft, "'Conceptual and Political Approaches to Integration: A Scandinavian Perspective'", in *Managing Integration: The European Union's Responsibilities Towards Immigrants*, ed. R. Süßmuth (Washington: Migration Policy Institute, 2005), 37.

²³⁸ Miguel Benito, 'Chapter 25: Sweden', in *European Immigration: a Sourcebook*, ed. Anna Triandafyllidou and Ruby Gropas (Aldershot: Ashgate Publishing, Ltd., 2007), 345.

media as discriminatory, with Swedish officials preferring to use terms such as “segregated housing areas” in policy documents.²³⁹ Swedish authorities also tend to avoid the word “immigrant,” preferring to use the term “persons of migrant origin” in official discourse to counteract tendencies of social exclusion, ethnic discrimination and stereotyping.²⁴⁰ Similarly the Swedish government’s ‘Integration Policy for the 21st Century’ proposed to revise policy objectives so that the word “tolerance” is replaced by “respect”.²⁴¹ It is within this context that anti-immigration political platforms have been met with limited success.²⁴²

Sweden is quite unique from a Nordic perspective because of this explicit preference for a multicultural integration policy, emphasising diversity and pluralism.²⁴³ This is still evident today as Integration Minister Eric Ullenhag stated in a recent speech: “I want to be crystal-clear on one point: Sweden is a multicultural country... The diversity of Sweden is positive.”²⁴⁴ This, argues Dingu-Kyrklund, illustrates “a tendency towards a more realistic, future-oriented approach of the Sweden integration policy.”²⁴⁵

3.3 Migrant naturalisation

This thesis explores migrant naturalisation more deeply, as a particular subset of citizenship policy which explicitly demonstrates the criteria which foreigners are expected to meet in order to become national citizens. Citizenship policies are closely tied to national migrant integration policies as they delineate a legal and social boundary in the transition from foreigner to national. As described in Chapter One, these legal and social boundaries manifest in both organisational and conceptual forms, granting access to status, rights and national membership within the state. In his comparative studies of citizenship policies, Howard argues that “citizenship acquisition can serve as a rough measure of integration...

²³⁹ Ministry of Industry, Employment and Communications, ‘Integration Policy for the 21st Century (2001/02:129)’, 6.

²⁴⁰ Charles Westin, ‘Migration Information Source - Sweden: Restrictive Immigration Policy and Multiculturalism’.

²⁴¹ Ministry of Industry, Employment and Communications, ‘Integration Policy for the 21st Century (2001/02:129)’, 5.

²⁴² Angus Roxburgh, *Preachers of Hate: The Rise of the Far Right* (Gibson Square, 2002), 291.

²⁴³ Jørgensen, ‘Dansk Realisme Og Svensk Naivitet? En Analyse Af Den Danske Og Svenske Integrationsspolitik’.

²⁴⁴ Erik Ullenhag, ‘Multiculture and Multiculturalism - a European Debate’ (presented at the Lund Association of Foreign Affairs, Lund University, September 13, 2011).

²⁴⁵ Elena Dingu-Kyrklund, ‘Citizenship Rights for Aliens in Sweden’, in *Citizenship in A Global World: Comparing Citizenship Rights for Aliens*, ed. Atsushi Kondo (New York: Palgrave Macmillan, 2001), 65.

and immigrants who become naturalised citizens are likely to become much more integrated in their new country than those who remain non-citizen residents, or denizens.”²⁴⁶ While academic opinions differ over migrant naturalisation as an integration measure, the acquisition of national citizenship can have a significant effect on policy making and integration outcomes.

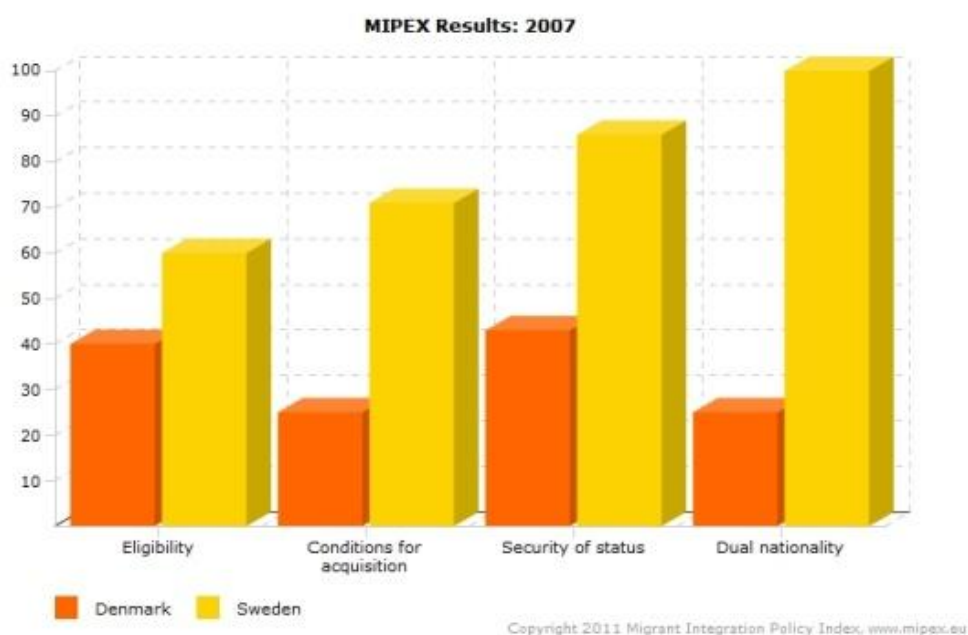
In the case of Denmark and Sweden, several citizenship traits stand out as being similar. All Nordic countries have maintained privileged access to citizenship for Nordic nationals, consisting of only a two year residency requirement.²⁴⁷ Other factors common to the citizenship policies of both countries include the lack of *jus soli* or “birth right” citizenship, which grants nationality on the basis of territoriality. Citizenship is generally acquired through ethnic and parental lineage (*jus sanguinis*). If citizenship is not attained through the nationality of the parent, then the only means of attaining citizenship for non-Nordic nationals is the process of naturalisation.

Divergence between Denmark and Sweden’s approaches to migrant naturalisation, particularly for TCNs, has been notable during the last decade. This is a surprising divergence given that the Scandinavian neighbours coordinated their citizenship legislation for over a century until the late 1970s. Citizenship laws began to diversify with the introduction of the national regulation of immigration. Comparative policy developments over the last decade have seen acute variations in the national legislation for granting citizenship to foreigners, and in political understandings about the role of citizenship in the integration of migrants into national society. The following section explores policy developments over the period 2000-2010 to explain these variances, with a particular focus on conditions for acquisition and dual nationality policies.

²⁴⁶ Marc Morjé Howard, ‘Comparative Citizenship: An Agenda for Cross-National Research’, *Perspectives on Politics* 4, no. 03 (2006): 446.

²⁴⁷ Bertel Haarder, ‘Consolidated Act on Danish Nationality (2004)’ (Ministry of Refugee, Immigration and Integration Affairs, June 7, 2004), 1–3, http://www.nyidanmark.dk/NR/ronlyres/52136BD4-FA62-4818-AABB-5709AABAC6A6/0/consolidation_act_no_422_7_june_2004.pdf.

Figure 3.2: MIPEX Access to nationality in Denmark and Sweden 2007²⁴⁸



Source: MIPEX, graph created 29 March 2012

According to 2007 MIPEX results, Denmark scored 33 points overall for access to nationality while Sweden scored 79 points, leaving a points difference of 46. This ranks Sweden as 2nd for the most favourable access to nationality for migrants while Denmark is rated as number 19, equal with the Czech Republic and Slovenia out of 31 countries.²⁴⁹

²⁴⁸ MIPEX, *Play with the data*, <http://www.mipex.eu/play/> graph created on 29 March 2012 ;MIPEX Indicator key: critically unfavorable – 0; unfavorable – 1-20; slightly unfavorable – 21-40; halfway favorable – 41-59; slightly favorable – 60-79; favorable – 80-100.

²⁴⁹ MIPEX, 'Access to Nationality', *Migrant Integration Policy Index*, 2012, <http://www.mipex.eu/access-to-nationality>.

Figure 3.3: Conditions for the acquisition of nationality (first generation TCNs) in Denmark and Sweden.²⁵⁰

	Denmark ²⁵¹	Sweden ²⁵²
Residency requirement (years)	9	5
Renunciation requirement	Yes	No
Language tests	Yes	No
Cultural tests	Yes	No
Evidence of financial independence	Yes	No

As can be seen in table 2.0, migrants can become naturalised as citizens in Sweden after 5 years permanent residence and are permitted to hold dual citizenship. There are no language requirements for naturalisation as this is considered unfair and unreasonable.²⁵³ By contrast, nine years of permanent residence, language and culture tests, and unitary citizenship requirements make Denmark one of the most restrictive naturalisation regimes in Europe.²⁵⁴ In Denmark, citizenship is also subject to parliamentary discretion, whereas those who meet the legal requirements for naturalisation in Sweden have an “unconditional right to become citizens and citizenship can consequently not be denied.”²⁵⁵

²⁵⁰ Adapted from Marc Howard’s table for comparing “citizenship components” across Europe, Marc Morjé Howard, ‘Variation in Dual Citizenship Policies in the Countries of the EU’, *International Migration Review* 39, no. 3 (September 1, 2005): 709. However, the components from his study compared only the first two categories as well as *jus soli* (birthright) citizenship policies.

²⁵¹ Haarder, ‘Consolidated Act on Danish Nationality (2004)’. Danish Ministry of Refugee, Immigration and Integration Affairs, ‘Consolidated Act on Integration of Aliens in Denmark’. Goli, M and Rezaei, S., ‘Chapter 6: Denmark’, 74.

²⁵² Government Offices of Sweden, ‘The Swedish Citizenship Act’, 2008, <http://www.sweden.gov.se/sb/d/3926/a/29191>.; Dingu-Kyrklund, ‘Citizenship Rights for Aliens in Sweden’, 64–65.

²⁵³ Hedvig Lorkrantz Bernitz, ‘Country Report: Sweden’ (EUDO Citizenship Observatory: European University Institute, Florence, 2010), 19.

²⁵⁴ Howard, ‘Variation in Dual Citizenship Policies in the Countries of the EU’, 698.

²⁵⁵ Bernitz, ‘Country Report: Sweden’, 1.

A special aspect of naturalisation is dual citizenship. When migrants naturalise they are either obligated to renounce or allowed to retain their former citizenship, which results in either single or dual citizenship in the host country. This generally implies reciprocal recognition, whereby both the destination and origin country must allow dual citizenship. One of the major factors ending Nordic coordination of citizenship law has been divergent attitudes towards dual citizenship.²⁵⁶

3.3.1 Sweden- *Medborgarskap*

Over the decade examined there was only one major legislative change to Swedish naturalisation laws, the Citizenship Act of 2001. As in Denmark, *jus sanguinis* has remained the dominant rule of citizenship acquisition, though liberal changes to naturalisation laws have seen a shift towards the recognition of domicile as an important factor in gaining nationality rights. Bernitz describes how the new Swedish Citizenship Act of 2001 was intended to “effectively fulfil the principle of legal certainty and legal protection of the individual.”²⁵⁷ As a consequence of this increased importance on individual rights, the possibility of citizenship by declaration was also extended to embrace new groups, such as the children of migrants, in order to encourage integration.²⁵⁸

Swedish citizenship law was amended in 2001 to fully permit dual citizenship, meaning foreign nationals who take out Swedish citizenship, or Swedes who take up citizenship in another country, are not required by the Swedish authorities to renounce their previous citizenship. Howard describes the policy shift as a significant step in the liberalization of citizenship policy as it challenges “...one of the most stable and long-lasting assumptions of the modern era... The notion of singular nationhood...”.²⁵⁹ This policy development aimed to help with the integration of immigrants and to uphold the individual rights of migrants and expatriate Swedes to hold multiple identities.²⁶⁰ Although stating that it hoped to promote the idea to other Nordic countries²⁶¹, Denmark and Norway continue to restrict occurrences

²⁵⁶ Ersbøll, ‘Country Report: Denmark’, 2.

²⁵⁷ Bernitz, ‘Country Report: Sweden’, 13–14.

²⁵⁸ Ibid., 12.

²⁵⁹ Howard, ‘Variation in Dual Citizenship Policies in the Countries of the EU’, 698.

²⁶⁰ Per Gustafson, ‘Globalisation, Multiculturalism and Individualism: The Swedish Debate on Dual Citizenship’, *Journal of Ethnic and Migration Studies* 28, no. 3 (July 2002): 463.

²⁶¹ Ibid., 468.

of dual citizenship as much as possible.²⁶² The Swedish Citizenship Act of 2001 therefore marked a departure from Nordic norms.²⁶³

The Swedish changes emerged out of discussions on migrant integration policies, with dual nationality entering political debates as an alternative to granting voting rights to non-citizens. One of the most important arguments in favour of dual citizenship was that the removing the renunciation requirement would facilitate and encourage immigrant naturalisation and integration.²⁶⁴ It was additionally argued that national citizenship helped immigrants to “...strengthen that sense of belonging to [the] country.”²⁶⁵ Sweden’s then integration minister argued that dual citizenship and multiple identity was a natural consequence of Sweden’s official policy of accepting ethnic and cultural diversity in order to progress the integration process.²⁶⁶ Parliamentary members Peter Bernström and Inger René argued, “We live in a globalizing world where borders are opened and barriers between people are torn.”²⁶⁷ It was therefore argued that Swedish citizenship legislation, including the principle of singular citizenship, should be reconsidered in the current context of internationalisation and global interdependence.²⁶⁸

The outcome of these legislative changes can be seen in each country’s naturalisation rates. In 2009, Sweden granted citizenship to 29,500 foreigners while the comparative Danish figure was 6,900.²⁶⁹ To control for population differences, one commonly used indicator to measure the effect of national citizenship policies is the ‘naturalisation rate’, in other words, the ratio between the total number of citizenships granted and the foreign population in each country at the beginning of the year. In 2009 Sweden had the second highest naturalisation rate in the EU-27 with 5.3 acquisitions per 100 foreign residents while Denmark was 14th at a rate of 2.1.²⁷⁰

²⁶² Ministry of Justice, ‘New to Denmark - Dual Nationality’, 2012, http://www.nyidanmark.dk/en-us/coming_to_dk/danish_nationality/dual_nationality.htm.

²⁶³ Bernitz, ‘Country Report: Sweden’, 9.

²⁶⁴ Regeringskansliet, ‘Svenskt Medborgarskap (SOU 1999:34)’, 1999, 202, <http://www.regeringen.se/sb/d/108/a/2401>.

²⁶⁵ Peter Weibull Bernström and Inger René, ‘Motion to Parliament 1996/97: Sf622 Dual Citizenship’ (Riksdagen, 1996).

²⁶⁶ Jørgensen, ‘National and Transnational Identities: Turkish Organising Processes and Identity Construction in Denmark, Sweden and Germany’, 294.

²⁶⁷ Bernström and René, ‘Motion to Parliament 1996/97: Sf622 Dual Citizenship’.

²⁶⁸ Regeringskansliet, ‘Svenskt Medborgarskap (SOU 1999:34)’, 204.

²⁶⁹ Eurostat, ‘Migration and Migrant Population Statistics’, 2.

²⁷⁰ Eurostat, ‘Migration and Migrant Population Statistics’.

3.3.2 Denmark- *Statsborgerskab*

Amendments to the Danish Nationality Act in 2002, 2005 and 2008 have largely restricted conditions for the acquisition of nationality for Third Country Nationals (TCNs). The 9-year residence requirement (up from the previous 7) for the first generation is one of the longest of all MIPEX countries and the level of expected language attainment is also the highest.²⁷¹ Other requirements for naturalisation include a statement of national loyalty, and renunciation of existing national citizenship. The conduct requirement dictates that migrants can be excluded from naturalisation on a permanent basis if they have been sentenced to imprisonment for eighteen months or more.

Additionally, economic conditions for naturalisation require that applicants cannot have outstanding public debts and must be able to demonstrate economic self-sufficiency, meaning that the applicant has not received social benefits for more than six months within the last five years. Applicants for naturalisation also have to demonstrate a level of linguistic and cultural knowledge by passing a series of citizenship tests. Legislative changes in 2005 included a revocation of second generation immigrants' rights to naturalisation by declaration.²⁷² Another particularity of Danish citizenship law is that decisions on naturalisation must be passed through Parliament, mentioning each of the applicants by name. After 2002, this was restricted to happening only twice annually which lengthened the citizenship application process.²⁷³

As a result of these changes over the last decade, Danish citizenship law now has the highest barriers for naturalisation among the Nordic countries.²⁷⁴ This resulted in a dramatic fall in the number of naturalisations, with a 77.2% reduction in issued citizenship over the following year.²⁷⁵

Goli and Rezaei note that "It has been a general perception, as naturalisation is based on the discretion of the Parliament, that no one has *a right* to Danish citizenship."²⁷⁶ In Denmark,

²⁷¹ MIPEX, 'Denmark', n.d., <http://www.mipex.eu/denmark>.

²⁷² Ersbøll, 'Country Report: Denmark', 19. Declaration is a simplified, formal procedure whereby a person has the right to citizenship if he or she satisfies certain legal requirements.

²⁷³ Ibid., 20.

²⁷⁴ Eva Ersbøll, 'Denmark: Abstract of the Country Report', *European Union Democracy Observatory on Citizenship*, n.d., <http://eudo-citizenship.eu/country-profiles/?country=Denmark>.

²⁷⁵ Ibid.

²⁷⁶ Ersbøll, 'Country Report: Denmark', 29.

migrant integration programmes leading up to citizenship are mandatory and a lack of participation can lead to financial or legal penalisation. By contrast, Swedish migrant integration programmes are largely voluntary and are far less severe in their sanctions for nonparticipation.²⁷⁷

The 2001 election campaign also signified a stark discursive turn in Danish political debate about citizenship. DF placed a full page newspaper advertisement in the *Jyllands-Posten* listing the names of five thousand immigrants who had recently been granted Danish citizenship in order to highlight the number of non-western migrants that were naturalising.²⁷⁸ According to DF, granting naturalisation to such a large number of foreigners would make Danes strangers in their own country and violated the national constitution.²⁷⁹ DF have an objective of reducing the number of naturalisations to their ideal quota of 2000 and explicitly reject the notion of citizenship as a means of integration.²⁸⁰

These actions and statements drew condemnation and criticism from political opponents but in 2002 the newly elected centre-right government made several restrictive changes to the Danish Nationality Act.²⁸¹ This example is reflective of the influence the DF has had on government policy direction and discourse during the 2000s.²⁸² Unlike Sweden, Denmark has strongly rejected changing its policy of unitary citizenship²⁸³ and the MIPEX naturalisation graph (1.3) shows that dual nationality is the area of citizenship policy where Denmark and Sweden vary most starkly. Currently, Danish law only allows dual citizenship for minors, stateless persons, refugees, or those who cannot be released from their national citizenship.²⁸⁴ The Danish parliament was prompted to debate dual citizenship in 2002 shortly after Sweden had passed its new Citizenship act. However, all parties (with the exception of far-left minority *Enhedslisten*) argued in favour of maintaining unitary

²⁷⁷ Vinnie Lundsgaard and Ea Elsbøl, 'Lov Og Policy På Integrationsområdet I Danmark Og Sverige – En Komparativ Analyse' (Kandidatuddannelsen, Aalborg University, 2011), 71.

²⁷⁸ Roxburgh, *Preachers of Hate*, 214.

²⁷⁹ Elsbøl, 'Denmark: Abstract of the Country Report', 20.

²⁸⁰ Elsbøl, 'Country Report: Denmark', 32.

²⁸¹ Roxburgh, *Preachers of Hate*, 214.

²⁸² Goli, M and Rezaei, S, 'Chapter 6: Denmark', 82.

²⁸³ Elsbøl, 'Country Report: Denmark', 2.

²⁸⁴ Jørgensen, 'National and Transnational Identities: Turkish Organising Processes and Identity Construction in Denmark, Sweden and Germany', 123.

citizenship in Denmark.²⁸⁵ During the debates, Conservative member Else Theill Sørensen argued:

“That a person can have dual, maybe even several citizenships, which they can use as needed goes against the Conservative Party’s perception of the concept of citizenship and everything it entails. You cannot change citizenship like you change a shirt, and you usually only wear one shirt...”

Jørgensen notes that the restrictive turn in Danish naturalisation policies, reflects an “underlying assimilation discourse behind both understandings of integration and perceptions of society...diversity is fundamentally based on the assumption that immigrants need to adapt to Danish norms.”²⁸⁶

While outside of the timeframe of this thesis’ analysis, it is worth noting that the L-C government coalition was defeated by a new centre-left government in September 2011. This led to some speculation that the new government would reverse some of the previous government’s restrictive immigration and citizenship policies, like the controversial 24-year-rule for spousal reunification.²⁸⁷ However the Social Democrat-led government has not over-turned this particular policy and early indications show that the government has little political scope to undo many of the previous government’s restrictions.²⁸⁸ This adds substance to Favell’s argument that national policy frameworks of migrant integration, once established, tend to be path-dependant in nature which restricts the future government decision-making options in these policy areas.²⁸⁹

²⁸⁵ Lærke Klitgaard Holm, ‘Migration, National Tilhørsforhold Og Statsborgerskab’, in *Bortom Stereotyperna? : Invandrare Och Integration i Danmark Och Sverige*, ed. Ulf Hedetoft, Bo Petersson, and Lina Sturfelt, Centrum För Danmarksstudier 12 (Stockholm: Makadam Förlag, n.d.), 317.

²⁸⁶ Jørgensen, ‘National and Transnational Identities: Turkish Organising Processes and Identity Construction in Denmark, Sweden and Germany’, 294.

²⁸⁷ Thomas Larsen, ‘Heading Towards a Change of Government in Denmark’, *EU Observer*, September 14, 2011, <http://euobserver.com/843/113620>.

²⁸⁸ Emil Kragh-Schwarz, ‘S må fastholde stram udlændingepolitik (Social Democrats must maintain strict immigration policy)’, *Berlingske*, June 13, 2012, <http://m.b.dk/touch/article.pml;jsessionid=554EAB9A550BF2277006E8860E67738C.uw-portal3?guid=20565506>.

²⁸⁹ Favell, *Philosophies of Integration*, 26.

3.4 Summary: Divergent models – Assimilation and Multiculturalism

In their legislative changes to the naturalisation requirements it is clear that Denmark and Sweden have varied in their expectations regarding migrants' length of residence, linguistic ability, cultural assimilation, and level of exclusive loyalty and attachment to their host country. The dual citizenship case-study outlined above illustrates that Denmark maintains a national perspective of citizenship which emphasises the continued primacy of traditional nation-state based frameworks and the importance of bounded national communities. Sweden's openness to dual citizenship reflects a more transnational and liberal attitude towards citizenship, recognising multiple identification and belonging. Insofar as citizenship legislation is "a well suited source for public self-presentation of the nation, and what is required to become a part of it",²⁹⁰ it is clear that the official citizenship identities propagated by the Danish and Swedish governments extol rather different ideas about what it means to be a citizen, and what is expected of migrants who want to attain this status.

A perceptible division between the migrant integration models can be seen in the objectives of Danish and Swedish naturalisation policy, namely, whether the extension of citizenship to newcomers should serve as a step in the overall integration process, or conversely, whether it should be the final reward for a fully integrated immigrant. Sweden's comparatively liberal conditions for naturalisation (five year residence, no language requirement, acceptance of dual citizenship) indicate that citizenship is considered as a means to integration; a process which continues after the migrant has become naturalised. Conversely, Denmark's rigorous testing of extended residence, behaviour, language, economic self-sufficiency, and national loyalty show that citizenship is considered to be the ends, rather than the means, of migrant integration. Acquisition of citizenship is viewed as part of the integration process, and an aim of the new Act was to strengthen the status of citizenship as a part of integration.²⁹¹

The key differences in the two models are neatly summed up by Hedetoft who notes that:

"Danish homogeneity faces Swedish multiculturalism; a closed, exclusionary regime encounters one that is open and inclusive; assimilation contrasts with

²⁹⁰ Grete Brochmann and Anniken Hagelund, *Immigration Policy and the Scandinavian Welfare State 1945-2010* (Palgrave Macmillan, 2012), 20–21.

²⁹¹ Bernitz, 'Country Report: Sweden', 13.

official recognition of difference; ideas that frame “them” as the problem confront ideas framing the national society as a barrier to integration; welfare is variously projected as hindrance to or a path toward integration; “they” are seen as victims of or responsible for their own destiny; institutional rigidity faces flexible adaptation of institutions to new groups; and demands for single, exclusive citizenship stand in opposition to possibilities for multiple citizenship. In this light, the two countries are worlds apart.”²⁹²

In this chapter I presented naturalisation policies as an empirical indicator that exemplifies the broader national citizenship policy regime. As the Danish and Swedish citizenship debates testify, citizenship itself is an expression of the rights and obligations that accompany full membership of a society. This chapter has argued that the two countries’ divergent migrant integration policies reflect different models of national citizenship. As is alluded to above, and will be described in more detail in the following chapter, the respective governments frequently frame their migrant integration models and societal visions in contrast with one another to the point where the issue has become one of open political conflict. In the next chapter, I will argue that these divergent migrant integration models, and the resulting conflicts, have complicated cross-border integration efforts in the Øresund region by heightening conceptual and organisational borders between the two countries with respect to TCNs in the region.

²⁹² Hedetoft, ‘Multiculturalism in Denmark and Sweden’, 3.

Chapter Four: Citizenship Dilemmas in the Øresund Region

The previous chapter empirically explored the migrant naturalisation policies of Denmark and Sweden, establishing that the former derives its citizenship policies from an assimilationist model, while the latter draws its policies from a multiculturalist model. But what, if any, affect does this policy divergence have on the goals and visions of regional integration and citizenship in the cross-border Øresund region as outlined in Chapter Two? This chapter illustrates how these officially purported views of what it means to become citizens, have created an area of political tension in the cross-border Øresund region, frustrating regional integration efforts. Parts of the analysis refer to the effects of divergent migrant *naturalisation* policies specifically, while others refer more broadly to the *citizenship models* as policy vehicles which direct the civil, social and political integration of migrants into the national community.

In this chapter, I map out regional “citizenship dilemmas” according to whether they manifest as organisational borders to work and welfare or as conceptual borders of inclusion, exclusion, and entitlement. I establish that divergent migrant naturalisation policies, and the political tensions that these incite, have served to reinforce organisational barriers for TCNs in the region. The different political narratives of entitlement, diversity and belonging have heightened conceptual barriers not only between regional citizens and migrants, but also between Danish and Swedish political conceptions of citizenship. I suggest that these dilemmas of migrant integration and national citizenship have implications for the full realization of an inclusive, transnational community, as envisioned by Øresund promoters.

4.1 Organisational borders of work and welfare

Removing organisational borders to work and welfare has been one of the primary focuses of the Øresund Committee in their goal to achieve “A diverse, yet cohesive labour market”²⁹³. Many of the free movement obstacles identified in the 33 Barriers Report relate to cross-border hindrances to enjoying full labour market participation and access to social

²⁹³ Øresund Committee, ‘Annual Review: 2010’, 20.

security rights, particularly for cross-border commuters.²⁹⁴ The key issues I identify in this section regard the organisational inconsistencies of citizenship, and what implications these have if regional mobility rights are extended to TCNs. Divergent national citizenship policies in Denmark and Sweden raise two issues in this regard. The first, how national residence requirements for naturalisation will accommodate the normalization of regional mobility. The second refers to a broader citizenship dilemma— namely, how different national approaches to labour migration, and the extension of civic, social, political rights in the process, raise implications for the collective regional management of a diverse yet cohesive labour market. Thus, while territorial borders and organisational borders to labour market access are removed during integration, other organisational rules guarding entitlement to rights and citizenship can arise as an issue for regional integration

4.1.1 TCN regional labour market access

As presented in Chapter Two, one of the key barriers identified to achieving a fully integrated Øresund labour market is that of TCN rights to work on both sides of the Sound. As well as current economic losses, regional leaders are acting on figures that show a significant increase in foreign workers will be necessary over the next decade to fill regional labour shortages and sustain the welfare systems of both countries.²⁹⁵ In addition to pointing out the implications of this barrier for the region’s growth and attractiveness, the report also asserts that the rule “hinders free movement for citizens of the Øresund Region.”²⁹⁶

This on-going focus of the Øresund Committee into extending labour market rights to non-EU residents²⁹⁷ is consistent with its goal of making the region “a model for how to make the best possible use of the resources that workers with a non-Scandinavian background can bring to the labour market”.²⁹⁸ The report noted that the issue of TCN mobility currently

²⁹⁴ Øresund Committee, ‘33 Hindringer, Udfordringer Og Muligheder: Oresundsmodellen 2010’.

²⁹⁵ Øresund Committee, ‘Øresund Region Application for “AEBR-Cross Border Award” 2011’ (AEBR website, 2011), 5, http://www.aebr.eu/en/pdf/winner_1_2011_en.pdf.

²⁹⁶ It is interesting to note that the use of the phrase ‘citizens of the Øresund region’ here extends to include resident foreigners in the region, suggesting the notion that freedom of movement and regional entitlements of regional ‘citizenship’ is not exclusive to Nordic or European nationals. This highly inclusive and civic notion of Øresund citizenship has implications when considered alongside the divergent national citizenship models in Denmark and Sweden, as will be discussed in the second half of this chapter relating to ‘conceptual’ borders.

²⁹⁷ Øresund Committee, ‘Labour Market and Cross-border Obstacles’, n.d., <http://www.oresundskomiteen.dk/Focus-areas/Labour-market-and-cross-border-obstacles>.

²⁹⁸ Øresund Committee, ‘ØRUS: Øresund Regional Strategy’, 7.

rested with the Danish government, which is politically resistant to the idea. Øresund Committee Chair, Pia Kinhult, noted herself that Denmark's restrictive immigration regime had made aspects of the Committee's integration work more difficult: *"We have had a wave of anti-immigration feeling in Denmark for instance that is very open that had influenced our work in the last few years."*²⁹⁹

A number of Nordic actors have also previously advocated for extending common labour market rights to non-European residents in order to enhance the labour market potential and economic productivity of the wider region. Former Danish Prime Minister Poul Schlüter served as special envoy to the Nordic Council for reporting on the removal of cross-border obstacles in the Nordic Region. In his report "The Nordic Countries — One Workplace, One Market", Schlüter proposes extending the joint Nordic labour market to include non-Nordic citizens with permanent work and residence permits.

*"I suggested a couple of years ago that non-Nordic citizens with permanent residence and work permits should be included under the joint Nordic labour market agreement. It has not been possible to reach political agreement on this point... As the content of the agreement will not be changed, it was decided to suspend this part of the work."*³⁰⁰

Denmark had objected to TCN mobility on the basis that its special opt-out on EU Directives relating to TCN mobility made this free movement difficult. Danish Minister for Nordic Cooperation Flemming Hansen stated that "It would neither be appropriate nor particularly useful to prepare separate Nordic rules for Denmark, going beyond the EU rules at this point. Such a rule formation would imply discrimination between TCNs in the EU and those in Scandinavia. It would be difficult to explain, and the government does not wish to."³⁰¹ However, when questioned during the 2003 Nordic Council Summit "...to answer the question why the Danish reservations about the EU suddenly have meaning for Nordic cooperation", Hansen was forced to admit that there is nothing legally in the Danish opt-out arrangement that prevents it from having a separate Nordic agreement on the issue, but

²⁹⁹ Kinhult, 'Interview, Stockholm'.

³⁰⁰ Nordic Council of Ministers, 'The Nordic Countries - One Workplace, One Market: A Report on Removal of Cross-border Obstacles by Special Envoy Poul Schluter 2005' (Nordic Council of Ministers, 2005).

³⁰¹ Nordic Council, *Question Time: Ministers of Cooperation*, Nordic Council Session (Oslo, 2003), http://docs.norden.org/Blaboken/2003/main_content.htm.

“that it is purely a political issue”.³⁰² This admission revealed that domestic political resistance was the main reason for the Danish government’s rejection of the proposal to allow TCN free movement within a common Nordic labour market. National immigration politics, in this instance, overrode a proposal for deeper regional integration between the Nordic countries’ labour markets.

If freedom of movement for TCNs is eventually achieved however, questions arise about if, and how, national migrant naturalisation policies will adapt to accommodate this. Specifically, given that TCNs would be free to live, work and commute on either side of the bridge, how will this affect national residency requirements as one of the key criteria to be fulfilled for migrant naturalisation? As noted in Chapter Three, Denmark requires a continual residence period of nine years in the country for a migrant to be able to apply for naturalisation. In Sweden, the equivalent is five years. Yet if deeper integration is pursued, and TCNs find themselves living and working between the two countries, how would this affect their residency status and eligibility for citizenship?

This relates back to Bauböck’s paradox referred to in Chapter Two about mobility being a key marker of regional citizenship, but an obstacle to attaining national citizenship which currently requires stable residence. One can already see this dilemma with Danes and Swedes trying to exercise their own citizenship rights on either side of the Sound. For example, Danes can only vote in national elections if they are normally resident in the country.³⁰³ A growing number of Danes living in Sweden and commuting to Denmark for work therefore lose one of their main political rights associated with citizenship. Similarly, Denmark’s policy of unitary citizenship means that Øresund citizens can have either Danish or Swedish citizenship – not both. Both of these points suggest that divergent national naturalisation rules and citizenship policies more generally, raise complications for the prospect of mobile Øresund citizens living, working and enjoying the full rights of citizenship on both sides of the Sound.

A 2010 report into the Nordic countries’ regulations to recruit and retain foreign labour highlighted the need to strengthen the Nordic cooperation on TCN labour migration policy

³⁰² Ibid.

³⁰³ Nordic Council, ‘Swedish MP Marvels at Danish Law’, November 12, 2007, <http://www.norden.org/en/news-and-events/news/swedish-mp-marvels-at-danish-law>.

and improve the region's attractiveness to skilled workers.³⁰⁴ However, a common approach to a TCN labour migration policy has not yet been politically possible, and tensions are evident between Denmark and Sweden in this regard.

The Mayor of Malmö, Ilmar Reepalu, has claimed that Danish xenophobia was ruining successful growth in the Øresund region. He claimed that the restrictive immigration and migrant integration approach of the Danish government discouraged qualified workers and international companies from investing their human and financial capital in the cross-border region.³⁰⁵

*"Denmark has branded itself as xenophobic, and that affects the whole Øresund region. A stain like that takes a long time to remove,"³⁰⁶... "The OECD report that came in 2009 very clearly showed that the xenophobic attitude in Denmark has in many ways had a very bad impact on Danish society...The skilled workforce – they are coming and they are leaving because they feel, the family feel, that Denmark is not welcoming them. We can't get enough skilled labour force coming from other countries... so today that is a serious problem...."*³⁰⁷

This view was also recently expressed by British economist Philippe Legrain, who said on a Danish news network interview that, "Denmark's immigration rules make it very unattractive for talented migrants to come here, and when Canada and Australia are competing to get them and Britain is going to allow them in freely then clearly those rules need to be liberalised."³⁰⁸ The 2008 'World Migration Barometer' study by the Economist Intelligence Unit (EIU) also points out that the Danish position in the indexes for accessibility for global talent, is not only ranked well below Sweden, Norway and the OECD average, but also lower than countries such as Venezuela, Cote D'Ivoire, Russia, Botswana and Kazakhstan.³⁰⁹ This case demonstrates that divergent national policies towards the rights

³⁰⁴ Nana Wesley Hansen, Åsmund Arup Seip, and Line Eldring, eds., 'Rekruttering av kompetansesarbeidskraft fra tredjeland til Norden – Reguleringer, strategier og realiteter' (Nordic Council of Ministers, 2010).

³⁰⁵ 'Malmö Mayor: Danish "xenophobia" Bad News for Region', n.d., <http://www.cphpost.dk/news/local/87-local/51034-malmoe-mayor-danish-xenophobia-bad-news-for-region.html>.

³⁰⁶ Reepalu, 'Interview, Stockholm'.

³⁰⁷ Interview with Ilmar Reepalu, Stockholm, 12 September 2011

³⁰⁸ Philippe Legrain, 'Denmark Needs All Kinds of Immigrants', *Philippe Legrain*, October 1, 2007, <http://www.philippelegrain.com/denmark-needs-all-kinds-of-immigrants/>.

³⁰⁹ Global Talent Strategy, 'Denmark Flunks as Talent Magnet', December 8, 2011, <http://globaltalentstrategy.com/en/article/denmark-flunks-as-talent-magnet-24>.

and entitlements of foreign nationals are having a negative effect on regional aims to foster a common “diverse, yet cohesive labour market.”

Further to this, there are conceptual citizenship borders; in this case, the extent to which the national community considers migrant workers from foreign cultures ‘fit in’ to their society and the rights and entitlements that should be extended to them. In the ILO’s World Migration Report, the proportion of respondents agreeing that immigrants make a large contribution to the country shows significant difference between Danish and Swedish respondents; 79 per cent of Swedes agreed with the statement compared to only 45% in Denmark.³¹⁰ The difference in national attitudes towards the role of migrants in economy and society goes some way to explaining why the two countries frequently criticise each other’s migrant integration and citizenship strategies.

This lack of consensus about the role of migrants in the economy and society more generally is not only reflected in public opinion data but also in political rhetoric towards non-EU migrants. Contrast the two following political messages sent out by the respective Ministers for Integration in Denmark and Sweden about the desirability of foreign workers and how they should be accommodated and integrated:

*Immigrants from countries that resemble Denmark have better prerequisites for integrating into Danish society. This is an inescapable fact. For example, a quick glance at statistics show that immigrants from Western countries are working to a far greater extent than immigrants from non-Western countries... In my view, this is... sensible immigration politics, which deal objectively with the fact that different people have different prerequisites for integrating into Danish society. This is why we need to differentiate between nationalities.*³¹¹ Søren Pind, Danish Minister for Integration.

“...One of the greatest challenges for Europe, and Sweden, and Denmark is to maintain open and tolerant societies. And what we have been seeing, which is deeply worrisome, in Denmark and other European countries is harsher attitudes towards immigration, less openness... Sweden, and the Swedish government, is

³¹⁰ International Organisation for Migration, ‘World Migration Report 2011: Communicating Effectively About Migration’ (IOM, 2011), 11.

³¹¹ ‘Ny i Danmark - All Immigrants Do Not Have the Same Prerequisites for Integration’.

standing out a little bit in Europe for the moment, stressing that we will continue to be open and tolerant; both for the solidarity... but also because it's going to make us richer in 15 or 20 years."³¹² Eric Ullenhag, Swedish Minister for Integration.

Ullenhag expressed his opposition to the anti-immigration directions of neighbouring Denmark, asserting that Sweden will have an advantage in the region and the world due to its openness to immigration and the resulting international presence. This discrepancy will be salient in future given that the Øresund region projects much of its growth to stem from the attraction, retention and cross-border mobility of foreign migrants.

4.1.2 Cross-border welfare entitlements

This section identifies how divergent national citizenship policies generate different levels of social entitlement for TCNs in the region, depending on which country they naturalise in. Liberalisation of access to Swedish citizenship and restriction of access to Danish citizenship, as described in Chapter Three, has created a situation whereby migrants on the Swedish side of the Øresund are able to naturalise quickly and easily compared to their migrant counterparts in Denmark.

Paraphrasing Bauböck's example of the "inequality and exclusion EU citizenship dilemma"³¹³, I use the hypothetical example of two migrants: one gaining residence in Sweden, the other in Denmark. After five years residence and minimal naturalisation requirements the migrant in Sweden has the right to become a Swedish citizen. Due to EU citizenship and the Nordic Social Security Convention this migrant is now free to reside, work, and access social rights in Denmark on par with Danish citizens.³¹⁴ The migrant who originally gained residence in Denmark however, would still have another four years of residence to prove, plus language and citizenship tests, before being able to naturalise and gain the same regional entitlements. Additionally, the Danish government's "economic self-sufficiency" requirement for naturalisation means that if the migrant in Denmark has to utilise social welfare for more than six months, this will delay access to citizenship further. By contrast, Sweden's legislation dictates no such precondition of economic independence.

³¹² Erik Ullenhag, 'Interview with Minister of Integration', September 13, 2011.

³¹³ Bauböck, 'Who Are the Citizens of Europe?'

³¹⁴ Einhorn and Logue, *Modern Welfare States*, 81.

This not only creates the citizenship dilemma of “inequality and exclusion” referred to by Bauböck, but also serves as a key point of bilateral tension between Denmark and Sweden.

Sweden’s liberal naturalisation laws have sparked criticism from Denmark, particularly DF, about “backdoor migration”, whereby immigrants who might not otherwise have been granted residence and citizenship in Denmark can enjoy national social rights anyway vis-à-vis the ‘backdoor’ entry of the more liberal Swedish citizenship.³¹⁵ DF received political attention in 2005 when it called for disestablishment of the Nordic Social Security Convention in order to protect the Danish welfare from backdoor migration.

From DF Foreign Affairs Spokesperson, Søren Espersen:

“Annually, ten-thousands of Turks, Pakistanis, Iraqis, Iranians, Palestinians, Moroccans, Libyans, Lebanese and other Arabs -in droves- get a Swedish passport... What good is all the hard work that the Danish People's Party and the government does to stop mass immigration, if the worlds refugees can, after just after a few years' residence in Sweden as Swedish citizens, slip into Denmark through the back door? ... Today, I see Sweden is as much a threat to Denmark as Turkey.... the moment that the Swedish welfare system breaks down - and it will— there will be every reason for them to move over the bridge. Thus, the Swedish people’s problem is also the Danish people’s problem and I thereby call on the Danish People's Party to soon reformulate its Nordic politics.”³¹⁶

This statement reveals two things; firstly, that DF perceives naturalised Swedish citizens, particularly those from Arab countries, as less eligible for cross-border rights vis-à-vis the Nordic Social Security convention than other Swedish citizens. One could paraphrase Orwell’s notion here as “all citizens are equal, but some citizens are more equal than others.”³¹⁷

Secondly, the reference to the breakdown of the Swedish welfare system reveals what Crepaz describes as a primordial claim about the viability of the welfare state in the context

³¹⁵ Norden (Nordic Council Website), “Danish People's Party: stop 'Swedish' immigration”, January 29 2007, <http://www.norden.org/en/news-and-events/news/danish-peoples-party-stop-swedish-immigration?searchterm=immigration>, (16 July 2009)

³¹⁶ Søren Espersen, ‘Danmark Må Ændre Sin Nordiske Politik’, *DanskFolkeblad*, October 2005, http://www.danskfolkeparti.dk/pictures_org/DanskFolkebladnr_5_2005.pdf.

³¹⁷ Ian Wooldridge and George Orwell, *Animal Farm* (Nick Hern Books, 2004).

of immigration and cultural diversity. Such an argument claims that too much immigration into a welfare state, and a lack of integration of these migrants, undermines the national sense of collective social fate. This in turn affects the willingness of people to contribute towards a welfare system that supports a community of “strangers.”³¹⁸ Within such a scenario the welfare state becomes untenable and breaks down. While neither national Government heeded DF’s calls, the political statements alone are enough to suggest an underlying dissatisfaction among some groups about the interdependencies of regional integration and the way in which national immigration, citizenship and welfare policies become entwined in the process. In this sense, the disparity between national citizenship policies can be seen to have regional political repercussions.

Through the Nordic Council, the Scandinavian countries have taken some cooperative steps to identify modern challenges, including immigration issues, to which the Nordic welfare model needs to adapt. One of the questions raised relates to how immigration affects the basic premise of the Nordic welfare model, such as equality, universal benefits, and cultural homogeneity.³¹⁹ Similar to Creapz’s observation, this debate reflects what Hedetoft describes as the “Welfare State - Immigration Nexus”, where, “In the Scandinavian context, cultural acceptance and access to political rights are thus intertwined, with equality interpreted to mean both cultural similarity and political sameness...”³²⁰ The Council has had less success, however, in getting the Nordic governments to coordinate their migration and citizenship policies, despite calls for cooperation from many Members on the Nordic Council.³²¹

As noted in Chapter Two, there is interplay between territorial, organisational and conceptual borders to free movement, and the DF case is an example where different Danish normative notions of belonging and entitlement (conceptual borders) were heightened due to the perception of low organisational barriers to Swedish citizenship. In response, DF called for an organisational border (disentitlement to Danish social security) to

³¹⁸ Markus M. L. Crepaz, *Trust Beyond Borders: Immigration, the Welfare State, And Identity in Modern Societies* (University of Michigan Press, 2008).

³¹⁹ Huset Mandag Morgen, ‘What Lies Ahead for the Nordic Model?’ (Nordic Council of Ministers, 2007), 18.

³²⁰ Hedetoft, “‘Conceptual and Political Approaches to Integration: A Scandinavian Perspective’”, 35.

³²¹ ‘The Nordic Governments Must Work Together on Immigration — Nordic Cooperation’, n.d., <http://www.norden.org/en/news-and-events/news/the-nordic-governments-must-work-together-on-immigration?searchterm=immigration>.

be re-erected between the Nordic neighbours. This not only demonstrates the regional issues that can arise over divergent naturalisation policies but also different national conceptions of entitlement and belonging. The next section explores more deeply how divergent national citizenship models outlined in Chapter Three have enforced conceptual borders within the Øresund region, frustrating regional integration and identity strategy efforts.

4.2 Conceptual borders of belonging and identity

Efforts to increase mobility across national borders in the Øresund region have raised important questions about migrant naturalisation and conceptions of citizenship. The latter half of this chapter explores how political strains over divergent national citizenship issues are reflective of a conceptual border between the two government's officially purported views about who belongs to the national community. This highlights how citizenship can be understood not merely as a set of formal regulations, but also as a construction of national identity, which has implications for the emergence of a common Øresund citizenship in the cross-border region.

4.2.1 Conceptual borders between citizens and foreign nationals in the Øresund region

The Øresund Region as a 'contact zone' of different cultures is promoted as a synergy of creativity and ideas with the potential to boost economic performance.³²² The Øresund Committee maintains that "All project work is undertaken with respect for the social and cultural identities represented in the region."³²³ Yet some have argued that Øresund political leaders attempt to frame regional citizenship in a way that avoids politicising unwanted forms of mobility in order to maximise their political efforts to enhance cross-border freedom of movement.³²⁴ For example, Nillson notes how "Immigrants comprise a rather large percentage of the imagined future Øresund region; nevertheless, people rarely

³²² Lofgren, 'Regionauts'. 196

³²³ Øresund Committee, 'The Creation of a Crossborder Region', n.d., <http://www.oresund.com/oresund/creation/committee.htm#Goal>.

³²⁴ Richard Ek, "'Subjects' in the Regional Camp?" (presented at the 'Geographies of Transgression Symposium', Uppsala, 2005).

speak of them as active participants in the regional project.”³²⁵ Such claims point out the undemocratic side effect that non-Scandinavian immigrants are written out of the regional narrative, despite the fact that they have a strong presence in the region and are one of the most mobile groups.³²⁶ Nilsson notes how:

*“The movement of most Swedes and Danes in the region stands, in this sense, in stark contrast to the situation faced by non EU-immigrants. Rhythms of perpetual movement taken by non EU-immigrants are more often than not framed as a threat to the sanctity of national culture and an impending source of its contamination from without.”*³²⁷

The suspicion of TCN movement within the region by some Danish national political groups suggests the existence of a fundamental identity and trust basis upon which free travel agreements are founded. Despite the economic incentives of free movement, it appears that deep conflicts can arise within regional arrangement over the geographical scope, membership and identity of the region when divergences arise about who deserves free movement and citizenship privileges in the region. This raises questions about regional citizenship, and how inclusive of cultural differences it can be.

Part of the reason for this regional tension is that Denmark and Sweden have reacted very differently within their own domestic political contexts to the viability of multiculturalism and diversity for national citizenship. Take the following recent statements by the Ministers of Integration in Denmark and Sweden about multiculturalism:

“We have a debate in Europe for the moment concerning multiculturalism. We have in Denmark, long speeches concerning multiculturalism.... For me I worry about this trend because it’s more or less a way of questioning immigration and openness more than multiculturalism. I want to be crystal-clear on one point: Sweden is a multicultural country... The diversity of Sweden is positive.... It’s no problem that we have different religions in Sweden... that we have all those

³²⁵ Anders Linde-Laursen, *Bordering: Identity Processes Between the National and Personal* (Ashgate Publishing, Ltd., 2010), 252.; Mark Vacher, Tom O’Dell, and Laura Schollert Hvalsum, eds., ‘Temporal and Spatial Modalities of Everyday Integration’ (Lund and Copenhagen Universities, 2011).

³²⁶ Linde-Laursen, *Bordering*, 252.; Vacher, O’Dell, and Schollert Hvalsum, ‘Temporal and Spatial Modalities of Everyday Integration’.

³²⁷ Vacher, O’Dell, and SchollertHvalsum, ‘Temporal and Spatial Modalities of Everyday Integration’, 16.

languages spoken in Sweden is a richness and it is of course a great advantage."³²⁸ Swedish Minister of Integration, Eric Ullenhag, 2011

*"My approach is that when you choose Denmark, you choose Denmark because you want to be Danish. In my view, multiculturalism, and the track it travels on, is beginning to crack -and I will fight it all I can."*³²⁹, Danish Minister of Integration, Søren Pind, 2011

These discordant national political attitudes to multiculturalism are significant for analysing citizenship dilemmas in the region. If Swedish migrant naturalisation policy derives from a multiculturalist model, and Danish policies from an assimilationist model, this suggests two different sets of expectations of how migrants should adapt to national society. For example, many of the organisational work and welfare issues outlined in the previous section can represent deeper conceptual assumptions about the effects of multiculturalism on economic and social stability. As Geddes notes, "Conceptual borders of belonging and identity can reinforce territorial and organisational borders and have tended, in the area of migration and asylum, to have a strong national focus." When heightened, these conceptual understandings can result in calls for the reinstating of organisational or territorial borders in order to protect the accepted national boundaries, for example, DF demands to revoke the Nordic social security convention.

In the same way, domestic political discourse about citizenship and diversity not only affects internal politics, but also how the nation-state itself perceives its own identity and relationship to the rest of world. In the Danish case, political supporters of the government's restrictive stance on immigration frame Denmark as a European leader in pragmatic migration and citizenship management:

"Denmark has nothing to be ashamed of. Quite the contrary. We are the first in Europe by reversing a trend which many had condemned as inevitable and part of the development. Denmark responds to the challenges the world are asking today. Denmark is a pioneer in openly discussing the problems that a mindless

³²⁸ Ullenhag, 'Multiculture and Multiculturalism - a European Debate'.

³²⁹ Henrik Mikaelson, 'Tiden Løbet Fra Integration', *DR Politik*, March 9, 2011, <http://www.dr.dk/Nyheder/Politik/2011/03/09/021347.htm>.

*immigration to the old European nation states has caused.*³³⁰ Pia Kjærsgaard,
DF Party Leader

By contrast, Swedish Integration Minister Eric Ullenhag speaks of Swedish migration policy as representing a long standing pillar of multiculturalism and human decency:

*“... I’m proud of a Sweden that has been open to refugees for quite a long while. Sweden was one of the countries that was fairly open when almost all Europe betrayed humanity.... In the Swedish government we are extremely clear on some things: We will continue to be open, we won’t go on the same path as you see in some European countries.”*³³¹

Focusing on matters of regional citizenship and cross-border governance in the Øresund therefore requires attention to clashes in official Danish and Swedish attitudes towards immigrants. Gregg Bucken-Knapp speaks of a “potential clash between a highly restrictive programmatic set of Danish beliefs towards immigrants and foreigners, and a multi-cultural Øresund population”³³² when he assesses the possibility of cross-border governance of the region. He notes that these issues become particularly salient if Øresund integration moves beyond economic development into political spheres of cross-border rights and governance. To negotiate regional citizenship in such a case would require coming to a cross-border agreement about multiculturalism – a feat which would be very difficult in the current tense political climate between Denmark and Sweden. To re-cite Geddes “Conceptual borders though more nebulous are no less important because notions of entitlement, belonging and identity may function as significant boundaries between domestic systems of governance and the scope for European integration to penetrate that system.”³³³

Bucken-Knapp sums the situation up well when he states, “...there is the likelihood that if sharp differences continue to exist between the two states over the immigration issue, then the cross-border Øresund region, where immigrants are also highly visible, has the ability to provide the source for a rather interesting boundary dispute: not over the comparative worth of Danish or Swedish national identities, but over the identities and rights of the

³³⁰ Pia Kjærsgaard, ‘Sæt En Broklap i Øresundsbroen - Dansk Folkeparti’, *Danskfolkeparti*, 2005, http://danskfolkeparti.dk/Pia_Kj%C3%A6rsgaard_S%C3%A6t_en_broklap_i_%C3%98resundsbroen.asp.

³³¹ Ullenhag, ‘Multiculture and Multiculturalism - a European Debate’.

³³² Gregg Bucken-Knapp, ‘Shaping Possible Integration in the Emerging Cross-Border Oresund Region’, 77.

³³³ Geddes, *Immigration and European Integration*, 59.

‘others’ who call the Øresund their home.”³³⁴ The presence of migrants in the Øresund region challenges regional leaders to develop new understandings of regional membership, though the question of who does or does not belong to a region may become a highly politicised question.

4.2.2 Conceptual divides between Danish and Swedish governments on migration and citizenship issues.

Although an external view of the Nordic countries often assumes cultural homogeneity, many from within the region would highlight significant differences between national cultures. Lamont and Molnár note that “The relational construction of national similarities and differences is particularly apparent in border regions between nation states.”³³⁵ In his article, “A train-ride away but still worlds apart”, Bucken-Knapp not only confirms many of these significant national differences, but argues that the facilitation of free movement often has the reverse effect of heightening national differences and stereotypes as they become more apparent through regular contact and cohabitation.³³⁶ This section shows that one particular national difference that has become heightened in this process is divergent national attitudes to migrant naturalisation. This in turn has raised a conceptual border between the countries that complicates deeper regional integration.

Political commentators and media have been quick to pick up on the political strains which have emerged over migration policy divergences between the two countries over the last decade. In February 2011, an “Open letter to Denmark from Sweden”³³⁷ by a Swedish journalist was published in leading Danish newspaper *Politiken* as a debate piece to reflect Swedish sentiments about Danish immigration politics.

“Dear brother, what’s happening?

It seems like you, in the last few years, have lost your footing....Before you were known for your openness. With your hearty laughter you embraced the multi-

³³⁴ Gregg Bucken-Knapp, ‘Just a Train-ride Away, but Still Worlds Apart’, 58.

³³⁵ Michèle Lamont and Virág Molnár, ‘The Study of Boundaries in the Social Sciences’, *Annual Review of Sociology* 28, no. 1 (August 2002): 167–195.

³³⁶ Gregg Bucken-Knapp, ‘Just a Train-ride Away, but Still Worlds Apart’.

³³⁷ Fredrik Rubin, ‘Åbent Brev Til Danmark Fra Sverige - Politiken.dk’, February 18, 2011, <http://politiken.dk/debat/ECE1200053/aabent-brev-til-danmark-fra-sverige/>.

cultural and diversity. Your policy was enviable seen with big brother Sweden's eyes.

...Why are you letting the debate about Muslims lead to witch hunts? What is the reason that immigrants have become a symbol of evil...?

...The ideals that we grew up with, seems to have gone out of your body. The democratic freedoms and rights, fundamental to everyone, they mean nothing?

...Dear brother, you can still turn back. Reopen your arms, you do not need to be afraid. I found even at your side, you can still choose to do the right thing.

Sincerely, Your brother, Sweden"

In response, *Politiken* published a response letter by a Danish journalist³³⁸:

"Dear Sweden.

Thank you for your letter. It's nice to know that your brother cares about how things stand. But frankly, brother, I wish that you could see the plank in your own eye before sending anxious letters about the splinter in mine.

...The only thing I heard from you was an accusatory cries of racism from the other side of the strait... With you, my dear brother, I see no debate, no religion, no discussion about what Islam is and what religion can cause. Even when a suicide bomber jumped in Stockholm, I couldn't hear you discuss this topic...

I see you censor election videos if you do not like them...I see you pointing at people and calling them 'racists' if they disagree with you... I see you cleanse meaningful dissent through intimidation, demonization, social stigma and power.

Dear brother, will you please try to clean up your own house first? It's not too late.

Sincerely, Your brother, Denmark."

The excerpts above show the salience of this immigration politics division in public debate between the two countries. While such examples reflect deliberately provocative positions,

³³⁸ Søren Villemoes, 'Kære Bror Sverige, Fej for Din Egen Dør Først', *Politiken*, March 1, 2011, <http://politiken.dk/debat/ECE1209412/kaere-bror-sverige-fej-for-din-egen-doer-foerst/>.

they provide a demonstration of the type of policy contrasting that has come to characterise the Swedish – Danish immigration debate. Petersson summarises how, “In Sweden the image prevails of Denmark as a den of intolerance, racism, and xenophobia, whereas Sweden is depicted in Denmark as a land of multiculturalism and political correctness, where people’s real opinions about immigration and multiculturalism are not allowed to be articulated.”³³⁹

In this domain, far-right parties have been extremely divisive, not only in their policies as outlined above, but also in the nationalist rhetoric that they employ. Far-right political parties such as DF and the Swedish Democrats “mobilize voters around a core nativist message: Sweden belongs to the Swedes and Denmark to the Danes”.³⁴⁰ This was expressed quite vividly by DF’s Leader Pia Kjöersgaard when she stated “If the Swedish government wants to transform Sweden... into a Scandinavian Beirut with clan wars, killings and mass rapes, then let them do it. We can always put a barrier on the Øresund Bridge...”.³⁴¹

Thus, we can see that the divergent national citizenship models - assimilationism and multiculturalism - have fostered a discursive process of national “othering” which has raised stereotypical notions about the incompatibility of Danish and Swedish nationality, and the implications this has for cross-border cooperation. The conceptual barrier in this case reflects different national perceptions of “self” which interact with the integration process and impact on the interests and identities of states and individuals involved.³⁴² Differences in national migrant naturalisation policies have heightened conceptual boundaries not only between migrants and Scandinavian citizens in the region but also between Danish and Swedish identities and national outlooks towards migration and diversity. Divergent national citizenship models therefore suggest implications for the concept of an Øresund citizenship built on commonly agreed principles about the long-term conditions of diversity and inclusion in the region.

³³⁹ Ulf Hedetoft, Bo Petersson, and Lina Sturfelt, eds., *Bortom Stereotyperna? : Invandrare Och Integration i Danmark Och Sverige*, Centrum För Danmarksstudier 12 (Stockholm: Makadam Förlag, n.d.), 25.

³⁴⁰ Anders Hellström and Peter Hervik, ‘Feeding “the Beast”: Nourishing Nativist Appeals in Sweden and Denmark’ (CoMID Working Paper Serier No.1, Aalborg University, 2011), 5.

³⁴¹ Kjöersgaard, ‘Sæt En Broklap i Øresundsbroen - Dansk Folkeparti’.

³⁴² The relationship between interests and identities is explored in constructivist theories of international relations, which assert that both are socially constructed and are important in analysing how international actors behave. For example, see Alexander Wendt, ‘Anarchy Is What States Make of It: The Social Construction of Power Politics’, *International Organization* 46, no. 2 (1992).

As Geddes suggests, conceptual borders “boil down to the question of ‘who are we’ and then, by extension the issue of how these self-understandings affect attitudes to migrant new comers.”³⁴³ If the Danish government conceptions of “being Danish”, and how this manifests in citizenship policy and discourse, is perceived as being incompatible with what the Swedish government considers “being Swedish” vis-à-vis naturalisation, then what is the likelihood of Danes and Swedes coming to an agreement about what is an ‘Øresund citizen’, particularly when faced with collective questions about migration management in a cross-border region?

4.3 Discussion: Effects of conceptual borders of national citizenship in the Øresund region

Returning to the question posed at the start of the chapter, this discussion section assesses what effects, if any, national citizenship policy divergence has on the goals and visions of regional integration and citizenship in the Øresund region as outlined in Chapter Two. It is important to note that issues of national citizenship policy are unlikely to have an impact on some of the more immediate questions of regional integration. Efforts to further cross-border commercial integration such as cross-border vehicle registration and apprenticeships, or flat telephone rates and standardised bank fees³⁴⁴ have little connection to political issues of citizenship. But several key integration strategies which raise questions about rights and belonging, such as TCN mobility and regional identity, do become problematic in the context of divergent national naturalisation policies.

The section framing organisational borders illustrated how divergent national systems for the integration and naturalisation of migrant labour can frustrate regional efforts to create a “diverse, yet cohesive labour market” that makes the most of migrant populations in the region. More broadly, this brings up questions over collective management regarding the rights and conditions extended to migrants in the region, and how they, along with other mobile Øresund citizens, can attain and fully utilise the rights-bearing status of citizenship. As alluded to in Chapter Two, this becomes particularly salient when one considers the significant number of TCNs living in the Øresund region, and the fact that part of the

³⁴³ Geddes, *Immigration and European Integration*, 26.

³⁴⁴ Øresund Committee, ‘33 Hindringer, Udfordringer Og Muligheder: Oresundsmodellen 2010’.

Øresund Committee's regional growth model is based on the attraction of more non-European nationals to the region.

Regarding conceptual borders, this chapter showed that political clashes over divergent national citizenship models have raised conceptual borders of belonging and entitlement between citizens and foreigners in the region, and also between Danes and Swedes themselves, as regional leaders attempt to deepen integration. Berg and Löfgren similarly note that, "Today there is a lot of public debate about cultural differences, as an "othering" of those "on the other side of the Øresund" raises fears of ingrained antagonisms and "barriers of understanding". In the process, imagined and real differences are reified into "Swedishness" and "Danishness"..."³⁴⁵

These conceptual borders are problematic for the Øresund Committee's identity strategy as outlined in Chapter Two. The OECD's report on the region noted that, "To strengthen the region's competitive position, the OECD recommends the adoption of a broader, pan-Øresund mind-set to promote integration and develop cross-border collaboration."³⁴⁶ Similarly, Hospers' research on Øresund regional integration and branding notes that "If the Øresund Region wants to continue its economic growth, it is important for the authorities to pay attention to the lacking regional identity among the population across the borders.... besides physical and legal borders they experience a mental border that may seriously temper the development of a shared cross-border feeling."³⁴⁷ Most of the mental barriers acknowledged by regional actors and academics so far have related to banal cultural differences and distinct administrative or corporate traditions.³⁴⁸ Bucken-Knapp is one of few academics that also flags the issue of divergent immigration politics as a potential source of cultural "othering" that may affect the regional integration process.

Deeper issues for Øresund integration exist, then, if the region is to indeed become the 'Human Capital of Scandinavia' and an attractive transnational market for international talent. If we consider the implication that cross-border regions, no matter the transnational image they may promote, are entrenched in national frameworks, then certain limitations

³⁴⁵ Berg, Linde-Laursen, and Löfgren, *Invoking a Transnational Metropolis*, 17.

³⁴⁶ Øresund Committee, 'Knowledge and Innovation | Øresundskomiteen', n.d., <http://www.oresundskomiteen.org/en/knowledge-and-innovation/>.

³⁴⁷ Hospers, 'Borders, Bridges and Branding', 1029.

³⁴⁸ Löfgren, 'Regionauts'.

must be acknowledged. If the Danish government has profiled its naturalisation policy on the basis of restricting immigrants and foreign cultures, and in contrast to 'the Swedish situation', then what are the prospects that the future Øresund region will emphasise the prominence and potential of its immigrant populations? As the "Human Capital" title suggests, the Øresund inhabitants (Danish, Swedish or otherwise) are themselves the most significant regional assets, as it is through their cross-border participation that the region can flourish. As expressed by Bucken-Knapp, deeper integration "has the ability to provide the source for a rather interesting boundary dispute: not over the comparative worth of Danish or Swedish national identities, but over the identities and rights of the 'others' who call the Øresund their home."³⁴⁹

Citizenship policies in this sense have more than just a domestic impact. There are significant repercussions beyond national borders due to the regional implications of cross-border integration. My argument here is that, far from being a policy area of exclusively national concern, divergent citizenship models have significant implications for the conceptualisation of a functional regional citizenship as envisaged by Øresund proponents. To paraphrase Bauböck, taking Øresund citizenship seriously means a shared understanding of who the future citizens of the Øresund are going to be.³⁵⁰

³⁴⁹ Gregg Bucken-Knapp, 'Just a Train-ride Away, but Still Worlds Apart', 58.

³⁵⁰ Bauböck, 'Who Are the Citizens of Europe?'. *"Taking European citizenship seriously means a shared understanding of who the future citizens of Europe are going to be"*

Chapter Five: Conclusion

In setting out to answer the research question, *To what extent do divergent national citizenship models inhibit deeper cross-border integration and prospects for regional citizenship?*, this thesis first lay the conceptual ground work for examining the relationship, and tensions, between national citizenship and regional integration. It revealed a number of practical and conceptual 'citizenship dilemmas' which have occurred at the EU level in this clash between regional freedom of movement and national self-determination over citizenship policies. The second chapter outlined the case-study of the Øresund region, asserting that the depth of current and projected integration makes it ideal for exploring the effects of divergent national citizenship policies on cross-border integration, and what implications these could suggest for Europe more widely. As the Øresund region illustrates, the geographical and cultural proximity of these Nordic neighbours is no guarantee of seamless movement and cross-border integration.

Chapter Three empirically explored divergent migrant naturalisation policies in Denmark and Sweden, determining that the former derives its citizenship policies from an assimilationist model, while the latter draws its policies from a multiculturalist model. Sweden has increasingly come to identify itself as a multicultural state with a responsibility to adjust its own society and culture to others and to processes of globalisation. Denmark, on the other hand has, over the period examined, come to define itself around resistance to multiculturalism and globalisation. In Denmark, the attainment of citizenship is seen as the *ends* of full integration, whereas in Sweden it is seen as a *means* of integration.

The final chapter substantively addressed the crux of the research question in order to assess how these divergent national citizenship models inhibit deeper cross-border integration and prospects for regional citizenship. My initial hypothesis anticipated that such divergence would result in political conflict between member states over regional integration processes that highlight the status and entitlements of foreigners, thus complicating prospects for regional citizenship. This thesis found that while divergent national migrant citizenship models are unlikely to have any impact on some of the more immediate consumer-based questions of regional integration, such as bridge tolls, several

key integration strategies do become problematic in the context of divergent national naturalisation policies. I assessed how regional tensions over divergent national approaches to migrant integration reflected different national organisational structures and expectations regarding migrants' labour market participation, access to citizenship status, and welfare entitlements. Findings showed that these discordant national citizenship policies can inhibit the regional aim of achieving a "diverse, yet cohesive labour market", and particularly the goal of extending full regional labour mobility to TCNs.

Additionally, the analysis revealed that political clashes over the divergent national citizenship models have highlighted conceptual borders of belonging and entitlement between citizens and foreigners in the region and also between Danish and Swedish approaches to diversity management. A distinctive finding of this thesis is that divergent national citizenship models, in the context of intensified integration, have fostered a process of national "othering" which has raised stereotypical notions about the incompatibility of Danish and Swedish nationality and identity. I suggested that these differences could have implications for the realisation of a regional citizenship based on a shared understanding of who the future citizens of the Øresund are going to be. One avenue of further research in this field could be to examine how ideational forces, such as national citizenship models, affect the identities and interests of state actors in the regional integration process. Such an approach could make a valuable contribution to constructivist literature which assesses how self-images interact with, and impact on, material incentives.

A recurring theme throughout this thesis, informed by Geddes' border typologies framework, has been that national borders of citizenship can manifest in different ways. National boundaries of entitlement to work, welfare and naturalisation determine a community of legitimate receivers of state benefits in a way that has an organisational dimension (formal entitlement) which is reinforced by a conceptual dimension defining who deserves and who is entitled. This is related to 'citizenship' as both a social institutional and legal status and as a signifier of national membership and identity. This is salient for political studies of regional integration as it shows that boundary disputes have moved from being about tangible, territorial border security to more nuanced barriers of national rights, entitlements and identities. Such borders exist not only between member states, but between citizens and foreigners within the state and the region. My research findings

suggest that fundamental political dilemmas of migrant integration and diversity management are not specific to the nation state but can also manifest in cross-border regions, challenging theoretical arguments outlined in Chapter One that the emergent regional forms of citizenship are more inclusive of TCNs.

The findings and analysis of this thesis have highlighted issues similar to several EU citizenship dilemmas outlined in Chapter One and contribute to wider discussions about the challenges of migration management and cross-border integration at macro-regional or supra-regional levels. My analysis is consistent with academic observations that citizenship has become a volatile policy area. This thesis demonstrated that not only does this have domestic impact, but it can also become a point of tension *between* member states, implicating regional integration efforts. Thus, when it comes to regional integration, it matters not only how the countries tackle the organisational and conceptual boundaries between each of their national systems, but also how each nation-state organises its internal borders in relation to foreigners entering from outside the region.

This speaks to a wider debate about the relationship between regional integration and national determination of citizenship policies. While functional theories of policy harmonisation in Chapter One allude to the influence of supranational integration on domestic policy making, this thesis also demonstrated that domestic citizenship policies and politics can conversely challenge processes of regional integration. This two-way causation suggests a dynamic process whereby national citizenship both challenges, and is challenged by, processes of regional integration.

While my research question does not petition solutions to these regional citizenship dilemmas, the findings of this thesis back up Bauböck's assertion that the introduction of European standards for citizenship of member states, whether via harmonisation or open coordination, needs to occur in order to prevent regional conflicts over who the future regional citizens are going to be. Like states, regional entities also have to develop rules and discursive legitimisation for how to deal with issues of belonging, entitlement and cultural diversity. The challenge for regions will be how member states politically negotiate how inclusive or exclusive their region should be. This suggests the need for more active measures supporting regional dialogue on migrant integration issues when integration is well advanced, institutionalized, and expanding, particularly into political spheres. The issue

becomes more pressing if Europe, like the Øresund region, recognises immigration as a key part of its demographic future and regional growth strategy.

Here, it is also useful to also acknowledge the limits of my argument. The first relate to the level of analysis, where I have predominantly focused on political actors. My arguments therefore cannot extend to making claims about other actors in the region such as business or interest groups, civil society or even migrant groups themselves. Additional research into these various actors, who are also vital to the integration process, may give a more comprehensive picture of all the forces at play. Secondly, there are also some limitations to how generalisable the findings of this thesis are to other border regions. I suggested that the cultural similarity of the two countries involved in the Øresund, as well as the region's status as a leading AEBR exemplar, meant that this case study was ideal for testing emerging notions of regional citizenship. But precisely because the Øresund is a European leader in terms of its identity strategy and cultural integration, some findings about inhibited identity building may not yet be applicable to border regions still engaged in the administrative practicalities of integration. Comparative research with the Øresund and another 'other border region' facing similar issues could be fruitful in further understanding the mechanisms that enable or constrain cross-border integration when it comes to sensitive nationalised policy area such as citizenship.

This research does contribute however to wider literature on the tension between regional freedom of movement and national determination over citizenship. The Øresund region demonstrated many of the same European citizenship dilemmas as outlined in Chapter One and also highlights the issues that can arise over different forms of wanted and unwanted mobility within regional arrangements. This mobility paradox pits traditional notions of citizenship based on a sedentary population conflict against the inherently mobile conceptions of free movement and regional citizenship.

Chapter One noted how regional efforts to enhance the free movement of labour remain strikingly limited when compared to those driving the liberalisation of trade in goods, capital and services. Unlike the trade of commodities, the free movement of people brings into question the social and political rights of migrants, and the pressures that demographic changes can have on sovereignty and national citizenship. This relates to the oft quoted remark by Swiss writer, Max Frisch, on labour migration to Europe, "Wir riefen Arbeitskräfte

und es kamen Menscchen (we asked for manpower and we got human beings)”.³⁵¹ In the same way, the word-play in the regional brand “The Human Capital of Scandinavia” is a fitting refrain for the paradox the region faces when it comes to deeper integration. Do political leaders envision the region as a capital city of humanity, extending rights and inclusion to all who reside there? Or are Øresund citizens those who fit into specific national criteria and are rewarded based on their contribution to economic growth? The real test of the Human Capital of Scandinavia may be how regional leaders reconcile these dilemmas in the pursuit of a common Øresund citizenship.

³⁵¹ UNESCO, ‘United Nations Convention on Migrants’ Rights - Information Kit’ (UNESCO, 2005), 7, <http://unesdoc.unesco.org/images/0014/001435/143557e.pdf>.

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Annex 2: List of Interviewees

12 September 2011, Riksdagen, Stockholm

Pia Kinhult	Swedish MP, Øresund Committee Deputy Chair
Ilmar Reepalu	Mayor of Malmö, Øresund Committee Member
Ole Stavad	Danish Politician, Former President of Nordic Council (2006)
Olle Norrback	Chairman, Freedom of Movement Forum, Nordic Council
Mikael Stamming	Outgoing Director, Øresund Committee Secretariat
Daniel Persson	Public Relations, Øresund Committee Secretariat

13 September 2011, Malmö

Eric Ullenhag	Swedish Minister of Integration
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16 September 2011, Malmö

Rolf Elmer	Director, Swedish Federation of Business and Enterprise
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22 September, Nordic Council Meeting, Oslo

Hans Wallmark	Swedish MP, Nordic Council Member
Minna Lindberg	Nordic Youth Council President

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