INTEGRATION AT THE CROSSROADS
- A COMPARATIVE CASE STUDY BETWEEN SWEDEN AND THE NETHERLANDS ON INTEGRATION POLICY LINKED TO CITIZENSHIP AND FAMILY REUNIFICATION

Master’s thesis in Comparative Politics, Administration and Society (COMPASS)
Author: Rickard Nätjehall (s4486609)
1st reader and supervisor: Prof. Dr. Taco Brandsen
2nd reader: Dr. Ellen Mastenbroek
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Nijmegen, November 13th 2015
Rickard Nätjehall
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Summary

In the midst of the largest refugee crisis since World War II and rising levels of immigration, the successful integration of migrants into the receiving countries is of unprecedented importance for maintaining cohesive and prosperous societies. Sweden and the Netherlands are two countries that share many similarities and had analogous integration policies linked to citizenship and family reunification at the start of the 1990s but display a sharp difference in policy today. Whereas Sweden has maintained a system of little to no integration measures linked to these policy areas, the Netherlands has introduced formalized naturalisation test (N.T) and installed an integration exam that prospective immigrants need to pass abroad, prior to entering the country, as a precondition for receiving a provisional residence permit. Given the similar starting points of the two countries, this divergent outcome in integration policy presents a puzzle of why this is the case.

Drawing from this, the purpose of this thesis has been to investigate what explains this difference between Dutch and Swedish integration policies. To that end, the study focused specifically on four sub-policies: the Dutch and (non-implemented) Swedish citizenship tests, the Dutch civic integration abroad (CIA)(2006) and the Swedish installation of a maintenance requirement (2010). In turn, based on the employed theories the study constructed three separate hypotheses on what could explain this difference, namely on issue competition (difference in adopted strategies by mainstream parties); path dependency (difference in strength of institutional mechanisms of reproduction that reinforces the status quo); and policy transfer (difference in degrees of conducted policy transfer). To test these hypotheses, a mixed methods design was employed consisting of database utilisation, with material gathered from the Manifesto Project Database and the European Election Database, semi-structured interviews with national level politicians and civil servants, and a qualitative content analysis.

The empirical findings of the study confirmed the hypotheses on issue competition and path dependency whilst modestly refuting the one on policy transfer. More specifically, where Dutch mainstream parties were found to have largely opted for adopting far right features on the immigration/integration (I.I) issue, their Swedish equivalent has predominantly downplayed the issue and/or opposed such initiatives.
In turn, the Swedish reinforcing mechanisms were identified as significantly more potent and persistent than the Dutch ones, which were found to have declined strength over time. Finally, contrary to what was expected, conducted policy transfers were only identified in the Swedish cases. Instead, the evidence suggested that the Dutch policies were constructed purely by domestic means. Consequently, this study concludes that the country difference in integration policy is the result of a combination of diverging mainstream party strategies and a difference in strength of the mechanisms that obstruct change. Finally, in addition to substantiating previous research that underscores the effect of party strategies and path dependency on immigration and integration policy, the study contributes 1) theoretically with an expanded framework on party strategies and insights on how to improve the applied theories; and 2) practically by informing policymakers on the opportunities and constraints that can be linked to the process of policy development.
**List of abbreviations**

CIA Civic integration abroad

EU European Union

F.R Family Reunification

I.I Immigration and Integration

MPD Manifesto Project Database

MP Member of Parliament

N.T Naturalisation Test

P.C Personal Communication

<table>
<thead>
<tr>
<th>Sweden</th>
<th>The Netherlands</th>
</tr>
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<tbody>
<tr>
<td>(C) The Centre party</td>
<td>(AOV) General Elderly Alliance</td>
</tr>
<tr>
<td>(S) The Social Democratic Party</td>
<td>(CD) Centre Democrats</td>
</tr>
<tr>
<td>(NyD) New Democracy</td>
<td>(CP) Centre Party</td>
</tr>
<tr>
<td>(M) The Moderate Party</td>
<td>(CU) Christian Union</td>
</tr>
<tr>
<td>(MP) The Green party</td>
<td>(D66) Democrats 66</td>
</tr>
<tr>
<td>(SD) The Sweden Democrats</td>
<td>(GL) Green Left</td>
</tr>
<tr>
<td>(V) The Left Party</td>
<td>(GPV) Reformed Political League</td>
</tr>
<tr>
<td></td>
<td>(LN) Liveable Netherlands</td>
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<td></td>
<td>(LPF) List Pim Fortuyn</td>
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<td></td>
<td>(OSF) Independent Senate Group</td>
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<td></td>
<td>(PvdA) The Labour Party</td>
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<td></td>
<td>(PVV) Party for Freedom</td>
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<td></td>
<td>(PvvD) Party for Animals</td>
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<tr>
<td></td>
<td>(RPF) Reformed Political Federation</td>
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<td></td>
<td>(SP) Socialist Party</td>
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<td>(SGP) Reformed Political Party</td>
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<td>(Union 55+) Union 55+</td>
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<td></td>
<td>(VVD) People’s Party for Freedom and Democracy</td>
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Table 1: Party Abbreviations – Swedish and Dutch Parties Represented In Parliament Between 1989-2012 (the Netherlands) and 1991-2014 (Sweden).

**Table 1.** Note. The table displays the translated names of the parties represented in parliament between 1989-2012 for the Netherlands and 1991-2014 for Sweden along with domestic party abbreviations within brackets. The slight difference in time is explained by differing years for general elections. Source: Volkens, Lehmann, Matthiefl, Merz, Regel & Werner (2015); Van der Brug, Van Heerden, de Lange & Fennema (2013).
1. Introduction

The topics of immigration and integration (I.I) are undoubtedly two increasingly salient issues of our time. In the midst of the largest refugee crisis since the Second World War and rising levels of immigration, European Member states now face the greatest challenge since the EU debt crisis (Park 2015; Reuters 2015). Since inevitably, immigration challenges our perspectives on identity, citizenship and community (Banting, 2000), effective integration policy becomes ever more important. For Sweden and the Netherlands, it is no different. However, despite the two countries sharing many similar features in e.g. institutional settings, share of population that has foreign descent, with Sweden at 27.3 % and the Netherlands at 21.3% (Statistiska Centralbyrån (SCB), 2014; Centraal Bureau voor de Statistiek (CBS), 2014), and previously similarly adopted stances on I.I (Odmalm & Super, 2014), they now differ sharply on integration policy connected to citizenship and family reunification (F.R).

Starting with the Netherlands, the country, along with a number of European states, have since the 1990s gone another way and adopted the so-called ‘civic integrationist turn’. This has entailed a series of reforms to increase integration by means of introducing formalized and compulsory tests linked to risks of monetary penalties and the possibility of loosing access to citizenship (Joppke, 2007a). Moreover, Dutch integration measures have been increasingly linked to the country’s policy on F.R, which in 2006 resulted in the installation of the Civic Integration Abroad (CIA) Act. This legislation requires joining family members to pass an integration test abroad, prior entering the Netherlands, in order to receive a temporary residence permit (Bonjour, 2010). In sharp contrast, Sweden has not implemented demands or sanctions on integration that surpass economic targets or incentives. Neither immigrants residing in the country, nor reuniting family members, are required to be successful in any integration- or language tests. On a similar note, nor is a failure to integrate linked to a risk of potentially loosing access to citizenship or obtain a residence permit (Borevi, 2014). Consequently, the country has no equivalent to the Dutch CIA. It was only in 2010 that Sweden introduced a maintenance requirement (M.R), i.e. a requirement for the recipient party to display a stable income and adequate housing (Migrationsverket, n.d. b).
Yet, the requirement is coupled with a series of exemptions, leaving less than one per cent of the cases actually affected by the regulation (Borevi, 2015).

In the light of this strikingly diverging development between Sweden and the Netherlands, the question may arise: What explains the difference between Sweden and the Netherlands on integration policies with regard to citizenship and F.R? A functionalist explanation, e.g. deriving the country difference to be a result of diverse types and quantity of immigration, has limited explanatory value in this regard. After all, all three of Sweden’s neighbouring countries: Norway, Denmark and Finland have all both adopted features of the civic integrationist turn with stricter integration policies despite sharing the ‘Scandinavian model’ with a universal welfare state and having smaller population shares of individuals that are foreign born (Andersen, 2008; Rooth & Strömblad, 2008; Eurostat, 2014). Drawing from these circumstances, it appears that the diverging trend between Sweden and the Netherlands has its explanation elsewhere. Consequently, this presents a mystery, if a functionalist explanation does not apply, what then explains the difference between the two countries? To investigate this will be is the guiding objective of this thesis. The study will focus specifically on two sub-policies for each respective country on citizenship and F.R: the Dutch and (attempted) Swedish implementation of a formalized citizenship test; the Dutch CIA; and the Swedish introduction of a M.R. To that end, this study will employ a three-part theoretical framework combined with a mixed methods design incorporate quantitative elements gathered from various databases coupled with the qualitative methods of semi-structured interviews and content analysis.
1.1. Research Questions
In the light of the research puzzle formulated in the preceding section, this thesis sets out to investigate why two countries that started from relatively similar starting positions on integration policy at the start of the 1990s can differ so decisively today. Consequently, the research- and sub-questions of this thesis are the following:

What explains the difference between Sweden and the Netherlands on integration policies with regard to citizenship and family reunification?

1. What are the Dutch and Swedish integration policies concerning citizenship and family reunification?
2. What are the most relevant theories to explain the difference between the two countries?
3. How does the theories of issue competition, path dependency and policy transfer apply to the case?
4. Which theory is the strongest in explaining the difference between the two countries?

1.2. Previous Research
The puzzle of what explains different outcomes in integration policies among countries has attracted quite significant academic attention. However, as is often the case within the academic sphere, there is no shortage of competing views. To begin with, the dynamics of party politics is often considered to be a prominent reason for explaining a country’s change on I.I policy. More specifically, the dynamic concerns political constellations and the competition between- and strategies assumed- by parties to put certain electoral issues on the political agenda (termed issue competition, Green Pedersen & Mortensson, 2010). Along this line of reasoning, Bale (2003) argued that mainstream right parties could adopt themes from far-right parties and hence increase the political salience of these issues and legitimize the more extreme entity. By doing so, the mainstream right could potentially incorporate the far-right party into a future expanded political block (2003) Drawing from this, Green-Pedersen together with Krogstrup (2008) and then Odmalm (2008), compared the responses of mainstream right parties’ in Denmark and Sweden and concluded that the Danish side had been significantly more able, due to party structure with block positions, and successful in politicizing the ‘immigration issue’ than their Swedish counterpart.
Yet, their research is constrained by the limiting of their focus to the mainstream right, which consequently misses out on much of the strategies adopted by the other parties in parliament.

With regard to the Netherlands, Van Kersbergen & Krouwel (2008) asserted that the ‘foreigners issue’ was a double-edged sword. In their work, the researchers forwarded that Dutch mainstream right parties have increasingly adopted far-right features, but in doing so they have struggled with intraparty conflict and a growing electoral threat from extreme right parties (2008). In turn, Van der Brug et al., (2014) contended that not only have Dutch mainstream parties shifted increasing attention to the I.I issue, the political discourse is now characterised by the promotion of cultural integration, as opposed to socio-economic, along with the stressing of ‘Dutch’ culture (2014). However, in spite of all this research, comparisons that incorporate both specifically Sweden and the Netherlands on issue competition are sparse. The exception from the case is a study by Odmalm & Super (2014) that focused on the implications of ‘particular institutional effects’ on party competition. In their work, they argue that these effects provide the foundation for cleavages (that can differ both in stability and compatibility with each other), which shape the extent to which political parties can contend on specific aspects of the immigration issue. The researchers conclude that these cleavages have allowed Dutch parties to have significantly more mobility in framing immigration in terms of socio-cultural implications than their Swedish equivalent, which instead had to opt for a socio-economic perspective (2014.).

Furthermore, other research highlights the transfer of policies between countries, predominantly through the European Union, as a promulgating force for change in integration policy. Among them, Joppke (2007) argues by comparing the Netherlands, France and Germany that Europeanization promotes these countries to adopt more restricted integration policies and, controversially enough, that national models on integration policy are converging (Joppke, 2007a; 2007b). Similarly, Guild et al., (2009) underscores the ‘Common Basic Principles’, established by the European Council in 2004, as crucial for explaining the extensive European policy convergence on integration policy (Guild, Groenendijk & Carrera, 2009).
In addition, Bonjour (2014) also forwarded the EU as a pivotal platform for transferring integration policies. Interestingly, while the author noted that while national governments were central in promoting this diffusion of policies, EU institutions e.g. the Commission, have sought to obstruct this process. Hence, according to this line of literature, the transferring of integration policies among European Member states is widespread. However, while a number of authors denote the Netherlands as a central force in diffusing integration policy to other countries and on EU level (Carrera & Wiesbrock 2009; Bonjour, 2014), mainly due to the country being a frontrunner in adopting such measures (Goodman, 2011), there is a striking lack of research on whether Dutch policymakers looked abroad for inspiration or transferred policies to the domestic stage (Entzinger, Saharso & Scholten, 2011:23).

Moreover, a third line of researchers underscores the effect of path dependency on I.I policy. Clear such cases of path dependency has been identified in e.g. Germany (Brubaker, 1992), Britain (Hansen, 2000) and Switzerland (Manatschal, 2012). Favel (2001) noted that national integration policies are typically characterised as path dependency and often display striking stability over time (2001:26-28). With regard to Sweden, Borevi (2014) contend that the country represents an outlier to the European trend on convergence and retains a national model of generous integration and immigration policies as a result of path dependency. Specifically, the author argued that the country’s policy logic, in which integration is based on equality and universal access to fundamental rights linked to the welfare state, has had crucial importance for how the policy has been shaped (2014). However, while Sweden certainly deviates from the general European trend, the work by Borevi (2014) is partly flawed by lack of systematic analysis, narrow theoretical use and modest use of evidence with only a brief overview on three governmental studies and reforms.

In turn, the implications of path dependence on Dutch I.I policy are less documented. In her dissertation, Van Oers (2013) briefly argues that once the country had adopted some stricter integration measures in 1998 (and hence assumed a new path), pressure was excerpted upwards to continue along that path towards more stringent policies (2013).
However, the analysis on this account is essentially limited to a brief note in the conclusion, without much systematic theoretical application of path dependency. Consequently, both with regard to Sweden and the Netherlands, more research can be done to complement these studies.

In sum, my general overview leads me to conclude that issue competition, path dependency and policy transfer are the most applicable theories for explaining the country difference on I.I policy. Moreover, the overview also highlights the academic contestation of which of these theories has the most explanatory value. It is in the midst of this contestation that this thesis takes its cue, seeking to explain why a significant change has occurred in the Netherlands but not in Sweden.

1.3. Scientific and Social Relevance
This study aims to contribute with valuable insights to both the scientific and societal sphere. In terms of scientific relevance, and as made clear in the proceeding section, there are clear gaps in previous research that this thesis aspires to fill. With regard to political issue competition, with the exception of the study by Odmalm & Super (2014), few studies directly compare Sweden and the Netherlands and distinguish the strategies adopted by the mainstream political parties. Yet, this study is solely conducted by desktop methods and thereby omits valuable insights that could be gathered from e.g. interviews. Further, little research has been done to investigate whether Dutch policymakers have garnered inspiration when formulating domestic integration policies (Entzinger, Saharso & Scholten, 2011). Similarly, the researcher was unable to find literature on Sweden on this account. On path dependency, the literature identified on Sweden and the Netherlands had clear limitations, which highlighted the need for more systematically conducted approaches more firmly linked to theory. In addition, despite Sweden representing an outlier to the European trend towards embracing stricter integration policy, research investigating why this is the case has been conspicuously absent (Borevi, 2011). Taken together, by aspiring to fill these identified gaps in research, this thesis ensures its scientific relevance.
In turn, in terms of societal relevance, the study is conducted during the largest refugee crisis and migration waves in decades (Park, 2015). Consequently, as the successful incorporation of immigrants into the recipient host country is crucial to maintaining social cohesion and a functioning society, this thesis undoubtedly concerns an extremely current topic. Furthermore, by studying how the integration policy of two different countries is formed, along with the background of how and why they came to be, this thesis aims to contribute with valuable insights in the policy field of integration. More specifically, the thesis aspires to help inform policymakers about the different political and administrative opportunities and constraints that shape the policy development process on integration. By extension, the study can provide policymakers with a better understanding of how and what kind of integration policies can be developed in the future.

1.4. Theoretical and Methodological Considerations
With regard to theoretical considerations, the overview on previous research clearly demonstrated the academic use of three theories when studying the dynamics relating to I.I policy; namely, issue competition, policy transfer and policy transfer. This gives way to the interesting question on which theory would carry the most explanatory weight in explaining the study’s cases of Sweden and the Netherlands. Consequently, all three theories will be applied within the scope of this thesis. However, while this will be elucidated more elaborately in the theoretical section, and more clearly demonstrated in the operationalization, it is worth noting that these theories are not mutually exclusive and can hence overlap to some extent. Moreover, while policy transfer can mean the transfer of policies to and from different units (Dolowitz & Marsh, 2000), e.g. defined as up- and downloading (Börzel, 2002), this study will limit its application of the concept to the latter. This is due to the study’s interest in the units of analysis (i.e. countries) as the receiving part of policies as opposed to the sending. For example, little explanatory value as to what explains the difference between Sweden and the Netherlands would be extracted by studying if and how they export policies to other entities.

Furthermore, in terms of methodological considerations, research in social science can broadly be distinguished between three categories. A study can either be descriptive, explorative or explanatory in nature (Babbie, 2015).
Since the aim of this study is to investigate what explains the difference between Sweden and the Netherlands on integration policy, it is of an explanatory character. Moreover, as the study seeks to test the strength of three different theoretical explanations, which requires different types of data and means to collects it, this thesis will employ a mixed-methods design. More specifically, when it comes to studying issue competition and the strategies adopted by political parties, a common approach is to analyse party manifestos and quantify quasi-sentences allocated to different topics (Van der Brug et al., 2014). Hence, this study will also employ this quantitative technique. Conversely, path dependency and policy transfer often entail complex and highly interpretable variables that are difficult to quantify. To ameliorate this predicament, the study will combine the quantitative data collection technique with the qualitative instruments of semi-structured interviews and qualitative content analysis. The inclusion of different methods and sources are expected to strengthen the findings of this study (Yin, 2014). Relevant data is expected to be in the form of public reports, parliamentary proceedings, legislation and party publications along with statements by public officials and secondary academic material. Taken together, a broadly encompassing research approach is undertaken.

Furthermore, and to conclude this section, with regard to the key concepts utilised in this thesis, some definitions need to be made. Starting with integration, in order to avoid the conceptual swamp of multiple different definitions that signifies the concept (Castles, Korac, Vasta & Vertovec, 2002), this study applies the broad definition established by the EU Commission, i.e. integration is defined as "a two-way process based on mutual rights and corresponding obligations of legally resident third country nationals and the host society which provides for full participation of the immigrant" (EU Commission, 2003:0336:17). In turn, by adopting the conceptualization made by Odmalm and Super (2014:676), a mainstream party is defined as party that is likely to be either the primary force or ‘junior’ partner in the establishment of a government (Ackland & Gibson, 2013), conform to Caramani’s (2004) ten-scale classification and is not identified as a extremist, radical, far-left- or right in the academic literature (Mudde 2007). This definition includes all parties mentioned in this thesis but SD; NyD; LPF; PVV; CP; and CD (see table 1 on party abbreviations).
Finally, by following Meguid, a *niche party* is defined as a party that i) “reject the traditional class-based orientation of politics” (2005:347); ii) promote new issues that do not fit with current parameters of political division; and iii) focus on a single or a few specific electoral issues (2005). Essentially, in this work, the niche parties are the political parties that are not considered as mainstream.

1.5. Reading Guide
This chapter has been dedicated to introducing the topic of this thesis, formulating the research problem and presenting the study’s research questions. By looking at previous research on the topic, a number of academic gaps were identified and subsequently briefly discussed in terms of the thesis’ scientific and societal relevance. This was followed by theoretical-methodological considerations and a short description of central concepts. Chapter two addresses the three-part theoretical framework adopted in this study, which consists of the theories of issue competition, path dependency and policy transfer. After having elaborated on each respective theory in detail, a separate hypothesis for each are formulated that are, in turn, subsequently tested in the results and analysis chapter. The third chapter concerns the methodology employed in this thesis. The chapter presents the study’s research design, data collection methods and units of analysis. In addition, the operationalization of the theories employed is elaborated at length along with reflections on the validity, reliability and limitations of the study.

In turn, chapter four is dedicated to presenting an overview of the policies concerned in this thesis, i.e. on citizenship tests, the Dutch CIA and the Swedish M.R. Furthermore, chapter five is dedicated to the main results and analysis of the thesis. The chapter is systematically divided according to the theoretical themes and identified independent variables. The end of each of the three result sections provides a judgement and brief reflection on the offered hypothesis. Lastly, chapter six concludes the thesis by summarizing the findings, answering the research questions and reflecting on the choices made from a theoretical and practical perspective. Finally, the chapter is concluded with a brief hypothesizing of how the results will stand in the coming years along with recommendations for future research.
2. Theoretical Framework

The purpose of this section below is to provide a thorough presentation of the applied theories in this study. The section is divided into three parts in line with the addressed theories and starts with issue competition, its implications for political constellations and strategies for political parties; followed by path dependency and policy transfer. Each sub-section is concluded with a theory specific hypothesis on what explains the difference between the Netherlands and Sweden on integration policy demands for citizenship and F.R.

2.1. Issue Competition

The theory of issue competition concerns the adoption of various strategies by political parties in relation to different issues on the electoral campaign (Green-Pedersen & Mortensen, 2015). The competition among parties is crucial for determining what topics and issues become salient and are up for debate. The key feature of this theory is the proposition that the aim of parties is to shape the political campaign in terms of issues where they have an advantage and, conversely, avoid being drawn into issues where they do not (Green & Hobolt, 2008; Green-Pedersen & Mortensen, 2010). Among others, Budge and Farlie (1983) argued that the party competition relationship is one characterised by a process of selective issue emphasises rather than one of straightforward confrontation (Budge & Farlie, 1983). Another, Riker (1996) proposed that the intent of parties is to highlight, and put on the political agenda, issues where they are stronger, rather than simply participate in debate and discourse with the opposition regardless of topic. This strategy is manifested in what the author labels the dominance and the dispersion principles. The dominance principle signifies situations whereby a political party has a comparative advantage over other parties on certain issues and should therefore actively promote their political salience. Conversely, the dispersion principle denotes situations where the political party enjoys a weak position and should disengage and divert public attention away from the issue, regardless of the issues’ level of salience for the voters (1996). Finally, Petrocik (1996) developed and applied the notion of ‘issue ownership’, which illuminated the idea that some issues fit better and ‘belongs’ better with some parties than others.
With this, the author argued that political candidates and parties engage in specific issues where they can portray themselves as handling something better than their opponents and, by doing so, conveys an image as the better alternative (1996). Taken together, the early academic works on issue competition provides a solid foundation to describe party competition.

What a number of these works have in common, besides underscoring the importance of selective issue focusing, is their assumption that there is limited overlap between political parties and candidates which can influence party strategies (Green-Pedersen & Mortensen, 2010). However, this presumption of an absence of political overlap has been refuted in several academic works (Sigelman & Buell, 2004; Green & Hobolt, 2008; Spoon, Hobolt & Vries, 2014). This research has highlighted the fact that political parties can be drawn into issues where their position is uncertain, or even disadvantaged, depending on the level of electoral threat that the opposing side represents. The party competition dynamic of ‘selective emphasis’ and electoral threats implies that political parties have a number of strategies at their disposal, which can have a crucial impact on whether certain issues become salient or not.

By following this line of reasoning, Meguid (2005; 2008) argued that mainstream parties run the risk of being challenged by niche parties and their promotion of new issues or political dimensions, a challenge which could threaten their electoral position. To counter this, the author contends that political parties can adopt three strategies: an accommodative approach (policy convergence) by including features of the niche party’s policy into its own agenda, typically with the aim of attracting the votes of the competitor; an adversarial approach (policy divergence), which assumes an opposing position in relation to the issues raised by the niche party in order to increase distance in policy; or a dismissive approach (non-action), signifying an ignoring or downplaying stance of the issue brought forward by the niche party (2005; 2008). Moreover, the response of the mainstream parties is also dependent on the dynamics of a multiparty system. In other words, if a niche party represents an electoral threat to a single mainstream party then an accommodative strategy is applied. Conversely, if the niche party challenges a mainstream party’s opponent, an adversarial strategy is adopted. Finally, if the niche party poses an electoral threat to all mainstream parties, then a joint accommodative strategy is deployed (2005; 2008).
However, the latter assumes that there is no widespread consensus among mainstream parties to adopt a certain position on an issue, which may not always be the case. Finally, while this strategic overview highlights the various approaches that mainstream political parties adopt, it preconditions the existence of an electoral threat from a niche party. However, political parties can be driven by other factors, e.g. ideology or perceptions about possible future electoral gains, factors that are assumed to lead parties to adopt new positions ex ante of serious electoral contenders. Based on this, this study adds another dimension to Meguid’s (2005; 2008) framework and terms it the proactive approach, which highlights a strategy that political parties can adopt despite the absence of a serious electoral threat.

In regards to issue competition on immigration and refugees, these questions has traditionally resided, or been ‘owned’, by mainstream right and/or far-right extreme parties who often adopt critical or intolerant positions (Green-Pedersen & Krogstrup, 2008). According to Bale (2003), the incentives of mainstream right parties to assume this critical position is not necessarily driven by expectations of increased voter popularity, but rather aims to normalize and incorporate extreme right parties into an expanded right-bloc with the subsequent goal of attaining political office (2003). In order for centre-right parties to attain far-right parties as their coalition or support partner and normalize their opinions, a procedure of adopting some of the latter’s key features is undertaken (Bale, 2003; 2008). By doing so, centre-right parties have helped prime, and thus enhance the salience of issues forwarded by their far right counterparts. Moreover, Bale (2003) claims that this relationship is mutually beneficial for both parties and serves each other’s interests, but crucially, that the centre-right parties benefit the most. Taken together, it would appear that issue competition on I.I., as well as other policy areas, can bring about substantial electoral gains.

However, in a comparative study between Sweden and Denmark by Green-Pedersen & Krogstrup (2008) on immigration and issue competition, the authors find that the attempts to incorporate the far right by centre right parties can constitute a double-edged sword, a predicament that is also underscored by Van Kersbergen & Krouwel (2008) as noted earlier.
In a multiparty context, mainstream parties can naturally be allied with other parties on the political scale, but if the former seeks cooperation with far-right entities it could jeopardise its relationship with the other parties. Thus, issue competition remains a balancing act between possible benefits as well as electoral pitfalls. Furthermore, the risk of undermining possible political alliances and coalitions by adopting a too hard liner profile against multiculturalism and foreigners can also alienate support from voters as well as the business sphere (Bale, 2008; Van Kersbergen & Krouwel, 2008).

While issues on immigration control and stricter integration traditionally have been more ‘owned’ by centre-right parties, besides their extreme-right counterpart (Bale, 2008; Van Kersbergen & Krouwel, 2008), left wing parties have also been affected and required to position themselves in relation to the topics (Bale 2008; Green-Pedersen, Luther, Bale, Krouwel & Sitter 2010). For centre-left parties, it appears highly important to compete on these issues, despite ideological distances. The reason for which is that they face a triple challenge. For one, the I.I topic is typically ‘owned’ by centre-right- and populist right parties, which undermines the electoral position of the centre-left. Second, the successful right-wing populists can drain voter support that might otherwise have gone to the left. Third, the success of populist right-wing parties facilitates the emergence of non-socialist governments (Green-Pedersen et al., 2010). In short, the issues of I.I appear to have tremendous potential in affecting the political discourse. The strategy framework of accommodation, adversarial, dismissive and proactive approaches all have implications for the issues’ effect on the party dynamic, and subsequently, on the political output on laws and new regulations. Figure 1 below displays the strategies available to mainstream parties before and after a political threat has been identified.
Hypothesis 1: The difference between Sweden and the Netherlands is the result of divergent mainstream party strategies, more specifically, where Dutch parties have opted for proactive/accommodation- and Swedish mainstream parties for a dismissive and/or adversarial approach.

Figure 1: Mainstream Party Strategies Before And After Identified Niche Party Threat.

Figure 1. Note: the figure is based on Meguid’s (2005; 2008) framework with the thesis’ addition of the proactive approach.

Taken together, significant shifts in mainstream party politics is possible if party positions are uncertain, the electoral threat from a niche party is significant and/or the potential electoral benefits from parts of the electorate is perceived as high. If this would be the case, one would expect mainstream political parties to adopt an accommodative or proactive approach. Conversely, if mainstream political parties did not perceive these factors to be present, one would expect them to apply an adversarial or dismissive approach. Finally, and concluding this sub-section, by applying these assumptions to explain the divergence in integration policy demands between Sweden and the Netherlands, the following hypothesis can be extracted:
2.2. Path dependency

The notion on path dependency is a widely applied branch of the broader perspective of historical institutionalism. Path dependency seeks to explain how certain initial steps along a specific path appear to define later possibilities and achievements. The concept has been described in a number of different ways. For instance, “path-dependency means that an institutional structure persists in a changed environment” (Kuipers, 2006:20), “each step along a particular path produces consequences which make that path more attractive for the next round” (Pierson, 2000:253) or that “path dependence characterizes specifically those historical sequences in which contingent events set into motion institutional patterns or event chains that have deterministic properties” (Mahoney, 2000:507). However, despite the lack of a universal definition, path dependency has attained significant academic attention in the last decades (Greener, 2005; Kuipers, 2009; Vergne & Durand, 2010).

In order to distinguish path dependency as something more than simply the assertion that history matters (Ebbinghaus, 2005), one typically needs to encompass three linked elements: first, antecedent causes that together make out a path are minor and contingent, in other words, they cannot explain the consequences of the path dependency and they are haphazard and undefined by previous sequences; Second, increasing returns or matters of institutional reproduction that promotes a continuation of existing conditions and; Third, identifiable path dependent series that commences and are disrupted as a result of critical junctures (Thelen, 1999; Mahoney, 2000; Pierson, 2000; Schwartz 2004; After Kuipers, 2009). The notion of institutional reproduction or increasing return is of crucial importance when seeking to explain why status quo is maintained. Essentially, institutional reproduction consolidates, reinforces and expands the institutions of the system. At the same time, reproduction also obstructs institutional reform, both by making it more difficult to diverge from the established path as well as enforcing the power advantage of conservative elites (Kuipers, 2009).

By drawing from Mahoney (2000) and Kuipers (2009), this study distinguishes between three types of institutional reproduction mechanisms based on power resources, utility, and legitimacy. The power resources mechanism grants key figures in a policy sector the ability to increase their power asymmetrically due to disproportionate access to beneficial resources.
Such resources include, but are not limited to, organizational assets, valuable information, professional support and access to influential policy venues (Kuipers, 2009). In turn, the utility mechanism concerns the reinforcement of comparative advantages of the status quo in relation to competing alternatives. This much in line with Pierson’s (2000) notion of increasing returns and implies that further steps along a certain path become more likely with each step as a result of the increasing relative benefits of current actions compared to other activities (2000:252). Two centrepieces in this line of argument are the costs relating to irretrievable costs, i.e. sunk costs, and the chance of high expenditures and uncertain outcome associated with institutional change (Kuipers, 2009; Mahoney, 2000). Both are considered critical for maintaining the status quo. Sunk costs, e.g. in the form of political interests, institutional structure and staff, can render divergence from an assumed path highly costly and thus undermine the perceived benefits of change (Thelen, 1999). Likewise, a perceived uncertainty concerning the costs and eventual outcome of change can obstruct initiatives for reform (Kuipers, 2009). Finally, the legitimacy mechanism is developed when certain policies get so ingrained in an institutional context that its main features and actors dictate how various policy issues facing the institution should be understood and defined (Kuipers 2009). Related to this are also perceptions of what is the just and right thing to do (Mahoney, 2000). Taken together, these mechanisms effectively serve to reinforce a certain institutional setting, rendering reforms difficult to achieve.

Furthermore, to achieve change in the political sphere with regard to institutional settings and policies can prove even more difficult than in for instance technological and financial areas (Pierson, 2000). This is due to several reasons. Previous policies and laws represent significant constraining features in the political environment as they often delineate what can and cannot be done and are associated with difficulties to change. At the same time, the political sphere is associated with intrinsic complexity and ambiguity and politically established institutions are rarely confronted with rivalling options that might conduce change (Pierson, 2000). Further, all barriers to change in various systems that render increasing returns gain increased salience, and the longer the time a course of action has been taken, increasing transactions, both financial and political, cost are associated with reform.
Finally, the logic of electoral politics assumes that politicians will mostly favour short-term solutions to long-term ones and only direct attention to long-term problems when they become politically pertinent or carry limited voter support retribution (Pierson, 2000). As such, path dependency on political policy and institutions can prove challenging to depart from.

The prospect so far is that path dependency implies a strong inclination towards maintaining the status quo and obstructing any attempts for change. Yet change does occur and this perceived inability to explain anything else than incremental change is one of the main academic critiques against path dependency argument (Gorges, 2001; Kay, 2005; Peters, Pierre & King, 2005; Kuipers, 2009). However, by drawing from Kuiper’s (2009; 2006), Boin and ‘t Hart (2000) and Hay’s (2001) arguments on non-incremental change, this study follows an expanded version of path dependency that incorporates a theoretical explanation to change. Specifically, it expects non-incremental drastic change to be the result of political behaviour in critical junctures that, in turn, have been brought about as a result of lengthy policy rigidity. In addition, this rigidity is expected to be able to be exposed by exogenous shocks, e.g. major external events, which can lead to pressure on decision makers to initiate change (Kuipers, 2006).

In turn, the rigid institutional setting in a changing environment facilitates the construction of a crisis that can be used by reform interested political actors as an instrument to promote wide-scale change. This entails the utilisation of a ‘crisis narrative’ whereby the current status quo is depicted as being unsustainable and in need of swift and convincing reform. Besides highlighting the need for change, the application of a crisis narrative is aimed to delegitimize the existing conditions, undermine the support for advocates of the status quo, and attack the mechanisms for institutional reproduction (Kuipers, 2009). Thus, reform-eager politicians can promote their own position while weakening the established elites’ source to policy sustaining resources (Kuipers, 2009). By doing so, the accumulated pressure can generate enable successful change-oriented politicians push for reform and implement a new institutional development. Figure 2 below displays this dynamic.
In sum, path dependency is the result of minor and contingent events generating a certain trajectory and status quo through reinforcing mechanisms, a trajectory that can only be diverted from in the case of growing contradictions in relation to its environment, exogenous shocks and political crisis narratives that successfully undermines the mechanisms institutional reproduction. Inertia, or minor reforms, is thus expected to be the result of the absence of some or all of these key factors. Building on this assumption, and linking it to this study’s topic on what explains the difference between Sweden and the Netherlands, where major policy change occurred in the latter case but not the former, the following hypothesis can be adopted:

Hypothesis 2: “In Sweden there were clear mechanisms of institutional reproduction whilst in the Netherlands these were either absent or reduced in strength sufficiently for change to occur”.

Figure 2. Source: Kuipers (2006:34), based on Hay (2001).
2.3. Policy Transfer
The theory of policy transfer concerns, as the name entails, the process of the transferring of policies from entity to another (Benson & Jordan, 2011). The theory has drawn considerable academic attention throughout the past decades and is widely used in the sphere of research. The origin of the policy transfer research comes from comparative policy analysis in the United States but has spread substantially since then (Dolowitz & Marsh, 1996; Stone, 2001; Benson & Jordan, 2011). Although definitions of policy transfer vary, the prevalent academic understanding is drawn from Dolowitz (2000), who defined it as ‘a process by which knowledge of policies, administrative arrangements, institutions and ideas in one political system (past or present)’ is used in the development of similar features in another’ (2000:3). The concept of policy transfer thus has clear links with the other widely applied academic concepts of lesson drawing, policy diffusion and policy innovation (Knill, 2005). The authors Dolowitz and Marsh are often seen as key figures in the development and cultivation of policy transfer (Benson & Jordan, 2011), and as a result, their work will provide the theoretical foundation for this section.

In order to identify and analyse a policy transfer empirically, three tests are necessary: 1) the conducted research much display commonalities between policy in the importing state/organization and policies elsewhere; 2) The analysis have to pinpoint the agents which transferred the policy knowledge and highlighted it to the policymakers; 3) The knowledge regarding the opportunities on policy transfer was used by the policymakers during the time of the development of policy (Smith, 2004). Each of these points will be further elaborated below. To be able to identify commonalities between different importing states and policies elsewhere, it is essential to be familiar with what is transferred as well as to what degree this occurs.

There are various sorts of policies that can be transferred. By following Newburn & Jones (2007), this study distinguishes between three levels of policy. First, in the broadest level reside policy ideas, symbols and rhetoric. The second is comprised of manifestations of policy regarding content and applied instruments. In turn, the third level concerns the practical application of policy in relation to its implementation by professionals (2007).
Furthermore, the extent to which transfer take place also differ. Dolowitz & Marsh (1996) identifies four different degrees: i) *Copying* takes place when a country uses a policy that has its origin somewhere else without any adjustments being made. For instance, this took place when former English Chancellor of the Exchequer Gordon Brown’s directly copied American tax credit system and adopted it as UK’s working family tax credit system (Evans, 2009); ii) *Emulation* occurs when the receiver declines to copy the policy in detail but acknowledges that the specific policies taken elsewhere are the best to adopt domestically; iii) *Hybridization and synthesis*, in turn, concerns the adoption of a combination of components from several different origins; and iv) *Inspiration*, finally, implies that by observing unusual solutions to problems elsewhere, it can enhance one’s own ideas and creativity about what can be done at home (Dolowitz & Marsh, 1996). Since then, *transfer failure* and *non-transfer* have been identified as two additional forms of transfer. Transfer failure is the result of lack of proper information, incomplete transfer of crucial policy elements and inappropriate preconditions of the policies adjusted to the original country which are ill-suited receiving one (Dolowitz & Marsh, 2000). Finally, non-transfer signifies the case whereby a developed policy has purely domestic antecedents and/or had no precedent beforehand, and is therefore not the case of a conducted policy transfer (Evans & Davies, 1999). In short, there are a number of different degrees in which policy is transferred and to what extent it takes place.

Furthermore, there are a number of actors that take part in and promote policy transfer. Dolowitz and Marsh (1996) identified six central categories of involved actors: elected officials, political parties, civil servants/bureaucrats, policy entrepreneurs/experts, pressure/lobby groups and supranational institutions. Although, more than one category of actors are expected to be engaged regardless of case (Dolowitz & Marsh, 1996). Furthermore, the influence of supranational institutions and experts/policy entrepreneurs on policy transfer has gained significant academic attention in later years with Europeanization and agency receiving a central focus (Radaelli, 2000; Stone, 2000; Jordan & Liefferink, 2004; Bulmer & Padgett, 2005; Stone, 2010). At the same time, policy transfer is an activity where governments and civil servants remain key actors.
For instance, as Wolman (1992) argued in a cross-national policy transfer study between the US and the UK on urban policies, that there is an obvious rationale behind glancing on other countries and how they deal with problems that are perceived as similar (1992). In a similar fashion, Stone (2012) argued that intergovernmental policy transfer can serve as a peer-to-peer function for politicians and civil servants and subsequently promote best practices (2012). Thus, there are several potential actors that can be involved in policy transfer and influence its outcome.

The final test in analysing policy transfer empirically is to demonstrate that the transferred knowledge was actually utilised by decision-makers (Smith, 2004). This can be achieved by drawing from sources in the media, reports, as well as statements in both verbal and written form (Dolowitz & Marsh, 2000). By doing so, one seeks to attain confirmation that policy-makers intentionally sought to implement external policy into their own institutional setting. Although, as the level of policy transfer can vary, so can the motives behind it. Dolowitz and Marsh (1996) distinguish between three types of reasons why transfer occurs: through voluntary means, direct coercion and indirect coercion. The voluntary transfer is traditionally the result of various forms of dissatisfaction with existing conditions, often rooted in a public and or a governmental perception that the current status quo is non-functioning and requires change. In turn, direct coercion either occurs when one government forces another to apply specific policies or when a supranational institution, e.g. the EU, does so. Finally, an indirect coercive transfer is the result of demands of policy reform connected to promises external help, for instance, similar to the International Monetary Fund’s requirements of institutional change in exchange for investments (Dolowitz & Marsh, 1996; Evans, 2009; Benson & Jordan, 2011). Although, such clear division rarely characterizes reality. Instead, a transfer process can occur through a combination of voluntary and coercive measures in different stages. This dynamic implies a continuum between various phases in the transfer process, which lie between lesson drawing, i.e. a voluntary activity in where external policies are taken into account and built upon, and coercive transfer (Dolowitz & Marsh, 1996). Figure 3 displays this continuum and the stages between lesson-drawing and coercive transfer.
Finally, there are several constraints that can either prevent or undermine policy transfer. Following Benson & Jordan’s line of reasoning, this study distinguishes between four types of constraints to policy transfer: demand side; programmatic; contextual; and application. The first signifies the unwillingness of policymakers to change the status quo without the impact of external shocks that necessitate action to be taken. Programmatic constraints refer to reduced transferability due to how context specific a policy is, i.e. a policy can fit well within one context and not another. In turn, context constraints regard impediments forwarded by path dependency and policy layering. Finally, the application constraints concern the transaction costs related to institutional reform, the level of change needed and whether the policies require adjustments for a successful policy transfer (2011). This, in turn, is largely associated with, scarcity in political, bureaucratic and economic resources which further delineate the limits for policy transfer (Dolowitz & Marsh, 1996). Consequently, the constraints to reform are numerous and can result in serious implications to what degree and how policy is transferred.

In sum, the theory on policy transfer sheds light on the transmission of policies between countries, organizations and transnational institutions. A policy transfer can be either of a voluntary-, coercive-, indirect coercive character or a combination between them, and there are often numerous actors engaged in the process (Dolowitz & Marsh, 2000). The character of the transferred policies can be divided into ‘soft’ and ‘hard’ policies respectively and the degree to which policy is transferred is dependent on various constraints.
By applying the following conditions of policy transfer to the case of this study and try to explain why significant policy change on integration was done in the Netherlands and not in Sweden, the following hypothesis can be constructed:

Hypothesis 3: “the difference between Sweden and the Netherlands can be explained by different degrees of conducted policy transfer”.

2.4 Summary of the chapter
This chapter has been dedicated to providing a detailed description of the three theories that will be applied in this study and each section has been concluded with a separate hypothesis. As has been shown, issue competition concerns the strategies that political parties can adopt when facing different issues on the electoral campaign (Green-Pedersen & Mortensson, 2014). In addition to the accommodative, adversarial and dismissive approach, the thesis added the proactive approach to signify situations whereby mainstream parties pre-emptively adopt features typically belonging to a niche party prior to the existence of a serious electoral threat. In turn, path dependency conveys how institutional structures can be maintained in a changing environment (Kuipers, 2006). Specifically, the theory denotes three mechanisms for institutional reproduction that reinforces the status quo i.e. the power-resource-, utility- and legitimacy mechanisms. Institutional change is expected to be the result of crisis narrative and external shocks. Finally, policy transfer concerns the process by which policies in one setting are transferred to another (Dolowitz & Marsh, 2000). The theory distinguishes between a number of different transfer degrees, actors involved and motivations for transferring policies. Four different types of constraints termed demand-side; programmatic; context; and application constraints can obstruct the transfer process. Furthermore, whereas the three applied theories are different, they do contain some similar features e.g. the political element; and for path dependency and policy transfer, resemblances between the constraints and the reproduction mechanisms. While this is not a problem in itself, it will potentially lead to some overlap in the result section.
3. Methodological Framework
This purpose of this chapter is to provide an outline for the methodological choices that are undertaken in this study. Specifically, the chapter presents the research design, methods of data collection and operationalization along with a reflection on validity and reliability and the limitations of the study.

3.1. Research Design
There are three different methods of data collection when conducting research in social sciences: quantitative, qualitative and a mixed method design. Quantitative research concerns the investigation of empirical material in the form of numerical data (Van Thiel, 2014). In turn, qualitative research serves as an umbrella concept for a wide variety of approaches to gather data that is predominantly non-quantitative in character, e.g. through interviews, document analysis and observations (Saldaña, 2011). Finally, the mixed method design entails the combination of both quantitative and qualitative techniques when processing data. Despite the methods following somewhat different logics, the two designs can be complementary to one another and thus enable researchers to combine them into one framework (Yang & Miller, 2008; Creswell, 2014).

To explain why a significant change in integration policy has occurred in one country but not the other is a complex task, especially since there are multiple factors at play over a time period of several years. This study tries to do so with the use of three separate theories: issue competition, path dependency and policy transfer theory. Consequently, this allows for the inclusion of several different methodological approaches. On the one hand, issue competition is about strategies adopted by political parties. By following a number of researchers, and as will be elaborated below, this study adopts the perspective that different strategies can be partly identified by examining party manifestos and determine how much attention they allocate to different topics (Meguid, 2005; Green-Pedersen & Krogstrup, 2008). Hence, this can be interpreted as numerical data, which allows for a quantitative approach. On the other hand, because of the complexity of the studied cases and the interpretive character of the theoretical variables, including certain aspects of issue competition, there is no fulfilling technique to process the other data by quantifiable means. Thus, this necessitates the application of a qualitative approach, in addition to the quantitative, to attain a more comprehensive result.
Accordingly, this study will utilize a mixed method design. More specifically, it will make use of a convergent parallel mixed methods design. This technique combines the collection of qualitative and quantitative data, analyses each in turn, and then compares the results with one another (Creswell, 2014). However, because of aforementioned reasons, the mixed method design with the incorporation of quantitative data will only be utilised on the issue competition section whilst the remaining parts will be addressed by qualitative means.

Furthermore, since the aim of the research is to investigate integration policy specifically and explain why a considerable change occurred in one setting but not another, the thesis applies a multiple case study. Case study research is a qualitative research method in which the “researcher develops an in-depth analysis of a case /…/ and collect detailed information using a variety of data collection procedures over a sustained period of time” (Creswall, 2014:14). By comparing multiple cases in which the starting point is similar, but the outcome differ, such as this study, one can apply Miller’s method of most similar systems design (MSSD). This method entails the conceived controlling of similar characteristics while diverging attributes are seen as explanatory variables (Tarrow, 2010). Essentially, the MSSD follows a strategic system of choice whereby one explicitly focuses on diverging factors to explain a difference in outcome, thus implying a ceteris paribus of other variables, i.e. everything else is perceived as constant (Esaiasson, Gilljam, Oscarsson & Wängnerud, 2012). Again, since the objective of this study is to investigate what explains the significant change occurring in one country but not the other, this approach is evidently advantageous and will consequently be applied. Finally, given this inquisitive nature, it means that the thesis’ multiple case design adopts an explanatory character, as opposed to an exploratory and descriptive approach (Yang & Miller, 2008).

3.2 Unit of analysis and selection of policies
This study employs a most similar systems design and focuses specifically on two cases: Sweden and the Netherlands. The reason behind the selection is that the countries provide an interesting comparison as they display numerous similarities yet differ sharply with regard to integration policy.
In terms of similarities, both countries demonstrate comprehensive welfare state regimes, which are based on neo-corporatist consensus between business and the state that for a long time was astonishingly successful in ‘de-politicizing’ the topic of immigration whilst promoting ethnic diversity and multiculturalism (Haverland & Liefferink, 2012; Odmalm & Super, 2014). Moreover, both countries are constitutional monarchies with a multiparty system, display comparable levels of GDP per capita and share a history of similar integration policies (The World Factbook, 2013; Koopmans, 2009).

In terms of differences, the two countries have diverged significantly on integration policies connected to F.R and citizenship since the late 1990s. Whilst the Netherlands appear to have embraced the European trend on adopting stringent policies for civic integration in the form of e.g. compulsory integration tests for attaining residence permit and citizenship (Joppke, 2007a), Sweden has maintained an outlying position in this regard and have few such measures in place (Borevi, 2014). Consequently, this contrast provides two compelling cases for comparison. The reason for conducting a paired comparison is twofold. It allows for an intense studying of the cases, which would diminish if more cases were incorporated, and augments the design’s inferential power in relation to a single case study as it cancels out the risk that the dependent variable has occurred despite the potential absence of the independent variable (Tarrow, 2010; Gerring, 2007).

Furthermore, this study concentrates on integration measures linked to citizenship and F.R. This decision is justified on the grounds that citizenship policy and integration programs for newly arrived immigrants, which encompass F.R policy, represents the most prominent features of the European trend in favour of obligatory activation policy (Borevi, 2011). However, given the vastness of these two policy areas, additional delineations need to be made. Consequently, the study focuses on two country-specific policies that are subsumed under these areas as its units of analysis, namely formalized citizenship tests, the Dutch CIA (2006) and the Swedish M.R (2010). Formalized citizenship tests were incorporated due to the Netherlands being one of the first European countries to implement one whilst Sweden has yet to do so, despite previous attempts by various policymakers.
In turn, the CIA was selected on the grounds that it is arguably one of the most invasive Dutch integration measures for reunification (Joppke, 2007a). Finally, since Sweden does not have and has not attempted to implement any equivalent to the Dutch CIA, the choice fell on the only integration measure for F.R that the country has: the M.R. Whilst the Netherlands also has a MR in place, the CIA was favoured partly due to its stringent nature that better illustrates the considerable shift in Dutch policy-making and partly because the Dutch MR was implemented decades ago (Bonjour, 2008a), which limits its potential for testing.

Finally, and to conclude this section, the studied time span encompasses the period 1989 till 2014. The justification for selecting 1989 as a specific starting point was twofold. First, both the Netherlands and Sweden had national elections in close vicinity to one another that year, the former in 1989 and the latter in 1991, which allowed for access to comparable manifesto values from the MPD. Second, at the time, both Swedish and Dutch policymakers displayed a similar understanding of the effect of access to citizenship and the ability to reunite with one’s family members. Back then, citizenship and F.R were seen as crucial in promoting integration and, as such, the countries had either lenient or no integration measures connected to citizenship and F.R (SOU 1999; Bonjour, 2008a; Van Oers, de Hart & Groenendijk, 2013). In turn, 2014 was chosen due to the availability of data. Finally, given the significant policy change over this period of time, the selected time span was deemed highly relevant to study.

3.3. Data Collection Methods
This study makes use of three methods for collecting data, namely semi-structured interviews, quantitative database utilisation and qualitative content analysis. The combination is advantageous as the methods complement one another. Whereas the quantitative data enables the adoption of a longitudinal perspective, the qualitative methods allow the researcher to gain a more in-depth picture and, with interviews, attain information that is not documented or available online. On a similar note, the combination of different sources of data strengthens the consistency of the findings made in a study (Yin, 2013). In the subsections below, each method will be described in detail and its application justified for this study.
3.3.1. Semi-Structured Interviews

The application of interviews is an important and widely used instrument in qualitative research. Essentially, depending on the level of structure to which the interview is arranged, it can either be unstructured, semi-structured or structured (Bryman, 2008). The semi-structured interview maintains part of the flexibility associated with its unstructured equivalent yet provides sufficient structure to ensure cross-case comparability (Bryman, 2008). In addition, the flexibility of the technique makes it useful to better understand the world from the perspective of the respondent (Kvale & Brinkmann, 2014). Hence, given that both flexibility and structure is necessitated in this study, a semi-structured interview method has been opted for. In order to establish this degree of structure, a series of interview guides, which can be found in in the Appendix, were constructed that enabled the researcher to manoeuvre between different questions and themes during the course of the interviews. Since the questions are firmly based on the theoretical framework, the validity of the study is strengthened (Kvale & Brinkmann, 2014).

The guides were designed to be country- and occupation-specific, meaning that specific guides were made for Swedish and Dutch civil servants and politicians respectively. The justification for this is twofold. First, while the inherent logic of the guides remained the same, the need to explain why the considerable change occurred in one country but not the other naturally had minor implications for how the questions were phrased. To illustrate, where the questions for Dutch respondents focused on ‘why has this occurred?’ the Swedish ones were characterised by the opposite perspective, i.e. ‘why has this not occurred?’. Second, since politicians and civil servants have widely different occupations and knowledge about the addressed topic, a tailored guide was designed for each group. Essentially, while the guides covered all the themes, more detailed questions were directed to politicians on issue competition whereas the ones for civil servants focused more intently on path dependency and policy transfer theory.

In addition, it is worth mentioning that the interview questions have intentionally been devised broadly in order to attain an overarching perspective on the development in each country, meaning that questions have been phrased concerning e.g. integration measures for F.R and citizenship at large as opposed to specifically on distinct policies.
Given the flexibility of the semi-structure interview, any uncertainties or need to specify could be adjusted by stating follow up questions. The interviews lasted between 20 and 60 min and were conducted individually and, in all but one case, on location in Stockholm and The Hague respectively. The discrepancy in time can be explained by the fact that some civil servants had specific knowledge on policy but had less information on e.g. political developments and the impact of various events. The one interview that was not done in person was conducted by means of telephone. The language used in the interviews was Swedish, given the origin of the researcher, and English due to the researcher’s rudimentary knowledge in Dutch. The use of personal interviews was deemed appropriate, not least because it allows the researcher to repeat stated questions and mitigate potential misinterpretations and language difficulties that could arise (Esaiasson et al., 2012). In turn, the material extracted from the interviews was transcribed in separate documents and categorised in specific folders. Finally, since the topics on I.I are still often considered to be sensitive subjects, special consideration was given to the risk of an interview effect, meaning that that received answers can differ depending on who is asking the questions and how it is done (Esaiasson et al., 2012). To that end, efforts were taken to safeguard objectivity in the stated questions, encouraging the interviewee to talk freely and by offering the respondents to remain anonymous, to which all declined.

3.3.1.1. Interview selection
The process of selecting relevant interview respondents was done strategically based on theoretical grounds, which is called a purposive sample (Van Thiel, 2014). Since the aim of the study is to investigate the strategies of political parties, the impact of current and previous policies and potential policy transfers in relation to integration measures, a combination of both politicians and civil servants has been deemed necessary to include within its scope. The decision to interview both civil servants and politicians was also made in order to gain a more balanced and encompassing perspective on what the policies were and why they were established in the first place. More specifically, whereas civil servants were expected to be more policy oriented, the politicians were believed to be able to shed light on the political dynamic and strategies adopted by the mainstream parties. Moreover, in order to attain the most valuable information from the interviews, the respondents were selected on the basis of their position.
In other words, the selection was conducted intentionally and strategically in order to answer the research questions of the study (Bryman, 2008). Consequently, the study focused specifically on individuals that were active with citizenship- and F.R policy at the state level, since it is on that level that such policy is managed and developed.

In terms of civil servants, three Swedish and two Dutch respondents were interviewed from the relevant ministries, i.e. the Swedish Migration Agency and Ministry of Justice in Sweden and the Ministry of Social Affairs and Employment and Ministry of Security and Justice in the Netherlands. Two of the Swedish civil servants worked at the Ministry of Justice with FR- and citizenship policy respectively. The interviewee from the Swedish Migration Agency carried the role as a communicator and was selected to given the person’s overarching knowledge on the policies concerned and their change throughout recent years. In turn, the Dutch civil servants had responsibility for the II areas and were also active with policies on FR and citizenship.

In the Netherlands, the selection included the Labour party (PvdA, social democracy); the People’s party for Freedom and Democracy (VVD, liberal conservative); and the Christian Democratic Appeal (CDA, Christian democracy). Multiple attempts were made to include the Democrats 66 (D66, social liberalism) MP in charge of the party’s integration portfolio, given their numerous turns in government between 1989-2014, but who was unfortunately indisposed. Whilst the same was true for the CDA spokesperson on integration, a close political aide was able to fill in as a substitute. Moreover, two interviewed politicians came from the same party, the PvdA. The reason behind which was that one interview, with a representative from the parliamentary committee that handles immigration rather than integration, was intended as a pilot interview. However, in the end, it yielded so much valuable information that the decision was taken to include it as well. In turn, the Swedish group of politicians comprised of representatives for the Social democrats (S, Social democracy), the Moderates (M, liberal conservative), the Liberal People’s party (FP, liberalism) and the Left party (V, democratic socialism, feminism)(Parties and elections in Europe, 2014; 2012). The interviewees for S, M and V were MPs whilst the FP representative was a former secretary of state under the minister of integration and now a prospective member of the European parliament. The party’s spokesperson on integration was unable to take part of the study.
Right-wing parties such as the Sweden Democrats (SD) and the Dutch Party for Freedom (PVV) was deliberately excluded, as it is their effect on mainstream parties that is of relevance for this study, not the parties themselves.

The selection process for the interviewed politicians was conducted based on three criteria: 1) party size (as was the case for PvdA, VVD, CDA, S and M); 2) Key role in pushing for various policy initiatives on integration (FP); and 3) to provide an even balance between centre-right and centre-left parties included in the study (V) and/or having had a recurrent position in government between 1989-2014 (D66). In total, a number of thirteen individuals, five civil servants and eight politicians, were interviewed and their names, party affiliation (when applicable) and position is displayed below in table 4. The prime reason behind the limited number of interviews can be attributed to significant difficulties associated with getting in contact with and booking in interviews with individuals on the national level. Whereas the study may have benefitted from a larger set of respondents, the limited access to more civil servants and politicians, along with the strained time schedules of the ones contacted, proved to be a recurrent problem in expanding the number of people involved.
<table>
<thead>
<tr>
<th>Name</th>
<th>Country</th>
<th>Party</th>
<th>Occupation</th>
</tr>
</thead>
<tbody>
<tr>
<td>Ohlsson, C.</td>
<td>Sweden</td>
<td>Social democrats (S)</td>
<td>MP, The Committee on Social Insurance</td>
</tr>
<tr>
<td>Cederbratt, M.</td>
<td>Sweden</td>
<td>The Moderates (M)</td>
<td>MP, The Committee on Social Insurance</td>
</tr>
<tr>
<td>Selimovic, J.</td>
<td>Sweden</td>
<td>The Liberal People’s Party (FP)</td>
<td>Former Secretary of state and prospective member of the European Parliament</td>
</tr>
<tr>
<td>Höj-Larsen</td>
<td>Sweden</td>
<td>The Left Party (V)</td>
<td>MP, party spokesperson on Migration and Inclusion</td>
</tr>
<tr>
<td>Lagerström, I.</td>
<td>Sweden</td>
<td>(-)</td>
<td>Swedish Migration Agency</td>
</tr>
<tr>
<td>Mårtensson, H.</td>
<td>Sweden</td>
<td>(-)</td>
<td>Ministry of Justice</td>
</tr>
<tr>
<td>Strandberg, J.</td>
<td>Sweden</td>
<td>(-)</td>
<td>Ministry of Justice</td>
</tr>
<tr>
<td>Kuiken, A.</td>
<td>The Netherlands</td>
<td>The Labour Party (PvdA)</td>
<td>MP, Committee on Security and Justice</td>
</tr>
<tr>
<td>Marcouch, A.</td>
<td>The Netherlands</td>
<td>The Labour Party (PvdA)</td>
<td>MP, Committee on Social Affairs and Employment</td>
</tr>
<tr>
<td>Potters, S.</td>
<td>The Netherlands</td>
<td>The People’s Party for Freedom and Democracy (VVD)</td>
<td>MP, Committee on Social Affairs and Employment</td>
</tr>
<tr>
<td>V.D Beukel, S.</td>
<td>The Netherlands</td>
<td>The Christian Democratic Appeal (CDA)</td>
<td>Close political aide to CDA spokesperson and MP on integration: Pieter Heerma</td>
</tr>
<tr>
<td>Bleeker, E.</td>
<td>The Netherlands</td>
<td>(-)</td>
<td>Ministry of Security and Justice</td>
</tr>
<tr>
<td>Logger, K.</td>
<td>The Netherlands</td>
<td>(-)</td>
<td>Ministry of Social Affairs and Employment</td>
</tr>
</tbody>
</table>

Table 2: List of Interviewed Respondents.

*Table 2.* Note: MP = Member of Parliament; (-) = no party affiliation due to position as civil servant.
3.3.2. Database Utilisation

The quantitative data collection part of this thesis comprised of material gathered from the Manifesto Project Database (MPD) (Volkens, Lehmann, Matthiefl, Merz, Regel & Werner, 2015). The studying of party manifestos to diagnose party strategies is deemed a suitable technique since manifestos serve to inform the electorate about what the party wants to achieve and are useful to investigate political party agendas-and conflicts in a comparative viewpoint (Odmalm & Super, 2014). The MPD dataset contains quantitative data on political parties’ support and prioritization of different electoral topics by coding the content of party manifestos (Meguid, 2005). Essentially, the database displays the percentage of the total party manifesto allocated to certain topics. The coding process is conducted at the hands of pre-trained individuals that follow a specifically devised coding scheme (Volkens et al. 2015). Despite documented shortcomings with reliability and misclassification linked to human interpretive coding (Mikhaylov, Laver & Benoit, 2012), the database is still widely utilised in the academic world and will hence be applied in this study (e.g. Meguid, 2005; Green-Pedersen & Krogstrup, 2008; Van Heerden et al., 2014).

Since the topic of this thesis concerns immigration, the study focused on coded manifesto components that together could be labelled as the I.I issue. In order to avoid selection bias on what constitutes the I.I. issue and thereby reduce the risk for an adverse result, this study follows the framework of Green-Pedersen & Krogstrup (2008). In their research, the authors characterise the issue as a combination of the mentioning of underprivileged groups, such as immigrants and refugees (7051), together with positive and negative mentions of multiculturalism (607, 608) and national way of life (601, 602)(2008). By drawing from this framework, this study could code indications of the different strategies that mainstream parties can pursue (section: 3.4. Operationalization). Further, since the accessed quantitative data in the MPD database was displayed in percentages, i.e. the share of manifestos dedicated to the I.I. components, and the purpose of using the information was to simply display fluctuations in party attention (read strategies) over time, the researcher opted to use Windows Excel for processing the material.

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1 Coding number of variables recorded in the Manifesto Project Database.
Finally, additional quantitative data on election results and surveys on public opinion were predominantly drawn from Norsk Samfunnsvitenskapelig Datatjeneste (NSD)’s European Election Database, the Swedish ‘Samhälle, Opinion, Media’ (SOM) - institute and secondary empirical material.

3.3.3. Qualitative content analysis
In order to ensure that a high level of in-depth empirical data is gathered, this study complements the aforementioned semi-structured interviews and quantitative material by applying the method of qualitative content analysis. It is one of the most prevalent techniques in analysing documents qualitatively (Bryman, 2012) and can be defined as “a research method for the subjective interpretation of the content of text data through the systematic classification process of coding and identifying themes or patterns” (Hsieh & Shannon, 2005:1278). Qualitative content analysis can be subdivided into three different approaches: conventional, which is inductive in character; directed, which is deductive; and summative, i.e. the use of content analysis in a quantitative fashion (Hsieh & Shannon, 2005). Since this study seeks to test three different theoretical explanations for the difference between two countries, it is deductive in character, meaning that theoretically derived variables and indicators are devised prior to coupling them with accessed documentation (Mayring, 2000). Hence, this study applies the direct content analysis approach.

There are multiple advantages to analysing documents and using content analysis. The technique is cost efficient as the data is already collected, i.e. in the documents, and only requires the researcher to evaluate the material (Bowen, 2009). Further, the method is unobtrusive in character, meaning that the researcher is not required to interfere in the research situation to obtain empirical material, which limits implications for the study’s validity and reliability (Van Thiel, 2014). Finally, another advantage is that enables the researcher to with relative ease conduct a longitudinal analysis, i.e. apply a long-term perspective (Bryman, 2012). For this study, it also means that the information gathered from the conducted interviews can be compared with the data collected from accessed documentation to see how well the sources correspond. In doing so, one bolsters the validity of the findings. Despite the advantages of using qualitative content analysis, a shortcoming of the technique is that it restricts the researcher from making additional inquiries beyond the information gathered in the accessed documentation.
This predicament, however, is believed to be ameliorated by the study combining the technique with other methods e.g. semi-structured interviews where more in-depth follow-up questions can be stated (Esaiasson et al., 2012).

The material included in this study’s content analysis has been diverse, stretching from governmental reports, parliamentary proceedings and statements by public officials and offices (government as one entity) to party publications, media sources and secondary empirical research. The last-named proved especially important for this study in highlighting valuable sources documented in Dutch. This was because of a language barrier that partly obstructed the researcher from browsing through large segments of material (e.g. parliamentary proceedings) by own accord (section: 3.7. Limitations). Finally, in order to conduct a meticulous qualitative content analysis, this study coded the accessed material by highlighting the information deemed valuable with different colours, linked comments to the segments to specify what the kind of indicator was identified, and gathered the material along with source name and page number into a separate document to create an overview. Align with deductive research (Van Thiel, 2014) the coding firmly conformed to the operationalization of the study (see tables in section 3.5).

3.4. Operationalization
This section presents the operationalization of the independent variables identified in the theoretical framework. To the extent that it has been possible, the study draws upon insights from previous research in order to strengthen internal validity (Van Thiel, 2014). In the cases where this has not been the case, the researcher has strived to devise as straightforward and transparent indicators as possible.

3.4.1. Issue competition
Issue competition is about the strategies political parties adopt in relation to various electoral issues. In order to deduce what strategies are applied by these entities, this study follows Meguid’s (2005; 2008) framework on party competition and nice parties, while adding the proactive approach. As addressed in the theoretical chapter, this framework concerns four party strategies: the proactive, accommodative; adversarial; and dismissive approach.
In addition to this, party positions on concrete policy proposals will be utilised as a complement to strictly observing manifesto values, as there is a risk of a discrepancy between the two.

Proactive approach. This strategy is distinguished when mainstream parties and their political leaders address an increasing amount of negative attention to the I.I issue, despite the absence of a serious electoral threat. Negative attention entails negative remarks on multiculturalism (607) and promotion of a national way of life (601) in party manifestos. The strategy is also identified in the event of party support for more stringent integration policies along with expressed critique on I.I by key political figures (e.g. party leaders and prominent MPs). In turn, a serious electoral threat is defined as an anti-immigration niche party either entering parliament in the subsequent election or rapidly expanding their number of seats.

Accommodative approach. This approach signifies the occurrence of mainstream parties adopting (or accommodating) features found in the political agenda of niche parties. For this study, the application of an accommodative approach is recognized when mainstream political parties adopt negative remarks on multiculturalism (607) and promotion of a national way of life (601) and/or supports the introduction of more stringent integration policies after a serious political threat has been identified.

Adversarial approach. This strategy is assumed when parties adopt the opposite position in relation to the accommodative approach in the event of an electoral threat. Consequently, this is operationalized as increased, or alternatively comparatively high levels of manifesto attention allocated to the active promotion of multiculturalism (608), opposition to a national way of life (602) and the mentioning of underprivileged groups, e.g. immigrants and refugees (705). However, it is worth noting that (705) is an umbrella category that includes a very general references to a broad number of different underprivileged groups including, besides refugees and immigrants, e.g. the handicapped and homosexuals (Volkens et al., 2015). Thus, the indicator signifies little by itself, which necessitates it to be combined with 608 and 602 in order for an adversarial approach to the identified. In terms of policy positions, an adversarial approach is indicated when a mainstream political party oppose and criticise the installation of more stringent integration policies.
**Dismissive Approach.** The adoption of a dismissive approach entails downplaying the salience of certain issues by either ignoring the matter or shifting to other topics. Thus, in order to see this in practice, one would expect to see neither increased attention to anti-immigration party features nor its positive counterpart. An alternative indication of a dismissive strategy would be a decreased level of attention addressed to the I.I. issue components, regardless of positive or negative connotation. Finally, with regard to actual policy positioning, dismissive party behaviour is detected in the case of the inaction concerning the promotion of new integration policies.

3.4.2. Path dependency
By following Kuipers (2006) and Mahoney (2000), this study assumes that the maintenance of the status quo is heavily linked with the mechanisms of institutional reproduction, i.e. the power-resource, utility- and legitimacy mechanisms. Alterations from the status quo are expected to be the result of path dependency change factors: shifts in public support, exogenous shocks and Utilisation of crisis narrative (Kuipers, 2009; 2006). Furthermore, since the process of identifying the minor and contingent antecedent causes is considered a considerably difficult and time-consuming task\(^2\), this element will be omitted from this study.

**Power-resource mechanism.** This variable refers to how key actors in an institutional setting obtain favourable resources that enhance their comparative advantage over competing entities. By drawing from Kuipers’ (2006) research, these resources are operationalized as privileged access to decision-making venues, i.e. position in government and parliament, information, professional competence, and abilities to gather organizational assets, e.g. members and financial funds.

**Utility mechanism.** As was made clear in the theoretical chapter, the utility mechanism denotes the comparative advantages, or institutional returns (Pierson, 2000), of maintaining the status quo in relation to adopting competing alternatives. Sunk costs and uncertainty concerning change are expected to be the key factors comprising the utility mechanism.

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\(^2\) The identification of minor and contingent antecedent causes would necessitate the retracing of initial events and practices that shaped the current country policies and require the hypothesizing of different potential outcomes. Consequently, this laborious work would risk exhausting the time and space allocated for testing the other theories.
Sunk costs are irretrievable economic and political costs linked to dismantling the status quo in favour of change, expenses that may be perceived as higher than the expected reaped benefits of reform (Kuipers, 2006; Mahoney, 2000). Specifically, political costs are measured in terms of potentially diminishing voter support and verbal attacks from various political figures and the media. Further, uncertainty regarding change is measured as expressed doubts by politicians and civil servants concerning the effects, applicability and costs linked to changing the status quo. In short, by drawing from this, the utility mechanism is operationalized as political costs, references to irretrievable investments concerning e.g. institutional settings, professional competence, and time as well as references to uncertainty and expenses associated with change.

**Legitimacy mechanism.** This mechanism is established when actors in an institution regard the institution and its policies as legitimate and voluntarily support their reproduction. Conversely, it also entails the opposition towards, and discrediting of, changes to the status quo. Simply put, the mechanism boils down to a perception of what is just and the right thing to do (Mahoney, 2000). Given its highly subjective nature, it is also linked with significant difficulties to measure. Because of this, a fairly straightforward operationalization is adopted and will focus on positive references to the status quo and the portraying of change in negative terms. More specifically, in this study, the legitimacy mechanism is operationalized in terms of positive references of the domestic integration policy, i.e. the status quo, as underscoring solidarity, ensuring inclusion and promoting multiculturalism. In addition, it entails the de-legitimization of any divergence from this setting by discrediting change as exclusive, unfair, increasing inequality and being counterproductive.

**Path dependency change factors.** As addressed in the theoretical chapter, this study adopts the position that path dependency can account for both inertia and change. According to this perspective, drastic change is expected to be the result of political behaviour in critical junctures that, in turn, have been brought about as a result of lengthy policy rigidity (Kuipers, 2009). Lengthy policy rigidity is indicated by perceived contradictions vis-à-vis a changed environment. This is displayed when the public and or politicians regard the institutional structures as unable to meet the changing needs and wishes of society.
To establish whether this is the case, the public opinion is measured through the use of national surveys on I.I to establish if the current system enjoys changing public support. Another promoting factor for change is the occurrence of an external shock. This is operationalized as major external events that have widespread implications for popular and governmental support, e.g. an influx of immigrants during a short period of time, a terrorist attack or a financial crisis. Finally, political dissatisfaction is equated with the use of crisis narrative, which, by drawing from Kuipers (2006), is operationalized as the use of the term crisis in relation to I.I; usage of symbolism and metaphors to underscore a perceived crisis; change of values, i.e. from previously having promoted e.g. solidarity and multiculturalism to switching to individual responsibility and assimilation.

3.4.3. Policy transfer
Policy transfer refers to the “process by which knowledge of policies, administrative arrangements, institutions and ideas in one political system (past or present)’ is used in the development of similar features in another’ (Dolowitz, 2000:3). To establish if transfers have occurred in the Dutch and Swedish cases, this study will look into the following variables: transfer character, actors involved and Utilisation of transferred policies, policy transfer change factors and constraints.

Transfer character. This variable concerns the extent to which elements of policies have been transferred. By following a number of authors, six different degrees of policy transfer has been identified (Evans and Davies, 1999; Dolowitz & Marsh, 1996; 2000). The first degree, copying, is observed if policies are found to have their origin elsewhere yet have not been subjected to any adjustments. The second, emulation, is distinguished when, rather than a direct copy of a text, similar policy characteristics/solutions are found in another place and there are explicit references to its initial source. The third degree, hybridization and synthesis is identified when policy parts are taken from several different sources and subsequently combined into a single domestic policy. In turn, the fourth, inspiration, is observed when policymakers make explicit but general references to foreign policy solutions as having provided insights for their own domestic policies (Dolowitz & Marsh, 1996).
The fifth degree, transfer failure, is identified when policymakers have tried to transfer policies, according to the aforementioned degrees, but failed due to lack of information and other various constraints (see Policy transfer constraints) (Dolowitz & Marsh, 2000). The sixth and final degree, non-transfer, is operationalized as the country policy having had domestic antecedents and/or is innovative in character, i.e. had no precedent beforehand (Evans & Davies, 1999).

Actors involved and Utilisation of transferred policies. There can be a number of different actors involved in the process of transferring policies. Literature distinguishes between elected officials, political parties, civil servants/bureaucrats, policy entrepreneurs/experts, pressure/lobby groups and supranational institutions (Dolowitz & Marsh, 1996). In order to identify what specific actors are involved, a systematic approach of distinguishing the roles and positions, i.e. if they advocate or hinder transfer, is undertaken. Furthermore, to convincingly show that transferred knowledge from external actors was actually used by domestic policymakers, this study will follow Smith (2004) in measuring this in terms of explicit statements made by civil servants along with politicians on how exogenous country/organizational policy helped inform, highlighted and/or facilitated domestic policy change. This is done in order to ensure that policy transfer actually took place rather than just two countries coming to analogous policy outcomes irrespective of a possible transfer.

Motives for policy transfer. To account for why change occurs with regards to policy transfer, it is important to focus on what the motives behind these were. As addressed in the theoretical framework, Dolowitz and Marsh (1996) distinguishes between three types of reasons why policy transfer takes place: through voluntary means, by coercion and indirect coercion respectively. A voluntary transfer is identified when policymakers adopt externally gathered policies without any ‘strings attached’, i.e. without any elements of coercive measures such as economic, political and international obligations and demands connected to external actors. Further, this is displayed when policy actors acknowledge that a more suitable solution for a similar problem is found elsewhere and or where there is a public or governmental perception that the current system is unsustainable. A governmental perception of policy failure is identified when politicians express dissatisfaction with the status quo in political debates and in the media.
In turn, the public perception is measured through the use of national surveys on I.I to determine if the current system enjoys changing public support.

In turn, a coercive transfer is identified when one government is forced by another to adopt constitutional, social and political changes opposite to the will of its population. At the same time, while membership in the supranational institutions of the EU and UN can be linked with coercive demands but these are significantly more likely to be of indirect coercive or voluntary nature (Evans, 2009). Thus, while coercive policy transfer is not expected to occur in the case of Sweden and the Netherlands, it is nonetheless identified when threats of economic, political or social repercussions are linked to non-transfer from external actors.

Finally, an indirect coercive transfer is highlighted when demands of policy reform are made in return for promises of inward investments (Dolowitz & Marsh, 1996; Benson & Jordan, 2011). While a coercive element still exists, it is still the decision of the recipient state to accept or not. Thus, signs of an indirect coercive transfer are identified when recipient states need to undertake policy changes in return for external help, e.g. economic, political or social assistance. Subsumed under this category are also international obligations to various conventions and treaties that oblige states to take necessary changes. The reason behind this is that while international commitments may include coercive components, it is unlikely that possible demands run completely counter to the will of the country’s population.

**Constraints to policy transfer.** The policy transfer process is often affected by various constraints that limit the extent to which a transfer is possible. By following Benson & Jordan (2011), four kinds of constraints are recognized: the demand-side; programmatic; context; and application costs. First, the demand-side constraint signifies the unwillingness of policymakers to diverge from the status quo in the absence of an external shock (see section 3.4.2 on path dependency change factors). This constraint is operationalized as expressed reluctance by political figures to change the current policies. Second, the programmatic constraint signifies situations whereby external policy arrangements are deemed too complex or country specific by policymakers to be successfully transferred and implemented domestically.
In order to detect the occurrence of this constraint, this study will rely on expressed doubts and uncertainty from civil servants and politicians regarding policy solutions found abroad and their applicability in a domestic setting. Third, context constraints refer to impediments linked with path dependency and policy layering. Here, references in statements, publications and media by policymakers or experts on how previously established laws and institutional settings obstruct the transfer of policy from external sources. Fourth, and finally, application costs are attributed to transaction costs of possible institutional reform and whether or not policy adjustments are required for perceived successful implementation. Constraints of this character are operationalized as statements by policymakers and civil servants on high significant costs related to adopting the external policies, both in economic, instructional and political regards. Importantly, it is worth noting that parts of these constraints overlap with the study’s use of path dependency. Consequently, evidence supporting the existence of these will hence provide potential explanatory value for both applied theories. To sum up, the tables 3-5 present a concise representation of the operationalization of this section.

3.5. Overview of operationalized variables
The tables below summarize the operationalization of the applied theories and distinguish between key variables and further divide them into workable indicators. These schematic overviews will subsequently be utilised in the analytical stage of the thesis.
<table>
<thead>
<tr>
<th>Theory</th>
<th>Ind. Variables</th>
<th>Subdivision (if applicable)</th>
<th>Indicators</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Issue competition</strong></td>
<td>Proactive approach</td>
<td></td>
<td>▪ Negative focus on multiculturalism (607) and promotion of a national way of life (601)</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>▪ Negative political statements on I.I by prominent party figures</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>▪ Promotion of more stringent integration measures</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>▪ All occur in the absence of a serious electoral threat from a niche party (i.e. entering parliament in the next election or rapidly expanding their seats)</td>
</tr>
<tr>
<td></td>
<td>Accommodative approach</td>
<td></td>
<td>▪ Negative focus on multiculturalism (607) and promotion of a national way of life (601)</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>▪ Promotion/support of more stringent integration measures</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>▪ After a serious electoral threat is identified</td>
</tr>
<tr>
<td></td>
<td>Adversarial approach</td>
<td></td>
<td>▪ Positive focus on multiculturalism (608)</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>▪ Opposition to a national way of life (602) and emphasis on underprivileged groups (705)</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>▪ Opposition to more stringent integration measures</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>▪ After a serious electoral threat is identified</td>
</tr>
<tr>
<td></td>
<td>Dismissive approach</td>
<td></td>
<td>▪ No increase in or the diminishing of the aforementioned points</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>▪ No push for new integration measures to be put in place</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>▪ Both prior and after a serious electoral threat is identified</td>
</tr>
</tbody>
</table>

Table 3: *Operationalization Table - Issue Competition*
<table>
<thead>
<tr>
<th>Theory</th>
<th>Ind. Variables</th>
<th>Subdivision (if applicable)</th>
<th>Indicators</th>
</tr>
</thead>
<tbody>
<tr>
<td>Path dependency</td>
<td>Power resource mechanism</td>
<td></td>
<td>Access to decision-making venues e.g. government and parliament</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Information</td>
</tr>
<tr>
<td></td>
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<td>Professional competence</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Organizational assets</td>
</tr>
<tr>
<td></td>
<td>Utility mechanism</td>
<td>Sunk costs</td>
<td>References to significant investments, e.g. staff, institutional setting</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Uncertainty associated with change</td>
<td>and political costs</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>References to unclear effects, applicability and costs associated with</td>
</tr>
<tr>
<td></td>
<td>Legitimacy mechanism</td>
<td>Positive references on integration in terms of solidarity,</td>
<td>change</td>
</tr>
<tr>
<td></td>
<td></td>
<td>equality, inclusion and multiculturalism</td>
<td>De-legitimization of change by describing it in terms of exclusive,</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>inequality, unfair, counterproductive</td>
</tr>
<tr>
<td></td>
<td>Path dependency change factors</td>
<td>Public support</td>
<td>National opinion polls</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Exogenous shocks</td>
<td>E.g. financial crisis, terrorist attacks, influx of migrants under a</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Crisis narrative</td>
<td>short period of time</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Political usage of the word crisis; symbolism and metaphors for perceived</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>crisis; change in values</td>
</tr>
</tbody>
</table>

*Table 4: Operationalization Table - Path Dependency*
<table>
<thead>
<tr>
<th>Theory</th>
<th>Ind. Variables</th>
<th>Subdivision (if applicable)</th>
<th>Indicators</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Policy transfer</strong></td>
<td>Transfer character</td>
<td>• Copying</td>
<td>• Direct copy of text</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Emulation</td>
<td>• Similar features and explicit references to another policy source</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Hybridization and synthesis</td>
<td>• Combination of various external policies</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Inspiration</td>
<td>• Explicit references to external inspirational sources</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Transfer failure</td>
<td>• Attempt for policy transfer that was obstructed by lack of information and other transfer constraints (see below)</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Non-transfer</td>
<td>• Domestic antecedents and/or innovative in nature, i.e. no precedent such policies existed beforehand</td>
</tr>
<tr>
<td></td>
<td><strong>Actors involved &amp; Utilisation of transferred policies</strong></td>
<td></td>
<td>▪ Explicit statements that distinguish the actors involved and support the usage of transferred policies</td>
</tr>
<tr>
<td></td>
<td><strong>Motives for policy transfer</strong></td>
<td>▪ Voluntary transfer</td>
<td>▪ Expressed preferences about another system without 'strings attached', negative political remarks on the status quo, low public support</td>
</tr>
<tr>
<td></td>
<td></td>
<td>▪ Coercive transfer</td>
<td>▪ Explicit and inexplicit external threats of economic, political and social consequences in the absence of change.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>▪ Indirect-coercive</td>
<td>▪ Explicit statements on change in return for e.g. economic, political and social assistance; binding international conventions and treaties</td>
</tr>
<tr>
<td><strong>Policy transfer constraints</strong></td>
<td>▪ Demand side</td>
<td>▪ Express political unwillingness to change the status quo</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>▪ Programmatic Context</td>
<td>▪ Doubts and uncertainty on foreign policy solutions</td>
</tr>
<tr>
<td></td>
<td></td>
<td>▪ Application costs</td>
<td>▪ References to previous laws/policies as hindering change</td>
</tr>
<tr>
<td></td>
<td><strong>Constraints</strong></td>
<td>▪ Statements on high bureaucratic-, political- and economic costs associated with change</td>
<td>▪ Expresses unwillingness to change the status quo and associated costs.</td>
</tr>
</tbody>
</table>

Table 5: Operationalization Table: Policy Transfer
3.6. Validity and reliability
The importance of validity and reliability are at the epicentre of conducting sound scientific research (Van Thiel, 2014). Validity is often distinguished between internal and external validity, where the former concerns whether or not the study measures what it is supposed to measure and the latter regard generalizability (Van Thiel, 2014). In turn, reliability denotes to what extent the study the can be replicated with the same results (Yin, 2014). Case study research is often vulnerable to deficiencies in validity and reliability, given the limited number of studied units (Van Thiel, 2014). This can be ameliorated by using the method of triangulation, i.e. the “convergence of data collected from different sources, to determine the consistency of a finding” (Yin, 2013:241). In other words, one uses two or more sources and/or methods, potentially both by quantitative and qualitative approaches, to strengthen the results of a study. This study applies this method by combining quantitative database material with qualitative data from e.g. interviews and documents. With regards to issue competition, this combination of sources is used since there can be a potential discrepancy in party behaviour between what is stated in manifestos and what is actually being in practice. Further, to the extent its been made possible, the study draws upon the operationalization and concepts of previous academic work. In addition, all theoretical constructs and indicators were defined as clear as possible to demonstrate what would be measured in the empirical material. In combination, this has served to manifest the relationship between the independent and dependent variables and ensure an adequate operationalization, which together bolsters internal validity (Van Thiel, 2014).

In turn, the generalizability, or external validity, of this study has clear limitations. Indeed, it is the very nature of case study research to only encompass a small number of units, which inhibit the results’ applicability to a larger set of cases (Gerring, 2006). However, case studies can be generalizable to making theoretical propositions, i.e. providing analytical generalization (Yin, 2014). Consequently, if the results of the study correspond with other research that have examined different countries which share similar characteristics e.g. multiparty systems and institutional arrangements, some room for theoretical generalisation could be possible. In addition, case-specific results can also hold important empirical value and contribute to collectively accumulated knowledge (Flyvbjerg, 2006).
Finally, the reliability, to which the absence of random errors is subsumed (Esaiasson et al., 2012) is strengthened by a threefold action. First, the study is devised in a systemic and transparent fashion whereby all utilised material is documented, e.g. by the transcription of conducted interviews. In addition, the operationalization was intentionally designed to be as clear and intuitive as possible to facilitate any future replication. Second, the potential risk of random errors has been counteracted by being as meticulous as possible and by re-examining the gathered material so as to avoid misinterpretations. Third, by using the method of triangulation as mentioned above. Taken together, and to conclude this part, all these actions serve to augment the validity and reliability of the study.

3.7. Limitations
Alike most research projects, the thesis is constrained by a number limitations and to highlight them here is the aim of this section. First, the researcher experienced recurrent complications with the analysing of empirical material in Dutch, e.g. long documents of parliamentary proceedings and governmental reports, due to limited knowledge in that language. To circumvent this problem, the researcher had to partly rely on secondary empirical sources in English to help pinpoint valuable sources of Dutch empirical evidence. Specifically, the process of circumventing the language barrier was the following: 1) looking up the referenced material by these scholars; 2) accessing and translating the material by use of online translating tools and; 3) confirming that the material was correctly translated by reviewing it with native Dutch speakers. Naturally, this had implications for the researchers’ ability to analyse material in Dutch that was not already highlighted as important by previous studies. Consequently, by limiting the quantity of material that could be analysed, the language barrier impaired the strength of this study.

Second, the conducted interviews had twofold limitations. One is the restricted access to civil servants and politicians at the national level circumscribed the number of individuals that could be interviewed in this study. The other is the fact that some of the policies studied were installed more than fifteen years ago (e.g. the Dutch Nationality Act, 2000) meant that not only could this time discrepancy have implications for the respondents’ memory of cases concerned, but they may not have been involved in their actual making.
While this complication was partly amended by the researcher forwarding the interview questions in advance, hence giving the respondents time to refresh their memories and/or prepare by studying relevant material, it nonetheless proved a limitation for the quality of the interviews.

The third, and final, limitation of this study is its narrow inclusion of cases. For one, it only includes two countries, which inhibits the generalizability of the results. The inclusion of more countries that display similar outcomes, even though Sweden is an outlier from a European perspective (Borevi, 2015; 2014), could strengthen the validity of the study in this regard. Moreover, the use of policy transfer theory necessitates the in-depth focus on a specific set of sub-policies, as opposed to an overarching perspective, and hence the inclusion of several policies over a number of years, that is needed to demonstrate the outcome on issue competition and path dependency. Consequently, the testing of policy transfer is intrinsically linked to having a limited and very specific set of units to enable a thorough analysis. Nonetheless, the inclusion of a larger set of sub-policies could have enhanced the generalizability of the study’s results.

3.8. Summary of the chapter
This thesis employs a mixed methods design to collect and analyse data. Specifically, it combines quantitative features, predominantly in the form of manifesto data, with material collected and processed by use of semi-structured interviews and qualitative content analysis. In doing so, it applies the technique of triangulation, i.e. the assembling of data from different sources, to strengthen the study (Yin, 2013). The unit of analysis is four Dutch and Swedish sub-policies on citizenship and F.R, i.e. citizenship tests (for each respective country), the Dutch CIA and the Swedish M.R, and the time period concerned is 1989-2015. The accessed material was coded and processed according to the operationalization in section 3.5, which was summarized in tables 3-5. In turn, section 3.6 addresses the validity and reliability of the study. Finally, the chapter’s concluding section highlights the limitations of the study and briefly reflects on its implications for the results.
4. Results - What are these policies?
The content of this chapter is dedicated to familiarizing the reader with the sub-policies on citizenship and F.R that this thesis focuses upon, i.e. the Dutch citizenship tests and CIA and the Swedish M.R and funnelled attempts to install a citizenship test. Despite never materialising into actual policy, the last named are included to provide the reader with a general overview of the different attempts made thus far.

Citizenship policy in the Netherlands is regulated in the Dutch Nationality Act (Rijkswet op het Nederlandschap), which stipulates the requirements for the naturalisation process. The link between integration and naturalisation has always been a present characteristic in this legislation but has changed over time (Van Oers, de Hart & Groenendijk, 2013). Between 1985 and 2003, prior to the enforcement of the Nationality Act (2000), the integration test on naturalisation typically consisted of passing a brief, free of charge, interview with a municipal civil servant in order to demonstrate sufficient skills in Dutch. The applicant was neither required to have knowledge of the Dutch state and society nor demonstrate written language skills (Van Oers 2013). During the making of the revised Nationality Act (1985), Dutch policymakers considered attaining citizenship as an essential tool for achieving successful integration and, consequently, derived the legislation so as to facilitate access to it (Van Oers et al., 2013). However, due to considerable vagueness in policy guidelines, there were sometimes significant discrepancies in how the integration requirement was controlled for by civil servants. One study reported that in more than 10% of the naturalisation cases, the applicant was required to also display written language despite that such a requirement was explicitly exempted in the actual policy (Heijs, 1998; After Van Oers, 2013).

In 2003, the Netherlands supplanted the lenient integration test with a formalized citizenship exam. This exam was termed the N.T and came to be as a result of Dutch policymakers revising the Nationality Act (2000). The conditions of the test were specified in a Royal Decree, which stipulated that applicants for citizenship had to demonstrate knowledge of the Dutch state and society, i.e. norms and values, and be able to understand, speak, write and read Dutch (Staatsblaad, 2002:197).
Moreover, the cost for the exam (260 €) was to be paid by the individual applicant. In addition, all test material was undisclosed, which meant that the government provided zero possibilities for preparation (Van Oers 2013). Hence, both in terms of content and economic costs, the N.T was significantly stricter than its predecessor. However, only four years later, the N.T was replaced by the Civic Integration examination (henceforth Integration exam) (2007), originally designed for the Civic Integration Act (Wet Inburgering, 2007), which obliges immigrants to pass an examination in exchange for continued or permanent residence permit (IND, n.d).

In comparison with the N.T, the Integration exam has the same difficulty level in Dutch language skills yet is slightly easier due to preparation material being made available. Also, since 2015, in addition to having to demonstrate the skills demanded in the N.T, immigrants now have to pass another ‘part’ test concerning orientation on the Dutch labour market. In order to pass the exam, immigrants are encouraged to follow an integration course at their own expense (Government.nl, n.d), the total costs of which, including taking the exam, has been estimated at 5300€ (Witteman, 2010). While, the financial costs for the immigrants were reduced during the years 2007-2013 as the Dutch government instituted the ‘Delta plan’ which served to help municipalities to pay for the integration courses, this was revoked completely in 2013 and the immigrants now once again have to pay for themselves (Van Oers, 2013).

Taken together, it is clear that the Dutch process for naturalisation has changed dramatically over the past decades and is today significantly stricter than before.


In Sweden, the policies on citizenship are stipulated in the country’s Citizenship Act (Lag om svenskt medborgarskap, SFS 2001:82). Unlike the Netherlands, Sweden neither has nor has ever had a formalized integration test linked to the naturalisation process. Although, up until the middle of the 1980s, Swedish authorities thought it appropriate that the application for citizenship should include a certificate of demonstrated Swedish skills, which was to be issued by a ‘teacher, priest or other competent person’ (SOU 2013:29).
However, the regulation was applied inconsistently and arbitrary, which led to its dismantlement in 1984 (SOU 1999:34). Since then, the establishment of a citizenship test for naturalisation has been promoted on several occasions, most notably between 2002-2006 by FP, but so far without results (Wiesbrock, 2013).

The FP proposal concerned the installation of a formalized language test, yet was never formulated into concrete policy text, nor was it comprehensively evaluated by public authorities (Largerström, personal communication (PC), 2015). Consequently, no specifications on what level of Swedish should be tested nor how the examination should be conducted is to be found. A more recent policy proposal floated in a governmental report concerned introduction of a so-called language bonus. Essentially, the idea was that immigrants that acquired a certain level of Swedish would be able to attain citizenship a year earlier than the originally required waiting time. However, despite this ‘light’ version of a language requirement, it failed to gain traction with either the government or the majority of the consultative bodies (SOU 2013:29; Mårtensson, P.C, 2015). Consequently, to date, Sweden does not have any integration test or language bonus linked to the naturalisation process.

4.3. Family Reunification – The Netherlands – Civic Integration Abroad
In the Netherlands, the policy on F.R is primarily regulated in the Dutch Alien’s Act (Vreemdelingenwet, 2000), which, in turn, is affected by the European Directives on the right to family reunification (2003/86/EC, hereinafter F.R directive) and the status of third-country nationals who are long-term residents (2993/109/EC, henceforth long-term residents directive). The Act on Civic Integration Abroad (Wet Inburgering Buitenland) from 2006 is an amendment to the Alien’s Act (2000) and has supplementary guidelines specified in the Aliens’ Decree (Vreemdelingenbesluit, 2000), Alien’s Circular (Vreemdelingencirculaire, 2000) and the Aliens’ Regulations (Voorschrift Vreemdelingen, 2000)(de Vries, 2013). The CIA obliges adult FR applicants, between the ages 18-66, to pass an integration exam as a precondition for attaining a provisional residence permit prior to entering the country (IND, n.d).

Citizens from the EU, European Economic Area (EEA, previously EES), as well as various economically developed nations such as Japan, South Korea and the USA, do not need a provisional residence permit and are thus exempted from taking the exam (IND, n.d).
Since 2011, the exam consists of three parts: reading, speaking and knowledge about Dutch society, costs 350€, and is to be taken at the Dutch embassy, consulate or agency in the applicant’s country of origin or place of prolonged stay (NaarNederland, n.d). That year, the reading test was added and the difficulty level was raised from A1- to A1 according to the Common European Framework of Reference (CEFR). Consequently, this meant that not only did the migrant have to have sufficient vocal Dutch skills and knowledge about Dutch society and values, but are now also required to be able to understand and read Latin script (de Vries, 2013).

Furthermore, the Dutch state carries but a minor role in assisting applying migrants with material and educational courses. Instead, the immigrants are primarily considered to responsible for their own integration and the provision of means for preparation is largely left to market forces (de Vries, 2013). Nonetheless, the Dutch government have set up a preparation package, available for 99.50€, consisting of a DVD, photo- and audio workbook, vocabulary lists and various other materials to give the migrant a reasonable chance to prepare before the examination (Naarnederland, n.d). The effect of the CIA (2006) on immigration has been noteworthy. In the year of its inception in 2006, the immigration numbers dropped to 14,230 compared to the preceding year of 20,221. In turn, 2010 and 2011 saw the numbers 18.621 and 15.540 respectively (de Vries, 2013). Consequently, while immigration flows fluctuate from year to year, it appears evident that the CIA (2006) has had considerable influence on the number of migrants who apply for FR to the Netherlands.

4.4. Family Reunification – Sweden – The Maintenance Requirement
The Swedish policies on F.R, including the M.R, are regulated in the country’s Alien’s Act (SFS 2005:716), which, similar to their Dutch equivalent are also affected by the EU directives on FR and long term residents. In 2010, Sweden was the last country to introduce a MR among the EU Member states (Regeringen, 2010). Whilst Sweden did have a MR up until 1979, designed for the admittance of non-nuclear family members in the context of labour immigration, the policy was abolished. The reason for which was that the MR was considered meaningless, impossible to control and countervailing the Swedish principle of a universal welfare state and the state’s policy goal of equal treatment irrespective of origin (SOU 1995:75, p. 94).
Nonetheless, the renewed MR from 2010 consists of an income- and housing requirement that obliges the receiving party, or sponsor; to have a stable work related income and adequate housing accommodation for the entire family (Migrationsverket, n.d.b). Sufficient income means that the sponsor has a regular income through e.g. work, unemployment benefits or retirement pension to support oneself and does not include a financial responsibility to support accompanying family members. Even though a certain income level is not specified in the legislation, the preparatory work noted that the minimum disposable income must at least correspond with the reservation amount for an individual that lives alone, which according to the 2015 level equates to a monthly income of SEK 4675 (495,35€). Moreover, the sponsor is also required to maintain a sufficient income to provide for housing expenses, approximating to a month cost of SEK (476,85€)(SOU 2008:114, p.94; KFMFS 2014:1). In turn, the requirement on housing accommodation differs depending on the number of individuals involved (Migrationsverket, n.d.b).

In the eyes of the government, the MR would serve as an instrument to promote integration, especially on the labour market, and better harmonize regulations with other European member states (Government bill 2009/10:77). Despite the expressed desire for harmonization, the Swedish MR differs sharply from other EU Member states in three important aspects. First, not only is the income requirement set a lower level than the EU average but second, the MR is also designed in a different fashion. Despite the EU F.R Directive (Council Directive 2003/86/EC) permitting member states to demand the sponsors have a sufficient income to cover their own living expenditures and that of the joining family members (§7:1C), the Swedish requirement is restricted to solely targeting the sponsor (Borevi, 2015). Third, and finally, the MR is linked to a number of exceptions that seriously limits its application and reach. Significant groups e.g. refugees and asylum seekers, individuals with a permanent residence permit for at least 4 years, minors and families with children are exempted from the requirement (Migrationsverket, n.d.b). In practice, this means that less than 1% of the sponsors are affected by the legislation and needs to fulfil the MR as a condition for F.R (Strandberg, P.C, 2015). In short, despite Sweden having introduced a MR in 2010, it is decisively different from the policies of other European states.
4.5. Summary of the chapter
In this chapter, the objective has been to familiarize the reader with the four policies concerned in this thesis: the Dutch and Swedish (non-implemented for the latter) policies on citizenship tests, the Dutch CIA (2006) and Swedish MR (2010). The table below provides an overview of the key features of each respective policy.

<table>
<thead>
<tr>
<th>DUTCH POLICY ON CITIZENSHIP TESTS</th>
<th>SWEDISH POLICY ON CITIZENSHIP TESTS</th>
</tr>
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<tbody>
<tr>
<td>▪ Lenient integration test (short interview) replaced by the formalised Naturalisation test (N.T) in 2003, which in turn was supplanted by the Integration exam (I.E) in 2007</td>
<td>▪ No implemented policy in place despite various initiatives to do so, most notably by the FP between 2002-2006.</td>
</tr>
<tr>
<td>▪ The N.T obliged the applicant to pass an exam consisting of speaking, understanding, writing and reading Dutch at A2 level and have knowledge of the Dutch society and domestic norms and values. The supplanting IE has the same difficulty level [A2] but includes a test on labour market orientation</td>
<td></td>
</tr>
<tr>
<td>▪ Financial responsibility lies with the applicant: Costs: integration test (free of charge); N.T (260€); and I.E (estimated at 5300€ for test + integration courses, 350€ for the test only)</td>
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<tbody>
<tr>
<td>▪ Obliges joining family members to pass a three-part integration exam, consisting of reading, speaking and knowledge of the Netherlands, in exchange for a provisional residence permit</td>
<td>▪ Obliges the receiving party to maintain a stable income (for personal expenses only) and adequate housing to support joining family members</td>
</tr>
<tr>
<td>▪ Must be taken in the country of origin or prolonged stay prior to entering the Netherlands</td>
<td>▪ Income requirement set lower than the average level of other EU states</td>
</tr>
<tr>
<td>▪ Financial responsibility lies with the applicant and costs 350€.</td>
<td>▪ A series of exceptions restricts the number of F.R cases affected by the requirement to less than 1%.</td>
</tr>
</tbody>
</table>

Table 6: Policy Overview On Citizenship Tests, Civic Integration Abroad And The Maintenance Requirement

Table 6. Sources: Migrationsverket (n.d.a;b), IND (n.d); Naarnederland (n.d); Ministerie van onderwijs, cultuur en wetenschap (n.d); Borevi (2015); Van Oers (2013); Wiesbrock (2013).
5. Analysis & Results
This chapter is dedicated to the analysis of the collected data as well as presenting the results of the study. The chapter follows the same structure as detailed in the operationalization, in other words, the empirical evidence and analysis is divided under the three applied theories and their respective independent variables. Section 5.1 and its subheadings are addressed to issue competition; 5.2 to path dependency; and 5.3 to policy transfer. Finally, section 5.4 concludes the chapter and provides a brief summary.

5.1. Results - Issue competition
The aim of this subsection is to test the constructed hypothesis grounded in the issue competition framework, namely:

Hypothesis 1: The difference between Sweden and the Netherlands is the result of divergent mainstream party strategies, more specifically, where Dutch parties have opted for proactive/accommodation- and Swedish mainstream parties for a dismissive and/or adversarial approach.

The section is divided into separate parts that address each potential strategy, i.e. proactive-, accommodative-, adversarial- and dismissive approach, in a consecutive order following the general overview provided below.

A central notion in issue competition is the level of salience given to a certain topic. A high level of salience is predicted to generate political action whereas a low level will promote and or reinforce the status quo. The level of salience (or attention) addressed to certain topics indicates what strategies various parties apply. In regards to the I.I issue, Sweden and the Netherlands display significant disparities in how much attention is addressed to the topic. The figure below displays the average party percentage allocated to the I.I. issue in manifestos between 1989-2012. The values represent the average party attention devoted to the I.I. question as a whole, i.e. a positive perception of minority groupings; positive/negative perspective on multiculturalism and national way of life. As a result, the figure only displays the comparative levels of salience given to the topic and does not indicate the strategies adopted by individual parties. Moreover, as the values are predominantly low, stretching between 0.161-10,771 %, it is important to remain cautious before drawing any major conclusions.
Table 7. Comment: the average attention on the I.I. issue was calculated by combining the party values on positive perception of minority groupings (705); positive/negative perspective on multiculturalism (607/608) and national way of life (601/602); divided by the number of parties in parliament and those joining the same year. The (-) symbol signifies the absence of a national election that year. I.I = Immigration/Integration. Source: Volkens et al., (2015).

As made visible in table 7, the Dutch and Swedish political parties have dedicated significantly different levels of attention to the I.I. issue. During the years 1994 and 2003, the topic was almost completely absent on the Swedish parties’ agendas whereas it in the Netherlands has close to received continuous attention. For Sweden, 1991, 2006 and 2010 stand out. An explanation behind which could be that the electoral success of anti-immigration parties. In 1991, the party New Democracy (Ny Demokrati, NyD) entered the Swedish parliament with 6.7% of the vote but lost their seats completely in the subsequent election. In 2006, the Sweden Democrats doubled their electoral support from 1.4 to 2.9% compared to the election in 2002 and eventually entered the Swedish parliament with 5.7% in 2010 (NSD, n.d). In comparison with Sweden, Dutch figures remain high but experiences occasional surges, especially the election year of 2006 stands out with more than a doubling of attention given to the I.I. issue compared to the previous election.
During the same year, the anti-immigration Party for Freedom (Partij voor de Vrijheid, PVV) entered the Dutch parliament with 5.89% of the vote (NSD, n.d).

Hence, in both the Swedish and Dutch case, the entrances of anti-immigration parties into parliament have had clear implications for the salience level of the I.I. issue. Overall, however, Swedish parties have diverted significantly less attention to the issue compared to their Dutch counterparts. In fact, the low scores, especially during the period of 1994-2006, provide a strong indication supporting the notion that most Swedish parties utilised the dismissive approach and either ignored or downplayed the salience of the I.I. issue. What is more, this was during the same time, in 2002-2006 that FP tried – and failed – to gain support for a language requirement to be linked with the naturalisation process (Borevi, 2014). However, while these results give a first indication that the salience level of I.I. issue was significantly higher in the Netherlands than in Sweden, they do not provide in-depth evidence of the choices (read strategies) that individual parties made and how they positioned themselves on each of the components of the I.I. issue. In order to deal with this, a close up on individual parties’ is required, the selection of which was explained in the Methodology chapter. Thus, figure 4 and 5 below display the attention level of four Swedish and four Dutch mainstream stream parties, including the two to three key parties in each country, (i.e. S and M in Sweden and PvdA, VVD and CDA in the Netherlands) addressed to the individual components of the I.I. issue between 1989-2012. The election years are displayed along the X-axle and level of party attention in percentages at the Y-axle. In turn, the five subcomponents are highlighted in different colours.
Figure 4: Overview Of The Swedish Mainstream Parties’ Level of Attention Devoted To The I.I Issue Between 1991-2010

Figure 5: Overview Of The Dutch Mainstream Parties’ Level of Attention Devoted To The I.I Issue Between 1989-2012

Figures 4; 5. Comment: the tables display the percentage share of mainstream party attention allocated to the five components of the I.I issue. (P) = positive; (N) = negative position; I.I = Immigration/Integration. Source: Volkens et al., (2015).
Figure 4 and 5 highlight the discrepancy between Swedish and Dutch mainstream parties in how they have addressed the various components of the I.I. issue. These results will now be combined with the gathered data from interviews, reports and additional academic works in separate sub-sections in accordance with the party strategies and analysed in turn.

5.2.1. Proactive approach

The proactive approach is indicated when: a mainstream party demonstrates increasing negative focus on multiculturalism (607) and promotion of a national way of life (601); prominent party figures make negative political remarks on I.I and the party advocate for stricter integration policy; and occurs in the absence of a serious electoral threat.

Starting with Sweden, the values of the mainstream parties’ attention to the I.I. issue’s components indicate that the topic as a whole has not been considered salient. The parties’ attention has predominantly been focused on favourable mentions of underprivileged groups and a national way of life. Importantly, the cultural aspect, i.e. positive and negative perspective on multiculturalism is almost completely absent (Figure 4). While the attention level fluctuate between the political parties and across time, the two largest parties, the S and M display relatively similar attention level, which conforms with interviews highlighting their similar position on the I.I. topic (Ohlsson (S); Höj-Larsen (V), P.C, 2015). In 1991 and 2006 respectively, both parties diverted attention towards a more negative and more nationalistic approach (Table 4). As was mentioned earlier, this was during the same time that the anti-immigration parties NyD and SD enjoyed increasing electoral support and entered or nearly entered the Swedish parliament. Hence, the move by M and S could be regarded as a minor action to highlight the topic before the election and accommodate the voters who shifted allegiance. Thus, this can be regarded as a defensive reaction rather than a strategically proactive move to gain far-right wing votes. An offshoot from this occurred 4 years later when the M pushed for an introduction of a M.R in 1995, which they argued could legitimize a more liberal immigration policy (SOU 1995:75, p. 265). Since NyD lost its seats in the subsequent election in 1994 (NSD, n.d), this occurred in the absence of an anti-immigration party in parliament and is hence indicative of a proactive approach assumed by the party.
However, considering that the proposal was coupled with legitimizing more lenient immigration rules, it could only be regarded as a limited adoption of a proactive approach. Nevertheless, the proposal was rebuffed by the other parties under the rationale that it would run counter to the Swedish principle of a universal welfare state (Borevi, 2015). Consequently, the party was not able to realize its aim for a MR until 2010 after coming to joint coalition power in 2006 (Borevi, 2015).

Furthermore, another interesting result is the manifesto position of FP in 2002, the same year as the party started to push for the language requirement to be linked with the naturalization process (Green-Pedersen & Krogstrup, 2008). The party’s devoted attention to the I.I. issue that year is marginal, 1.865%, out of which 1.632% is addressed to the favourable mentioning of underprivileged groups. Hence, FP’s outspokenness of additional demands of acquiring citizenship does not correspond with the low level of salience given to the I.I. issue in the party’s manifestos. Two possible explanations behind this predicament could be that there was either more talk than action from the party’s side dedicated to the I.I issue, or that this initiative was not encompassed by the coding scheme categories of the Manifesto Database Project. Whichever the case, based on its manifesto results, FP does not appear to have assumed a strong position – either a positive or negative – on the I.I. issue. Despite this, FP launched the initiative for a language requirement to be introduced in a time when the party suffered from both intraparty conflict and low electoral support (Dahlstedt, 2010). As a result, the party cashed in at the subsequent election and almost tripled its electoral support in comparison with the previous one (NSD, n.d).

Moreover, during the run-up to the election and to fortify its position, FP commissioned a statistical survey from SIFO that showed that 71% of the respondents supported the implementation of a language requirement (Dahlstedt, 2010). Taken together, this does indeed indicate that the party adopted a proactive approach, as it was a shift towards a more demanding citizenship policy in the absence an electoral threat from a far-right wing party. However, it is worth highlighting that the proposal was made in the context of a proposition for increasing, rather than restricting, immigration to Sweden (Green-Pedersen & Krogstrup, 2008). Thus, the move by FP does not necessarily imply a significant shift to gain voter support from the far right. Crucially, it failed to find broader support among the wide majority of the other parties in parliament.
The exception from this was the lacklustre support from the M. In fact, as a reaction to FP’s initiative, the party had scrambled to introduce an even stricter proposal, which included knowledge of society in addition to a language requirement for citizenship. However, they never communicated it sufficiently to either other parties or, more importantly, to the electorate and hence failed to gain the same attention as the FP proposal (Dahlström & Esaiasson, 2011). Thus, while the initiative by M can also be characterised as a proactive move, its lacklustre effort can hardly be seen as an all out proactive approach to politicizing the matter.

In the Dutch case, the VVD was the first out as a major mainstream party to adopt a more negative perspective on the I.I. issue. As displayed in figure 5, the party demonstrates an interesting early development between 1989 and 1994. In the former, hardly any attention is granted to the I.I. question with the exception of the favourable mention of underprivileged (which by itself renders inconclusive results). In the latter, both a negative perspective on multiculturalism and a positive view on a nationalistic way of life start to gain party attention. This is consistent with the party’s leader, Frits Bolkestein, who at the time increasingly argued for an alleged incompatibility between Islam and Dutch and Western values (Entzinger, 2006; Vellenga, 2008). In a speech at the Liberal international congress in 1991, he argued that the official Dutch policy of ‘integration with preservation of identity’, i.e. that promoted the cultural identity of minority groupings, should be replaced by integration based on western values for which there could be no compromise (Bolkestein, 1991). The fact that this came from a major respectable party triggered a fierce political debate and laid the groundwork for an eventual normalization of such opinions that previously was considered both taboo and racist (V.D Beukel, P.C, 2015). While fiercely opposed by supporters of multiculturalism, the actions by Bolkestein resulted in substantial electoral gains for the party. The Dutch voters appeared to have “silent majority” that opposed multiculturalism and only then started to give voice to its opinion (Entzinger, 2003). The party leadership had recognized the popular dissatisfaction towards immigration along with European integration and deliberately chose to politicize the issue (Van Kersbergen & Krouwel, 2008).
Moreover, as the only far-right party in parliament at the time, the Centre Democrats (CD), which received a mere 2.4% in the 1994 election and faced a cordon sanitaire (Van der Brug et al., 2014), the actions by the VVD are indicative of adopting the proactive approach.

What is more, the actions by the VVD encouraged other parties, e.g. the CDA, to also engage in the topic in a way that contrasted sharply with its position up until then (Entzinger, 2006) (V.D Beukel (CDA), P.C, 2015). While a clear shift is not clearly discernable based on the party’s manifesto values in 1994 and 1998, steps to attract dissatisfied voters was certainly taken at national level. Prominent party members, most notably the member of parliament (MP) Maxim Verhagen, repeatedly criticised the perceived laxness of Dutch citizenship- and integration policy as ‘too pampering’, lacking sufficiently strict measures and unable to promote loyalty to the Dutch state (Van Oers, 2013). The CDA’s crushing defeat in the 1994 election, where its electoral support dropped from 35.3% in 1989 to 22.23%, together with the perceived failure of its traditional support of cultural distinctness (pillarization) signalled the need for change (Entzinger, 2006). Hence, the party’s shift towards a more firm approach was a move to tap into the growing voter dissatisfaction and reassert its position in Dutch major politics (V.D Beukel (CDA), P.C, 2015). However, the CDA also faced intra-party conflict on the topic, which obstructed too great a shift in policy (V.D Beukel, P.C, 2015). Although, by collaborating with VVD in parliament, the party was able to push through the re-application of the renunciation requirement when applying for Dutch citizenship in 1997 and, importantly, was close to introducing a formalized language and society knowledge test for the same procedure. This attempt was rejected as the Dutch First chamber could not agree upon the renunciation requirement (Van Oers 2013), which led to the failure of the proposal, a proposal that was only accepted three years later with the Nationality Act (2000). Further, similarly to the VVD, the shift in policy from the CDA occurred in the absence of a serious electoral threat presented by a far-right populist party, a threat that only later came to be in the parliamentary in 2002 with the success of the List Pim Fortuyn (LPF)(Van Selm 2005), which will be addressed later. Taken together, the actions by the CDA appear, very similar to the VVD, to indicate a proactive approach on the I.I. issue.
In sum, whereas the initiative by FP, M, VVD and CDA have differed in kind and degree, most notably with the FP proposal for a language requirement being made in the context of a proposal for increased immigration to Sweden, and M’s lacklustre effort to actively promote both the introduction of M.R and a citizenship test (Green-Pedersen & Krogstrup, 2008; Dahlström & Esaiasson, 2011; Borevi, 2015) in comparison with VVD’s and CDA’s push for a reintroduced ban on dual nationality and stricter integration measures connected to citizenship (Van Oers, 2013), they all display characteristics of opting for a proactive approach. The key difference, however, is the extent to which these parties were able to find political allies in other parties who were willing to accommodate and promote this shift in policy. This will be addressed in the succeeding part.

5.2.2. Accommodative approach

The extent to which mainstream political parties have adopted, or accommodated, features traditionally belonging to the extreme right wing, differs sharply in the Netherlands and Sweden. Figure 4 and table 7 above indicate that not only have the I.I issue been met with mild interest by Swedish mainstream parties, even in times of electoral gains of the far-right, but it has almost been completely absent on the political agenda for a multitude of years between 1991-2010, especially between 1994 and 1998. What is more, with the exception of the implementation of the M.R in 2010, which in itself is a limited tool affecting less than 1% of the applicants for F.R (Strandberg, P.C, 2015), few measures have been put in place to make integration obligatory. To be fair, the M’ push to install the requirement between 2006-2010 could be seen as indicative of opting for an accommodative approach, as opposed to a proactive in this stage given that the anti-immigration party SD was on the rise and would enter parliament in 2010 with 6.7% of the vote (NSD, n.d). However, the crucial importance of maintaining a united Alliance coalition has limited the M’ ability to adopt more restrictive right-wing integration features on its political agenda (Green-Pedersen & Krogstrup, 2008).
Consequently, to adopt an overly accommodative approach has insofar been politically unfeasible, which help explain the marginal manifesto values in figure 4. Taken together with the manifesto- and negative policy positions of the other parties, which is elaborated under the subsection on adversarial approach below, the evidence thus indicate that the Swedish mainstream parties’ adoption of an accommodative approach has been practically non-existent. In contrast, mainstream Dutch parties have taken another turn.

As clearly displayed in figure 5, all addressed parties have shifted an increasing level of attention towards the negative subcomponents of the I.I. issue, i.e. the negative perspective of multiculturalism (608) and positive way of national life (601). Whereas the VVD and CDA were the first major parties to take steps in this direction (see the previous subsection), the fundamental shift for Dutch political parties in large came in 2002. That year, the right wing triumphed in the general election, gaining 17% of the vote and making it the second largest party in the Netherlands. Its charismatic party leader Pim Fortuyn appealed to large segments of the Dutch society that was dissatisfied with the country’s I.I policies but was killed in May 2002 just before the election by an animal rights activist (Vellenga, 2008). Despite this, the party enjoyed huge electoral success in 2002 and was subsequently made part of a coalition government along with the VVD and CDA the same year, termed Balkenende I (Van Oers, 2013). Even though the government fell only a few months after its inauguration after internal conflict within the LPF and where the support for the party diminished rapidly to 5.7% in the subsequent election, the effect of its breakthrough rippled into Dutch mainstream politics.

The momentum of the LPF was interpreted as an indication that the politicians had lost the connection to the people and that this link needed to be re-established (Marcouch (PvdA), P.C, 2015). Consequently, in the subsequent election in 2003, the mainstream parties shifted increasingly right and adopted a more critical view on the I.I. issue, especially with regards to multiculturalism (see figure 5). The VVD, in particular, shifted more right even at the same year as LPF’s breakthrough in 2002, which indicated that their proactive approach in the 1990s was insufficient in the eyes of the voters.
Although it is not clearly discernable from the manifesto values of the VVD (figure 5), it had almost the identical position as the LPF in 2002 (Van der Brug et al., 2014), and would, as table Y from 2003 onwards display, only turn more right wing after that. What is more, the party had several prominent members in its ranks, including Ayaan Hirsi Ali, Rita Verdonk, and Geert Wilders that proved determined to shift the party towards a more nationalistic and anti-immigration position, where the latter two eventually broke away and established their own parties, Wilders’ PVV and Verdonk’s Proud of the Netherlands (Trots op Nederland, TON) (Van Kersbergen & Krouwel 2008). Linked to this, the VVD has experienced significant internal conflict between it’s libertarian wing, which support multiculturalism and economic liberalism, and its conservative one that support of a more nationalistic and EU-sceptic position (Van Kersbergen & Krouwel, 2008). Despite this, in the present day, the party is more right-wing than ever before (Potters (VVD), P.C, 2015).

However, the VVD was not alone in adopting ring-wing features. On a similar note, the D66 and PvdA also experienced shifts towards the right (figure 5). To be fair, a prominent party member of the PvdA, Paul Scheffer, had issued a highly critical article on the Dutch integration policy in 2000 called the ‘multicultural drama’ (het multiculturele drama), which stirred major political debate and the D66 had shifted support towards stricter integration measures in the late 1990s (Scheffer, 2000; Entzinger, 2006; Van Oers, 2013); yet before 2002 no party had diverted considerable manifesto attention to the negative aspects of the I.I. issue (figure 5). Interestingly enough, however, changes in integration policy connected to citizenship was already underway in 2000 under the ‘purple’ government of PvdA, VVD and CDA, with the parliamentary adoption of the Nationality Act (2000), which came into force in 2003 (Van Oers, 2013). In it, the formalized language and knowledge test for acquiring citizenship was introduced and later specified in a royal decree that was implemented in 2003 (Staatsblad 2002:197). In the light of this, the rise of Pim Fortuyn appear to have triggered Dutch mainstream parties into a more urgent rush denounce the old integration policy that had sought to preserve cultural identity and multiculturalism (Bonjour, 2010), but crucially, that this development was already set in motion prior to the success of the LPF thanks to the combined lobbying of the VVD and CDA with the help of D66 (Van Oers, 2013).
So far, the results in figure 5 strongly indicate that Dutch mainstream parties largely opted for a combination between a proactive and accommodative approach in 2003. This development was continued in the election in 2006 where LPF lost its seats in parliament and was replaced by the explicitly anti-immigration PVV with its populist leader Geert Wilders. The same year saw a sharp average attention level increase in the I.I. issue from 5,248% to 10,732% among Dutch political parties (figure 5). Without including the PVV’s manifesto for the year (which has 24,817% addressed to the I.I. issue), the number is average party attention level is still 9,167%. Hence, this indicates the continued rise in the salience of the I.I issue for Dutch parties. However, the results are less conclusive in 2006 compared to the election in 2002. With the exception of the D66, all put more emphasis on a positive mentioning of a positive way of life (601), which indicates a more nationalistic focus in the debate. In turn, the D66 as well as the CDA also increasingly criticises multiculturalism. This is in contrast to all four parties displaying increased attention for a positive perspective on multiculturalism (607), which together with the favourable mentioning of underprivileged groups (701) would imply an adversarial approach. Yet this image is distorted by their focus on the negative perspective on multiculturalism (608) and positive on a national way of life (601) (figure 5).

During the subsequent two elections in 2010 and 2012, the VVD stands out as particularly politicizing the negative aspects of the I.I issue. So does the CDA during the 2010 election, although on a smaller scale (figure 5). These accommodating features by the parties were also mirrored in the coalition agreement in 2010, where the two mainstream parties finally opted to form a minority government with the PPV as formal support but without any positions in the cabinet (Groenendijk, 2011). While the PvdA has proven less embracing of an anti-I.I agenda than its counterparts the VVD and CDA, it has still opted to accommodate negative features of the I.I. issue and been drawn into the more socio-cultural, rather than socio-economic, debate that today characterise Dutch politics on the immigration topic (figure 5; Kuiken (PvdA, P.C, 2015). In contrast, the D66 has proved more fluctuating on its emphasis on the I.I issue. The period before 2002 was characterised by a relatively low emphasis on the topic, only to be followed by a stark shift in focus in 2002-3, and then returning to a downplaying behaviour.
This indicates that the party only for a minor period opted for an accommodative approach (figure 5). Its ensuing shift away from this position has since been reflected in its more moderate stance, generally in favour of more lenient policies on I.I (Van der Brug et al., 2014).

What remains clear however is that the overall trend in the Netherlands displays large mainstream parties increasingly adopting negative aspects of the I.I. issue, which is indicative of an accommodative approach. These results can be even better regarded when looking at the development on F.R policy, specifically with the CIA initiative (2006), which occurred in the same year. Whereas the push for stricter integration measures on acquiring citizenship met solid opposition by the PvdA, GL and SP (see table 1 on party abbreviations) in most of the 1990s, the contrast was sharp in comparison with the debate on CIA. With the exception of marginal opposition from the GL, the great majority of the parties, including the VVD, CDA and PvdA, supported the initiative without much debate (Bonjour 2010). This thus provides a strong indication that while the parties’ manifesto positions proved slightly inconclusive, the accommodation of stricter integration policy by mainstream parties was thorough.

5.2.3 Adversarial approach

The adversarial approach is indicated when a mainstream party: demonstrate increased focus on the promotion of multiculturalism (608), opposition to a national way of life (602) and the mentioning of underprivileged groups (705); oppose more stringent integration measures.

A first look at table 7 indicates that the I.I. issue in Sweden has received minor interest by mainstream parties in Sweden. Whereas only the subcomponent favourable mention of underprivileged groups (705) has received notable attention, stretching from 1-3% in the selected parties’ manifestos, the positive perspective on multiculturalism (608) and negative perspective on a national way of life (602) has barely seen the light of day (figure 4). As the subcomponent ‘favourable mention of underprivileged groups’ (705) by itself is insufficient to argue for an adversarial approach (see section 3.4.1. Operationalization), one can conclude that Swedish mainstream parties have opted for a dismissive approach.
However, in regards to specific policy proposals, specifically the FP’s proposal of a language requirement and the Alliance’s initiative for a MR, a more nuanced picture can be offered.

The FP proposal was met by fierce criticism by the centre-left and left-wing parties, the S, V and MP as well as the media (Blomqvist & Green-Pedersen, 2004; Dahlström & Esaiasson, 2011). Hence, this is a strong indication of an adversarial, and not dismissive, approach being adopted by these entities. Likewise, the C and KD voted against the initiative but were not as critical as the parties on the left (Kalmteg, 2002). Whereas the M leader Bo Lundgren had put up an even stricter proposal, which included knowledge of society besides a language requirement, they had been unable or unwilling to communicate it sufficiently to draw the same attention as the FP proposal (Dahlström & Esaiasson, 2011). As only M supported the FP’s proposal, and even then without sufficient enthusiasm, it is clear that an overwhelming majority of the Swedish parties opposed the introduction of language requirement linked to citizenship. Thus, the conclusion can be drawn that Swedish parties largely opted for an adversarial approach in this instance.

The same approach was also wide adopted by the majority of the mainstream parties concerning the process leading up to the installation of the M.R (MR) in 2010. As mentioned previously, already in 1995 the proposal by the M to establish such a requirement was met with solid opposition by the other parties in parliament based on the reasoning that it would counteract the principle of welfare state universalism (Borevi, 2015). Again, in the 2006-2010 period leading up to the MR’s eventual introduction, there was considerable resistance from both parties in and outside of the government towards what was perceived as a too strict demand. The ruling Alliance, consisting of M, C, FP and KD, faced intra-block contestation as the two later refused to include families with children within the scope of the legislation, which inevitably make out a significant group in F.R (Martikainen, 2014) In turn, the oppositional parties in parliament, S, V and MP, with the exception of the far-right SD, tried actively to obstruct the introduction of a maintenance requirement through multiple parliamentary propositions (Motion 2009/10:Sf9; 2009/10:Sf10; 2009/10:Sf11). Despite the resistance, the M.R was accepted by parliament in 2009 and enforced 2010.
Crucially, however, the almost overwhelming resistance by the majority of the Swedish parties meant that M, which was the dominant force in favour, had to accept a significantly watered down version (Strandberg, P.C, 2015; Borevi, 2014). Consequently, the resistance by the majority of the parties is once again indicative of an adversarial approach being adopted. But, as will be shown in the section on the dismissive approach, both the cases with the language test and the M.R were merely a small diversion from a larger trend of a dismissive approach assumed by the Swedish mainstream parties.

In the Netherlands, Dutch mainstream parties have displayed a greater variety of opinions. As was shown in the previous subsection on accommodative approach, the great majority of the parties increasingly opted for the accommodation of right-wing features after the electoral breakthrough of the LPF and the later of the PVV in 2002 and 2006 respectively. Hence, after that, Dutch mainstream politics has largely moved towards a more right-wing consensus for stricter integration measures connected to citizenship and F.R (Potters (VVD), P.C, 2015; Bonjour, 2010). During the 1990s, the situation was different, with e.g. the CDA and PvdA in 1994 and the D66 in 1998 adopting slightly adversarial positions (figure 5). For the two latter parties, this corresponds with the parties’ opposition towards raising the difficulty level of the integration exam for citizenship during the same time, which lasted until the D66 eventually shifted position on the question in 2000 (Van Oers, 2013). As a general trend, the evidence displayed in figure 5 indicates that the mainstream parties have not adopted an adversarial approach.

Furthermore, a somewhat deceiving picture is given when looking at the CDA. On the one hand, according to the party’s manifesto values it has a clear inclination towards an adversarial approach (figure 5). On the other, the CDA was one of the leading parties, along with the VVD, to push for stricter integration measures in parliament (Van Oers, 2013; 2010). Also, where they had previously championed the preservation of cultural identity, or pillarization, and hence adopted an adversarial role up until 1994 (Entzinger, 2006), it changed after the loss in the general election the same year, but this shift is not clearly discernable in the manifesto values. The fact that the party has traditionally opposed large-scale immigration to the country (V.D Beukel, P.C, 2015) also renders the party’s position on the I.I. issue somewhat elusive.
Consequently, this discrepancy between positions in party manifestos and actual conduct proves troublesome in diagnosing the strategy adopted by CDA. However, given that the party emerged as “fervent nationalists and as proponents of cultural assimilation” in 2002 (Entzinger, 2006:10) and that such a shift seldom occur overnight, one can assume that the CDA, in practice, gradually moved away from an adversarial approach after 1994. In sum, whilst the evidence on this account is somewhat mixed, the Dutch mainstream parties appear not to have adopted an adversarial approach extensively over time, in particular not after the 2002 election.

To conclude, the extent to which the mainstream political parties have adopted an adversarial approach on the I.I issue differs quite significantly between the countries. In Sweden, the mainstream parties have generally opted for a dismissive approach on the I.I issue. At the same time, the great majority have adopted an adversarial position in regards to the language- and M.R cases. This implies that the long-term strategy of most of the parties has been to dismiss the I.I issue and refrain from politicising it, but when they have been confronted with concrete policy proposals the general inclination has been to opt for an adversarial position. Consequently, this suggests that the two strategies are not mutually exclusive.

In turn, Dutch mainstream parties have displayed a more divided and changing approach. During the 1990s, mainly the D66 and PvdA display indications of adopting an adversarial approach, whilst the CDA standpoint during that time is ambiguous due to the discrepancy between manifesto- and ‘in practice’ positions. What remains clear, however, is that an adversarial approach was used decidedly less by the mainstream parties in the aftermath of the 2002 election, which thereafter progressively opted for accommodation.
### 5.2.4 Dismissive approach

The dismissive approach is indicated when a mainstream party display no increase in- or the diminishing of party attention to the I.I components (601, 602, 607, 608 & 705) and do not push for new stringent integration measures.

Given the relatively high salience level among Dutch parties on the I.I. issue (table 7) together with the increasingly strict national policies that the country pursued, the evidence indicate that these entities have not opted for a dismissive approach in a long-term perspective. Arguably, the years 1989 and 2002 stand out in particular as the parties PvdA, D66 and VVD in former, and including the CDA in the latter, clearly decreases attention awarded to the I.I topic (figure 5). The other years, however, the parties divert significantly more focus to the issue, which runs counter to a dismissive approach. In contrast, the I.I. issue in Sweden has for a long time almost been completely absent on the mainstream parties’ agenda. Hence, the low scores, especially during the period of 1994-2006, strongly indicate that most Swedish parties utilised the dismissive approach and either ignored or downplayed the salience of the issue. What is more, while these years stand out as a period of particular non-action, the years after 2006 up until present day are striking.

Since that year and onwards, mainstream party conflict in parliament on I.I has practically ceased to exist. In fact, the convergence of opinions has rendered the result that essentially all the seven established parties had accepted the same ‘refugee-friendly’ position by the time that SD entered parliament in 2010 (Loxbo, 2015). This situation was further fortified in 2010 when the Alliance won a minority government position and, in order to shut out the SD from power, chose to rule with the support of the Green party (MP). In exchange for this support, the Alliance government made the concession to further liberalize the country’s labour- and refugee policies. Importantly, S and V - the traditional partners to the MP - made no significant objections to this agreement (Loxbo, 2015). This cross-block cooperation to depoliticize the matter was further formalized in the aftermath of the election in 2014 when S and MP won a minority governmental position.
To keep SD from excerpting influence in parliament, the government and the opposition reached the ‘December agreement’, which commits the opposition to abstain from voting against the budget proposals made by the government until 2022 (BBC, 2014). The highly criticized agreement by mainstream parties had the explicit aim of ensuring a continued minority rule by the government while keeping the SD out. Taken together, these actions are compelling indications that the seven established parties’ have opted for a de-politicizing strategy, or dismissive approach, on the I.I issue to marginalise the SD and de facto apply a cordon sanitaire.

In the light of the results from the Swedish parties, the subsequent question is then why they adopted this dismissive and anti-SD position. The gathered material indicates three different reasons, deliberate strategy; perceived uneasiness with talking about the I.I issue; the need to maintain a cohesive political coalition. With respect to the first reason, one interviewee stated that the mainstream parties were disinclined to politicize the I.I issue and thereby legitimize the political views and problem definition of the far right. Consequently, it was more favourable to either try to change the problem definition or shift focus to other topics (Høj-Larsen (V), P.C, 2015). In turn, the second reason was highlighted by one respondent who believed that there had been a degree of ‘contact phobia’ among mainstream politicians with regard to the I.I issue. By simply downplaying or ignoring certain aspects of the question, one reduced the risk of getting drawn into a debate where one potentially lost both the initiative and credibility (Ohlsson (S), P.C, 2015). Finally, the third reason concerned the importance of maintaining intact coalition blocks. As denoted by Green-Pedersen & Krogstrup (2008), it has been crucial for M to maintain a cohesive and stable ‘bourgeois’ coalition to trump S in winning government power. As a result, M has been unable to embrace or support too many features typically originating from the far right if it wanted to preserve coalition unity with its social liberal, and more left-leaning, coalition parties (2008). Seen in this perspective, the alliance as a whole appears to have intentionally opted for an overarching dismissive approach in order to diminish the risk for intra-coalition conflict.

To conclude, Swedish mainstream parties have overwhelmingly opted for a dismissive approach on the I.I. issue. Not only have the parties declined to cooperate with the far right, but have gone to extensive lengths to marginalize and restrict their chance to exert parliamentary influence.
As a result, the attempts to either enhance or implement integration demands connected citizenship and F.R have been met with mild interest by the majority of the mainstream political parties whilst at the same time been obstructed by opposing forces, a fear to debate the topic and a need to maintain coalition blocks. In comparison with the Netherlands in this regard, Sweden proves decisively different.

5.2.5. Summary and verdict on hypothesis

Hypothesis 1: The difference between Sweden and the Netherlands is the result of divergent mainstream party strategies, more specifically, where Dutch parties have opted for proactive/accommodation- and Swedish mainstream parties for a dismissive and/or adversarial approach.

The results strongly indicate that the large mainstream parties in the Netherlands and Sweden have opted for different strategies. Whilst a certain discrepancy between manifesto position and concrete policy support has been detected, the difference in overall trend in the two countries is clear. With the exception of the M and FP’s proactive policy approaches in 1995, 2002-2006 and to a lesser extent accommodative in 2008 with M’s push for a M.R, the Swedish mainstream parties have largely opted for a dismissive approach. However, when confronted with concrete policy proposals e.g. the language test- and M.R, the predominant strategy has been an adversarial approach. Clearly, the two approaches are not mutually exclusive. This helps explain why the FP proposal for a citizenship test was thwarted and the MR only resulted in a significantly watered-down version.

In contrast, the I.I issue has been significantly more salient in Dutch politics. In addition to the CDA’s and VVD’s proactive approach in the 1990s, the overall trend of the large Dutch mainstream parties has principally featured an accommodative approach. This corresponds with both the manifesto positions displayed in the post-LPF climate (figure 5) as well as the overwhelming policy support for the CIA in the second chamber (Bonjour, 2010). Consequently, given that Swedish mainstream parties have chiefly opted for a dismissive/adversarial strategy whilst the Dutch parties largely adopted a proactive/approach, the H1 hypothesis can be regarded as confirmed.
5.3. Path dependency
In this section, the goal is to test the stated hypotheses on path dependency, i.e.:

Hypothesis 2: “In Sweden there were clear mechanisms of institutional reproduction whilst in the Netherlands these were either absent or reduced in strength sufficiently for change to occur”.

The section comprises of four subsections concerning the power resource-, utility-, legitimacy mechanisms and path dependency change factors, which are addressed in turn.

5.3.1 Power resource mechanism

The power resource mechanism is indicated when actors display privileged access to decision-making venues, information, professional competence and organizational assets.

In order to distinguish this mechanism, one should identify which key actors there are and subsequently examine what benefits they have at their disposal. The most important actors have undeniably been the political parties in the Swedish and Dutch parliament due to their exclusive access to policymaking. In the Netherlands, the number of actors involved and consulted in the decision-making process has changed over time. This was especially the case during the minority policy (1983-1994), i.e. the country’s former integration policy framework, but also but also to a lesser extent during the supplanting integration policy (1994-2003)(Entzinger, 2003). Back then, immigrants enjoyed institutional access through the founding of consultative bodies made up of ethnic minorities at both local and national level. The purpose of these bodies was for Dutch authorities to consult minority groupings on matters that affected them, yet the consultative bodies themselves only retained an advisory role (Entzinger, 2003). Moreover, while the extent to which these groupings could actually wield power and resist unfavourable decisions as consultative bodies is unclear, their role has gradually lost status and importance since their inauguration (V.D Beukel (CDA); Bleeker, P.C, 2015). Hence, the minorities do no longer have the same access to policy venues as before and are no longer considered ‘really a factor’ when formulating integration policy (Bleeker, P.C, 2015).

More importantly, the CDA which had up until 1994 championed pillarization, and hence the safeguarding of multiculturalism, suffered a major electoral defeat that year.
Quite significantly, this was the first time that the CDA party and its preceding constellations failed to attain a government position after almost a century in power (Entzinger, 2006). This occurred despite that the CDA and PvdA coalition government in 1989-1994 replaced the ‘minority policy’ with the more demanding governmental ‘integration policy’, which focused on personal responsibility and work, just before the election. Conceivably, the timing of which indicates that the parties tried to pre-empt the rising electoral support for the VVD and its leader Frits Bolkstein (Van Oers, 2013). In effect, this meant that the prime defender of multiculturalism not only lost its position in the most important policy venue (the government) and the organisational assets and professional support associated with it, it meant that party gradually shifted its position and finally emerged as “feverish nationalists and as proponents of immigrant assimilation” (Entzinger, 2006:10) upon their return to power in 2002. In the meantime, the CDA joined forces with the VVD on numerous occasions along with smaller Christian parties and after 2000 with the D66 as well to lobby for the gradual alteration towards stricter Dutch policy on citizenship and F.R (Van Oers, 2013).

Another significant change was the partisan shock wave caused by the electoral breakthrough of LPF in 2002. As the party and its leader Pim Fortuyn had an explicit anti-immigration rhetoric with an emphasis on assimilation, its remarkable success was a wake-up call for the mainstream parties that perceived it as a sign of having lost connection with the people (Marcouch (PvdA), P.C, 2015). Linked to this was the fact that the election proved disastrous for several of the established parties. The VVD went from 24.7% in 1998 to 15.4% in 2002, D66 from 9% to 5.1%. Yet the PvdA suffered the worst, nearly cutting their support in half between the same elections from 29% to 15.1%. The only major established party to emerge stronger in the election was the CDA, which gained 9.5% with a final result of 27.9% (NSD, n.d), a party whose transformation was clearly displayed in the section above. The election was widely considered a vote of no confidence against the political establishment, where the future credibility and legitimacy of the political system on the I.I issue was in jeopardy. Consequently, the political parties wanted to distance themselves from previously supported positions and policies and hence reshape their image in the eyes of the public (Bonjour, 2010).
Thus, whereas several of the interviewed Dutch parliamentarians underscored the existence of intra-party dissonance between factions that desired either softer or more restrictive policy (Kuiken (PvdA); Potters (VVD); V.D Beukel (CDA), P.C, 2015), the pendulum appeared to have swung decisively in favour of the latter in the aftermath of LPF’s success. As will be shown in a section further below, this development was even more enhanced in 2004 with the killing of the controversial film producer Van Gogh by a young ‘home grown’ Dutch-Moroccan (Van Selm, 2005). In effect, it further underscored the perception that multiculturalism, and integration at large, had failed (Van Oers et al., 2013). In regards to the power resource mechanism, this meant that the large mainstream parties and actors within them that were still promoting a positive perspective on the I.I. issue inescapably lost significant support both inside and outside the parties themselves. Essentially, this entailed the loss of key resources such as information and expertise associated with being in government, which e.g. the PvdA lost in its detrimental election of 2002; significant reductions in the number of representatives in parliament; and the ability to accumulate organizational assets such as funds or member support given the voter flight. In sum, the key figures that opposed stricter policy were gradually undermined. Subsequently, this led to a newfound near consensus among Dutch mainstream parties that previous policy changes had been inadequate in the eyes of the voters and new large-scale change was needed.

In Sweden, the parties in parliament also remained the key figures in shaping the country’s policies on citizenship and F.R. However, unlike its Dutch counterpart, the political landscape in Sweden has been remarkably consistent over the past 20 years. The parties in parliament have barely shifted during that time, with the exception of NyD entrance between (1991-1994) followed by MP in 1988-1991 and again 1994 till present day, and finally SD in 2010 (NSD, n.d). What is more, as was displayed in the section on issue competition, Swedish mainstream parties have overwhelmingly declined to politicize the I.I. issue, even in the case of the eventual entrances of far-right parties in parliament. Correspondingly, party conflict on the matter has been practically non-existent (Dahlström & Esaiasson, 2011).
In effect, this means that whereas the Dutch mainstream parties that maintained positive inclinations towards the I.I. issue and promoted lenient regulations on citizenship and F.R suffered a dramatic electoral backlash, especially in 2002, the Swedish mainstream positions has remained relatively consistent over time. There has more or less been a consensus among the great majority of the parties not to invoke stricter policy on either citizenship or F.R, which might separate families with children (Mårtensson; Strandberg, P.C, 2015). This can help explain why the M.R got so hollowed out. In ‘power resource mechanism’ terms, the key actors promoting the status quo have maintained access to the organizational assets, information advantage, and expertise associated with being represented in parliament and government. Above all, they have been able to sustain access to the most important policy-making venues in the country itself, the parliament and government, without suffering a detrimental loss to a niche party. Crucially, and unlike the Netherlands, since consensus on the I.I. issue has been overall prevalent among the Swedish mainstream parties, the shifts in party support that has fluctuated between elections has not been conducive to change in the policy area.

5.3.2 Utility mechanism

The utility mechanism is indicated by references to political-, economic- and organizational- sunk costs and expressed concerns with expensive investments and uncertain outcomes of reform.

In both the Dutch and Swedish case, this mechanism was difficult to discern from both the interviews as well as the accessed data material. There have been several political parties (key actors) in both the Netherlands and Sweden that have been/or were at first unwilling to change the status quo and adopt stringent integration demands on citizenship and F.R. Yet, references to the high costs of change and the loss of previous investments have been sparsely used as arguments to obstruct change. A plausible explanation for this predicament can be traced to political framing and its consequences for debate. References that relate to already invested resources e.g. money, expertise and time are directly connected to an economic frame, the very same frame that right-wing parties adopt to promote more restrictive policies on I.I.
Hence: “Most of the time they [left-wing parties who oppose stricter I.I policies, author’s addition] stay away from the economic frame because they're going to lose the debate on that” (Potters (VVD), P.C, 2015). Seen in this light, a more strategic choice, and significantly more common approach, as will be addressed in the subsequent section, is to refer to values e.g. solidarity and equality instead. Nonetheless, both countries display characteristics of the utility mechanism, although more so on potentially high future investments and uncertainty associated with change.

In the Swedish case, a public report on the revising of the Nationality act (1950:382) noted that designing a just and practical test would be linked to significant difficulties and uncertainties (SOU 1999:34, p. 316). On a similar note, the government was of the opinion that “the control to establish whether the knowledge (read: language) requirement has been fulfilled would also entail an administrative burden that is difficult to defend” (Government Bill 1999/2000:147 p. 63-4.). More recently, a governmental report from 2008 highlighted a remarkable lack of evaluative data from countries that have implemented a language requirement on citizenship (Rooth & Strömblad, 2008). Hence, the uncertainty regarding the effects of such a reform has certainly been present.

What is more, the somewhat elusive term of ‘political correctness’ can also have had implications for the willingness of Swedish politicians to promote such initiatives. As was displayed in the section on issue competition, the political climate in Sweden for the past 20-25 years on the I.I. issue has been characterized by a dismissive and downplaying behaviour by the mainstream parties. One interviewee asserted that attempts to shift more responsibility to the migrant were quickly met by xenophobic accusations from politicians on the left (Selimovic (FP), P.C, 2015). This was made particularly visible during the campaign by FP to introduce a language requirement. After the FP first floated the proposal in the electoral campaign, it was met with fierce criticism from S, V, and MP, which denounced the action (Dahlström & Esaiasson 2011). For instance, V framed the initiative as hypocritical, “opening the door for those who want to be tougher on immigrants” and legitimizing a harmful group mentality of “us and them” (Vidlund, 2002).
Moreover, FP had to repeatedly ward off accusations of drawing inspiration from Denmark, which had recently enacted a series of restrictive legislation towards immigrants (Milani 2008). Seen in this light, clear perceived political costs appear to be associated with pushing for stricter policies, despite FP’s electoral upswing after its initiative on a language requirement in 2002 (NSD, n.d).

In turn, the introduction of a M.R has displayed fewer indications of significant costs and uncertainty associated with a change in comparison to the language test case. This most likely boils down to the fact that several governmental reports investigated the matter, which thus lowered uncertainties about its possible outcome, and that such policy was considered socio-economically profitable (SOU 2002:13:218-19; SOU 2008:144:144). An exception from the latter argument and an implicit indication of sunk costs was provided in another governmental report from 2005. In it, the expert committee argued that to have a MR that obliged the sponsor to have financial responsibility for joining family members would not lead to lowered public expenditures (SOU 2005:103:16). Essentially, the argument was that according to the Swedish Social Insurance Act (SFS 1999:799) and the Social Security Act (SFS 2001:453), a whole range of social benefits, e.g. healthcare, welfare, social insurance and economic support for the elderly, are granted on an individual basis irrespective of the financial state of the receiving party (SOU 2005:103:113-116). Hence, the establishment of such a MR would be economically meaningless for the state unless significant changes were made to how the Swedish welfare state and legislation were constructed and thus shift it away from a universal system towards one based increasingly on selective measures. Undoubtedly, this would entail the relinquishing of preceding investments sunk into constructing the system as well as conceivably large political costs. Importantly, this was later ameliorated in the final MR version that only targeted the sponsors themselves and did not extend fiscal responsibility for joining family members (Government bill 2009/10:47).

Moreover, despite the change in the MR’s design, additional costs were linked to the introduction in 2010. As the aforementioned governmental report (SOU 2008:144) underscored that a MR was socio-economically beneficial, these were mainly concerning political costs. For instance, during the preparatory work of the proposal, a number of advisory opinions were gathered from various consultative bodies.
These proved largely critical of the proposal and emphasized its potentially harming effects on families’ right to be together and the risk of discrimination towards economically weak groups (SOU 2008:144, p. 131-135). Crucially, the ruling government was itself divided on the question (Borevi, 2015). The fact that M needed to uphold a cohesive centre block to trump S in elections (Green-Pedersen & Krogstrup, 2008) remains pivotal in this respect. Undoubtedly, in order to avoid serious political repercussions and an intra-coalition conflict, concessions from M regarding exemptions to the MR were of crucial importance. To conclude, both the two Swedish cases display indications of a viable utility mechanism that have either reinforced the status quo or only allowed for incremental change. Whilst references have been identified that underscore significant investments and uncertainties associated with change, especially in the language test case, both highlight the high political costs linked to altering the status quo.

In the Dutch case, the pre-conditions for the utility mechanism were somewhat different compared to Sweden. For one, the Netherlands has maintained an integration requirement connected to naturalisation, regardless of how rigorous the testing procedure might have been in practice (Van Oers, 2010). This was also in place during the Nationality Act (1985), when attaining citizenship was deemed crucial from an integration point of view (Van Oers, 2010). A logical expectation of this could be that lower political costs were associated with strengthening the test and imposing stricter integration measures in comparison to Sweden, which had no such instruments introduced. Second, already in 1998, WIN was introduced which obliged newly arrived non-EU immigrants to participate in integration courses and undertake a language examination, mainly to test the student’s performance rather than exert result-oriented pressure (Joppke, 2007; de Vries, 2013). Whilst the outcome of WIN proved ineffective with inter-municipal coordination problems, high drop-out rates and disappointing performance results (Entzinger, 2003; de Vries, 2013), the fact that its test had a higher expected performance level than the N.T proved to exert an additional upward pressure for change (Van Oers, 2013). On this line, CDA MP’s argued that to expect more from newly arrived migrants than applicants for citizenship was a ‘world turned upside down’ (Tweede Kamer (TK), 2000:3634-35).
Conceivably, the fact that the Netherlands had maintained an integration requirement for citizenship along with the subsequent adoption of WIN meant that parts of the logistical infrastructure and political acceptance necessary for the ensuing N.T (2003) and CIA (2006) were already in place, thus lowering the financial and political costs associated with change.

Furthermore, in terms of strictly political costs, a chain of events after the turn of the millennia altered the political climate from entailing costs associated with supporting stricter integration policy to costs of opposing it (section 3.4. path dependency change). In the post-LPF atmosphere, the old integration policy was considered a policy failure and scientists who failed to acknowledge that were quickly branded as naïve and in the hands of multiculturalists (Bruquetas-Callejo, Garcés-Mascareñas, Penninx & Scholten, 2011). For instance, when a parliamentary committee investigated the reasons behind the perceived integration failure in 2004 came to the conclusion that the integration policy was actually relatively successful (Blok commission, 2004), it was severely criticized in both parliament (TK, 2004) and the media for allegedly being biased towards multiculturalism and hence unable to evaluate the policy accordingly (Bruquetas-Callejo et al., 2011). Moreover, the full extent of the political climate can perhaps be best characterised by the minister of integration Ella Vogelaar (PvdA) who described it, although in negative terms, as a competition among politicians to come up with ideas for the harshest integration measures (Dutch News, 2007). Hence, during the period that the N.T (2003) and CIA (2006) came into force, the political climate had generated larger costs of opposing such policies rather than supporting them.

In addition, in terms of economic costs, the N.T (2003), the consecutive integration exam (2007) and the CIA (2006) all put the fiscal responsibility largely on the migrant personally. In all instances, the migrants need to pay for their own means to integration as well as the mandatory test. While the Dutch government briefly assumed the financial burden for integration courses linked to the integration exam (2007) under the ‘Delta integration plan’ between 2007-2013, the immigrants are now once again obliged to pay for themselves (Logger, P.C, 2015).
On a similar note, the Dutch state itself has adopted but a minor role in the managing of integration courses and the provisioning of study material (See sections Citizenship tests & CIA - the Netherlands). With respect to the N.T (2003), possibilities for preparation were even completely absent (Van Oers, 2013). Instead, it has largely left the task in the hands of private enterprises to substitute the state’s involvement on this account (Joppke 2007a, Bonjour & Lettinga 2012). In effect, as a result of subsuming the fiscal burden as part of the personal responsibility of the migrant, the costs associated with change, which greatly affect the uncertainty of policymakers (Kuipers, 2009), was significantly reduced. Thus, the combination of WIN serving as ‘upward’ pressure for change with its mandatory character and performance test (Van Oers, 2013), the Dutch preservation of an integration requirement, along with the limited uncertainty level and transformed political costs linked to reform, meant that the utility mechanism in the Dutch case was initially weak and subsequently reduced over time.

To conclude, the analysis has shown that the utility mechanism has indeed had different strength and implications in the two countries. However, the evidence supporting this has predominantly centred on the different levels of uncertainty and political costs associated with change, as opposed to sunk costs or indications of increasing returns. In Sweden, indications have been found that support the preservation and continued viability of a utility mechanism. In contrast, the Netherlands displayed relatively weak pre-conditions for a strong utility mechanism and, as a consequence of diminishing levels of uncertainty and shift in political costs associated with change, was gradually reduced in strength.

5.3.3. Legitimacy mechanism

The legitimacy mechanism is indicated by positive references to integration in terms of solidarity equality, inclusion, and multiculturalism. Conversely, it is identified by de-legitimizing change as exclusive, promoting inequality, unfair and counterproductive.

In the present day, the understanding of the integration aspect in citizenship and F.R differs sharply between Sweden and the Netherlands. In Sweden, easy access to citizenship and lenient regulations on F.R is perceived as a crucial step towards successful integration (Mårtenson; Strandberg, P.C, 2015).
In contrast, in Netherlands citizenship and F.R is largely comprehended as a final reward for, or in the case of the CIA a milestone towards, a completed integration process into Dutch society (Van Oers et al., 2013). Yet, this difference has not always been the case. In the 1980s and during the minority policy, the Dutch perspective on citizenship was very similar that the Swedish equivalent of today. At the time, the acquirement of citizenship, and the strengthening of the immigrant’s legal position were then regarded as a crucial means towards becoming integrated (Van Oers et al., 2013).

Whereas the Dutch understanding has changed substantially over time, the Swedish perspective has persisted. There are multiple references to the importance of maintaining the current model while discrediting initiatives that seek to change the status quo. To begin with, a Swedish official inquiry on citizenship in 1999 stated that for decades the dominant political will had focused on facilitating the acquirement of citizenship (SOU 1999:34, p. 330), something that the inquiry agreed was indispensable for achieving successful integration. The same committee, consisting of parliamentarians from all parties, maintained that: “the committee regards citizenship as a path to societal cohesion and as an essential part of the integration process. Increasing the qualification demands would instead have the counterproductive result of decreasing cohesion in the nation as a whole” (SOU 1999:34, p. 318). Hence, it was argued that the addition of a language requirement would obstruct rather than ameliorate the integration process. A potent argument against integration demands was that it would unjustly discriminate against vulnerable groups such as women, the uneducated and elderly (SOU 1999:34, p. 313-17). The government later echoed this sentiment in stating that: “to create a fair and practically achievable arrangement would according to the view of the government be linked with considerable difficulties” (Government Bill 1999/2000-147:50). Further, the proposal by FP to introduce a language requirement (Motion 2002/03:Sf 226) was quickly labelled as discriminatory pseudo-xenophobic rhetoric that played into the hands of the far-right (Mellgren, 2002).
The justice argument was reiterated more than 10 years later in another public inquiry (SOU 2013:29) on citizenship on the suggestion to include a language-bonus, i.e. whereby newly arrived immigrants who achieved a certain level in Swedish would be granted citizenship a year earlier whereas those who did not retain the original waiting period (p. 22). Yet, despite this suggestion being considered a ‘light version’ of a language requirement (Mårtenson, P.C, 2015), the proposal was soon criticized as unfair and discriminatory against vulnerable groups by several consultative bodies and subsequently failed to be implemented in practice (TT, 2013). Another inquiry in 2010 stated the following in regards to a consideration of introducing a demand for civic skills in exchange for citizenship:

‘All new citizens should be included generally, blindly and equally, without testing their level of knowledge. Besides, anything else would be a historical breach of the supporting, solidarity-based and inclusive idea underlying the Swedish people’s home and welfare state’ (SOU 2010:16, p. 25).

Taken together, these results indicate that the very understanding of citizenship as a means towards integration and the need to maintain a relaxed and facilitating naturalisation process has persisted to present day. At the same time, the attempts to alter this policy and make it more stringent have been widely discredited.

The inclusive perspective on citizenship is also reflected in the policy on F.R. Sweden did have a M.R for children providing for their parents up until 1979 but the policy was abolished as it was deemed unfair and pointless given the authorities’ inability to monitor it effectively (Governmental Bill 1979/80:96). After that, no M.R was put in place until 2010. In two governmental reports from 1995 and 2005 on the subject, the introduction of a MR was considered incompatible with the Swedish system of a universal welfare state (SOU 1995:75, p. 164) and counter to the principles of justice and equality that characterise the Swedish society (SOU 2005:103:138). Despite another such report in 2002 actually recommending the introduction of a MR (SOU 2002:13), the proposal was not implemented in practice (Borevi, 2015).

Moreover, similar to the initiatives to make the naturalisation process more stringent, the eventual installation of the M.R was harshly criticized as counterproductive to the integration process given its implications in prolonging the reunification of family members (Motion 2009/10: Sf9; 2009/10:Sf 10; 2009/10: Sf11).
Besides the criticism by parliamentary parties both in and outside of government, a number of consultative bodies questioned its implications for families and their children and were sceptical about the efficiency of such an incentive (Runblom, 2009). What is more, while the M pushed the integration aspect, there has been close to a political consensus on the importance of keeping core family members together (Strandberg, P.C, 2015). Finally, later attempts to expand the scope of the legislation and remove some of its exceptions have been met with solid political resistance from the majority of the parties of the ruling government, in addition to that of the left-wing opposition (Martikainen, 2014). Taken together, it is clear that Sweden displays several indications of a viable and still operating legitimacy mechanism. It has both successfully contributed to obstructing the establishment of a language requirement and effectively undermined a comprehensive MR.

In the Dutch case, the perception of integration and how best to achieve it has undergone significant change over the past two decades. Under the Minority policy, the attainment of citizenship was regarded as instrumental for integrating into Dutch society (Van Oers, 2010). As a result, the naturalisation process was designed to be inclusionary and accommodating to vulnerable groups. What is more, the 1985 Nationality Act altered the acquisition of citizenship from being a favour from the state into a right for the immigrant who met the required conditions (Groenendijk, 2011). On a similar note, conditions for F.R were significantly lenient at the time. The reunification of family members was widely seen as both a moral right and crucial for facilitating integration (Bonjour, 2008a). Further, to highlight ethnic differences in regards to their impact on native society was often quickly labelled as racist, discriminatory and fascist, concepts that were regularly utilised interchangeably (Scholten, 2007). What is more, from the start of the 1980s and for years ahead, Dutch politicians adopted a downplaying position on the I.I. issue and agreed not to employ it for electoral purposes. The reason for which was to avoid stirring up public sentiment against immigrants (Guiraudon, 2000; After Bonjour, 2008b). This view was largely maintained throughout the 1990s despite the gradual sharpening of public debate. Political actors in both parliament and government generally refrained from framing the I.I. issue as a problem, unwilling to fuel right-wing xenophobic opinion among the voters (Bonjour, 2008b).
Equally important, the political stigma associated with promoting an anti-immigration agenda persisted and few politicians were eager to “burn their hands about it” (V.D Beukel, CDA, P.C, 2015). Moreover, remnants of the Dutch legitimacy mechanism persisted over a long time, in particular on the political left. For instance, during parliamentary discussions in the middle of the 1990s on making the naturalisation process more stringent, the D66, PvdA and GL resolutely opposed more demanding language- and integration measures (Van Oers 2010). Among others, MP Rabbeae (GL) argued that more stringent demands would limit societal inclusion for the top echelon of immigrants (TK, 1995), hence criticizing the approach as unequal and exclusive. On a similar note, MP Dittrich (D66) emphasized how stricter requirements would present unfair difficulties for vulnerable groups such as the illiterate and handicapped (Van Oers, 2013:46).

Over the course of the 1990s and in particular in the aftermath of the Pim Fortuyn, the Dutch legitimacy mechanism gradually diminished in strength. The political commotion caused by Bolkestein (VVD) in 1991 and the subsequent minorities debate certainly influenced this development. Moreover, during the same years the CDA actively pursued a reframing of the integration process in terms of ‘personal responsibility’. For instance, during a brief political debate in 1993 concerning an income requirement for immigrants applying for F.R, the Christian Democratic prime minister Lubbe mentioned the words ‘responsibility’ and ‘responsible’ a full fifteen times (Bonjour, 2008a: 9). Whereas rights had been emphasized during the Minorities’ policy, the CDA now stressed the importance of rights and duties. This revised mind-set slowly found resonance with the broader political sphere and the ‘personal responsibility’ of the migrant to integrate is today a central feature in Dutch integration policy (see e.g. De Vries, 2013; Strik, Luiten & Van Oers, 2010). To illustrate, the coalition agreement between the VVD and CDA in 2010 explicitly stated that: “migrants and asylum seekers are themselves responsible for their integration into our country” (Coalition agreement, VVD-CDA, 2010:26). Arguably, this frame shift has had significant implications for how references to integration have been made, away from solidarity and equality towards the individual responsibility of the migrant.
What is more, during the parliamentary proceedings leading up to the revised Nationality Act (2000), the language had turned progressively nationalistic and emotional. Citizenship was increasingly something that should be earned, not be given away lightly and immigrants should be loyal to the Dutch state (Entzinger, 2003). This assimilationist turn was exasperated by the ‘Fortuyn-revolt’ (Bonjour, 2010) with the electoral break of LPF. Whilst the post-election coalition consisting of LPF, CDA and the VVD collapsed after only 87 days, the I.I issue was firmly established in a new more assimilationist fashion (Van Selm, 2005), Consequently, the successive government declared early on that: “Whoever wants to permanently settle in our country will have to actively participate in society and master Dutch language, be aware of Dutch values, and observe the norms” (Coalition agreement CDA, VVD and D66, 2003:11). Shortly after, the Ministry of Alien Affairs and Integration (MAAI) announced the replacement of the existing integration policy (1994-2003) with a revamped version called ‘integration policy new style’ (integratiebelied nieuwe stijl)(MAAI, 2003). The new policy was firmly designed in an assimilationist fashion, envisioned significantly stricter integration measures, and targeted both long-term resident immigrants as well as new arrivals (Scholten, 2007).

The effect of LPF from a legitimacy mechanism perspective must not be underestimated. Parties all across the political scale sought to distance themselves from previously held more lenient positions on multiculturalism, migration and integration to prove to the voters that they were listening and were willing to take action (Bonjour, 2010). Gone were the taboo and political danger of talking of the I.I in negative terms and with it the consensus not to utilize the issue for electoral gains. From then onwards, “the Dutch politicians would call a spade a spade” (Bonjour, 2008b: 23). Together with the strong need to shift away from earlier policy positions, it can be interpreted as the legitimacy mechanism was itself de-legitimized and supplanted by other values such as personal responsibility, protection of social cohesion and integration according to Dutch values and norms.

During the same period, and intrinsically connected to the newfound emphasis of domestic values and norms, was the Dutch identity crisis that followed. It became urgent to discuss and define what it is to be Dutch and what traditional values and norms it entails (Marcouch, P.C, 2015).
A consequence of these developments was a shift in the very perception of citizenship, from an instrumental tool in facilitating integration towards representing the pinnacle and prize at the end of the integration process (Van Oers, 2013). The minister for Aliens Affairs and Integration during the Balkenende II and III administration, Rita Verdonk (VVD), depicted citizenship on numerous occasions as the ‘first prize’ (Strik, Luiten & Van Oers 2010). Moreover, this revised understanding of citizenship along with the notion of personal responsibility for immigrants became even more fortified with the introduction of the Integration Act (2007). The new Act replaced the perceived failure of WIN and shortly after supplanted the N.T with the Integration test. Despite the new test entailing a significantly increased financial burden for the migrant, the Act was passed without any major resistance. On July 7, 2006, a sole MP from D66 opposed its installation in the second chamber. In the first chamber and five months later, the parties SP, GL, D66 and an OSF MP voted against it, presumably after having received a letter by 25 university professors criticizing what they saw as flaws in the bill (Van Oers, 2013). Even though there was some opposition to the Integration Act (2007), the relative ease with which it passed indicates the subordination of delegitimizing arguments such being exclusive and unfair to the stressing of personal responsibility and requirement to integrate into Dutch society.

Furthermore, the perception on F.R changed as well. A notion that F.R could have adverse effects on integration slowly took root. In the words of an interviewed respondent: “Gradually the idea grew, even for left-wing parties, that lack of integration was something you could import by importing spouses from abroad” (Bleeker, P.C, 2015). In 2004, the Balkenende II government elaborated at length on the topic, stating that:

“The large-scale immigration of the past 10 years has greatly disturbed the processes of integration and inclusion into Dutch society a the group level, so that the process must start anew every generation /…/ the government finds it necessary to break up the repetitive process of lagging integration with continuous immigration” (MAAI & Ministry of Foreign Affairs (MFA), 2004:2; 17).

This was a radically different perspective than was predominant during the Minority policy when F.R was regarded as conducive to successful integration (Bonjour, 2008a).
The parliamentary debates leading up to the CIA displays the new political consensus in sharing this problem definition. The CIA was critiqued not based on its problem definition, i.e. that family migration is the root cause of failed integration, but on parts such as unreliable testing technology, the method of examination, and on principal grounds. Yet, the marginal opposition was limited to two parties – SP the GL – and the overwhelming majority supported the introduction of the CIA (Bonjour, 2010). The lack of opposition and the staggering support of the CIA clearly indicate the demise or severe reduction of the Dutch legitimacy mechanism. Finally, the persistence of both the integration Act (2007) and CIA (2006) in present day implies that no major alterations to this development have been made since then. Rather, the governmental decision in 2010 to completely defund the integration budget, i.e. the Delta plan, and once again obligate the individual migrant to pay personally for integration courses (Van Oers, 2013) reinforces the image that the Dutch legitimacy mechanism is seriously reduced in strength or even supplanted by another more stringent one.

To conclude this section, the legitimacy mechanism in Sweden and the Netherlands has experienced widely different trajectories. In the former, the studied period has displayed a strong and dynamic mechanism that reinforces the status quo and only allows for incremental change. In stark contrast, the latter case has been characterized by an initially strong mechanism that gradually been de-legitimized reduced in strength and subsequently supplanted with other values. The sharp differences between the two countries help explain why a change was made possible to such an extent in one but not the other.

5.3.4 Path dependency change factors

Path dependency change factors are indicated by shifts in public opinion, the occurrence of external shocks, political rhetoric concerning a perceived crisis (crisis narrative) and the changing of wording in referencing to integration, e.g. in terms of solidarity and multiculturalism to individual responsibility and assimilation (change in values).

Starting with Sweden, the preceding subsections on path dependency have indicated that the country’s integration policies have been largely shaped by viable mechanisms for institutional reproduction.
In comparison with the Netherlands, Sweden has experienced fewer factors promoting diversion from the assumed path. While a significant minority, around 40-45%, of the voters, have maintained a sceptical view towards refugees (Loxbo, 2015), the I.I topic has rarely made the top three in citizens’ ranking of salient issues within the time period of 1987-2014, with the exception of 1993 and 2014 when it attained third place (Ekengren-Ocarsson & Bergström, 2015). What is more, Sweden did not have a xenophobic right-wing party represented in parliament in the majority of that time period, 1994-2010 (NSD, n.d), which implies an overall low issue salience for the voters. From a political point of view, the I.I has also received marginal attention by the parties in parliament throughout the same period (table 7).

However, the country has experienced a number of factors and events that can be labelled as external shocks. In the first half of the 1990s, an economic crisis coincided with an influx of refugees predominantly from the Balkans, Iran and Iraq. Unemployment rose to alarming levels, especially amongst non-Nordic citizens, and recession hit the country for three consecutive years (Borevi, 2012). Moreover, in the year of 1991, the far-right party NyD entered parliament with 6.7% of the vote but lost its seats in the subsequent election (NSD, n.d). Since then, large influxes of immigration and refugee streams have been a recurrent theme in Sweden. Between the years 2003-2008 alone, the country accepted 40 000 Iraqi refugees, the largest portion among EU member states and more than the United States (Borevi, 2012). In terms of critical events that have helped frame an anti-immigration discourse, such as terrorist attacks and the killings of high-profile politicians, the country has been largely, but not fully spared (Lagerström, P.C, 2015). Three events stand out as plausible shocks, the 9/11 attacks on the twin towers, the murder of the Social Democratic heavyweight Anna Lindh by a Serbian-Swede in 2003 and the failed terrorist attack on Drottninggatan, Stockholm in 2008 by an Iraqi-Swede. None of the events registered sufficiently with the voters to make the I.I issue part of top three important topics for the voters (Ekengren-Ocarsson & Bergström 2015). While the subsequent year of the first and third events saw the I.I jump from the 5th to 4th place on the ranking, the killing of Anna Lindh actually went opposite direction from 6 to 7 (Ekengren-Ocarsson & Bergström, 2015). On a similar note, the aftermath of 9/11 saw no change in Swedish immigration policy (Suter & Qvist, 2011), which further illustrates its minor effect on the political and public sphere.
In short, the lack of external shocks inflicting Sweden and the limited public and political backlash of the ones that have occurred lends explanatory value to why the country has maintained a status quo with regards to integration policies.

Finally, the study has not identified a widespread use of a crisis narrative regarding the I.I issue in Sweden. The conducted interviews yielded little evidence supporting the political framing of integration in crisis terms, which in itself serves to illuminate the absence of such rhetorical techniques. As shown in the ‘issue competition’ section, the mainstream parties in parliament largely opted for a dismissive approach on the I.I issue and thus intentionally sought to depoliticise the topic. Given that Utilisation of a crisis narrative would achieve the opposite, the lack of such is a logical outcome. To be fair, during FP’s campaign to link a language requirement to the naturalisation process in 2002, references were made to increasing segregation, deficiencies in democratic participation (Motion 22/03/Sf226; FP, 2003) and the failure of Swedish integration policy (FP, 2006). Yet the initiative was made within the context of proposing a more liberal immigration policy (Green-Pedersen & Krogstrup, 2008), and was framed as emancipatory for immigrants as opposed to being necessary to divert a looming crisis. In general, the political discourse on the immigration has been characterised by a predominantly economic perspective. In their research, Odmalm and Super (2014) have shown that Swedish parties have been decisively more successful in framing immigration as having economic implications, as opposed to socio-cultural, compared to their Dutch equivalent. Importantly, the parties have been able to frame labour migration as a technical issue and focused on how policy instruments can be made to promote integration, instead of regarding it as welfare chauvinism (2014). Consequently, the discourse has mainly revolved around the economic integration of immigrants into Swedish society rather than socio-cultural integration according to Swedish norms and values by framing immigration as a threat to social cohesion. Finally, a change in values of the importance for integration of attaining citizenship and being able to reunite with one’s family members has not been detected. To obtain citizenship and ability to reunite with family members is still regarded as being conducive to successful integration, as opposed to a final prize at the end of the process (Mårtensson; Høj-Larsen (V), P.C, 2015). In sum, the Swedish case has not displayed fundamental factors for path dependency change.
The occurrence of a shift in public support and external shocks has not been sufficient to change policymakers into enacting more stringent integration measures. Similarly, the lack of crisis narrative and perpetuating perspective on the positive effect of citizenship and F.R on integration has led to the preservation of the status quo.

Furthermore, the development in the Netherlands underwent a widely different trajectory than in Sweden. The Dutch case included all ingredients necessary for a sharp break with old integration policies, namely external shocks, crisis narrative, and distinct shifts in public opinion. To start with, the salience level on the immigration issue has for a long time remained prominent in public opinion. For one, the Netherlands was one of the first West-European countries to have an anti-immigration party represented in parliament, the Centrum Partij (CP) in 1982-1986, and later the CD, 1989-1994. However, both were electorally unsuccessful and subjected to a cordon sanitaire by the other parties in parliament (Van der Brug et al., 2014). An important shift came when the VVD and its outspoken leader Frits Bolkestein won a crushing victory in 1994, a victory that has largely been regarded as attributed by a ‘silent majority’ among the Dutch voters who were reticent about immigration and multiculturalism (Entzinger, 2003:75). Eight years later and in a decisive development, the LPF’s had its electoral breakthrough into parliament, coming out of nowhere to become the second-largest party in the Netherlands (NSD, n.d). Since then, the I.I issue has been firmly set on both the political and public agenda, not least displayed by the electoral success of Geert Wilders’ PVV which garnered 15.5% of the vote in the election of 2010 (NSD, n.d). Overall, the immigration issue has frequently topped lists on issue salience in Dutch Parliamentary Electoral Surveys (Aarts, Todosijevic & van der Kaap, 2010). Clearly, the Dutch public opinion has shifted significantly on the I.I issue and it remains a crucially important electoral topic today.

Furthermore, the Netherlands was undoubtedly shaped by a series of external shocks, which had a profound influence on the Dutch political and public agenda. First, the 9/11 terrorist attacks on American soil occurred and had far-reaching implications on the political views on the I.I issue (Bonjour, 2009). A number of conducted surveys in its aftermath indicated that most Muslims residing in the Netherlands could understand the committed act.
Based on this, members of the media and political sphere, including PM Kok (CDA), concluded that integration in the country had failed miserably (Bonjour, 2009:242). Consequently, this external shock came to add focus and urgency to ameliorating the I.I. issue. Secondly, the breakthrough of the LPF, and the murder of its charismatic political leader Pim Fortuyn just days before the election, only amplified the sense of urgency (Van Oers, 2013). All the Dutch respondents in this study described the ‘Fortuyn-revolt’ as a defining moment in breaking with the past. It created an imminent need for the traditional parties to re-establish the connection with the people and win back its trust, not least in the policy area of I.I (Marcouch, PvdA, P.C, 2015). Despite the LPF only forming part of a short-lived government and thus able to influence marginal changes, the societal change it had incurred was here to stay. In the aftermath of the 2003 election, the new centre-right government abandoned the term ‘multicultural’ from its coalition agenda and replaced it with stressing the need for immigrants’ to learn the language and understand Dutch norms and values (Van Selm, 2005). Thirdly, and the same year, a group consisting of Islamic extremists termed the Hofstad group was prosecuted, which eventually led to the expulsion of three fundamentalist imams (Van Oers, 2013). This was shortly followed by, fourth, the 2004 killing of controversial filmmaker Van Gogh by a Dutch-Moroccan whereby a written note targeting the anti-Muslim VVD politician Ali Hirschman was ‘pinned’ on the victim, which only further fuelled the perceived need and urgency for decisive political action (Van Selm, 2005; Van Oers, 2013). The Van Gogh murder also shifted the societal climate from a confrontation between cultures to a confrontation with religion, specifically Islam, and led to a more infected debate about Muslims in Dutch society (Marcouch, PvdA, P.C, 2015). Taken together, these external shocks have effectively undermined the support of political actors supporting multiculturalism and lenient legislation, with the election of 2002, and removed them from power (power-resource mechanism), and following its trail reinforced the image that previous policies, values, and integration at large, had failed miserably (i.e. the legitimacy mechanism was reduced in strength). Likewise, they have also reduced political costs associated with change (utility mechanism) given the larger acceptance for wide-scale change.
Moreover, the Dutch political debate has seen its fair share of crisis narrative Utilisation. In 1991, the VVD party leader Bolkestein lashed out against what he perceived as the detrimental impact of foreign culture and religion, specifically Islam, on Liberal and Western values and traditions. As the two could allegedly not be reconciled and no compromise was possible, Bolkestein called for stronger integration measures to be put in place (Bolkestein, 1991). These controversial statements were followed by a multicultural debate and election that rattled the Dutch political landscape. This development was coupled with a growing scientific and popular concern for high rates on unemployment-, school dropout- and crime along with welfare state dependency among immigrants throughout the 1990s fostered an increasing political feeling that integration had failed (Joppke 2007a; Schinkel & Van Houdt, 2010). This perception was also reflected in different studies that indicated that immigrants’ identification with the Netherlands and feeling Dutch was generally limited (Van Oers 2013; Phalet, Van Lotringen & Entzinger, 2000). Another crisis narrative that caused a political stir was started by Scheffer (PvdA) with the writing of the ‘the multicultural drama’ in 2000. In his work, Scheffer warned of the gradual development of an ethnic subclass of immigrants that, absent a connection to the domestic culture and community along with an inability and unwillingness to integrate, would pose a threat to the social cohesion and liberal values of the Dutch society (Scheffer, 2000). The article triggered the so-called ‘Scheffer debate’ in the public as well as the Dutch second chamber and centred on the impact of culture on integration (Van Oers, 2013).

In addition, after 2002 election and the ‘Fortuyn-revolt’, the use of a crisis narrative to frame the issue has also been a common feature on the governmental level. For instance, according to the government in 2004, the result of non-action on the I.I issue would be dire: “the marginalization of certain groups of the population” increases the risk of consequences for “the economic well-being of the Netherlands, the public order and public safety and the rights and freedoms of others” (MAAI & MFA, 2004: 17). On a similar note, if immigrants did not adjust to Dutch language, norms and values, the government was of the opinion that the “the continuity of society is at stake” (MAAI, 2005:40).
What is more, key political figures such as Minister Verdonk (VVD, later Trots op Nederland or TON) and Geert Wilders (PVV) have repeatedly pursued a more nationalistic agenda based on an anti-immigration platform and have helped push mainstream parties, especially the VVD, in adopting a more right-wing stance on the I.I. issue (Van Kersbergen & Krouwel, 2008). Consequently, features of a crisis narrative have certainly been present in the Dutch case.

To conclude, all these factors have contributed in shaping an environment characterized by a perception of failed integration and a pending crisis. One interviewed MP emphasised that the chain of events had three implications that facilitated large-scale political change. There was urgency, openness (i.e. the taboo associated with the I.I issue was gone) and there was common ground about the problem, which together downgraded the mechanisms for institutional reproduction and enabled wide-scale change to occur (Potters, VVD, P.C, 2015). In short, the necessary ingredients for extensive policy change were present and the mechanisms for institutional reproduction significantly reduced in strength. However, it is important to remember that the trajectory towards more stringent I.I policies was already in motion prior to the election in 2002 and Pim Fortuyn, e.g. both WIN and the revised Nationality Act, which introduced the N.T, were already established in 1998 and 2000 respectively, with the latter enforced in 2003. Clearly, the trajectory towards more stringent integration measures was already in motion prior to many of the subsequent events and narratives, but these factors help explain the profound outcome in both scope and width that came to characterize the adopted policies. Consequently, the aforementioned change factors created the momentum that enabled the subsequent introduction of the CIA (2006) and Integration Act (2007) to be passed with relative ease (Van Oers 2013; Bonjour 2010) and has since led stringent measures to be firmly linked with Dutch integration policy today.
5.3.5 Summary and verdict on hypothesis

Hypothesis 2: “In Sweden there were clear mechanisms of institutional reproduction whilst in the Netherlands these were either absent or reduced in strength sufficiently for change to occur”.

Sweden and the Netherlands have displayed widely different outcomes in regards to both the strength of the mechanisms for institutional reproduction as well as in the occurrence and impact of elements for path dependency change. The case of Sweden did indeed present clear and viable such mechanisms. The political parties and actors within them who have supported the status quo have largely maintained their access to decision-making venues, i.e. the government and parliament, along with the resources in information, professional competence and organizational assets that it entails (power-resource mechanism). A recurring argument, especially in regards to the language requirement case, concerned the uncertainty and investments associated with change (utility mechanism). References to sunk costs were, interestingly enough, largely absent in arguments to maintain the status quo. In turn, initiatives to adopt more stringent integration measures have repeatedly been de-legitimized as exclusive, xenophobic and unfair whilst the maintenance of the status quo has been depicted as promoting equality and inclusiveness (legitimacy mechanism). Similarly, path dependency factors such as large shifts in public opinion, external shocks or Utilisation of crisis narrative has either been largely absent or had a limited effect. Taken together, these conditions effectively thwarted the FP initiative to implement a language requirement linked to the naturalisation process and only allowed for incremental change, and a significantly watered down version, with regards to the introduction of a MR.

In contrast, the Netherlands experienced a widely different trajectory. Starting during the 1990s and culminating in the aftermath of LPF’s breakthrough, the Dutch mechanisms for institutional reproduction got progressively diminished in strength. Interestingly, changes towards adopting more stringent integration measures were already in motion prior to the killing of Van Gogh, the breakthrough of LPF, 9/11 and the Scheffer debate. For instance, WIN and the revised nationality act, which introduced formalised integration exams were put in place 1998 and 2000 respectively.
However, the N.T was only devised three years later in 2003 in connection with the Naturalisation decree (Staatsblad 2002:197). During the same time, the changed political climate influenced the Dutch policymakers behind the test to make it more difficult than originally intended back in 2000 (Van Oers, 2013). This implies that the Dutch mechanisms were gradually in decline prior to the 2000s, and were thus vulnerable to the subsequent series of events and Utilisation of crisis narrative which, when combined, exasperated the situation and opened up to wide-scale change with the introduction of the CIA (2006) and the Integration Act (2007). To conclude this section, Sweden displayed clear mechanisms for institutional reproduction whereas the Dutch equivalents were sufficiently downgraded in strength for significant alterations in integration policy to occur. Thus, this hypothesis can be considered as confirmed.

5.4. Policy transfer
This subsection on policy transfer is dedicated to testing the H3 hypothesis formulated in the theoretical section of 2.3, i.e.:

**Hypothesis 3:** “the difference between Sweden and the Netherlands can be explained by different degrees of conducted policy transfer”.

As opposed to the previous two sections on issue competition and path dependency, which apply an overarching perspective, this part is specifically limited to focusing on four policies: the Dutch N.T (2003) and CIA (2006) and the Swedish attempt to introduce language requirement by FP between 2002-2006 and the M.R (2010). This means that e.g. the Integration exam (2007), which supplanted N.T (2003), and the M’ proposal for a citizenship test (2002) is intentionally omitted in order to keep the section manageable within the scope of this study. The selection is based both on chronological order and the impact it had on the political debate.
5.4.1. Transfer character

Transfer character concerns the six different degrees to which a policy transfer is, or is not, conducted. The degrees are distinguished between 1) copying: direct copying of text; 2) Emulation: similar features and explicit references to another policy source; 3) Hybridization and synthesis: combination of various external policies; 4) Inspiration: explicit but general references to external inspirational sources; 5) Transfer failure: attempt for transfer that was obstructed by transfer constraints; 6) Non-transfer: domestic antecedents and/or innovative in nature.

Citizenship – Sweden – The Language Test
The Swedish attempt to introduce a language requirement in connection to the naturalisation process represents a difficult case in determining possible policy transfer. In the electoral campaign of 2002, FP was the first party to seriously float and politicize such an idea, however, it was vaguely formulated and received surprisingly little attention within the party’s election program. In fact, the proposal was not even mentioned in the summary at the start of the document (FP, 2002). What is more, the proposal is only described in rudimentary terms and is more or less limited to “[It would be] natural for acceptable knowledge in the Swedish language to become a requirement for citizenship” followed by “the corresponding rule for citizenship also exists in most other countries” (2002:17). According to Dahlstedt (2010) the “proposal, in fact, had more the character of an appeal than a well-developed, concrete proposal” (2010:40). Consequently, no references to specific countries or concrete policy text that can be compared with foreign legislation are to be found. Unfortunately for this study, the interviewed representative for FP, along with the other respondents were unable to shed additional light as to the possible origin of the language test proposal. Although, in an unsubstantiated statement from 2006, the former FP leader Maria Leissner told reporters that the party had looked to their Danish sister party for inspiration on new political strategies since the middle of the 1990s. However, the claim that FP had transferred policies and ideas on stricter integration measures from Denmark was repeatedly denied the acting party leader Lars Leijonborg, potentially due to the Danish enactment of controversial policy at the time (Milani 2008). Sadly, this study has not been able to corroborate or refute the claim based on the analysed material.
Nonetheless, it was first in 2003 that the party in its report ‘Språkkravsreform brådskar – nya fakta och argument’ (A language requirement reform is urgent – new facts and argument, 2003, *author’s translation*) was able to provide a more well-defined language proposal. In the report, the authors highlighted that 31 out of 44 studied countries, including 11 EU member states, had introduced some version of a language requirement for citizenship. Besides it was mentioned, Sweden did also have such requirement up until the 1980s. Moreover, especially Norway was advertised as seriously considering the implementation of such a policy (FP, 2003). However, to whatever extent these countries were used as sources of inspiration is unclear. There appears to be some discrepancy between utilizing other countries’ policy as a blueprint for national policies and legitimizing domestic initiatives. The latter is most likely the case, given that the authors of the report stated that:

“The People’s party’s [FP] demand on knowledge in Swedish for [acquiring] citizenship was during the election campaign depicted as more or less extremist. But corresponding conditions are made in many other countries that Sweden in another context typically compares itself with” (2003:9)

Further, once again there was a clear lack of specifications in regards to what skills should be tested, who should be subjected to the examination as well how this should be done. This was to be detailed further in future public investigations (FP, 2003). Consequently, the lack of elaboration and references to specific countries significantly limits the possibility to determining a conceivable policy transfer.

A clearer example of prospective policy transfer was made in the campaign leading up to the election in 2006. In the aftermath of Norway’s introduction of language requirement for citizenship and permanent residence, the FP party leader visited the country to learn from their model and muster valuable arguments ahead of the subsequent negotiation session for the Alliance manifesto, a coalition of which FP took part (Olsson, 2006). At the same time, the party released the telling report ‘Kan Norge kan vi!’ (If Norway can so can we!). The report provided an elaborate overview of the Norwegian model and was meant to provide answers to some of the practical objections raised in the Swedish debate (FP, 2006). While the party leader declined to state whether or not the Norwegian model should be copied straight of (Olsson, 2006), both he and the authors of the report emphasized Norway as an important source of inspiration (2006; FP 2006).
Regrettably for FP however, the Alliance coalition members were unable to agree on the topic and the proposal was excluded from the joint manifesto (Green-Pedersen & Krogstrup, 2008).

In terms of transfer character, the proposal made by FP presents a difficult case to determine. Its early version between 2002-2005 can be characterised as a ‘work in progress’ and contained little specific and concrete policy details and only sweeping references to the practices of a multitude of other countries. In turn, the subsequent attempt by FP to utilize Norway as a model for a prospective Swedish language requirement provides stronger indications of a possible clear-cut, specific policy transfer. Yet, since the party proved unwilling to state to what extent the Norwegian model should be adopted along with the fact that the proposal was not included in the Alliance’s manifesto, one is limited to pure speculation. Moreover, as a result of the FP proposal failing to gain traction with other parties in parliament, and even in their own coalition, there have not been any serious political discussions as to how such a proposal could be put into practice and formulated in concrete policy (Lagerström, P.C, 2015) Given these predicaments, the most credible approach would be to characterise the transfer character as inspiration in a case that eventually resulted in a failed transfer.

**Citizenship – The Netherlands – The Naturalisation Test**

The introduction of a formal integration test for naturalisation in 2003 and its subsequent replacement, the integration exam in 2007, has to be understood in the context of the civic integration program (Wet inburgering nieuwkomers, WIN) that started in 1998. It obliged newly arrived non-European immigrants to participate in an integration course consisting of language training, social and civic skills and orientation on the labour market. The program culminated in a language test that was utilised to evaluate the students’ performance (Entzinger, 2003). This Dutch integration program has since become something of a ‘model for Europe’ and has been adopted by a number of countries, including Finland, Denmark, Austria and Germany to name a few (Joppke 2007a; Michalowski 2004; Entzinger 2003). While the intellectual engineers behind WIN looked to the USA and Canada, where such courses were already in place, their personal contribution was to add the mandatory aspect (Entzinger, P.C, 2015).
The relevance of WIN to the subsequent introduction of the N.T (2003) is twofold. First, even though it was limited to educational purposes only, it was the first formalised Dutch test in concerning the integration of foreigners. Second, it served as pressure upwards to supplant the somewhat lenient naturalisation interview with a formalised and stricter test (Van Oers, 2013). In parliament, Christian Democrats argued that to demand more from newly arrived immigrants compared to those seeking to attain citizenship was a ‘world turned upside down’ (TK, 2000:3634-35).

Furthermore, in terms of the transferring of policies, according to one interviewed civil servant who was involved in work surrounding the Nationality Act (2000) and the implementation of the N.T (2003), Dutch policymakers did not look abroad for inspiration when producing the replacement of the old interview integration exam. Instead, they sought to improve the already existing examination procedure and make it more objective (Bleeker, P.C, 2015). The same interviewee later reaffirmed this statement after consulting colleagues at the Ministry of Social Affairs and Employment. Regrettably, no other interviewees were able to provide a clear answer on this account. All four interviewed Dutch politicians forwarded the USA as a source of inspiration for its perceived ability to integrate various cultures into one big ‘melting-pot’ (Potters (VVD), V.D Beukel (CDA), Kuiken & Marcouch (PvdA), P.C, 2015). However, they did not point to specific policies that might have contributed to this, which weakens the validity of their answers. Finally, the study did not identify any other indications of a policy transfer in the accessed material in the form of parliamentary procedures, think tank- and public reports, academic literature or from media sources. As a result, and to conclude this subsection, given the domestic antecedents of WIN and the material extracted from the interviewee who was involved the legislation process, the evidence indicates that the introduction of the N.T (2003) was the result of a non-transfer.

F.R – The Netherlands – Civic Integration Abroad
A number of authors depict the Dutch introduction of the CIA as one of the first attempts in the Europe, and indeed the world, to link an integration requirement in the form of a test to the pre-admission stage (Entzinger et al. 2011; Bonjour 2010; Carrera & Wiesbrock 2009). Although, the idea of integration abroad is in itself is no Dutch creation.
It was first implemented more than one decade earlier as part of the German Aussiedler policy to better integrate ethnic Germans displaced beyond the country’s borders. The German policy entailed the requirement for foreign children between the age of 16-18 to provide proof of sufficient proficiency in German or ability to integrate into German society prior to being allowed to join their parents in the country itself. However, the Dutch equivalent differs sharply in terms of state support. In contrast to the German initiative, the Dutch state has had but a minor role in providing funding and education material (Bonjour 2014; Joppke 2007a). Further, the idea to apply an integration requirement in the pre-admission phase for non-European family migrants was a Dutch product and has since acted a model and source of inspiration for other European states (Bonjour 2014; Goodman 2011). Moreover, despite the similar idea of integration abroad existed prior to the introduction of the CIA, Dutch policy-makers appear to have utilised policy transfer to a minor, or non-existent, extent. According to one interviewee from the Ministry of Justice and Security, the policymakers “didn’t look to other countries how they operated /…/ maybe they will take us as an example, but when we started we didn’t have an example” (Bleeker, P.C, 2015). Unfortunately, no other interviewees were able to concretely support or refute this statement. A reason behind which could be that the political discourse on the topic appears to have evaded calls for the use of policy learning from other countries (Entzinger et al., 2011). Moreover, as the Netherlands is considered to have been pioneering the CIA idea, little research has been conducted that investigates whether Dutch policymakers attained knowledge or inspiration elsewhere (Entzinger et al., 2011).

Despite this, the Netherlands has to some extent been influenced by policies of other EU member states, EU directives and soft law. Both the Directive on the right to F.R (2003/86/EC) and the Directive on the status of third-country nationals who are long-term residents (2003/109/EC) have affected Dutch integration policy in terms of the CIA (2006) and Integration act (2007)(Van Oers 2013; Carrera & Wiesbrock 2009). Inspiration has been drawn from both concerning integration requirements for F.R and permanent residence, and both Directives includes a clause that states that ‘Members states may require third-country nationals to comply with integration conditions in accordance with national law” (Article 7.1; 5.2).
The directives have been utilised as a “supranational precedent that created the political opportunity for national implementation” and “created a legitimacy that makes it possible for member states to link integration requirements to immigration” (Goodman, 2011:235, 242). However, while these Directives were in place even before the CIA proposal was presented to the Dutch parliament, the idea was on the horizon. Consequently, the Dutch EU delegation lobbied extensively to include the aforementioned articles so as to pre-empt a negative outcome that could possibly obstruct its eventual implementation (Strik, 2011; After Bonjour 2014). But importantly, the negotiation process on EU level has provided a platform for an exchange of ideas that in turn have helped shape and influence the policy-making procedures of the countries involved, including the Netherlands (Van Oers, 2013). Given that the idea of CIA was already ‘in the air’ prior to these negotiations, along with the marginal information extracted from the conducted interviews, it is not clear if and to what extent Dutch policymakers transferred policies or even inspiration from other states.

Two additional plausible sources for exchange that are worth mentioning are the National Contact Points (NCPs), a European commission funded network consisting of Member states to share integration practices, and the Common Basic Principles (CBPs) on integration. The latter were meant to provide Member states with a guide concerning integration and were established during the Dutch EU Presidency in 2004 (Van Oers, 2013). The CBS emphasize the crucial importance of knowledge of the host country’s traditions, instructions and language for integration (Council of the European Union, 2004). According to some scholars, the CBS have lent justification and legitimacy to the development of integration programmes on the state level (Carrera & Wiesbrock, 2009). Given the Netherlands position as holding the EU presidency, and thus the crucial role in establishing CBS, the Dutch policymakers seem to upload integration ideas and policies to EU level as opposed to transferring downwards, and the same can be said with respect to the Dutch lobbying on the EU directives. This upward policy transfer can thus be regarded as pre-emptive uploading after the idea of CIA already existed. In combination with the novelty of the CIA idea, the respondent who stated that Dutch policymakers did not look for inspiration elsewhere, and the Netherlands’ subsequent upward transfer to EU level, the evidence indicate a non-transfer of policy when designing the CIA.
F.R – Sweden – The Maintenance Requirement

Sweden was the last EU Member state to introduce a M.R and only did so on September 15, 2010 (Regeringen, 2010). This was despite the idea of a MR for members outside of the nuclear family being forwarded as early as 1995, whereby a governmental report looked mainly to other European countries (SOU 1995:75), and the fact that Sweden maintained a MR up until 1979 formulated within the context of labour migration (Borevi, 2015).

When it came to its eventual introduction in 2010, Swedish policymakers conducted a thorough study of the MR policies of other countries, which came to provide the knowledge and legitimacy for the subsequent domestic regulation. To illustrate, in the Swedish Government Official Report (SOU 2008:10/77) that investigated the possible implementation of such a requirement, a broad European perspective was adopted to establish what conditions other member states applied. To that end, the authors of the report gathered information from a number of European states, specifically Germany, the Netherlands, France, Finland, Denmark and Ireland (2008:57). Besides looking to the policies of other European states, the report also makes references to the EU F.R directive (2003/86/EC), which allows for the introduction of various conditions, including a M.R (SOU 2008:144:17). In addition, the investigation included a report by the European Commission that provided an overview of how the member states had transposed the EU directive on the right to F.R (2003/86/EC)(EU Commission, 2003). In 2009, after the government report was finished, the centre-right government put forward the proposition ‘Maintenance requirement for F.R’ (Government bill 2009:10/77). Similar to the governmental report, the bill refers explicitly to the practices of other EU member states and draws upon the aforementioned report by the EU commission when stating that “All member states besides Sweden impose some form of a maintenance requirement as a condition for F.R” (2009:17). At the time, all European member states except for Sweden applied a requirement for stable and regular means of income and all, but Finland, the Netherlands and Slovenia maintained some version of a requirement for adequate housing (SOU 2008:10/77, p. 57-58).

In terms of the eventual Swedish policy, the M.R came to condition F.R on adequate housing and a regular income (See section 4.4 Sweden – maintenance requirement; Migrationsverket, n.d.b).
Hence, this combination follows suit with a number of other European states, e.g. Austria and Poland, yet the different countries vary in terms of required income levels and what housing space is deemed sufficient (Government bill 2009:10/77). Three interviewees stated that a plausible reason as to why some Swedish legislators wanted to adopt a M.R. According to these, an important reason, besides promote integration, was to harmonize Swedish rules with that of the other EU member states (Lagerström; Strandberg; Höj-Larsen (V), P.C, 2015). This aim was also echoed from the government when it emphasized the importance of a more uniform framework of European regulation (Government bill 2009/10:77:19). Seen in this light, it is of no surprise that the Swedish M.R shares many similarities with other European states’. However, a few differences make it decisively different and single it out. Besides being comparatively low compared to the European standard and less than the maximum income requirement regulated in the EU F.R directive (2003/86/EC), the requirement is designed differently. Rather than obliging the sponsor to be financially able to provide for joining family members, as is generally the case with a M.R, the Swedish equivalent only requires the sponsor to be able to support oneself (Borevi, 2015). Moreover, as a result of the many exemptions incorporated in the legislation, the Swedish requirement is unusually liberal with less than 1% of the F.R cases actually covered by the condition (Strandberg, P.C, 2015; Borevi, 2015). Thus, given the very similar features of Swedish policy compared to several other EU member states along with explicit references and comparisons to the same and to the EU directive on F.R, yet with a somewhat different design and series of exemptions to its applicability, the evidence indicate that Swedish policymakers have adopted hybridization and synthesis as a transfer approach.
5.4.2 Actors involved & Utilisation of transferred policy

The actors involved and utilisation of transferred policies are identified by explicit references found in the accessed data that distinguish the actors participating in the process and corroborate the usage of the potentially transferred policies.

Citizenship – Sweden– The Language Test

The push by FP to introduce a language test in connection to the naturalisation procedure was brought about by various important figures in the party. Again, the conducted interviews, including the representative of the same party, were unable to provide clear accounts as to what actors these were and what influence they had in the process, which necessitates the use of secondary sources. According to Dahlstedt (2010), most of the FPs initiatives in 2002-2006 concerning a more ‘duty-based’ integration, including a mandatory language test for citizenship, carry clear resemblance with ideas previously floated by Mauricio Rojas. Rojas, a Chilean-Swede, academic and later integration spokesperson and a member of parliament on behalf of FP had written several books and articles on integration, was firmly in favour of a more strict approach, and came to have an important role in influencing the party’s position on the matter (2010). A second important figure in FP’s shift to demand stricter integration was Johan Jakobsson, head of information and secretary of the party between the years of 2002-2006. During the same period, Jakobsson maintained a central role in profiling FP as a party decisive on integration and gradually influenced the party towards adopting more right-wing features (Dahlstedt 2015). Finally, a third crucial actor in the party’s attempts to introduce a language requirement was the party leader Lars Leijonborg. Besides traveling to Norway in 2006 to learn about their model and gather valuable insights about a possible future Swedish equivalent (Olsson, 2006), Leijonborg was the author and co-author of a large number of reports and debate articles on integration, which contributed to politicizing the topic (Dahlstedt, 2010). In short, three actors have been identified as important for the party’s attempt to adopt a language requirement into the Swedish naturalisation process.

Furthermore, indications for the utilisation of transferred policies, which by following Smith (2004) were operationalized as explicit statements by civil servants and politicians, has been discernible.
Both the aforementioned reports (FP 2002; 2003), not to mention the illustrative ‘If Norway can so can we!’ (FP 2006), and parliamentary motions (e.g. motion 2002/03/Sf226) explicitly make references to the policies of other states. Yet, similar to the Dutch case on CIA, it is unclear whether the period between 2002-2005 was a case of policy transfer or an attempt to legitimize the party’s own position. Unfortunately, as been mentioned earlier, the conducted interviews failed to illuminate this further.

The subsequent trip to and report based on Norway provides a clearer example of Utilisation of transferred policies, yet given that the push by FP never resulted into actual ‘text on paper’ (i.e. concrete policy) seriously limits the extent to which one can determine this to be the case. Consequently, the evidence modestly suggests that FP policymakers had the intention to utilize transferred policies into the domestic setting, but to whatever extent this would be the case if the actual policy was drafted remains unclear.

Citizenship and FR – The Netherlands - Naturalisation test and Civic integration abroad
In both Dutch cases concerning the N.T and CIA, the forwarded evidence indicates that their development has been the result of non-transfer, i.e. had either been borrowed from domestic antecedents or been the result of innovative solutions procured in the country itself (Evans & Davies, 1999). Neither material gathered from interviews with the civil servants and politicians nor accessed documentation in the form of parliamentary proceedings, reports or research articles have concretely indicated external sources of inspiration, which has contributed to the making of Dutch policies. This could potentially partly be the result of Dutch policymakers proving unwilling to address policy learning on integration matters from other countries when participating in the political discourse (Entzinger et al., 2011). Unsurprisingly, the researcher has not identified any specific key figures in the gathered material that may have been involved in a potential policy transfer on either of the two policies concerned.

FR – Sweden – The Maintenance Requirement
The interviewed respondents yielded marginal information as to what actors were involved in the transferring of policies and to what extent they were influential. No specific actors were identified as important for the process. One civil servant from the
Ministry of Justice emphasized the importance of the governmental report in highlighting the policies of other European states, thereby implicitly forwarding the authors behind it as important actors in the process (Strandberg, P.C, 2015). According to Suter & Qvist (2011), who conducted a report on Swedish policy for the integration of newcomers, the Ministry of Justice, the centre-right government and the Minister of Migration Tobias Billström were crucial for the process (2011:1-2).

Interestingly enough, whilst the policy formulation on integration traditionally resided with the Ministry of Integration and Gender Equality and only to some extent with the Ministry of Justice, the political work towards the introduction of the M.R was spearheaded by latter and many authors of the governmental report (SOU 2008:144) were employed at same Ministry (Suter & Qvist, 2011). Further, the government, and more specifically the M, carried a central role in the introduction of the M.R. The party was the driving force within the Alliance government in favour of such a demand, but faced significant intra-coalition resistance, which help explain the many exceptions incorporated in the legislation (Borevi 2015). Finally, Minister Billström was also able to maintain an important function in the process leading up to Sweden’s adoption of the requirement. The minister initiated the procedure of examining the feasibility of establishing a M.R in connection to F.R and thus laid the groundwork for its future introduction (Suter & Qvist, 2011)

Moreover, in terms of Utilisation of transferred policies, the Swedish M.R case provided several such indications. As was illustrated in the subsection above, both the governmental report (SOU 2008:144) that investigated the implementation of a possible M.R, along with the eventual governmental bill (2009/10:77) that proposed in inauguration, made explicit references to the policies of other EU member states and to the EU directive on F.R (2003/86/EC). On a similar note, the information gathered in the interviewees, where three respondents highlighted the perceived need to harmonize domestic legislation with other EU member states, provides additional indications of policymakers being aware of the policies of other states and who subsequently decided to better conform with those by altering the national legislation. In short, the evidence indicates that Swedish policymakers have indeed utilised transferred knowledge, which strengthens the plausibility of a policy transfer having occurred.
5.4.3 Motives for policy transfer

In this subsection, the reasons behind the policy transfers are focused upon. Since the Dutch cases on the N.T (2003) and CIA (2006) have been classified as the result of non-transfers, the two cases are excluded in this subsection.

The different reasons behind a policy transfer are distinguished between and identified as 1) Voluntary transfer: expressed preferences about another system without 'strings attached', negative political remarks on the status quo, low public support; 2) Coercive transfer: explicit and inexplicit external threats of economic, political and social consequences in the absence of change; and 3) Indirect-coercive: explicit statements on change in return for e.g. economic, political and social assistance; International conventions and treaties.

Citizenship – Sweden – The Language Test

The case with the attempted initiative to link a language requirement to citizenship did not display any signs of coercive or indirect components that may have influenced Swedish, or liberal (FP), policy-makers. Given that the FP attempt failed to gain political traction with any of the other parties, except for the M, and failed to be implemented in practice renders the existence of external coercive elements or conditional exchanges highly unlikely. By assuming the perspective of FP, due to the party’s central role in the proposal, several indications for a voluntary transfer are identified. In the party’s documentation and parliamentary motions, there are several positive references to the policy of other countries that have a citizenship test in place (Motion 2002/03/Sf226: 15; FP 2003; 2006:2). Second, the FP was highly critical about maintaining a naturalisation procedure that did not entail a language test. Proponents argued that lack of Swedish among immigrants, which could be remedied with the installation of such a test, was alienating, detrimental to democratic participation and fostered poor integration (e.g. FP 2003:5-6). Third, there were indications of low public support for the status quo but this has proven somewhat more elusive. As mentioned earlier, an opinion poll by the SIFO institute on the commission of FP in 2002 showed that 71% of the respondents were in favour of connecting a language requirement to the naturalisation process. On a similar account, the party nearly to three folded its support from 4.6 to 13.3% compared to the previous election after having politicised the issue (Dahlstedt, 2010). Taken together, this indicates that significant segments of the public were in favour of change. However, these numbers do not mean that public support on the naturalisation process was low per se, but rather imply that many felt that an addition to it was in order.
Whatever the case, given the lack of coercive or conditional elements coupled with the occurrence of indicators associated with a voluntary attempt for change, the evidence suggest that FP’s language requirement initiative can be characterised as a voluntary (failed) transfer.

**FR – Sweden – The Maintenance Requirement**
In the Swedish case of introducing the M.R, there have been no indications of coercive elements that might have induced national policymakers into implementing the policy against their will or in exchange for external assistance of some kind. This is in line with what one representative from the largest party in favour of its installation, the M, was saying when stating that there was no perceived external pressure to better conform to the practices of other European states (Carnebratt (M), P.C, 2015). The fact that Sweden did so after years of inaction and as the last country in the EU, and even then, only implemented a significantly watered down version that barely affected any cases of F.R, strengthens this assertion. Besides, the EU directives on F.R (2003/86/EC) and long-term residence of third-country nationals (2003/109/EC) only allow for obliging integration measures to be put in place but do not compel member states to do so. Rather, research has indicated that powerful EU institutions, e.g. the Commission, actively oppose integration measures that might limit access for F.R (Bonjour, 2014). Instead, the evidence gathered from predominantly interviews (Strandberg; Höj-Larsen; Lagerström, P.C, 2015) imply that Swedish policymakers in favour of the introduction of a M.R wanted to better harmonize Swedish legislation to the general practices of other EU member states. The government also underscored the importance of doing so in order to further long-term and sustainable EU migration and asylum policy in its proposed bill (Government bill 2009/10:77:19). Moreover, political dismay over the status quo, i.e. not having a M.R, reached limited proportions and have mainly derived from the conservative M, a natural result given the opposition the party faced within the government coalition as well from other parties in parliament (Borevi, 2015). In turn, to whatever extent the initiative by M was driven by a perceived need to counter the gradual rise of SD, which entered parliament in 2010 with 5.7 % of the vote (NSD, n.d) remains unclear since the interviews yielded little on this account. Unfortunately, no opinion polls have been found to been conducted regarding the possible introduction of a M.R, which could inform the politicians about the public’s opinion.
on the matter. Consequently, rather than multiple negative political remarks concerning the status quo and low public support for the absence of a M.R, an expressed preference for another system, mainly forwarded by the M, appears to have been an important factor in promoting change. Thus, given the expressed willingness to promote harmonization of EU regulation, along with the lack of conditionality or coercive elements, the case is indicative of a voluntary transfer.

5.4.4. Policy transfer constraints
This section is concerned with the different constraints that can obstruct a policy transfer process. To reduce overlap with e.g. the path dependency section, this section is intentionally made more concise. Moreover, given that the two Dutch cases have been identified as non-transfers, they are omitted from this subsection.

Citizenship – Sweden – The Language Test
The attempt to link a language requirement to the naturalisation process in Sweden represents a case where the strength of the constraints eventually resulted in a transfer-failure. A crippling constraint to the policy transfer was the clear lack of political willingness to change the status quo. Besides FP, only the M supported the initiative, and the two were unable to find sufficient support with the other parties in parliament. As mentioned earlier, external events such as the 9/11 did not generate the political momentum to change the related field in immigration (Suter & Qvist, 2011) nor did it heighten the salience level of the I.I issue higher than rank 4 among the voters (Oscarsson & Bergström, 2015). Consequently, neither in 2002 nor 2006 was FP able to mobilize sufficient political support to induce change. In policy transfer terminology, the demand-side constraint obstructed the transfer process and assisted in its eventual failure.

In turn, programmatic constraints regarding doubts and uncertainties on foreign policy solutions and their prospective transferability were partly visible.
A recurrent argument concerned if and how a language test could be made at all, provided that such a demand was linked to the naturalisation process (SOU 1999:34, p. 316; FP 2006). Indeed, the whole purpose of FP’s report ‘If Norway can, so can we!’ (2006), was to illustrate how such language requirement for citizenship could be implemented in practice (2006:2). However, given the fact that the proposal by FP was never seriously investigated (Lagerström, P.C, 2015) along with the minimal interview material highlighting this aspect, limited additional indications of programmatic constraints have been identified. In turn, context constraints also played a role in thwarting FP’s attempt for a policy transfer. Arguably, the Swedish citizenship policy with its relatively lenient requirements for naturalisation is designed based on the assumption that attaining citizenship is conducive to integration (Mårtensson, P.C, 2015). A state inquiry from 1999 underscored that facilitating access to citizenship has been the dominant political will for decades (SOU 1999:34, p. 330). Given that Sweden since 2001 allows for dual nationality, has eased regulations for children that are either stateless or have foreign parents and grew up in the country to gain citizenship (SOU 2013:29), and have not thus far connected any integration requirements to the naturalisation process, it is safe to assume that this policy mindset has perpetuated.

In terms of application costs, i.e. political, bureaucratic and economic expenses, the language requirement case presents some difficulties. Despite several calls from FP, public authorities never properly investigated the costs and procedures associated with implementing such a proposal (Lagerström, P.C, 2015; SOU 1999; Motion 2003/03/sf226; FP 2003;). This limits the extent to which one can concretely pinpoint different expenditures. Notwithstanding, a few references to expenses have been identified. For instance, a public report highlighted the significant difficulties with designing a practical and just test for ascertaining a certain knowledge level (SOU 1999:34, p. 316). On a similar account, a government bill stated that the establishment of a framework to control the knowledge level of applicants would entail an administrative burden that was difficult to justify (Government bill, 1999/2000:147, p. 63f).
Finally, concerning political costs, the gathered material only allows for speculation on this account. Seen in the light of the political backlash linked with forwarding stricter integration measures for immigrants, in the form of xenophobic accusations (Selimovic (FP), P.C, 2015), the political costs appear to have been significant.

**FR – Sweden – The Maintenance Requirement**

The introduction of a M.R in Sweden faced a series of hurdles in the form of policy transfer constraints. In terms of demand side constraints, political unwillingness to implement the initiative has certainly influenced the process. In 1996, the government agreed with a committee (SOU 1995:75) investigating the topic in stating that it would run counter to the Swedish universal welfare state system and the state’s policy on equal treatment between natives and immigrants (Government bill 1996/97:25, p. 115). In 2002, a proposal from a governmental report (SOU 2002:13) to implement a MR that would oblige the sponsor to provide for both his/herself and joining family members, in addition to adequate housing, was never put into practice (Borevi, 2015). Similarly, three years later and after yet another governmental inquiry (SOU 2005:103, p. 116), which echoed the standpoint of the 1995 report, the government bill barely even mentions the issue of a MR (Government bill, 2005/06:72). Finally, the renewed push by the M, which eventually led to its implementation in 2010, met fierce opposition in parliament from Centre-left and left wing parties (parliamentary motions 2009/10: Sf9; 2009/10: Sf10; 2009/10: Sf11) as well as intra-coalition resistance from predominantly KD and to a lesser extent C and FP (Borevi, 2015).

Besides, since there has been a near-complete consensus regarding the importance of keeping the core family intact (Strandberg, P.C, 2015), the opportunities to introduce a more stringent MR has been limited. Taken together, the demand side constraints certainly lend support to explaining why the transfer of policy was stalled and subsequently led to a significantly watered down version compared to other European states.

Furthermore, this study had difficulties in clearly identifying constraints in the form of programmatic obstacles, e.g. uncertainty or doubts regarding the complexity of and transferability of the MR policies of other states.
One exception to this was the governmental report from 2005, which emphasized that the conditions in foreign welfare systems, which utilize needs-based assessment and thus could be more admissible towards a MR, just was not applicable to the same extent in Sweden given its universalist system. In a nutshell, the introduction of a MR would not lead to economic relief for the Swedish state, given joining family members’ continued access to welfare benefits, and would not have the steering effect on family migration as intended (SOU 2005:103:116). Furthermore, the evidence suggests that context constraints grounded in previous laws and policies have restricted the transfer of a MR into a Swedish context. As mentioned above, a recurrent argument was that a MR was incompatible with ‘the universal welfare state model’ and the state’s policy on equal treatment regardless of origin (SOU 1995:75; 2005:103). Consequently, to establish a MR was for a long time considered departing significantly from the Swedish policy path. Finally, in terms of application costs, the study did not identify significant costs in the form of economic and administrative expenses. While such costs were considered in the public report leading up to the MR, the initiative was still deemed to be profitable from a socio-economical perspective (SOU 2008:144, p. 144). Given that the MR would oblige the migrant to be financially responsible, the result is not very surprising on this account. Finally, the political costs associated with change appear to have been significant. As aforementioned, its main advocates MR, the M, faced resistance from both within its coalition as well as by the opposition in parliament (Borevi, 2015). Importantly, the compromises to the legislation, which resulted in its many exemptions, illuminate the high costs of pushing for a stricter requirement and hence the need for the M to dissuade this by scaling back on its initial demand. Consequently, and to conclude, these factors appear to have had a combined effect on the eventual result of the MR transfer, leading it to be significantly delineated in both scope and design.

In sum, both the Swedish cases concerning the language requirement and the MR demonstrated the obstruction of various constraints. In the former, the constraints proved so strong that that the transfer was halted completely and thus failed to result in concrete domestic policy. In the latter, the constraints clearly circumscribed the degree to which transfer was possible and resulted in a hollowed out version more aptly corresponding to the Swedish context.
5.4.5. Summary and verdict on hypothesis

Hypothesis 3: “the difference between Sweden and the Netherlands can be explained by different degrees of conducted policy transfer”.

The aim of this section has been to investigate whether Dutch and Swedish policymakers transferred policies and, if so, what actors were involved, how and why the transfer was done and if constraints obstructed the process. Starting with the Dutch cases, the study was unable to find evidence supporting the expectation that policymakers imported policy solutions from elsewhere. To the contrary, the evidence rather indicates the manifestation of non-transfers taken place, i.e. the N.T (2003) and CIA (2006) were based on domestic antecedents and, for the latter, were innovative in character (Evans & Davies, 1999). However, due to the limited evidence on this account, it is difficult to conclude anything with absolute certainty.

With regard to Sweden, the study identified the language test case as starting as a voluntary inspiration transfer but that eventually resulted in a transfer failure. In turn, the MR was diagnosed as a case of hybridization and synthesis. However, while Swedish policymakers appear to have transferred policy from other EU member states, the domestic MR differ in both scope and design in comparison with other states (Borevi, 2015). Consequently, this indicates that while Swedish policymakers adopted some elements taken from other countries, the core of the MR is devised to correspond to the domestic setting of a universal welfare state and fulfil the demands settled in the political negotiations leading up to the initiative. Moreover, while only some elements appear to have been transferred, the MR case fulfils, although in varying degrees, Smith’s (2004) test for studying a policy transfer empirically. This included the identification of commonalities between Sweden’s and other countries MR policy; the pinpointing of crucial actors that transferred the policy knowledge and highlighted it to the policymakers; along with identifying clear references to the usage of foreign MR policy within the domestic context.

In contrast, the language test case only featured sweeping references to the policies of other countries and political parties, except in the instances of Norway (FP, 2006) and somewhat insubstantially to the Danish Liberal Party in 2006 (Milani, 2008).
In addition, since the proposal was never substantiated with any concrete domestic policy text being drafted, the transferred policy was never utilised in practice. Consequently, a successful policy transferred occurred in one case but not the other. What both had in common, however, was that both were heavily subjected to various transfer constraints, which thwarted the transfer in the language test case and severely restricted the level of transferred policies in the case of the MR.

Taken together, the evidence implies that different degrees of conducted policy transfers have only occurred in the cases of Sweden and not those of the Netherlands. Rather, the Dutch policies appear to have been the result of non-transfer. To put this result in relation to the stated hypothesis, and with respect to the limited evidence on the Dutch cases, the H3 can thus be modestly refuted. Consequently, this means that the theory on policy transfer does not provide a comprehensive explanation for the difference between Sweden and the Netherlands.

5.5. Summary of the chapter

This chapter has been dedicated to presenting the results and analysis of the study. To briefly recap, section 5.1 addressed issue competition; 5.2 path dependency and; 5.3 policy transfer. Every section was systematically divided into subsections that concerned the independent variables identified in each respective theory and was subsequently concluded in short summary and judgment of a stated hypothesis. In the chapter, it was shown that the two hypotheses on issue competition and path dependency could be confirmed whilst the one on policy transfer was modestly refuted. In section 5.1 there were clear overall differences identified with regard to party strategies between Swedish and Dutch mainstream parties. Specifically, where the former largely opted for a dismissive/adversarial approach and the latter for a proactive/accommodation strategy. In turn, in section 5.2 it was demonstrated that whereas the Swedish mechanisms for institutional reproduction were still vital, the Dutch were sufficiently weakened in strength, or even transformed to exert pressure in favour of change, that alterations to the status quo could be made. Furthermore, section 5.3 showed that only the Swedish cases displayed indications of conducted policy transfers whilst the Dutch ones seem to be the result of non-transfers. In sum, the analysis and results chapter have demonstrated clearly different outcomes in Sweden and the Netherlands on all three applied theories. However, only issue competition and path dependency could be confirmed to carry explanatory value for
explaining the difference in integration policy between the two countries. Finally, table 8 and 9 below provide a country respective timeline encompassing the most crucial policies and events addressed in the chapter.

▪ 1985, New Nationality Act is introduced (facilitates access to citizenship)  
▪ 1991, VVD party leader Bolkestein starts criticising the country's immigration and integration policy at the Liberal International conference in Luzern |
| Integration policy (1994-2003) | ▪ 1994, The integration policy is introduced to supplant the Minority policy  
▪ 1994, General election, PvdA, VVD, and D66 forms new government called the ‘purple coalition’  
▪ 1998, Newcomers Integration Act is introduced  
▪ 2000, Proposal for amending the nationality Act (adopted in 2000); Prominent PvdA member publishes the ‘Multicultural drama’ in the NRC Handelsblad  
▪ 2001, 9/11 terrorist attacks in the USA  
▪ 2002, Killing of LPF party leader Pim Fortuyn; Electoral breakthrough for the LPF, gaining 17% of vote; Forms government with VVD and CDA but falls after a few months |
| Integration policy new style (2003-) | ▪ 2003, Integration policy new style is introduced and supplants the Integration policy; New election, CDA, VVD and D66 forms new government; New Dutch Nationality Act (2000) is enforced along with the Naturalisation test decree (2002:197); Prosecution of the Hofstad group whereby three radical imams were expelled from the Netherlands  
▪ 2004, Murder of controversial film-maker Theo Van Gogh  
▪ 2006, Introduction of Civic Integration Abroad; General election, PVV enters Dutch parliament with 5.9% of the vote and LPF loses its parliamentary seats completely  
▪ 2007, The Integration Act is introduced which replaces the naturalisation test with the integration exam  
▪ 2010, General election, CDA and the VVD forms government with the PVV as support party  
▪ 2010-2014, Integration budget gets completely defunded  
▪ 2013, Revised Integration Act – immigrations are once again personally responsible for integration costs and temporary residence can be revoked upon failing the integration exam. |

Table 8: Timeline For Major Policies And Events - The Netherlands

Table 8. Note: the Minority Policy prior to 1989 is included to display the contrast with current Dutch policies. Sources: Van Oers (2013); Bonjour (2008a;b); Entzinger (2003); Bolkestein (1991); NSD (n.d).
<table>
<thead>
<tr>
<th>Year Range</th>
<th>Events</th>
</tr>
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| 1989-1999  | 1991, General election, anti-immigration party NyD enters parliament with 6.7% of the vote  
|           | 1994, General election, S forms a minority government and NyD loses its seats in parliament  
|           | 1995, the Moderates starts to unsuccessfully push for the installation of a maintenance requirement |
| 2000-2009  | 2001, 9/11 terrorist attacks in the USA; Revised Citizenship Act is introduced (SFS 2001:82)  
|           | 2002-2006, FP pushes for the introduction of a language requirement connected to the naturalisation process  
|           | 2003, Murder of Social democratic heavy-weight Anna Lind  
|           | 2006, General election, M, FP, C and KD form the Alliance coalition and win the election. SD gains 2.93% of the vote  
|           | Failed terrorist attack in Stockholm |
| 2010-2014  | 2010, Sweden introduces a maintenance requirement; General election, the Alliance coalition retains power with the Green party (MP) as support party; SD gains 5.7% of the vote but is subjugated to a cordon sanitaire  
|           | 2014, General election, the Social democrats forms a minority government with MP. SD gains 12.86% of the vote; The December agreement is reached between the government and opposition to keep SD away from exerting influence. |

Table 9: Timeline For Major Policies And Events - Sweden

Table 9. Note. Sweden does not have clearly delineated overarching integration policies like the Netherlands; hence the division between is made between time periods. Sources: Dahlstedt (2015); BBC (2015); Borevi (2015; 2014; 2012); NSD (n.d),
6. Conclusion
The aim of this chapter is to conclude the thesis by summarising the conducted work, answering the research questions along with their implications for the field and finalising with some recommendations for future research.

6.1. Summary of the thesis
The main objective of this thesis has been to explain how the Netherlands and Sweden, two countries that share significant similarities and started from analogous positions on integration policy at the beginning of the 1990s, can differ so dramatically today. Consequently, this thesis has sought to answer the following research question:

*What explains the difference between Sweden and the Netherlands on integration policies with regard to citizenship and family reunification?*

To that end, the study has looked specifically on two respective policies in each country that concern citizenship and family reunification (FR). With the case of Sweden, focus resided with the unsuccessful initiatives by Swedish policymakers to introduce a citizenship test linked to the naturalisation process, predominantly the political push by the liberal FP to install a language examination between 2002-2006, and the country’s establishment of a maintenance requirement (MR) in 2010. Even though Sweden was the last country among all EU member states to institute a MR, the policy only came to be after being subjected to a series of exemptions and tailored design that seriously impede on its scale and scope and leaves less than 1% of all FR cases actually affected by the legislation (Government Bill 2009/10:77:17; Strandberg, P.C, 2015).

In turn, the Dutch case concerned the establishment of a formalised citizenship test in 2003, which was supplanted by the integration exam in 2007, and the introduction of the civic integration abroad (CIA) in 2006. While the citizenship policy requires immigrants to pass an exam in order to be naturalised, the CIA obliges joining family members to pass an integration test abroad, prior to entering the Netherlands, as a precondition for receiving a temporary residence permit (IND n.d).
To put into perspective, whereas the Swedish initiatives to install a citizenship test were never implemented and the MR only resulted in a significantly watered down version (Borevi, 2014), the formalised integration test is now firmly linked to the Dutch naturalisation process and the CIA was backed with massive parliamentary support and is today a central feature of the Netherlands’ integration policy in the pre-admission stage (Van Oers 2013; Bonjour & Lettinga 2012).

In order to explain this difference in outcome, an overview of previous research in the field was conducted that distinguished between three different possible theoretical explanations, which in turn were elaborated upon in the Theoretical framework. The theories were issue competition, i.e. the adoption of various strategies by political parties to adapt to different issues on the electoral campaign (Green-Pedersen & Mortensen, 2015); path dependency, which conveys how institutional structures can be maintained in a changing environment (Kuipers, 2006); and policy transfer, namely how policies in one setting is used in the development of policies in another (Dolowitz, 2000). After having outlined and described the theories in detail, each part was concluded with the formulation of a separate hypothesis to explain the different outcome in integration policy of the two countries.

Furthermore, as was demonstrated in the Methodological chapter, the study utilised a mixed methods design and combined both quantitative and qualitative elements. The quantitative element primarily concerned material collected from the Manifesto Project Database (MPD), which yielded statistical data on how much attention the Dutch and Swedish political parties have awarded different issues concerning integration and immigration in their manifestos. In turn, the qualitative methods encompassed individual semi-structured interviews and a qualitative content analysis of governmental documents, parliamentary procedures, media reporting and secondary empirical sources. The group of interview respondents comprised of national level politicians and civil servants in each country, all of which had either been or was active in working with I.I policy. Finally, the independent variables distinguished in the three theories were operationalized into a series of indicators and thereafter summarised in three tables in section 3.5.
6.2. Findings
To be able to understand what explains the difference between the two countries, it is important to know what the concerned policies are about. The Swedish and Dutch integration policies addressed in this thesis differ both with regards to character and strictness. In short, Sweden does not have any policy regarding an integration test for citizenship. The hitherto failed attempts to install one have mainly concerned the establishment of a language requirement. In turn, the Swedish MR obliges the receiving party to have a stable and sufficient income for personal expenses and have adequate housing to support joining family members. The required income level is comparatively low to other European states; it solely concerns the receiving party’s ability to support his or herself; and only affect a marginal proportion of all cases on F.R (Borevi, 2015; Migrationsverket, n.d.b). Conversely, the Dutch citizenship policy for naturalisation requires the applicant to pass an integration test consisting of e.g. the demonstration of language skills, knowledge of the Dutch state and awareness of Dutch norms and values (Van Oers, 2013). Finally, the Dutch CIA obligates joining family members to pass an integration exam prior to departure as a precondition for attaining a temporary residence permit (Naarnederland, n.d).

The theories utilised in this thesis carried different degrees of explanatory value in accounting for the difference between Sweden and the Netherlands. While the two stated hypotheses on issue competition and path dependency were confirmed, the one on policy transfer was modestly refuted, yet was restricted due to a lack of evidence. To begin with, the theory on issue competition has proven to be strongly applicable to highlighting the different political responses in the two countries. Not only did the evidence demonstrate that the I.I issue has been significantly more politically salient in the Netherlands; it has shown that Dutch political parties have largely opted towards either a proactive or accommodative approach. In contrast, the gathered data indicated an opposite position and general trend assumed by Swedish mainstream parties, a trend which has predominantly been characterised by dismissive and adversarial strategies.
However, a certain discrepancy has been detected between party positions adopted in manifestos in relation to positions assumed in practice. For instance, the Dutch CDA party repeatedly displayed manifesto values that indicated an adversarial approach on the I.I issue (figure 5) whilst at the same time serving as a key political advocate of stricter integration measures (Van Oers, 2013). Moreover, even solely policy positions can be ambiguous from a perspective of issue competition. The Swedish proposals for a M.R in 1995 and language test in 2002 was stricter from an integration point of view, i.e. indicative of either a proactive or accommodative approach, but were made in the context of proposing a more liberal immigration policy at large (Green-Pedersen & Krogstrup, 2008; Borevi, 2015), which implies an adversarial approach. Consequently, the process of distinguishing different party strategies has intermittently been rather elusive. Nonetheless, clear differences in party behaviour over time have been discernable in Sweden and the Netherlands, which have lent considerable explanatory value towards explaining the difference in integration policy between the two countries.

On a similar note, the theory on path dependency has also proven highly applicable. In varying degrees, the study was able to identify still viable mechanisms of institutional reproduction in the Swedish case that combined have served to reinforce the status quo, restrict policy alterations to incremental change and largely managed to keep the existing policy paradigm relatively intact. The power-resource mechanism, i.e. the preservation of key actors in power that supported that the status quo; and the legitimacy mechanism, with the discrediting and de-legitimization of change; were especially prominent in this regard. Conversely, the Dutch case demonstrated significantly weaker, or even changed mechanisms. Elections in 1994 and in particular 2002 transformed the political landscape and undermined the support for advocates of multiculturalism and lenient integration legislation. As a consequence, it resulted in reduced access to critical political venues such as parliament and government for these entities (power-resource mechanism). Similarly, the costs associated with change got progressively replaced by costs linked to supporting the status quo, especially in terms of political costs (utility mechanism). In turn, legitimacy frames on equality and inclusion have gradually been supplanted by new values promoting personal responsibility and the importance of preserving social cohesion.
Consequently, attempts to delegitimize and stigmatize changes to the status quo have decreased over time (legitimacy mechanism). Moreover, path dependency change factors have not only been present to a different extent in the two countries, but critical events e.g. external shocks have been framed differently so as to either preserve or radically alter the domestic integration policies. Whilst the theory on path dependency has been largely applicable to the study’s case, the fact that changes in Dutch integration policy started prior to the event of a series of external shocks e.g. 9/11, LPF’s breakthrough and the killing of Pim Fortuyn and Theo Van Gogh, renders a slightly puzzling result. Conceivably, and as the evidence has indicated, the mechanisms for institutional reproduction were already somewhat diminished in strength before these events and their occurrence only intensified the trajectory towards change.

Furthermore, the study has shown that policy transfer theory has had limited application in explaining the policy difference between Sweden and the Netherlands. Little concrete evidence was found to support the occurrence of a potential Dutch policy transfer. Neither conducted interviews nor accessed documentation convincingly demonstrated that Dutch policymakers looked abroad to other policy solutions when formulating the domestic integration policy. Instead, one interviewee that was directly involved in the work on the revised Nationality act (2000) that introduced the N.T, and was partly active with the CIA, insisted that both policies were purely Dutch inventions (Bleeker, 2015, PC). In the Swedish case, indications modestly support the notion that Swedish policymakers have transferred some elements from other countries or attempted to do so. Yet due to various constraints, the transfers have either been obstructed or limited in scope. Consequently, the fact that policy transfer theory can only lend explanatory value to Sweden but not the Netherlands has significantly reduced the theory’s applicability for this study.

So which theory is the strongest in explaining the difference between the two countries? Based on the discussion above and the fact that the analysis confirmed the hypotheses on issue competition and path dependency whilst modestly refuting the one on policy transfer, it is clear that the former two have provided more robust explanatory value. However, the process of measuring which among the two is the strongest is inherently linked to significant difficulties, as will be elaborated below, and outside of the scope of the thesis.
Consequently, this study holds that the question to why Sweden and the Netherlands differ so sharply on integration policies concerning citizenship and F.R can be explained by a combination of different strategies adopted by the mainstream parties and a difference in strength of the institutional mechanisms for reproduction that reinforced the status quo.

6.3. Theoretical reflection
In hindsight, some brief reflections can be made concerning the applied theories, choices made and their implications for this study. First, issue competition, especially with the thesis’ theoretical addition of a proactive approach, and path dependency proved well applicable and feasible within the scope of this study. In contrast, the use of policy transfer entailed a significant amount of independent variables and indicators that had to be applied to each addressed policy, as opposed to the overarching perspective assumed with the two other theories. If the Dutch cases had been found to be the result of the transferring of policies, the policy transfer section might very well have amounted to a thesis in itself. Nevertheless, the inclusion of a full three theories, which needed to be processed in turn, inevitably limited the space available for the researcher to elaborate in detail. Consequently, the expansive theoretical framework may have been better suited for a larger study that stretched over a longer period of time.

Second, with regard to path dependency and the utility mechanism, theory literature distinguishes the highlighting of economic sunk costs, which makes change very expensive, as a potent argument for maintaining the status quo (Kuipers, 2009:168). However, contrary to this expectation, this line of argument was rarely identified in the accessed data. As was noted by an interviewed MP, protectors of lenient policies on I.I tend to shun an economic perspective (frame) when addressing the topic as it can easily backfire (Potters (VVD), P.C, 2015). While sunk costs can be understood more broadly and include political investments and interests, the economic component remains an important aspect (Kuipers, 2009). Consequently, this discovery implies that users of path dependency theory could draw insights from other research on the political sphere and the use of framing. By doing so, researchers could better anticipate what arguments are potent, and hence to be expected, in a certain case and which are not.
Third, and finally, despite the study finding both issue competition and path dependency to carry explanatory value for the different outcome on Dutch and Swedish integration policy, it does not have the theoretical tools to determine which among the two theories is the strongest. Clearly, the measuring process would be difficult since the theories are intertwined. To illustrate, the strategies and decisions adopted by political parties have a decisive impact on what policies are made. At the same time, and as in particularly demonstrated in Sweden, mechanisms of institutional reproduction can seriously limit what strategies are considered politically feasible to maximize support, maintain credibility and limit the risk of potential backlashes. Conversely, as was shown in the Dutch cases, long-term political behaviour, partly entailing crisis narrative, can gradually diminish the strength of those mechanisms and facilitate change. Given these interlaced conditions, it has been beyond the scope of this study to compare the theories’ explanatory value against one another.

6.4. Methodological reflection
A brief reflection can also be made with regard to the methodological aspects of the thesis. First, while the interviews yielded plentiful of valuable information, the time span between the installation of some of the policies and this study, amounting to 10-15 years, undoubtedly had implications for their overall quality. Even if the respondents had been directly involved in the development of the policies, which given the time gap was not necessarily the case, the long time period may have potentially had natural limitations on their ability to recollect all essential information. This complication was made especially visible with respect to policy transfer, which required in-depth information about the origin and establishment of the addressed policies, as this knowledge proved repeatedly lacking amongst several of the interviewed respondents. A larger selection of interviews with politicians from more parties and additional civil servants that, if possible, had actively participated in the formulation of the policies may have had partly ameliorated these concerns.

Second, the selection of integration policies may well have had implications for the result of the study, not least in relation to policy transfer theory. Conceivably, policies on labour market integration entail a widely different dynamic of political and intuitional elements that could render a different outcome.
Third, as was noted in section 3.7 on limitations, the language barrier limited the researchers’ ability to analyse large segments of data in Dutch independently. Although this limitation is not expected to have changed the outcome of the results, the findings may have been stronger if more material could be processed. Fourth and finally, the study’s limitation to focus solely on two countries has unavoidably had implications for its generalizability. Nevertheless, by drawing on previous research that have also indicated the effects of party strategies and path dependency on I.I policy in various countries (e.g. Van der Brug et al., 2014; Manatschal, 2011; Green-Pedersen & Krogstrup, 2008), one can make cautious theoretical generalizations of the findings of this study to be applicable in other cases as well. Yet, the inclusion of an additional country that shares similar characteristics with Sweden and the Netherlands, e.g. a strong welfare state and multiparty system, could clearly have strengthened the study additionally in this regard. Taken together, a number of methodological aspects can be said to have influenced the thesis.

6.5. Academic and practical contribution
In spite of some of the shortcomings identified in the preceding reflection, this study makes several contributions to contemporary research and provides some practical insights for policymakers on integration. For one, it augments the scarce previous research on what has been seen as the Swedish exception from the civic integrationist trend that characterises many EU Member states (Borevi, 2011:47) Furthermore, the study provides a more comprehensive and conclusive picture on the extent to which Dutch policymakers learned from other countries when formulating their domestic integration policy, a perspective that has been clearly lacking in the literature (Entzinger et al., 2011:23). In addition, the thesis further substantiates preceding studies that distinguish Sweden’s limited changes on integration measures linked to citizenship and F.R as heavily influenced by path dependency (Borevi, 2014). Moreover, the study’s theoretical addition of the proactive approach to Meguid’s (2005; 2008) framework on party strategies, proved well applicable to explaining the pre-emptive positioning of mainstream parties in the absence of a perceived serious electoral threat by a niche party. Consequently, the addition allows for a more comprehensive blueprint of the strategies available to political parties. Furthermore, in terms of practical insights, policymakers can also draw benefit from the study.
Besides providing in-depth information about the policy solutions of two different countries, the study highlights the political dynamic, factors inhibiting and promoting change and ways of transferring knowledge that is linked, but not limited, to policies on I.I. Essentially, the study offers insights on the opportunities and constraints that influence the policymaking process. With these combined actions, this study has aimed to make some important contributions of both academic and practical nature.

6.6. Looking forward

In the light the results forwarded in this study, it seems apt to shortly reflect on how these would stand in a longer perspective. With respect to the risk of introducing new information in the conclusion, some remarks need to be made. At the time of writing, the political landscape in Sweden is changing rapidly with far-right SD closing in on, if not even surpassing, the largest parties S and M in opinion polls (NOVUS 2015; Wallroth, 2015). Moreover, the cross-coalition December agreement (see page 72) that was made to shut out SD from political influence fell in mid-October 2015 (Forsberg & Wågenberg, 2015) once again leaving the country in an uncertain political future. To whatever extent this combined development will have ramifications for the strategies employed by the mainstream parties and on the country’s integration and immigration policy, future studies will see. Conceivably, and based on the Dutch experience with LPF, the Swedish mainstream parties will increasingly opt for an accommodating approach to counter the electoral threat.

Perhaps even more importantly, the world now faces the largest refugee crisis since World War II with an influx of asylum seekers reaching European shores (Reuters, 2015). Undoubtedly, this will have a major impact for the policies of both the Netherlands and Sweden in the foreseeable future. For Sweden in particular, it is very well conceivable that its path dependent integration policy to date, based on inclusion and the idea of a universal welfare state, will gradually give way under the pressure of accommodating large numbers of refugees. In theoretical terms, this would mean that the Swedish mechanisms for institutional reproduction would diminish in strength and no longer be able to obstruct change. Whereas path dependency theory could still account for this change according to the expanded perspective employed in this study, its most prominent feature – of explaining why the status quo is maintained – would diminish in analytical value and no longer carry as much explanatory power as before.
Consequently, this would mean that issue competition and the more dynamic feature of path dependency theory would be more applicable to explaining the change that is likely to occur in the future. However, if, how and to what extent this development actually takes place, only time will tell.

6.7. Recommendations for Future Research
The reflections above have highlighted some of the limitations of this study as well as briefly hypothesising on how current events can have future implications for its results. In this respect, future research can make a number of valuable contributions to complement this work. Firstly, the inclusion of other integration measures and/or additional countries could prove academically fruitful in investigating whether the same mechanisms apply for change or the maintaining of the status quo. Secondly, prospective studies can utilise the same cases but devise a framework for measuring which of the theories of issue competition and path dependency carry the most explanatory value. Thirdly, given the twofold challenge facing Sweden today with a rapidly expanding anti-immigration party in parliament and an on-going refugee crisis, future research investigating its implications for mainstream party behaviour as well as the Swedish path dependency mechanisms would prove most welcome. Tellingly enough, at the time of writing, policy ideas are now being floated that would have been unthinkable less than a year ago. Moreover, in investigating these implications, researchers are encouraged to focus specifically on Sweden, include the latest manifesto material from the election in 2014 and beyond if possible, review statements made during political debates and compare concrete integration policy proposals presented before and after 2014 by the mainstream political parties. The application of a quantitative content analysis and or a rigorous method of process tracing may prove highly useful on this account.

To conclude, this study has sought to explain why Sweden and Netherlands differ with regard to integration policy and looking back, this objective can now be considered achieved. Yet, as was stated at its very beginning, immigration challenges our perspectives on identity, citizenship and community (Banting, 2000).
Against the backdrop of the ongoing refugee crisis and rising levels of immigration, the challenge for states to ensure the continued cohesiveness of national communities and maintain society as we know it becomes ever more pressing. Seen in this light, the successfulness of integration policies is of paramount importance and will remain so in the foreseeable future.
7. References

Governmental / Parliamentary / Party / EU Publications


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Academic Literature


Annex A: Interview guides for civil servants

A1.1. Interview guide – Civil servants – the Netherlands

Background questions

- How long have you been working with issues on immigration and integration?
- What are the policies for citizenship and family reunification of non-European, non-high skilled migrants?

Issue competition

- How would you describe the political debate on citizenship integration demands for Non-European immigrants? (Naturalisation). Has this changed in the past 15-20 years? If so, why?
- How would you describe the political debate on integration demands for family reunification on Non-European immigrants? Has this changed in the past 15-20 years? If so, why?
- To what extent do you think these policies have been influenced by the rise of the far right parties? How would you describe the response from mainstream parties?

Path dependency

- The Netherlands has adopted a series of integration demands connected to acquiring citizenship. Why do you think this is the case?
  - What actors have advocated a stricter policy? What were their reasons?
  - What actors have resisted change? Why? Why do you think they were unsuccessful?
- Change has also occurred in regards to family reunification, most notably with civic integration abroad. What led to this change?
  - What actors have advocated a stricter policy? What were their reasons? Why do you think they were successful?
  - What actors have resisted change? Why? Why do you think they were unsuccessful?
- Has there been any certain events taking place that might have influenced the outcome of these questions?

Policy transfer

- Looking back to when the policy demands on citizenship for non-European immigrants was developed, did the policy-makers look for inspiration abroad? (Ideas, policies, instruments). If so,
  - Where did it come from?
  - How was this attempt for transfer made? (Travels, conferences, international cooperation)
  - What actors were involved?
  - Were there any that factors obstructed/facilitated this transfer of policies?

3 3 The utilised Swedish version is provided at the end.
Looking back to when the policy on family reunification for non-European immigrants was developed, did the policy-makers look for inspiration abroad? (Ideas, policies, instruments). If so,
  - Where did it come from?
  - How was this information acquired? (Travels, conferences, international cooperation)
  - What actors were involved?
  - Were there factors that obstructed/facilitated this transfer of policies?

Thank you for your cooperation!

A1.2. Interview guide – Civil servants - Sweden

Background questions:

  - How long have you been working with issues on immigration and integration?
  - What are the policies for citizenship and family reunification of non-European, non-high skilled migrants?

Issue Competition

  - How would you describe the political debate on citizenship integration demands for Non-European immigrants? (Naturalisation). Has this changed in the past 15-20 years? If so, why?
  - How would you describe the political debate on integration demands for family reunification on Non-European immigrants? Has this changed in the past 15-20 years? If so, why?
  - To what extent do you think these policies have been influenced by the rise of the far right? (Sweden-democrats).

Path dependency

  - Sweden has yet to implement any significant demands on integration connected to acquiring citizenship, unlike several of our neighbouring countries. Why do you think this is the case?
    - What actors have advocated a stricter policy? How did they do this? What were the their reasons?
    - What actors have resisted change? How did they do this? What were the their reasons?
  - With the exception of the maintenance requirement, Sweden has yet to implement stricter demands on family reunification with civic integration abroad (integration tests). Why do you think this is the case?
    - What actors advocated change? Why? What arguments did they use?
    - What actors resisted the change? Why? What arguments were used?
    - Why did a change occur with the introduction of a maintenance requirement?
  - Were there any specific events taking place that promoted a certain outcome?
Policy transfer

To what extent were Swedish attempts to implement citizenship integration tests inspired by similar initiatives elsewhere? (Ideas, policies, instruments)
- Where did it come from?
- How was this information gained acquired? (Travels, conferences, international cooperation)
- What actors were involved?
- Were there any factors that obstructed this process?
- Swedish law on citizenship has been made in coordination with the other Nordic states, yet both Denmark and Norway has adopted integration tests connected to citizenship and Sweden has not. Why do you think this is the case?

Has similar attempts been made with regards to policy demands on family reunification (civic integration abroad/maintenance requirement)? If so,
- Where did it come from?
- How was this information gained acquired? (Travels, conferences, international cooperation)
- What actors were involved?
- Were there any factors that obstructed this process?

Thank you for your cooperation!

A1.3. Intervjuguide – tjänstemän - Sverige [Swedish]

Bakgrundsfrågor

Hur länge har du arbetat med frågor kring immigration och integration?
Vad är det för lagverk som reglerar medborgarskap och anhöriginvandring för icke-Europeiska och ej-arbetskraftsinvandring?

Issue competition

Hur skulle du beskriva den politiska debatten kring integrationskrav för medborgarskap de senaste 15-20 åren? Har den ändrats över tid? Om så är fallet, varför?
Hur skulle du beskriva den politiska debatten kring integrationskrav för anhöriginvandring (integrationstest) de senaste 15-20 åren? Har den ändrats över tid? Om så är fallet, varför?
Till vilken utsträckning skulle du säga att den här utvecklingen har påverkats av valframgångar på högerkanten? (Sverigedemokraterna)
Path dependency

Sverige har ännu inte infört några strikttare integrationskrav för medborgarskap, till skillnad från flera av våra grannländer. Varför tror du detta är fallet?
- Vilka aktörer har förespråkat förändring? Hur gick de tillväga? Vad för argument använde dem?
- Vilka aktörer har motsatt sig förändring? Hur gick de tillväga? Vad för argument använde dem?

Med undantag på försörjningskravet har Sverige inte antagit strikttare krav för anhöriginvandring i form av integrering utomlands (integreringstest). Varför tror du detta är fallet?
- Vilka aktörer förespråkade förändring? Vilka argument använde dem?
- Vilka aktörer motsatte sig förändring? Vilka argument användes?
- Varför skedde en förändring med försörjningskravet?
- Var det några speciella händelser som påverkade utfallet av dessa frågor?

Policy transfer

Till vilken utsträckning skulle du säga att svenska försök att införa integrationstest för medborgarskap har hämtat inspiration utomlands? (idéer, policies etc.).
- Vart kom denna inspiration från?
- Hur fick ni reda på den informationen? (Resor, konferenser, internationella samarbeten)
- Vilka aktörer var involverade i detta?
- Vad var det för faktorer som hindrade dessa idéer från att genomföras i praktiken?
- Svensk lagstiftning för medborgarskap brukar utformas i samspel med andra Nordiska stater, ändå har Danmark, Norge och Finland infört olika integrationstester för medborgarskap men inte Sverige. Varför tror du detta är fallet?
- Hur liknande försök genomförts gällande krav för anhöriginvandring (integrering utomlands/försörjningskravet)? Om så är fallet.
- Vart kom denna inspiration från?
- Hur fick ni reda på den informationen? (Resor, konferenser, internationella samarbeten)
- Vilka aktörer var involverade i detta?
- Var det några faktorer som hindrade denna aktivitet/process?

Tack för ditt samarbete!
Annex B: Interview guides for politicians

A2.1. Interview guide – politicians – Netherlands

Background questions

- How long have you been working with issues on immigration and integration?

Issue competition

- What has been your party’s position on integration demands for acquiring citizenship for Non-European immigrants? (Naturalisation). Has this changed in the past 15-20 years? If so, why? (What influenced this development?)
- What has been your party’s position on demands for family reunification policy for Non-European immigrants? Has this changed in the past 15-20 years? If so, why?
- How have your party positioned itself in relation to the increasing public salience on immigration and integration?
  - How did your party perceive the public opinion (electoral gains) on stricter integration policy?
  - How have you responded to the electoral gains of right-wing parties? What factors influenced this decision?
- To what extent would you say that your party position been influenced by the position of other mainstream parties in parliament? (Coalitions/potential alliances/mainstream party consensus)

Path dependency

- The Netherlands has adopted a series of integration demands connected to acquiring citizenship. Why do you think this is the case?
  - What actors have advocated a stricter policy? How did they do this? What were their reasons? Why do you think they were successful?
  - What actors have resisted change? How did they do this? What were their reasons? Why do you think they were unsuccessful?
- Change has also occurred in regards to family reunification, most notably with civic integration abroad. What led to this change?
  - What actors have advocated a stricter policy? How did they do this? What were their reasons? Why do you think they were successful?
  - What actors have resisted change? How did they do this? What were their reasons? Why do you think they were unsuccessful?
- Has there been any certain events taking place that might have influenced the outcome of these questions?

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4 The utilised Swedish version is provided at the end.
Policy transfer

Looking back to when the policy demands on citizenship for non-European immigrants was developed, did the policy-makers look for inspiration abroad (Other countries, EU)? (Ideas, policies, instruments). If so,

- Where did it come from?
- How was this attempt for transfer made? (Travels, conferences, international cooperation)
- What actors were involved?
- Were there factors that obstructed/facilitated this transfer of policies?

Looking back to when the policy on family reunification for non-European immigrants was developed, did the policy-makers look for inspiration abroad? (Ideas, policies, instruments). If so,

- Where did it come from?
- How was this information acquired? (Travels, conferences, international cooperation)
- What actors were involved?
- Were there any factors that obstructed/facilitated this transfer of policies?

Thank you for your cooperation!

A2.2. Interview guide – politicians – Sweden

Background question

- How long have you been working with issues on immigration and integration?

Issue competition

- What has been your party’s position on citizenship integration demands for Non-European immigrants? (Naturalisation). Has this changed in the past 15-20 years? If so, why?
- How has it been with regards to integration demands on family reunification before residence permit is given?
- How have your party positioned itself in relation to the increasing public salience on immigration and integration?
  - How have you responded to the electoral gains of the far right Sweden democrats? What factors influenced this decision?
- To what extent would you say that your party position been influenced by the position of other mainstream parties? (Coalitions/potential alliances/mainstream party consensus)
Path dependency

Sweden has yet to implement any significant demands on integration connected to acquiring citizenship, unlike several of our neighbouring countries. Why do you think this is the case?

- What actors have advocated a stricter policy? How did they do this? What were their reasons?
- What actors have resisted change? How did they do this? What were their reasons?

With the exception of the demands for economical self-support prior to acceptance, Sweden has not adopted stricter demands on family reunification in terms of civic integration abroad (integration tests). Why do you think this is the case?

- What actors advocated the change? What arguments were used?
- What actors resisted the change? What arguments were used?
- Why did change occur with the introduction of the maintenance requirement?

Has there been any certain events taking place that might have influenced the outcome of these questions?

Policy transfer

To what extent were Swedish attempts to implement citizenship integration tests inspired by similar initiatives elsewhere? (Ideas, policies, instruments)

- Where did it come from?
- How was this information acquired? (Travels, conferences, international cooperation)
- What actors were involved?
- What factors obstructed this transfer of policies?
- Swedish law on citizenship has been made in coordination with the other Nordic states, yet both Denmark and Norway has adopted integration tests connected to citizenship and Sweden has not. Why do you think this is the case?

Has similar attempts been made with regards to policy demands on family reunification (civic integration abroad/maintenance requirement)? If so,

- Where did it come from?
- How was this information acquired? (Travels, conferences, international cooperation)
- What actors were involved?
- Were there factors that obstructed/facilitated this activity?

Thank you for your cooperation!
A2.3. Intervjuguide – politiker – Sverige [Swedish]

Bakgrundsfrågor:

Hur länge har du arbetat med frågor kring immigration och integration?

Issue competition

Vad är ert partis position angående integrationskrav för medborgarskap för utom-Europeiska invandrare? (Naturalisation). Har detta ändrats över de senaste 15-20 åren? Om så är fallet, varför då?

Hur har detta sett ut gällande integrationskrav för anhöriginvandring innan uppehållstillstånd ges?

Hur har ditt parti positionerat sig i förhållande till det ökade väljarfokus på integration och invandring?

- Hur har ni positionerat er i förhållande till Sverigedemokraternas ökade valframgångar? Vilka faktorer har påverkat detta beslut?

Till vilken utsträckning skulle du säga att ditt partis position på dessa frågor har påverkats av de övriga partiernas ställning i riksdagen? (Koalitioner, potentiella allianser, möjlig förekomst av blocköverskridande konsensus).

Path dependency

Sverige har ännu inte infört några strikta integrationskrav för medborgarskap, till skillnad från flera av våra grannländer. Varför tror du detta är fallet?

- Vilka aktörer har förespråkat förändring? Hur gick de tillväga? Vad för argument har dem använt?

- Vilka aktörer har motsatt sig förändring? Hur gick de tillväga? Vad för argument har dem använt?

Med undantag på försörjningskravet har Sverige inte antagit strikta krav för anhöriginvandring i form av integrering utomlands (integreringstest). Varför tror du detta är fallet?

- Vilka aktörer förespråkade förändring? Vilka argument använde dem?

- Vilka aktörer motsatte sig förändring? Vilka argument använtes?

- Varför skedde en förändring med införandet och ändringen av försörjningskravet?

- Var det några speciella händelser som påverkade utfallet av dessa frågor?

Policy transfer

Till vilken utsträckning skulle du säga att svenska försök att införa integrationstest för medborgarskap har hämtat inspiration utomlands? (idéer, policies, etc.).

- Vart kom denna inspiration från?

- Hur fick ni reda på den informationen? (Resor, konferenser, internationella samarbeten)

- Vilka aktörer var involverade i detta?

- Vad var det för faktorer som hindrade dessa idéer från att genomföras i praktiken?
Svensk lagstiftning för medborgarskap brukar utformas i samspel med andra Nordiska stater, ändå har Danmark, Norge och Finland infört olika integrationstester för medborgarskap men inte Sverige. Varför tror du detta är fallet?

Hur liknande försök genomförts gällande krav för anhöarginvandring (integrering utomlands/försörjningskravet)? Om så är fallet.

- Vart kom denna inspiration från?
- Hur fick ni reda på den informationen? (Resor, konferenser, internationella samarbeten)
- Vilka aktörer var involverade i detta?
- Var det några faktorer som hindrade denna aktivitet/process?

Tack så mycket för ditt samarbete!