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Nationhood and Scandinavian Naturalization Politics: Varieties of the Civic Turn

Jensen, Kristian Kriegbaum; Fernández, Christian; Brochmann, Grete

Published in:
Citizenship Studies

DOI (link to publication from Publisher):
[10.1080/13621025.2017.1330399](https://doi.org/10.1080/13621025.2017.1330399)

Publication date:
2017

[Link to publication from Aalborg University](#)

Citation for published version (APA):
Jensen, K. K., Fernández, C., & Brochmann, G. (2017). Nationhood and Scandinavian Naturalization Politics: Varieties of the Civic Turn. *Citizenship Studies*, 21(5). <https://doi.org/10.1080/13621025.2017.1330399>

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Nationhood and Scandinavian Naturalization Politics:

Varieties of the Civic Turn

Abstract: The neighboring countries of Denmark, Sweden and Norway represent three very similar societies that differ markedly with respect to naturalization policy. While the general trend of a civic turn has brought about some of Europe's strictest residence and citizenship requirements in Denmark, it has left the liberal Swedish policy largely untouched and the Norwegian somewhere in between the other two. How might such divergence in otherwise very similar societies be explained? This article investigates the role different conceptions of nationhood has played. It is argued that different conceptions of nationhood has mattered, but that the national differences has less to do with the normative content of nationhood than with how politicians tend to conceive of the integration process that newcomers must commit to in order to develop a strong sense of national belonging.

Keywords: Civic turn; Naturalization; Citizenship; Nationhood; Social cohesion; Scandinavia

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

24 requirements to condition access at the different stages in the naturalization trajectory, from
25 entry over permanent residence to citizenship (Goodman 2014; Stadlmair 2015). These policy
26 instruments are typically grouped under the term ‘civic integration policies’. For Christian
27 Joppke (2007) and Sarah Wallace Goodman (2014), these policy instruments reflect West
28 European ideational convergence on a non-nationalist notion of the good citizen as liberal-
29 minded, autonomous and (economically) self-sufficient. They see a retreat from nationalism in
30 policy-making that other scholars do not. Instead, these other scholars either argue that civic
31 integration policies are layered on top of existing policies (Kymlicka and Banting 2013; Meer
32 and Modood 2009) or that strong national differences remain in the interpretation of liberal and
33 democratic values. These differences, it is argued, *both* tie in with how the nation has
34 historically been imagined *and* how civic integration policies are designed and used today, if at
35 all (Levey 2014; Mouritsen 2013). For these scholars, civic integration policies are but one
36 symptom of a more broad ‘civic turn’ towards nation-states more intensely and openly
37 questioning how to maintain a national citizenry conducive to a well-functioning liberal
38 democracy and welfare state in the wake of (non-Western) immigration (Mouritsen 2008).

39 This article investigates how ideas concerning nationhood and social cohesion
40 have informed and legitimized the divergence of Danish, Swedish and Norwegian
41 naturalization policy in the last 15 to 20 years. Before 2001 none of the three had any formalized
42 integration requirements nor allowed for dual citizenship as a right. Moreover, until the 1970s,
43 citizenship legislation was almost identical in the three countries due to extensive political and
44 judicial cooperation. Today, Denmark requires nine years of legal residence combined with
45 tough language, knowledge, and self-sufficiency requirements but introduced dual citizenship
46 as a right in 2015. Sweden, on other hand, clearly deviates from the trend towards civic
47 integration policies by not demanding any kind of test, oath, or proof of integration as a
48 requirement for naturalization. Moreover, dual citizenship is allowed (since 2001) and the legal

49 residence requirement is five years, which is only lower in two other European countries,
50 namely Belgium and Ireland. Norway falls in between with a seven year residence requirement,
51 a requirement to document 600 hours of language training (which includes 50 hours of social
52 studies) but without having introduced a right to dual citizenship (Midtbøen 2015).

53 This divergence presents itself as a puzzle because all three countries have
54 histories of ethnic homogeneity before the first wave of immigrants, they have developed
55 similar universal welfare states, they have similar political systems and traditions of political
56 consensus, and, not least, they all share a commitment to being culturally open-minded on
57 issues of gender, sexuality and life style. This suggests that it is not different notions about the
58 normative content of nationhood that have directed them towards different policies. All three
59 nation-states share rather similar notions of the good citizenry. Instead, this article argues that
60 the relevant ideational differences are causal and concern how politicians tend to conceive of
61 the integration process newcomers must commit to in order to develop a strong sense of national
62 belonging. Boiled down, the question is whether politicians think that naturalization policy can
63 actually assist in fostering a sense of belonging or merely test it by proxy.

64 We start out by outlining our theoretical approach before analyzing the dominant
65 rationales/legitimations that can be teased out of key reforms and public debates since the late
66 1990s.¹ In the last section, we compare the three cases and highlight how nationhood has played
67 a central part in shaping their naturalization policies.

68

69 **Nationhood, the universal welfare state and the civic turn**

70 As already mentioned, we distinguish civic integration *policies* from a more broad civic turn
71 towards questioning the intersection of immigration, national cohesion and liberal democracy
72 in national debates. Civic integration policies are a certain kind of policy instruments that

73 governments *might* turn to as relevant answers to how the state can help turn immigrants into
74 good citizens, or how to, more heavy-handedly, measure desert. Although the use of civic
75 integration policies have proliferated since the late 1990s, they vary significantly throughout
76 Western Europe in who they cover and who can be exempted, how early and how many times
77 in the integration process the instrument is used and, not least, how difficult the requirement is
78 to accommodate (Goodman 2014).

79 The *meaning of nationhood* has taken center stage in many of these national
80 debates. Yet, as Joppke (2008) describes, it seems paradoxical that across Western Europe
81 nationhood is predominantly expressed within the same kind of liberal universalist register that,
82 on the face of it, does not lend itself to the construction of *particular* national identities.
83 Nonetheless, national particularism often gets tied in with (even small) national varieties in
84 political traditions, the welfare state, and the meaning attributed to liberal-democratic values.
85 In reality, there is seldom any clear breaking-point between what is perceived as a historically
86 and culturally unique way of life, and shared, universal political values and virtues (Jensen
87 2014: 566).

88 Especially in the Nordic states, the comprehensive, social-democratic welfare
89 state plays a central part in the national imaginary as a unique, progressive historical
90 accomplishment. It represents a strong normative image internalized by all mainstream parties,
91 left to right, that paints the good citizen, male or female, as highly committed to working and
92 paying taxes (Ryner 2007). Not least because the large public sector with its universal services
93 and comparatively high entitlements requires a large tax base. Yet, strong commitment to the
94 national welfare state project is often coupled, in different ways, with a civic sense of
95 community or nationhood and beliefs about how such norms and sentiments are cultivated.

96 Since Brubaker's (1992) seminal study on France and Germany, the normative
97 content of nationhood has been a standard explanation of naturalization rules. Broadly
98 speaking, the argument is that restrictive rules tend to follow ethnic notions of nationhood based
99 on (ethno)cultural customs and traditions, while rules that are more permissive tend to follow
100 civic notions based on political values. What such analyses often omit is perceptions of causal
101 links between policy means and normative ends: what can state action actually change and how
102 fast (cf. Jensen 2014: 567)? Our examination of the Scandinavian countries will consider both
103 dimensions, but we will tend to argue that the ideological differences are stronger when it comes
104 to how nationhood develops.

105 Consequently, we follow Zimmer (2002) and separate notions about the
106 normative content of nationhood – such as language, history, political values or institutions –
107 from perceptions of the social mechanisms that construct nationhood. While the former pertains
108 to notions of *what* (should) define the nation and the good national citizen, the latter is about
109 the mechanisms (or socialization processes) through which nationhood is cultivated in
110 newcomers and future generations, i.e., how integration proceeds (cf. Favell 2006: 51). These
111 are in theory two independent dimensions of how people conceive of nationhood.

112 Within this second dimension, we distinguish analytically between an organic and
113 a voluntarist ideal type of the integration process (see also Borevi 2017; Kohn 1944; Smith
114 2000: 5-10, Zimmer 2002). From the organic perspective, a strong (enough) sense of belonging
115 emanates from shared norms and experiences that only a slow, immersive process can produce.
116 Nationhood and mutual solidarity is something achieved by citizens being deeply embedded in
117 the same kind of societal experiences, from childhood to adulthood, and therefore it cannot be
118 readily extended to newcomers. Consequently, there is little expectation that naturalization
119 policy can do much to further this process. Instead, such policy will tend to become a screening

120 tool for detecting whether an applicant is sufficiently socialized to become a member of the
121 nation.

122 From the voluntarist perspective, nationhood is a choice people take based on
123 interacting and experiencing equal treatment within fair and well-functioning institutions.
124 Knowing that you are participating on equal, fair terms in the national project, you more easily
125 commit yourself to the nation. From this viewpoint, naturalization requirements might well be
126 superfluous or even counter-productive if they hinder the equal societal inclusion of
127 immigrants. Indeed, it implies that immigrant's identity and trust is politically manageable by
128 way of inclusion and institutional design (Rothstein and Uslaner 2005).

129 To sum up, these two ideal typical perspectives offers different answers to what
130 naturalization policy can actually do for the integration process based on different assumptions
131 about how individuals develop a strong sense of national belonging. Is it necessarily a slow-
132 moving, non-voluntarist process that takes place outside the reach of naturalization policy
133 (organic), or can the state increase or decrease the tendency of newcomers to choose nationhood
134 using naturalization policy (voluntarist)?

135 We apply the two ideal types heuristically knowing well that each case, to some
136 extent, will mix both kinds of thinking. In addition, we wish to stress that the two ideal types
137 describe *perceptions* of how integration works (cf. Borevi 2017: 380). Moreover, any person or
138 organization can hold such a perception. In this article, we focus on the perceptions of political
139 parties and governments as expressed in key naturalization policy debates and documents.

140 The following three country analyses use both primary sources and existing
141 research. However, the data basis of the three analyses will appear different to the reader: The
142 analysis of Denmark is more oriented towards party politics; the Norwegian analysis focuses
143 more on policy documents/commissioned reports, while the Swedish analysis falls in between.

144 This is a consequence of different policy-making processes, and that naturalization has been a
145 much more politicized issue in Denmark than in Sweden or Norway (Green-Pedersen &
146 Krogstrup 2008). Regarding the policy-making process, political initiation in Norway and
147 Sweden has been followed by the creation of a government-appointed commission that
148 independently reports on what is problematic about the existing rules and possible solutions.
149 No such tradition exists in Denmark (Bak Jørgensen 2011). Instead, the Danish government has
150 constitutional power to decide on new naturalization requirements without approval from
151 parliament. This may partly account for the differences in politicization.

152

153 **Denmark**

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

164 Before 2001, 7 years of residence and the ability to participate in a Danish
165 conversation (tested by the local police) were required for naturalization. This was
166 consecutively tightened in 2002, 2003, 2005, and 2008. In 2013, a left-wing government³
167 relaxed the requirements only to watch them return to their previous levels in 2015 under the

168 current right-wing government⁴—with the support of the Social Democrats
169 (*Socialdemokraterne*). Today, one is required to have had nine years of legal residence, to pass
170 a language test at the B2 level, to pass a citizenship test⁵ that includes cultural and historical
171 questions, and to sign a loyalty oath. Moreover, you must not have received certain
172 unemployment benefits⁶ within the last year and not for more than 6 months within the last 5
173 years, and you cannot have any public debt.

174 Already from the late 1970s, when integration of immigrants was first debated in
175 parliament, the Conservatives (*Det Konservative Folkeparti*) were critical of a multicultural
176 society, and then Minister of the Interior, Britta Schall Holberg from the Liberal Party (*Venstre*),
177 argued that immigrants must adapt to Danish norms which in some instances required a
178 “cultural loss” (Hvenegård-Lassen 2002, 149-52). However, it was not until the mid-1990s that
179 immigration and integration issues became highly salient in the public debate. Both in January
180 1994, February 1995, and November 1997, the Liberal Party and the Conservatives proposed
181 tightening the informal language requirement for naturalization and making no public debt a
182 requirement (Folketinget 1994, 1995 and 1997). In the remarks to the proposals and in the
183 parliamentary debates, the two parties argued that citizenship is the critical point from which
184 one becomes a full-fledged member of the nation. An often used phrase was that receiving
185 citizenship is a ‘seal of approval’ (*blåt stempel*) to call oneself Danish (Holm 2007, 107-09).
186 This notion of citizenship as a privilege, a prize at the end of the road, that you have to earn by
187 integrating into Danish norms and traditions have continued to be prevalent in the reasoning
188 behind strengthening naturalization requirements. In the Liberal Party’s most recent program
189 for integration policy, it is stated that naturalization means that:

190 ...a citizen from another country has chosen Denmark as her new
191 nation. It is a big decision for the individual, and it is a big decision for
192 Denmark which conclusively accepts this person as Danish with the

193 rights and duties it entails. That is why we must have high demands, to
194 ensure that only foreigners that are truly integrated and have shown that
195 they want Denmark are granted citizenship. (Venstre 2014, 23).

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

209 The Danish welfare state is made for a very homogenous people, where
210 nearly every child has been to the same [kind of] school and developed
211 the same attitudes; where the large majority have a strong work ethic
212 and productivity; where working is an end in itself, a part of the identity.
213 In such a society, a Nordic welfare state can be arranged. It does not
214 work if the doors are opened and people with very different
215 backgrounds enter. (Haarder quoted in Lillelund 2002; own
216 translation).⁸

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

234 The Social Democrats have not adopted the nationalist rhetoric of the right-wing
235 parties, yet they have gradually adopted the ensuing restrictive requirements for permanent
236 residence and naturalization. In fact, the Social Democrats were part of the 2015 agreement to
237 strengthen naturalization requirements, and openly argued that they only agreed to relax the
238 rules in 2013 because they had to find a compromise with their coalition partners (Dahlin 2015).
239 This has commonly been perceived as a strategical move to decrease the politicization of the
240 immigration issue which they tend to lose votes on (cf. Bale et al. 2009). Yet, the Social
241 Democrats have never committed themselves to a different discourse about the meaning of

242 citizenship and nationhood, or presented more multicultural ambitions (Jørgensen 2006).
243 Instead, most disagreements with the center-right parties have arisen over whether the level of
244 the requirements are fair—that is, too demanding—albeit there is no real disputes over this
245 today.⁹

246 When the Social Democrats in the late 1980s established a working group to draft
247 the party's integration policy, before the integration issue was being politicized by the center-
248 right parties, the question of cultural differences was not addressed (Jønsson 2013). When the
249 Social Democratic lead government introduced the new integration law in 1998, respect for
250 cultural differences was removed from the purpose clause despite being proposed in the report
251 of an expert committee (Jørgensen 2006, 291). And by the end of the 1990s, the Social
252 Democratic Prime Minister, Poul Nyrup Rasmussen, and Minister of the Interior, Karen
253 Jespersen, distanced the party from any notion of Denmark as a 'multi-ethnic' or 'multicultural'
254 nation but still without addressing explicitly a different notion of the nation (Jensen 2009).
255 Since, under changing leaderships, the Social Democrats have emphasized liberal-democratic
256 values as Danish values but continuously shied away from addressing the relationship between
257 nationhood, social cohesion, and the welfare state. Instead, they focus on the duty of immigrants
258 to seek employment and education. However, they accept the premise that citizenship is a
259 privilege, and that integration is difficult and thus requires high demands. Coupled with their
260 lack of opposition to the right-wing discourse about Danishness and dismissal of
261 multiculturalism, a political situation exists where only the far-left Unity List (*Enhedslisten*)
262 and the Social Liberal Party (*Radikale Venstre*) irregularly oppose the dominant notion of
263 nationhood.

264 In this political environment, both the Social Democrats and the Liberal Party voted
265 to allow dual citizenship in 2014.¹⁰ This seems like a curious turnaround from 2011, where they
266 had firmly rejected dual citizenship. Then Minister of Integration, Søren Pind of the Liberal

267 Party, called it a fundamental question about identity and loyalty (Folketinget 2011). What
268 changed was the framing of the issue. The 2014 parliamentary debate was filled with references
269 to Danes travelling abroad due to globalization processes, especially to the USA, with only few
270 references to refugees and non-Western immigrants living in Denmark (Folketinget 2014).
271 Consequently, dual citizenship was framed as a way of recognizing and maintaining the strong
272 ties of native Danes to the nation as they move abroad to live and work. This is what Sejersen
273 (2008) have termed the ‘emigrant approach’ to dual citizenship, and it is an approach that is
274 consistent with the dominant discourse on nationhood. Not least, it is a way of arguing that is
275 particularly forceful in a political context where an organic notion of national identity is highly
276 valued, and there already are very restrictive naturalization rules in place.

277

278 **Norway**

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

285 The most recent Norwegian Nationality Act was implemented on 1 September
286 2006. Although being partially changed several times over the recent decades, this new act
287 represented the first major revision since 1950. A preparatory committee was appointed in
288 1999, with a somewhat dualistic mandate: It was to review the existing law “building on the
289 existing principles within Norwegian citizenship law”, yet at the same time being asked to
290 consider a number of new concerns for possible inclusion or revision. The dual citizenship issue

291 was the most significant of these, also causing most disagreement in the committee itself as
292 well as in the informed public. But the question of requirements as to language skills and
293 knowledge of polity and society also caused some discussion. Besides, the committee was
294 explicitly asked to consider the importance of citizenship legislation for the integration of
295 foreigners and their participation in society.

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

311 Dual citizenship, however, was a minor exception. The large majority of the
312 NGOs being asked for comments on the Law proposal were in favour of dual citizenship. The
313 most prevalent line of argument was in terms of getting in tune with the major trends
314 internationally. It was seen as practical and more immigrant-friendly to let newcomers choose
315 single or dual citizenship. This attitude represented continuity on the political left, as well as

316 among the NGOs dealing with multicultural issues: as few demands as possible should be
317 imposed on newcomers in the integration process. For long, this attitude dominated the public,
318 seconded or induced by the media. The grand exception was The Progress Party
319 (*Fremskrittspartiet*), which actually capitalized on attitudes in the population going against the
320 more lenient approach. The Progress Party accused larger parts of the political sphere for
321 conducting *snillisme* – literally “kindism”; being kind to a fault – hereby showing disrespect to
322 the Norwegian majority and its traditions, and actually pursuing the opposite of the historically
323 consensus-based policy of equal treatment. The citizenship legislation only slowly came to the
324 fore through the question of *political* rights. It probably took some time for parties, let alone
325 the general population, to realize that the immigrant population represented voters, with
326 potential influence on institutions, thus affecting society at large. During the local elections in
327 1999, the major parties for the first time (particularly in Oslo) realized they could do better by
328 pandering to the immigrant population. Nevertheless, this fact did not trigger any major
329 engagement in the revision process of the Nationality Law sparked off the same year.

330 During the process it appeared that the Preparatory Committee itself comprised
331 the major fault line in its midst. A basic disagreement on the principle questions was revealed:
332 What it should take to become a Norwegian citizen; what the Nationality Law itself should
333 reflect in terms of traditions and nationhood; and not least the *kind of nationhood* that should
334 be prescribed. Was it not for this one-person-minority of the committee, a professor who
335 delivered a comprehensive justification for his dissent, the outcome of the whole process might
336 have been different. The professor argued principled that one should regenerate the connection
337 between polity and society. The national community was described first and foremost as a
338 *political* community, yet the difficulty of differentiating between political and cultural
339 community was underlined: As a source of solidarity and identity, the citizenship institute “must
340 communicate with nation and ethnicity”, he argued (NOU 2000:32). The dissent was a

341 meticulous historical review, emphasizing the welfare state's significance for the building of
342 trust and traditions of equal treatment. He saw the institution of citizenship as part of this
343 tradition in polity, and wanted a discussion of the consequences to be drawn in terms of role
344 expectations for new citizens (p. 62). Dual citizenship was not to be accepted, as a reform to
345 this effect would weaken the equality dimension, as a part of the constituency would have
346 loyalty to more than one state. It would thus infringe on the existing Norwegian polity. The
347 minority also argued for both language and knowledge requirements as a condition for
348 naturalization.

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

354 Since there was no public engagement, nor any major party cleavages involved in
355 this controversy, the following process was left fairly open to handle for the second Bondevik
356 Government (2001-2005).¹² Meanwhile, the public was gradually more interested in questions
357 of social cohesion, the duty side of the social contract, as well as problems of integrating
358 newcomers. As stated, the law making process was dragged out, and more pressing policy
359 issues in the field of integration was presented to the *Storting* in the form of one White paper
360 on Diversity and inclusion (Stortingsmelding nr 49. 2003-2004)—called a “value-statement”
361 by the Government—and one new law on an introductory program for newly arrived refugees
362 and their families (Introduksjonsloven 2003:80). Both documents were preparing new ground,
363 ideologically and practically, for the upcoming Nationality Law. The white paper is the first of
364 its kind in Norway trying to define what it takes for both the majority and immigrants to foster
365 a well-functioning diverse society. The *credo* of the document is that policies should facilitate

366 free choice for individuals: Pro pluralism, pro individual choice, yet within the confines of law
367 and order in addition to a vague concept of “something more”. It appeared that this government
368 wanted to place itself in the middle of the major multicultural schism between the right to
369 choose cultural affiliation and the need of society to have well-functioning members and social
370 cohesion.

371 The Introductory Law (implemented 1 September 2004) is relevant in this
372 context, as it introduces the right to language training (cum courses on the social and political
373 system) coupled with work training and labor market preparations.¹³ The law is path-breaking
374 as an integration instrument in the Norwegian setting, partly because it is mandatory and
375 conditions access to permanent residence (“a right and a duty”), and because in order to get the
376 salary (which is higher than the social benefits these categories used to depend on) one has to
377 show up and participate.¹⁴ This law also functioned as an indirect language and knowledge
378 requirement for naturalization and subsequently, in 2005, documentation of completed
379 language training was included formally as a condition for naturalization.

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

388 In 2004, four years after the conclusion of the Citizenship Law Committee, the
389 Bondevik Government presented its law proposal to the parliament; interestingly enough using

390 the *minority* position of the committee as its basis on important issues. The government wanted
391 a clearer emphasis on the basic values of the Norwegian society, and it did not want dual
392 citizenship but rather requirements for naturalization in terms of language skills. Moreover, it
393 wanted to introduce a (voluntary) ceremony with an oath. Much of the motivation for this
394 governmental proposition also followed the minority of the committee in the sense that
395 upgrading or revitalization of the citizenship institution was on the agenda. The parliament
396 passed the law in 2005 under a new center-left government (Stoltenberg II). In 2016 a new
397 proposed revision is in the pipeline: In order to gain naturalization a language and citizenship
398 test needs to be passed.¹⁵

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

410

411 **Sweden**

412 Like many other European countries, the post-War history of Swedish citizenship can be written
413 as a process of deregulation, by which a singular, closed and monolithic container of rights is

414 gradually replaced by a more open, differentiated and plural one, implying easier access for
415 immigrants to goods and entitlements which had previously been reserved for nationals (cf.
416 Hammar 1990; Soysal 1994; Joppke 2010; Spång 2011). While being far from unique in this
417 respect, the trend of liberalization has been more extensive in Sweden than in Norway and
418 especially Denmark. Above all, it has been more lasting. The formative years of the 1970s
419 brought about a reduction in the required time of residence for naturalization from a minimum
420 of seven years to five years (four years for refugees and stateless people and two years for
421 Nordic nationals) (SOU 1974:69; Prop. 1975/76:136), local and regional voting rights for
422 permanent residents (SOU 1975:15; Prop. 1975/76:23), and a gradual dissolution of the
423 language requirement and the condition of self-sustenance (Szabó 1997, 56ff). A defining
424 moment in the process of liberalization was the adoption of a multicultural policy in the mid-
425 1970s, which built on public recognition of cultural diversity and equal rights for all residents
426 regardless of ethnic background and nationality. The new policy also consolidated a view of
427 integration as a process of voluntary and mutual adaptation, encouraging immigrants to
428 preserve their native cultures (SOU 1974:69; Prop. 1975:26; Soininen 1999). In this pluralist
429 and voluntaristic view, integration is believed to be causally related to the inclusion and
430 empowerment of immigrants by the state, rather than to specific and explicit criteria of socio-
431 cultural adaptation. Citizenship is one such state-administered instrument of inclusion, which
432 encourages immigrants to participate in public and economic life, and to become well-
433 functioning members of society.

434 Two major revisions of the Swedish citizenship law have taken place since the
435 late 1990s, both of which confirm the country's commitment to liberal citizenship rules. The
436 first led to the acceptance of dual citizenship in 2001 and the second to an upgrade of Swedish
437 citizenship through a set of minor amendments in 2015. Notwithstanding the liberal nature of
438 these revisions, a 'civic impulse' is clearly discernible in the latter of the two; an impulse

439 inspired by the West European civic turn, yet within the confines of a pre-existing Swedish
440 paradigm of liberal voluntarism, as we shall see below.

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

452 The parliamentary committee that was appointed to prepare a new law, the
453 *Citizenship Committee*, argued clearly in favor of dual citizenship in its final 1999 report (SOU
454 1999:34). It held, first of all, that the expanding use of the principle of domicile had equalized
455 the status of residents and citizens in most areas of Swedish society, consequently downgrading
456 the meaning and importance of citizenship. Secondly, Sweden had become internationalized to
457 an extent that could not have been foreseen in 1950, with Swedes moving abroad and foreigners
458 moving in and settling down, turning the country into a truly multicultural society with a
459 constantly growing number of families with mixed nationalities. Recognizing the multiple
460 transnational ties of an increasingly diverse population was both a pragmatic adaptation to an
461 increasingly mobile population and a principled affirmation of the right to have more than one
462 heartfelt identity and sense of belonging. Such recognition would facilitate integration, the

463 committee argued, since it did not force immigrants or expatriates to choose one nationality
464 over the other (SOU 1999:34, 202f). The acceptance of dual citizenship was largely motivated
465 with respect to individual concerns, drawing on the pluralist and voluntaristic tradition in
466 Swedish integration policy, as illustrated in the following statement by the then Minister of
467 Integration, Ulrika Messing.

468 There is not just one way of being Swedish, but many. Nor is
469 Swedishness something unchangeable. It is continually shaped and
470 reshaped. It develops in encounters with other cultures. Therefore, it is
471 important that we turn Swedish citizenship into an open arena for
472 encounters across ethnic and cultural borders, and that we all participate
473 in shaping the new Swedishness. (Messing 2000)

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

487 centered individualism of the bill, the Conservatives stressed the loyalty and obligations to one
488 state that the bond of citizenship should entail; a bond they believed would be further devalued
489 by full acceptance of dual citizenship.

490 The formal requirements for naturalization have not undergone any significant
491 changes since the 1970s, although calls for stricter conditions have occasionally surfaced in the
492 public debate. The most persistent ones are the Liberal Party's (*Liberalerna*) attempts to
493 introduce a language test. In the 2002 election campaign, the proposed test was presented as a
494 progressive reform that would facilitate immigrant integration by making explicit the real
495 conditions of successful integration in Swedish society. "To impose demands is to care" was
496 the accompanying slogan. The Conservatives was the only supporter of the proposal, however,
497 while the Social Democrats (*Socialdemokraterna*), The Left Party (*Vänsterpartiet*) and the
498 Green Party (*Miljöpartiet*) were deeply critical. The language requirement was not dropped and
499 remains on the liberal and conservative agendas, but has only occasionally surfaced as a
500 purportedly pressing concern for policy makers.¹⁶ The most far-reaching demands for a tougher
501 citizenship policy have come, unsurprisingly, from the far-right Sweden Democrats
502 (*Sverigedemokraterna*), who wish to see the required years of residence extended to ten years
503 accompanied by both language and knowledge tests. So far they have been completely isolated
504 on this and most other issues by the other parties, although their staggering success in the 2014
505 elections (from 5.7 to 12.9 %) may end their isolation.¹⁷

506 A Conservative-led right-center government took office after the 2006 election
507 after 15 years of social democratic reign. Following re-election in 2010, it initiated revisions of
508 the Swedish citizenship law, which were clearly driven by an interest in revitalizing Swedish
509 citizenship. In 2012, a committee was appointed to suggest, among other things, an official
510 definition of the meaning of Swedish citizenship, content and organization of ceremonies for

511 new citizens, and potential ways of using citizenship as an incitement to further integration
512 (SOU 2013:29, 69). The connection between language, integration, and citizenship, was dealt
513 with extensively in the report that was delivered a year later. While recognizing the importance
514 of Swedish language proficiency, the committee concluded with the 1999 report that testing
515 was too blunt an instrument with too many negative side-effects; the main ones being the
516 difficulty of precise and efficient language assessment, and the excluding effects toward
517 immigrants with less opportunity and ability to learn Swedish (e.g., elderly, illiterates,
518 housewives). Along with previous investigations, it recommended other means of encouraging
519 naturalizing immigrants to learn Swedish (SOU 2013:29, 167-172). Although initiated by a
520 liberal party with an interest in upgrading Swedish citizenship— above all through language
521 requirements—the end result was a somewhat watered-down bill (prop. 2013/14:143), which
522 introduced voluntary ceremonies for new citizens, a new website on the importance of
523 citizenship, and extended equal birthright by descent on both the mother’s and father’s side.
524 The committee also suggested a four year fast-track, a so-called ‘language bonus’, enabling
525 immigrants who master the Swedish language to naturalize one year prematurely (see SOU
526 2013:29), but it was not included in the new law.

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

536 distributed as universally and equally as possible without distinction between less and more
537 deserving.

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

545

546 **Concluding discussion**

547 Despite being small, open economies with comprehensive, universal welfare states and
548 therefore exposed to the same kind of economic pressures from globalization and migration,
549 the three Scandinavian countries have developed their naturalization policy in very different
550 directions. These policies have not fluctuated much with the ideological orientation of
551 government. In each country, the large bloc-parties display a high degree of consensus on
552 naturalization policy. The extent to which the appearance of a successful far-right party has
553 pushed this consensus in a more restrictive direction even appears doubtful. Both Norway and
554 Denmark had a successful far-right party early on, yet have diverged because of different
555 responses from the center-right parties (Bale et al. 2009). And in Sweden, the recent success of
556 the Sweden Democrats has (so far) only served to strengthen the mainstream consensus.

557 These different reactions in the three countries, especially from the center-right
558 parties, seem closely linked to different dominant notions of nationhood. However, these

559 differences, according to our analysis, have less to do with the normative content of nationhood.
560 In all three countries, the universal welfare state, with the notions of equality and freedom it
561 embodies, is the single most cherished national treasure, the epitome of what these nations have
562 to offer and what they stand for. However, its causal ties to nationhood and social cohesion vary
563 between the three countries.

564 Sweden represents a voluntarist, bureaucratic, and administrative approach in
565 which citizenship is largely vacuous of popular sentimental registers. In fact, nationhood is a
566 highly sensitive concept that politicians tend to evade because it is typically associated with a
567 repertoire of ethnic symbols and sentiments. While still present and important in society,
568 national culture is largely viewed as a private matter, which, just like the Lutheran church, has
569 been divorced from state and citizenship. Instead, the Swedish state has committed itself to a
570 pluralist idea of cohesion that does not define one center but many. This understanding *does*
571 involve a rather indefinite civic notion of nationhood or Swedishness as an evolving process of
572 mutual acceptance and adaptation. Tolerance is a key liberal concept in this self-understanding
573 because it facilitates integration. The welfare state is proudly thought of as the very institutional
574 structure that generates such a positive and effective process of integration by promoting social
575 mobility and intercultural learning. However, this understanding also makes it difficult to define
576 one single finish line and reward for completed integration. Citizenship, accordingly, is seen as
577 an instrument to encourage and achieve integration through the extension of rights and (formal)
578 inclusion, on the assumption that once immigrants are institutionally included the institutions
579 will mold them into well-functioning citizens. Hence, the doctrine is one of voluntary
580 integration, in as much as it opposes mandatory tests and other proofs of integration, but it is
581 not laissez-faire and/or indifferent, since the end-goal is still national cohesion.

582 Danish politics, on the other hand, tend to revolve around an organic
583 understanding of the integration process. Here the welfare system (along with the democratic

584 traditions) is largely perceived as a fragile institutional structure built on civic cultural
585 homogeneity. The maintenance of interpersonal and institutional trust in Denmark is perceived
586 as dependent on a sense of nationhood that develops slowly and organically conditional on
587 being immersed in Danish welfare state life. Consequently, naturalization becomes a screening
588 process for who deserves to become a member of the nation. However, the concept of
589 nationhood is typically not associated with ethnic imagery but with a comforting sense of
590 togetherness concentrated around a particular Danish realization of social justice and liberal-
591 democratic norms and values. Even though this leaves considerable room for cultural
592 differences, the reproduction of these so-called Danish norms and values are typically
593 understood as presupposing a certain privatization of religion, egalitarian family life and
594 dedication to interaction with native Danes through settlement, day care, school, work and
595 associational life. Contrary to Swedish discourse, becoming integrated is pictured as a
596 demanding and difficult one-sided process towards a fixed end-goal that naturalization
597 requirements can test. Citizenship and other national institutions are expressions of an already
598 existing national community; they need to reflect this community's essential needs and values
599 to function. Although the Danish nation is understood as civic, albeit historically determined
600 and non-negotiable, it is believed that some immigrants simply cannot take in a Danish way of
601 life and, hence, should not receive citizenship.

602 Finally, the Norwegian approach to naturalization is more ambiguous. In Norway,
603 the welfare state has been the great post-war nation-builder with its strong, yet adaptive
604 institutions. In that sense, the approach resembles the Swedish one: confidence that simply
605 living under fair, well-functioning institutions cultivates nationhood. Yet, most Norwegians
606 would think this is only part of the story. Traditionally there is great enthusiasm attached to the
607 Norwegian national culture—scarcely any avoidance symptoms as in Sweden—as a bedrock
608 of social cohesion. This duality is evident in how, after the turn of the century, the Norwegian

609 governments have explicitly wanted both a tolerant plurality *and* to preserve a strong national
610 community, without trying to sort out the possible tensions. In public rhetoric this is “solved”
611 by implicitly saying that one may learn to be Norwegian. Consequently, naturalization can be
612 seen as both a test and an encouragement on the way. At least until the recent refugee crisis, a
613 somewhat inclusive attitude has been signaled: Immigrants *should* become citizens in order to
614 develop their attachment to the nation, yet it still requires some years of socialization and they
615 have to pass some hurdles to be permitted in. The strategy has been more muddling through,
616 hoping that the right, open attitudes and an “adjusted community feeling” would grow from
617 inclusion and molding by Norwegian welfare institutions.

618 To conclude, in all three countries the civic turn is shaped by different notions
619 about the role of naturalization policy based on different assumption about the time and effort
620 involved in developing a strong sense of national belonging. The article has not attempted to
621 answer why these ideational differences emerged, although many would stress the importance
622 of different historical experiences. Often the loss of the better part of Danish territory in the
623 Napoleonic and Slesvigian Wars which reduced Denmark to a small, inward-looking and
624 linguistically homogenous state is emphasized (Østergaard 1992). The positive attitude to
625 nationalism in Norway is often explained by the fact that Norway only became an independent
626 nation state in 1905 after first 400 years of Danish rule followed by almost 100 years of Swedish
627 rule (Gullestad 2006). Also, Sweden’s different experiences with emigration and immigration
628 is at times emphasized. Nearly 1.5 million Swedes emigrated to the US in the early 20th century
629 and the size and timing of post-war immigration was larger and started earlier in Sweden
630 compared to Denmark and Norway (Bengtsson & Borevi 2015). Finally, one could also point
631 to Sweden’s neutrality during the Second World War (whereas Norway and Denmark were
632 occupied), which may have induced more sustained questioning of nationalism and nationhood.
633 This is not to provide an exhaustive list of possible critical junctures but to clarify that there

634 might be good historical reasons for why different ideas about nationhood influence
635 naturalization policy today.

636

637

638 **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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