

Nationhood and Scandinavian Naturalization Politics:

Varieties of the Civic Turn

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Introduction

Within the policy repertoire Western liberal democracies have to foster national belonging and social cohesion, naturalization rules have come to hold a potentially important, yet quite tenuous position, with the increase in immigration. Even though only few rights are typically gained by naturalization (most importantly, national voting rights), it is perceived to hold significant potential for shaping how immigrants end up identifying with the national community. Indeed, naturalization policy has been reinvigorated in Western Europe since the late 1990s. This has manifested itself in an increased use of language, knowledge and economic requirements to condition access at the different stages in the naturalization trajectory, from entry over permanent residence to citizenship (Goodman 2014; Stadlmair 2015). These policy instruments are typically grouped under the term ‘civic integration policies’. For Christian Joppke (2007) and Sarah Wallace Goodman (2014), these policy instruments reflect West European ideational convergence on a non-nationalist notion of the good citizen as liberal-minded, autonomous and (economically) self-sufficient. They see a retreat from nationalism in policy-making that other scholars do not. Instead, these other scholars either argue that civic integration policies are layered on top of existing policies (Kymlicka and Banting 2013; Meer and Modood 2009) or that strong national differences remain in the interpretation of liberal and democratic values. These differences, it is argued, *both* tie in with how the nation has historically been imagined *and* how civic integration policies are designed and used today, if at all (Levey 2014; Mouritsen 2013). For these scholars, civic integration policies are but one symptom of a more broad ‘civic turn’ towards nation-states more intensely and openly questioning how to maintain a national citizenry conducive to a well-functioning liberal democracy and welfare state in the wake of (non-Western) immigration (Mouritsen 2008).

This article investigates how ideas concerning nationhood and social cohesion have informed and legitimized the divergence of Danish, Swedish and Norwegian naturalization policy in the last 15 to 20 years. Before 2001 none of the three had any formalized integration requirements nor allowed for dual citizenship as a right. Today, Denmark requires nine years of legal residence combined with tough language, knowledge, and self-sufficiency requirements but, nevertheless, introduced dual citizenship as a right in 2015. Sweden, on other hand, clearly deviates from the trend towards civic integration policies by not demanding any kind of test, oath, or proof of integration as a requirement for naturalization. Moreover, dual citizenship is allowed (since 2001) and the legal residence requirement is five years, which is only lower in two other European countries, namely Belgium and Ireland. Norway falls in between with a seven year residence requirement, a requirement to document 600 hours of language training (which includes 50 hours of social studies) but without having introduced a right to dual citizenship (Midtbøen 2015).

This divergence presents itself as a puzzle because all three countries have histories of ethnic homogeneity before the first wave of immigrants, they have developed similar universal welfare states, they have similar political systems and traditions of political consensus, and, not least, they all share a commitment to being culturally open-minded on issues of gender, sexuality and life style. This suggests that it is not differences in the normative content of nationhood that have directed them towards different policies. All three nation-states share rather similar notions of the good citizenry. Instead, this article argues that the relevant ideational differences are found in how nationhood is *causally* tied up with social cohesion and the welfare state in the national imagination. The different naturalization policies in Scandinavia do not primarily reflect whether the country has taken part in the civic turn or not. Civic integration has been a concern in all three countries, yet has materialized differently because of the causal ideas informing such debates. The core issue boils down to whether politicians think that formal integration requirements are considered necessary and conducive to foster national cohesion in a more diverse society.

We start out by outlining our theoretical approach before analyzing the dominant rationales/legitimations that can be teased out of key reforms and public debates since the late 1990s.¹ In the last section, we compare the three cases and highlight how nationhood has played a central part in shaping their naturalization policies.

Nationhood, the universal welfare state and the civic turn

As already mentioned, we distinguish civic integration *policies* from a more broad civic turn towards questioning the intersection of immigration, national cohesion and liberal democracy in national debates. Civic integration policies are a certain kind of policy instruments that governments *might* turn to as relevant answers to how the state can help turn immigrants into good citizens, or how to more heavy-handedly measure desert. Although the use civic integration policies have proliferated since the late 1990s, they vary significantly throughout Western Europe in who they cover and who can be exempted, how early and how many times in the integration process the instrument is used and, not least, how difficult the requirement is to accommodate (Goodman 2014).

The meaning of nationhood has taken center stage in many of these national debates. Yet, as Joppke (2008) describes, it seems paradoxical that across Western Europe nationhood is predominantly expressed within the same kind of liberal universalist register that, on the face of it, does not lend itself to the construction of *particular* national identities. Nonetheless, national particularism often gets tied in with (even small) national varieties in political traditions, the welfare state, and the meaning attributed to liberal-democratic values. In reality, there is seldom any clear breaking-point between a historically and culturally unique ways of life and shared, universal political values and virtues (Jensen 2014: 566).

Especially in the Nordic states, the comprehensive, social-democratic welfare state plays a central part in the national imaginary as a unique, progressive historical accomplishment. It represents a strong normative image internalized by all mainstream parties, left to right, that paints the good citizen, male or female, as highly committed to working and paying taxes (Ryner 2007). Not least because the large public sector with its universal services and comparatively high entitlements requires a large tax base. Yet, strong commitment to the national welfare state project is often coupled, in different ways, with a civic sense of community or togetherness and beliefs about how such norms and sentiments are cultivated. We argue that the main ideological difference between the Scandinavian countries informing their naturalization rules is not primarily the normative content of nationhood but the *perception* of what generates or reproduces national cohesion. We distinguish analytically between a bottom-up and a top-down perspective, where Danish politics gravitates towards the former, Swedish politics towards the latter (see Borevi forthcoming for a similar analysis), while Norwegian politics display an ambiguous attitude towards both perspectives.

From the bottom-up perspective, a strong (enough) sense of togetherness emerges from the sharing of norms and experiences that only a slow, organic societal process can produce. Nationhood and mutual solidarity is something that is achieved by citizens being embedded in the same kind of societal experiences, and therefore it cannot be readily extended to newcomers. Consequently, integration requirements and naturalization link up with a notion of deservingness based on a one-sided integration process and getting the nation ‘under the skin’, so to speak. Living up to this might well be perceived to generally involve a prolonged socialization process, to the extent that one has to grow up within the cultural and institutional confines of the welfare state.

From the top-down perspective, national cohesion does not require a historically grounded cultural commonality but simply flows from people interacting and experiencing equal treatment within fair and well-functioning institutions. This understanding will often be associated with the use of naturalization as a tool to further the basic equality that social cohesion rests on. Here integration requirements might well be seen as superfluous or even counter-productive if they hinder the equal societal inclusion of immigrants. This perspective implies that social cohesion and trust can be politically managed by way of inclusion and institutional design (Rothstein & Uslaner 2005). Such a perspective is not immune from being dressed up in nationalist rhetoric. The nation can still be thought of as unique, even superior, in terms of how to realize social justice and democracy in practice

The following three country analyses are based on both primary sources and existing research. However, the data basis of the three analyses will appear different to the reader: The analysis of Denmark is more oriented towards party politics; the Norwegian analysis focuses more on policy documents/commissioned reports, while the Swedish analysis falls in between. This is a consequence of different policy-making processes, and that naturalization has been a much more politicized issue in Denmark than in Sweden or Norway (Green-Pedersen & Krogstrup 2008). Regarding the policy-making process, political initiation in Norway and Sweden has been followed by the creation of a government-appointed commission that independently reports on what is problematic about the existing rules and possible solutions. No such tradition exists in Denmark (Bak Jørgensen 2011). Instead, the Danish government has constitutional power to decide on new naturalization requirements without it being discussed and passed by parliament. This partly accounts for the differences in politicization.

Denmark

Immigration and integration issues have been high on the political agenda in Denmark since the mid-1990s (Green-Pedersen & Krogstrup 2008). Not least, it has been a defining issue of several national parliamentary elections—including the most recent in 2015. The public debate has been dominated by the right-wing bloc with a discourse concentrated on a strong notion of deservingness, dismissal of multiculturalism, and veneration of Danish national (civic) culture as the foundation of the Danish welfare state and democracy. Integration policies, whether they pertain to family reunification, social rights, permanent residence, or naturalization, have almost uniformly been developed in a more restrictive direction through a host of law changes within the last 20 years—especially under the right-wing government from 2001 to 2011.² The parliamentary decision in 2014 to grant a right to dual citizenship is a notable exception.

Before 2001, 7 years of residence and the ability to participate in a Danish conversation (tested by the local police) were required for naturalization. This was consecutively tightened in 2002, 2003, 2005, and 2008. In 2013, a left-wing government³ relaxed the requirements only to watch them return to their previous levels in 2015 under the current right-wing government⁴—with the support of the Social Democrats (*Socialdemokraterne*). Today, one is required to have had nine years of legal residence, to pass a language test at the B2 level, to pass a citizenship test⁵ that includes cultural and historical questions, and to sign a loyalty oath. Moreover, you must not have received certain unemployment benefits⁶ within the last year and not for more than 6 months within the last 5 years, and you cannot have any public debt.

Already from the late 1970s, when integration of immigrants was first debated in parliament, the Conservatives (*Det Konservative Folkeparti*) were critical of a multicultural society, and then Minister of the Interior, Britta Schall Holberg from the Liberal Party (*Venstre*), argued that immigrants must adapt to Danish norms which in some instances required a “cultural loss” (Hvenegård-Lassen 2002: 149-52). However, it was not until the mid-1990s that immigration and integration issues became highly salient in the public debate. Both in January 1994, February 1995, and November 1997, the Liberal Party and the Conservatives proposed tightening the informal language requirement for naturalization and making no public debt a requirement (Folketinget 1994, 1995 & 1997). In the remarks to the proposals and in the parliamentary debates, the two parties argued that citizenship is the critical point from which one becomes a full-fledged member of the nation. An often used

phrase was that receiving citizenship is a ‘seal of approval’ (*blåt stempel*) to call oneself Danish (Holm 2007: 107-09). This notion of citizenship as a privilege, a prize at the end of the road, that you have to earn by integrating into Danish norms and traditions have continued to be prevalent in the reasoning behind strengthening naturalization requirements. In the Liberal Party’s most recent program for integration policy, it is stated that naturalization means that:

...a citizen from another country has chosen Denmark as her new nation. It is a big decision for the individual, and it is a big decision for Denmark which conclusively accepts this person as Danish with the rights and duties it entails. That is why we must have high demands, to ensure that only foreigners that are truly integrated and have shown that they want Denmark are granted citizenship. (Venstre 2014: 23).

Behind this notion of deservingness is a resolute rejection of multiculturalism and reverence for the historical and cultural foundation of the Danish welfare state and democracy. In the latter half of the 1990s, this was expressed by the centre-right parties as a strong discontent with the new integration law (Holm 2007: 107-11, 179-891; Jørgensen 2006: 267-299). They argued that the integration law undermined the aim of getting refugees to return to their home countries when possible. It “turned refugees into immigrants” as they often stated it, in the same breath as they argued that Denmark is not an immigration country. The cultural distance between native Danes and non-Western immigrants was continuously being problematized as both an argument for naturalization requirements and for reducing immigration. At the same time as integration was pictured as an onerous process, it was also said to be the responsibility of the immigrant to see this process through. In 2002, Bertel Haarder, then Minister of Integration and a prominent member of the Liberal Party to this day,⁷ succinctly argued that the universal welfare state rests on a deep, cultural socialization of its residents:

The Danish welfare state is made for a very homogenous people, where nearly every child has been to the same [kind of] school and developed the same attitudes; where the large majority have a strong work ethic and productivity; where working is an end in itself, a part of the identity. In such a society, a Nordic welfare state can be arranged. It does not work if the doors are opened and people with

very different backgrounds enter. (Haarder quoted in Lillelund 2002; own translation).⁸

This softening of the distinction between *integration* policies and *migration* policies is characteristic of the Danish debate. From family reunification over permanent residence to naturalization, increasingly difficult integration requirements are as much about integration as they are about deterring non-Western immigrants from coming. An important part of the underlying rationale is that Danish culture is a functional prerequisite of the welfare state. Often it is summed up in a demand that immigrants adapt in order to safeguard social cohesion. The current Minister of Integration, Inger Støjberg of the Liberal Party, replicated this line of reasoning in two highly debated op-eds in 2013 and 2014. She argued that immigrants and their children must adapt one-sidedly to Danish norms and values and, to this end, emphasized being part of a workplace dominated by native Danes and going to schools with mostly native Danish students. Hence, societal inclusion is less about a two-sided process of building inter-cultural understanding, than it is about socializing immigrants. The same kind of reasoning influences the discussion when it centers on democratic values. Denmark is pictured as having developed particularly anti-authoritarian, down-to-earth, and consensus-oriented democratic traditions and norms (Mouritsen & Olsen 2013). Especially during the cartoons crisis, this was often contrasted with Islam and connected to Danes being culturally influenced by Christianity despite not being very religious (Berg-Sørensen 2010).

The Social Democrats have not adopted the nationalist rhetoric of the right-wing parties, yet they have gradually adopted the ensuing restrictive requirements for permanent residence and naturalization. In fact, the Social Democrats were part of the 2015 agreement to strengthen naturalization requirements, and openly argued that they only agreed to relax the rules in 2013 because they had to find a compromise with their coalition partners (Dahlin 2015). This has commonly been perceived as a strategical move to decrease the politicization of the immigration issue which they tend to lose votes on (cf. Bale et al. 2009). Yet, the Social Democrats have never committed themselves to a different discourse about the meaning of citizenship and nationhood, or presented more multicultural ambitions (Jørgensen 2006). Instead, most disagreements with the centre-right parties have arisen over whether the level of the requirements are fair—that is, too demanding—albeit there is no real disputes over this today.⁹

When the Social Democrats in the late 1980s established a working group to draft the party's integration policy, before the integration issue was being politicized by the

centre-right parties, the question of cultural differences was not addressed (Jønsson 2013). When the Social Democratic lead government introduced the new integration law in 1998, respect for cultural differences was removed from the purpose clause despite being proposed in the report of an expert committee (Jørgensen 2006: 291). And by the end of the 1990s, the Social Democratic Prime Minister, Poul Nyrup Rasmussen, and Minister of the Interior, Karen Jespersen, distanced the party from any notion of Denmark as a ‘multi-ethnic’ or ‘multicultural’ nation but still without addressing explicitly a different notion of the nation (Jensen 2009). Since, under changing leaderships, the Social Democrats have emphasized liberal-democratic values as Danish values but continuously shied away from addressing the relationship between nationhood, social cohesion, and the welfare state. Instead, they focus on the duty of immigrants to seek employment and education. However, they accept the premise that citizenship is a privilege, and that integration is difficult and thus requires high demands. Coupled with their lack of opposition to the right-wing discourse about Danishness and dismissal of multiculturalism, a political situation exists where only the far-left Unity List (*Enhedslisten*) and the Social Liberal Party (*Radikale Venstre*) irregularly oppose the dominant notion of nationhood.

In this political environment, both the Social Democrats and the Liberal Party voted to allow dual citizenship in 2014.¹⁰ This seems like a curious turnaround from 2011, where they had firmly rejected dual citizenship. Then Minister of Integration, Søren Pind of the Liberal Party, called it a fundamental question about identity and loyalty (Folketinget 2011). What changed was the framing of the issue. The 2014 parliamentary debate was filled with references to Danes travelling abroad due to globalization processes, especially to the USA, with only few references to refugees and non-Western immigrants living in Denmark (Folketinget 2014). Consequently, dual citizenship was framed as a way of recognizing and maintaining the strong ties of native Danes to the nation as they move abroad to live and work. This is what Sejersen (2008) have termed the ‘emigrant approach’ to dual citizenship, and it is an approach that is consistent with the dominant discourse on nationhood. Not least, it is a way of arguing that is particularly forceful in a political context where an organic notion of national identity is highly valued, and there already are very restrictive naturalization rules in place.

Norway

Citizenship has been one of the least exposed and debated immigration related issues in the Norwegian public. When the citizenship legislation was to be revised after the turn of the century, the main features of the law was preserved and the consensus tradition was basically continued. A motivational duality is nevertheless striking: The exclusivity of the Norwegian citizenship is emphasized in tandem with signals to the effect that the government *wants* new permanent residents to naturalize.

The most recent Norwegian Nationality Act was implemented on 1 September 2006. Although being partially changed several times over the recent decades, this new act represented the first major revision since 1950. A preparatory committee was appointed in 1999, with a somewhat dualistic mandate: It was to review the existing law “building on the existing principles within Norwegian citizenship law”, yet at the same time being asked to consider a number of new concerns for possible inclusion or revision. The dual citizenship issue was the most significant of these, also causing most disagreement in the committee itself as well as in the informed public. But the question of requirements as to language skills and knowledge of polity and society also caused some discussion. Besides, the committee was explicitly asked to consider the importance of citizenship legislation for the integration of foreigners and their participation in society.

The assignment of the preparatory committee came at a time when the general opinion was believed to favour a liberalization of the Nationality Act. Norway had followed the general tendency among advanced welfare states to the effect that the most significant social and civil rights were extended to newcomers based on legal residency. Consequently, the spirit of the time indicated a devalued significance of the law itself, thus making it less important to keep exclusiveness in the form of single citizenship. And probably not least important, the recent Swedish draft of 1999 had proposed dual citizenship as their new approach (SOU 1999: 34).¹¹ The Norwegian committee delivered its report in 2000, yet it took another six years until the legislative process was concluded. This suggests a complicated and controversial process, during which a change in terms of political consensus on immigration and integration had taken place. All the same, it would be an exaggeration to rate citizenship issues among the more contentious public matters over the years. Citizenship law making in Norway has so far not stirred much public interest, and the reform process was void of much of the emotional energy that marks the rest of the immigration/integration sphere of politics. Thus, the usual party cleavages on immigration concerns were toned down.

Dual citizenship, however, was a minor exception. The large majority of the NGOs being asked for comments on the Law proposal were in favour of dual citizenship. The most prevalent line of argument was in terms of getting in tune with the major trends internationally. It was seen as practical and more immigrant-friendly to let newcomers choose single or dual citizenship. This attitude represented continuity on the political left, as well as among the NGOs dealing with multicultural issues: as few demands as possible should be imposed on newcomers in the integration process. For long, this attitude dominated the public, seconded or induced by the media. The grand exception was The Progress Party (*Fremskrittspartiet*), which actually capitalized on attitudes in the population going against the more lenient approach. The Progress Party accused larger parts of the political sphere for conducting *snillisme* – literally “kindism”; being kind to a fault – hereby showing disrespect to the Norwegian majority and its traditions, and actually pursuing the opposite of the historically consensus-based policy of equal treatment. The citizenship legislation only slowly came to the fore through the question of *political* rights. It probably took some time for parties, let alone the general population, to realize that the immigrant population represented voters, with potential influence on institutions, thus affecting society at large. During the local elections in 1999, the major parties for the first time (particularly in Oslo) realized they could do better by pandering to the immigrant population. Nevertheless, this fact did not trigger any major engagement in the revision process of the Nationality Law sparked off the same year.

During the process it appeared that the Preparatory Committee itself comprised the major fault line in its midst. A basic disagreement on the principle questions was revealed: What it should take to become a Norwegian citizen; what the Nationality Law itself should reflect in terms of traditions and nationhood; and not least the *kind of nationhood* that should be prescribed. Was it not for this one-person-minority of the committee, a professor who delivered a comprehensive justification for his dissent, the outcome of the whole process might have been different. The professor argued principled that one should regenerate the connection between polity and society. The national community was described first and foremost as a *political* community, yet the difficulty of differentiating between political and cultural community was underlined: As a source of solidarity and identity, the citizenship institute “must communicate with nation and ethnicity”, he argued (NOU 2000:32). The dissent was a meticulous historical review, emphasizing the welfare state’s significance for the building of trust and traditions of equal treatment. He saw the institution of citizenship as part of this tradition in polity, and wanted a discussion of the consequences to be drawn in

terms of role expectations for new citizens (p. 62). Dual citizenship was not to be accepted, as a reform to this effect would weaken the equality dimension, as a part of the constituency would have loyalty to more than one state. It would thus infringe on the existing Norwegian polity. The minority also argued for both language and knowledge requirements as a condition for naturalization.

The majority of the Committee did not go into the professor's principled discussion. What comes out in the text is therefore a rather limited argumentation for the majority's suggested liberalizations, with formulations strikingly close to the equivalent Swedish Committee report of 1999. The argument boils down to what is considered inevitable in an internationalized world as well as more practical justifications.

Since there was no public engagement, nor any major party cleavages involved in this controversy, the following process was left fairly open to handle for the second Bondevik Government (2001-2005).¹² Meanwhile, the public was gradually more interested in questions of social cohesion, the duty side of the social contract, as well as problems of integrating newcomers. As stated, the law making process was dragged out, and more pressing policy issues in the field of integration was presented to the *Storting* in the form of one White paper on Diversity and inclusion (Stortingsmelding nr 49. 2003-2004)—called a “value-statement” by the Government—and one new law on an introductory program for newly arrived refugees and their families (Introduksjonsloven 2003:80) Both documents were preparing new ground, ideologically and practically, for the upcoming Nationality Law. The white paper is the first of its kind in Norway trying to define what it takes for both the majority and immigrants to foster a well-functioning diverse society. The *credo* of the document is that policies should facilitate free choice for individuals: Pro pluralism, pro individual choice, yet within the confines of law and order in addition to a vague concept of “something more”. It appeared that this government wanted to place itself in the middle of the major multicultural schism between the right to choose cultural affiliation and the need of society to have well-functioning members and social cohesion.

The Introductory Law (implemented 1 September 2004) is relevant in this context, as it introduces the right to language training (cum courses on the social and political system) coupled with work training and labour market preparations.¹³ The law is path-breaking as an integration instrument in the Norwegian setting, partly because it is mandatory and conditions access to permanent residence (“a right and a duty”), and because in order to get the salary (which is higher than the social benefits these categories used to depend on) one

has to show up and participate.¹⁴ This law also functioned as an indirect language and knowledge requirement for naturalization and subsequently, in 2005, documentation of completed language training was included formally as a condition for naturalization.

Some of the perspectives of the new nationality law were announced already in the white paper on inclusion and participation. Even if foreign citizens since 1983 have had the right to vote in local elections, the government wanted as many as possible to gain full citizenship in order to be able to vote in governmental elections and “participate more fully in society”. The premise for this wish was an interpretation of the naturalization institute (symbolically and *de facto*) as an approval of the basic values of society, generally defined as democracy, human rights and gender equality. The government wanted to see naturalization as a formalization of the tacit societal contract existing between the citizen and the state.

In 2004, four years after the conclusion of the Citizenship Law Committee, the Bondevik Government presented its law proposal to the parliament; interestingly enough using the *minority* position of the committee as its basis on important issues. The government wanted a clearer emphasis on the basic values of the Norwegian society, and it did not want dual citizenship but rather requirements for naturalization in terms of language skills. Moreover, it wanted to introduce a (voluntary) ceremony with an oath. Much of the motivation for this governmental proposition also followed the minority of the committee in the sense that upgrading or revitalization of the citizenship institution was on the agenda. The parliament passed the law in 2005 under a new center-left government (Stoltenberg II). In 2016 a new proposed revision is in the pipeline: In order to gain naturalization a language and citizenship test needs to be passed.¹⁵

To sum up, the new nationality law in Norway is a hybrid in its composition. It wants both a tolerant, multicultural community *and* a strong sense of national belonging and solidarity. The enforced revocation policy, as well as the reinforced legislation on single citizenship, is a clear communication to the Norwegian population and the international community that Norwegian nationality is supposed to be exclusive. The oath, even though it takes place in a voluntary context, reaffirms the message to the naturalized individuals that there is a *duty* side to their new status. They have to show loyalty to their new country, abide by the laws, and respect democracy and human rights. The language/knowledge requirement is definitely also a more demanding change. Most important on the liberal side, is the introduction of the *right* to citizenship provided the conditions are met. Hereby, the discretion of the administration is removed, strengthening the rule of law.

Sweden

Like many other European countries, the post-War history of Swedish citizenship can be written as a process of deregulation, by which a singular, closed and monolithic container of rights is gradually replaced by a more open, differentiated and plural one, implying easier access for immigrants to goods and entitlements which had previously been reserved for nationals (cf. Hammar 1990; Soysal 1994; Joppke 2010; Spång 2011). While being far from unique in this respect, the trend of liberalization has been more extensive in Sweden than in Norway and especially Denmark. Above all, it has been more lasting. The formative years of the 1970s brought about a reduction in the required time of residence for naturalization from a minimum of seven years to five years (four years for refugees and stateless people and two years for Nordic nationals) (SOU 1974:69; Prop. 1975/76:136), local and regional voting rights for permanent residents (SOU 1975:15; Prop. 1975/76:23), and a gradual dissolution of the language requirement and the condition of self-sustenance (Szabó 1997: 56ff). A defining moment in the process of liberalization was the adoption of a multicultural policy in the mid-1970s, which built on public recognition of cultural diversity and equal rights for all residents regardless of ethnic background and nationality. The new policy also consolidated a view of integration as a process of voluntary and mutual adaptation, encouraging immigrants to preserve their native cultures (SOU 1974:69; Prop. 1975:26; Soininen 1999). In this pluralist and voluntaristic view, integration is believed to be causally related to the inclusion and empowerment of immigrants by the state, rather than to specific and explicit criteria of socio-cultural adaptation. Citizenship is one such state-administered instrument of inclusion, which encourages immigrants to participate in public and economic life, and to become well-functioning members of society.

Two major revisions of the Swedish citizenship law have taken place since the late 1990s, both of which confirm the country's commitment to liberal citizenship rules. The first led to the acceptance of dual citizenship in 2001 and the second to an upgrade of Swedish citizenship through a set of minor amendments in 2015. Notwithstanding the liberal nature of these revisions, a 'civic impulse' is clearly discernible in the latter of the two; an impulse inspired by the West European civic turn, yet within the confines of a pre-existing Swedish paradigm of liberal voluntarism, as we shall see below.

The acceptance of dual citizenship in 2001 had been a long time coming. It was first proposed by the social democratic government in the late 1980s and then blocked by the incoming center-right government in 1991. After their return to power in the mid-1990s, the social democrats initiated a major revision of Swedish citizenship in general and the single citizenship policy in particular. The objective was to modernize the 1950 citizenship law, which had become severely outdated. In practice, dual citizenship had been accepted for a growing number of exceptions—especially for immigrants whose countries of origin refused to recognize renunciation of citizenship—amounting to an estimated accumulation of dual citizens from 100,000 in the mid-1980s to 300,000 in 1997 (Gustafson 2002: 468). The new law was partly motivated as a full scale normalization of such exceptions by allowing dual citizenship without reservations, but it was also motivated in more principled ways.

The parliamentary committee that was appointed to prepare a new law, the *Citizenship Committee*, argued clearly in favor of dual citizenship in its final 1999 report (SOU 1999:34). It held, first of all, that the expanding use of the principle of domicile had equalized the status of residents and citizens in most areas of Swedish society, consequently downgrading the meaning and importance of citizenship. Secondly, Sweden had become internationalized to an extent that could not have been foreseen in 1950, with Swedes moving abroad and foreigners moving in and settling down, turning the country into a truly multicultural society with a constantly growing number of families with mixed nationalities. Recognizing the multiple transnational ties of an increasingly diverse population was both a pragmatic adaptation to an increasingly mobile population and a principled affirmation of the right to have more than one heartfelt identity and sense of belonging. Such recognition would facilitate integration, the committee argued, since it did not force immigrants or expatriates to choose one nationality over the other (SOU 1999:34, 202f). The acceptance of dual citizenship was largely motivated with respect to individual concerns, drawing on the pluralist and voluntaristic tradition in Swedish integration policy, as illustrated in the following statement by the then Minister of Integration, Ulrika Messing.

There is not just one way of being Swedish, but many. Nor is Swedishness something unchangeable. It is continually shaped and reshaped. It develops in encounters with other cultures. Therefore, it is important that we turn Swedish citizenship into an open arena for

encounters across ethnic and cultural borders, and that we all participate in shaping the new Swedishness. (Messing 2000)

The ensuing bill (Prop. 1999/2000:147) that was passed the following year enjoyed the support of all parties in parliament, save the Conservatives (*Moderaterna*). The Conservatives had remained a firm supporter of the single citizenship norm throughout the post-War years. Its dissenting opinion draws on all the traditional objections, which had been downplayed by the committee and other parties: The problem with dual voting and candidacy rights, the potential obligation to serve in the armed forces of two countries, loyalty conflicts, security concerns and the strongly limited ability for Swedish authorities to offer consular protection in the country of origin. On a deeper and more ideological note, the Conservatives questioned the correlation between globalization, dual citizenship and integration. If anything, increasing mobility and diversity generate a more pressing need for a citizenship that offers a strong sense of belonging and effective integration. Dual citizenship, on the contrary, is likely to create two tiers of citizens with different degrees of inclusion and participation, it was argued (Socialförsäkringsutskottet 2000/01:SfU8; Riksdagen 2000/01:70, §6). In contrast to the rights-centered individualism of the bill, the Conservatives stressed the loyalty and obligations to one state that the bond of citizenship should entail; a bond they believed would be further devalued by full acceptance of dual citizenship.

The formal requirements for naturalization have not undergone any significant changes since the 1970s, although calls for stricter conditions have occasionally surfaced in the public debate. The most persistent ones are the Liberal Party's (*Liberalerna*) attempts to introduce a language test. In the 2002 election campaign, the proposed test was presented as a progressive reform that would facilitate immigrant integration by making explicit the real conditions of successful integration in Swedish society. "To impose demands is to care" was the accompanying slogan. The Conservatives was the only supporter of the proposal, however, while the Social Democrats (*Socialdemokraterna*), The Left Party (*Vänsterpartiet*) and the Green Party (*Miljöpartiet*) were deeply critical. The language requirement was not dropped and remains on the liberal and conservative agendas, but has only occasionally surfaced as a purportedly pressing concern for policy makers.¹⁶ The most far-reaching demands for a tougher citizenship policy have come, unsurprisingly, from the far-right Sweden Democrats (*Sverigedemokraterna*), who wish to see the required years of residence extended to ten years accompanied by both language and knowledge tests. So far they have

been completely isolated on this and most other issues by the other parties, although their staggering success in the 2014 elections (from 5.7 to 12.9 %) may end their isolation.¹⁷

A Conservative-led right-center government took office after the 2006 election after 15 years of social democratic reign. Following re-election in 2010, it initiated revisions of the Swedish citizenship law, which were clearly driven by an interest in revitalizing Swedish citizenship. In 2012, a committee was appointed to suggest, among other things, an official definition of the meaning of Swedish citizenship, content and organization of ceremonies for new citizens, and potential ways of using citizenship as an incitement to further integration (SOU 2013:29, 69). The connection between language, integration, and citizenship, was dealt with extensively in the report that was delivered a year later. While recognizing the importance of Swedish language proficiency, the committee concluded with the 1999 report that testing was too blunt an instrument with too many negative side-effects; the main ones being the difficulty of precise and efficient language assessment, and the excluding effects toward immigrants with less opportunity and ability to learn Swedish (e.g., elderly, illiterates, housewives). Along with previous investigations, it recommended other means of encouraging naturalizing immigrants to learn Swedish (SOU 2013:29, 167-172). Although initiated by a liberal party with an interest in upgrading Swedish citizenship—above all through language requirements—the end result was a somewhat watered-down bill (prop. 2013/14:143), which introduced voluntary ceremonies for new citizens, a new website on the importance of citizenship, and extended equal birthright by descent on both the mother's and father's side. The committee also suggested a four year fast-track, a so-called 'language bonus', enabling immigrants who master the Swedish language to naturalize one year prematurely (see SOU 2013:29), but it was not included in the new law.

The above amendments to Swedish citizenship came into force in April 2015. It is interesting to note both the civic integrationist impulse behind the changes *and* the realignment of these changes with a pre-existing liberal legacy. The government wanted to upgrade citizenship, both symbolically and materially, and use it as a carrot to more effectively promote integration. It sought to introduce elements of desert to a legacy defined by free choice and individual rights. The end result and its justification, however, complied more with the liberal legacy by regarding integration as a voluntary process without unilaterally defined end goals such as citizenship. Just like previous amendments and revisions, the bill confirmed the view of naturalization being an encouragement to further

integration; one that should be distributed as universally and equally as possible without distinction between less and more deserving.

To sum up, in Sweden (as in Norway) citizenship does not stir up vigorous public debate and nationalist emotions. The effects of a generous (and increasingly contested) immigration and refugee policy on the public discourse on citizenship have been marginal.¹⁸ For the most part, the policy development on issues of citizenship has been guided by pragmatism and political consensus with few ideological conflicts (Spång 2007). Not even the dramatic entrance of the Sweden Democrats¹⁹ has brought about any significant change on this particular issue.

Concluding discussion

Despite their many institutional and structural similarities, the three Scandinavian countries have developed their naturalization policies in different directions in response to immigration and cultural diversity. Alternative explanations in the field such as a history of ethnic homogeneity (e.g., Brubaker 1992), public opinion (e.g., Howard 2010), the ideological orientation of government (e.g., Goodman 2014) and globalization (Joppke 2007) cannot account for this. First, the historical experiences of nation-building and -reproduction have relied on ethnic homogeneity in all three countries (Brochmann and Kjeldstadli 2008). Second, although the Swedish public has a comparatively positive attitude towards immigration and equal rights, the Danish and Norwegian publics typically cluster with Sweden in a European perspective (Gorodzeisky & Semyonov 2009; Nagayoshi & Hjerm 2015; Sides & Citrin 2007). Third, policies have not fluctuated with the ideological orientation of government. In each country a high degree of consensus on naturalization policies have developed between the large bloc-parties. The extent to which the appearance of a successful far-right party has pushed this consensus in a more restrictive direction also appears doubtful. Both Norway and Denmark had a successful far-right party early on, yet have diverged because of different responses from the centre-right parties (Bale et al. 2009). And in Sweden, the recent success of the Sweden Democrats has (so far) only served to strengthen the mainstream consensus. These different reactions from the centre-right parties in the three countries seem closely linked to different notions of nationhood. Finally, the fact

that all three economies are small and open, and that they all have comprehensive welfare states, subjects them to similar globalization pressures. This only predicts convergence.

If we instead turn to how the integration process is generally understood by mainstream politicians we do find strong variation. Even though the universal welfare state, both as institution and symbol, is perhaps the single most cherished national treasure, the epitome of what these nations have to offer and what they stand for, its conceptual and causal ties to nationhood and social cohesion vary between the three countries.

Sweden represents a top-down, bureaucratic, and administrative approach in which citizenship is largely vacuous of popular sentimental registers. In fact, nationhood is a highly sensitive concept which politicians tend to evade because it is typically associated with a repertoire of ethnic symbols and sentiments. The default position in Swedish politics and media is to view the Swedish nation as one of many existing ethnic communities in society and nationality as little more than the legal status of citizenship. While still present and important in society, national culture is largely viewed as a private matter which, just like the Lutheran church, has been divorced from state and citizenship. Instead, the Swedish state has committed itself to a pluralist idea of cohesion which does not define one center but many. This understanding *does* involve a more indefinite civic notion of nationhood or Swedishness as an evolving process of mutual acceptance and adaptation. Tolerance is a key liberal concept in this self-understanding. The welfare state is proudly thought of as the very institutional structure that facilitates such a positive process by promoting social mobility and intercultural learning. However, this understanding also makes it difficult to define one single finish-line and reward for completed integration. Citizenship, accordingly, is seen as an instrument to encourage and achieve integration through the extension of rights and (formal) equal inclusion. It relies on a doctrine of voluntary integration, in kind and degree, which is opposed to mandatory tests and other proofs of integration.

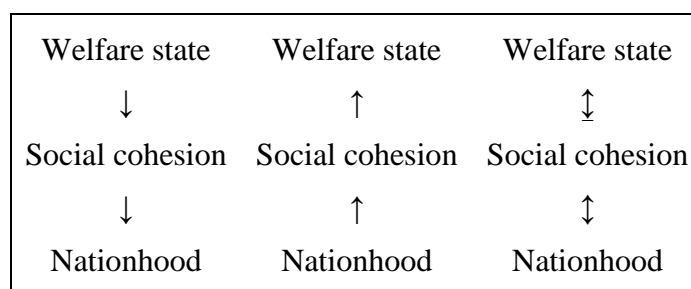
Denmark, on the other hand, represents a bottom-up approach to citizenship. Here the welfare system (along with the democratic traditions) is largely perceived as a fragile institutional structure built on civic cultural homogeneity. The high level of interpersonal and institutional trust in Denmark is just as much, if not more, about sharing a national culture as it is about well-functioning institutions. Consequently, naturalization is tightly coupled with becoming part of the national culture and immigrants have to be groomed and socialized before being accepted as fully included members. However, the concept of nationhood is typically not associated with ethnic imagery but with a comforting sense of togetherness

concentrated around a particular Danish realization of social justice and liberal-democratic norms and values. Even though this leaves considerable room for cultural differences, the reproduction of these so-called Danish norms and values are typically understood as presupposing a certain privatization of religion, egalitarian family life and dedication to interaction with native Danes through settlement, day care, school, work and associational life. Becoming integrated is pictured as a demanding and difficult one-sided process towards a fixed end-goal that integration requirements can both encourage and test. Although the Danish nation is understood as civic, albeit historically determined and non-negotiable, it is the understanding that some immigrants simply cannot take in a Danish way of life and, hence, should not receive citizenship.

Finally, the Norwegian approach to naturalization is more ambiguous. In Norway, the welfare state has been the great post-war nation-builder with its strong, yet adaptive institutions, also being used as such towards newcomers. In that sense the approach resembles the Swedish one—few, if any claims on the emotional side. Yet, most Norwegians would think this is only part of the story. Traditionally there is great enthusiasm attached to the Norwegian nation—scarcely any avoidance symptoms as in Sweden. To breed social cohesion, trust mechanisms are central, and the average Norwegian is likely to attach value to the national culture in this regard. This duality is evident in how, after the turn of the century, the Norwegian governments have explicitly wanted both a tolerant plurality *and* to preserve a strong national community, without trying to sort out the possible tensions. In public rhetoric this is “solved” by implicitly saying that one may learn to be Norwegian. Consequently, naturalization can be seen as both a reward and an encouragement on the way. At least until the recent refugee crisis, a somewhat inclusive attitude has been signaled: Immigrants *should* become citizens in order to participate politically, yet it still requires some years of socialization. The strategy has been more muddling through, hoping that the right, open attitudes and an “adjusted community feeling” would grow out of the basically welfare institutionalist approach.

Figure 1: the typical way that the causal connections between the welfare state, social cohesion and nationhood are portrayed.

<u>Sweden</u>	<u>Denmark</u>	<u>Norway</u>
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In all three countries, the civic turn is embedded in different notions of what an integration process entails in terms of time and effort from society and immigrants alike. We would argue that all three countries have elements of a rather liberal yet paternalistic, social engineering kind of approach to the field, although rooted in strikingly different conceptions of who should be the target for such disciplining efforts (Brochmann 2016): In Sweden the majority is the target. They are seen as potentially critical or hostile, therefore they need—in the Swedish traditional way—to be educated and molded into liberal and tolerant citizens, prepared for a pluralist era (see Wickström 2013). Conversely, Danish politicians mostly target the immigrant population. They need to learn (Danish) liberal values to be able to function well in modern *and* plural Denmark. These two opposite endeavors also reflect the divergent ways in which Denmark and Sweden understand “social cohesion” and “integration”. In the Danish, bottom-up community thinking, the state gets a role as gatekeeper, guiding immigrants into culturalized Danes, whereas the Swedish state retains a role as the top-down, grand educator for all citizens to become modern pluralists. In between we find Norway. For long politicians have relied on the nation-building capacity of the welfare state, yet are becoming increasingly concerned with the reproduction of Norwegian culture in order to maintain social cohesion.

Granted, the discussion above may come across as somewhat stylized. Of course, naturalization policies and nationhood have not remained wholly uncontested in each country. Instead, we have argued that political disagreement is structured along nationally distinct lines according to how nationhood, social cohesion and the welfare state are *predominantly* tied together in the political imagination.

Endnotes

¹ The ongoing refugee crisis makes this field of study a moving target. Although both border control and asylum policies in all three countries have undergone rapid reforms the last months, issues related to naturalization and citizenship reflect much slower processes. There are thus hardly any short term effects of the current crisis on the themes of this article.

² The minority government consisted of the Liberal Party and the Conservatives with the parliamentary support of the Danish People's Party.

³ The minority government from 2011 to 2015 were comprised of the Social Democrats, the Social Liberal Party and until 2014 also the Socialist People's Party.

⁴ A minority government consisting only of the Liberal Party.

⁵ Requires a minimum of 32 correct answers out of 40 questions within 45 minutes.

⁶ This only applies to public benefits falling under the Active Social Policy Act and the Integration Act.

⁷ He is Minister of Culture in the current government.

⁸ In the same article, Anne-Marie Meldgaard, spokesperson from the Social Democrats, did not take offense by this basic analysis.

⁹ In 2006 the Social Democrats did find the new naturalization requirements too restrictive. Today, they do not.

¹⁰ Without luck, the Social Liberal Party, as well as the new centre-right party Liberal Alliance, had pushed for allowing dual citizenship in four different law proposals from 2008 to 2011.

¹¹ By tradition, Norwegian legislation on naturalization had followed particularly Sweden with great interest.

¹² This was a centre-right government headed by Kjell Magne Bondevik from the Christian Democratic Party.

¹³ The law builds to a large extent on similar institutions in Sweden and Denmark.

¹⁴ Unauthorized absence implies reduction in salary.

¹⁵ Immigrants will have to take the two tests after completion of the introduction program. The language test will be at a considerably lower proficiency level than the Danish test.

¹⁶ The Conservative party re-launched the idea in a debate article in 2009 (Kristersson et. al. 2009) and the Liberal party has done so on several occasions (e.g. Björklund et. al. 2012 and Widman et. al. 2014).

¹⁷ The latest poll gives them an estimated 18.9 % of the votes (Novus, January 2016).

¹⁸ This remains the case even after the announcements of drastic policy changes in the Fall of 2015, due to the massive inflow of asylum-seekers from Syria and Afghanistan, among other countries. While these changes—e.g., border controls, stricter rules of asylum and family reunification, etc.—are intimately connected to the practical challenges of accommodation and the long-term challenges of economic integration, they remain completely separate from issues of citizenship and naturalization.

¹⁹ Since the turn of the century the Sweden Democrats have grown from a small party of marginalized extremists to the country's third largest party: 1.4 % of the votes in the 2002 elections to 12.9 % in 2014.

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