

## The Revised EU Blue Card Directive

### A Study of Sweden's Migration Policy Regime for Highly Qualified Third Country Nationals

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The recruitment of highly qualified migrants is vital for Sweden's economy, productivity, and innovation capacity.<sup>1</sup> Sweden is expected to need more highly qualified workers in the near future due to an ageing population, the green transition, and rapid technological developments (Swedish Agency for Economic and Regional Growth [Tillväxtverket] 2024). Despite upskilling and reskilling initiatives, many employers are unable to meet their need for highly qualified labor (Confederation of Swedish Enterprise [Svenskt Näringsliv] 2023a). These employers may try to recruit highly qualified migrants from abroad but have to engage in a European – and even global – “race for talent” (Shachar 2006).

One way to attract highly qualified migrants is to offer attractive admission- and residence policies. The EU Blue Card is one such initiative, a combined residence- and work permit for highly qualified third country nationals. The European Commission developed the EU Blue Card Directive (COM(2014) 287 final) to make Member States more attractive to highly qualified migrants, but the number of issued permits has remained low, except for in Germany.

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<sup>1</sup> Highly qualified migrants are persons who have completed 180 higher education credits or five years of professional experience at a level comparable to higher education (Sweden's Alien Act [Utlänningslag] (2005:716) Chapter 6a(1) on the EU Blue Card).

## Background and Purpose

For the past twenty-five years, the European Commission has sought to enhance Europe's attractiveness for highly qualified migrants. The Lisbon Strategy, launched in the year 2000, aimed to make Europe "the most competitive and dynamic knowledge-based economy in the world" (Presidency conclusions, Lisbon European Council, 23 and 24 March 2000). The creation of the original EU Blue Card Directive, adopted at the EU level in 2009 and implemented in Sweden in 2013, aimed to contribute to this goal. A revision in 2021 aimed to enhance the appeal of the permit. At the same time, Member States liberalized their national migration policies to attract highly qualified migrants (Kolbe 2021), including Sweden.

To promote the recruitment of highly qualified workers, Sweden introduced an employer certification process that ensured faster processing times for work permits for approved employers. In addition, the Swedish Migration Agency (SMA) focused on speeding up the processing time for national permits for highly qualified applicants in 2021 and 2022. Sweden's center-right government, consisting of the Moderate Party, the Christian Democrats and the Liberal Party, has launched subsequent initiatives to make Sweden an attractive destination for highly qualified migrants (Forssell et al. 2025). In 2023, the government tasked the SMA with shortening the decision-making time for work permits, and to provide information to employers and employees about work permits for the highly qualified (Swedish Ministry of Justice 2023a).<sup>2</sup> The government has also funded the Work in Sweden initiative to enhance cooperation between government agencies and to promote Sweden as an attractive destination for highly qualified migrants and other foreign-born workers. These efforts are part of the government's broader, self-proclaimed paradigm shift which is "redirecting focus from being a country for asylum immigration to now being a country for labour immigration" (Government Offices of Sweden n.d.).

This policy brief provides information about the revision process for the EU Blue Card in Sweden, stakeholders' perspectives on the proposed changes, and preliminary experiences with the revised EU Blue Card Directive (2021/1883)

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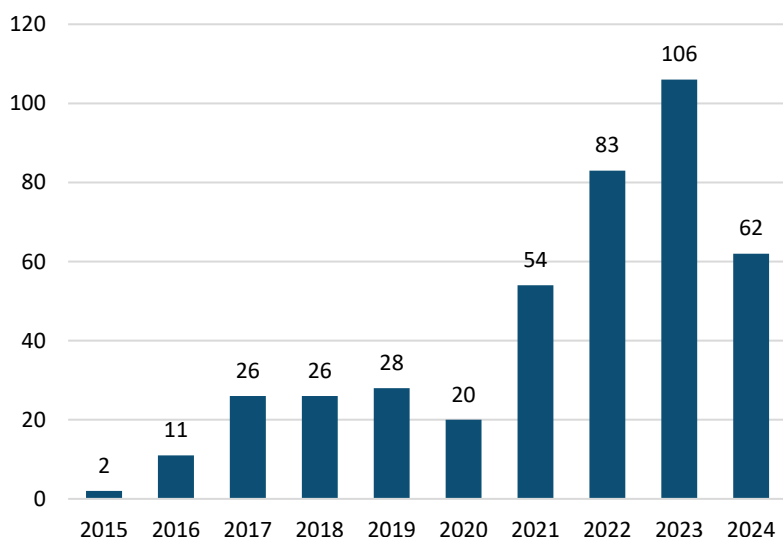
<sup>2</sup> The Swedish government issues annual appropriation directives [*regleringsbrev*] to government agencies. The government decides on the overall objectives and priorities, allocates funding approved by the Parliament, and sets reporting requirements. The government agency implements the tasks described in the directives but has operational autonomy (Öberg and Wockelberg 2021, OECD 2024).

which took effect in Sweden on January 1, 2025. The findings are based on an analysis of legal documents, consultation statements, interviews with three case workers and a unit manager in the SMA, a legal expert, a labor market expert, five international mobility managers, an international mobility expert in a relocation company, and two officials in the Directorate-General for Migration and Home Affairs (DG HOME).

## The EU Blue Card permit in Sweden

Like most Member States, the EU Blue Card permit has had little uptake in Sweden since its implementation in 2013. Between 2015 and the end of 2024, the SMA had issued only 418 EU Blue Cards to primary applicants (Eurostat 2025b) (see figure 1).<sup>3</sup> Compared to the number of national permits issued to highly qualified workers in Sweden, this number is very low. For example, the SMA issued a total of 24,117 work permits under the national scheme in 2022, whereof 8,317 permits were for highly qualified professions. That same year, the SMA issued solely 83 EU Blue Cards (EU Blue Card Proposal Ds 2023:6).

**Figure 1. Number of EU Blue Cards issued to primary applicants in Sweden 2015-2024**



Source: Eurostat (2025a).

<sup>3</sup> Data on the number of issued EU Blue Cards in 2013 and 2014 cannot be reported, as Eurostat data is only available from 2015.

The low uptake of the original EU Blue Card in Sweden (2013–2024) can be attributed to its high salary threshold (1.5 times the average gross national salary) and the attractiveness of Sweden's national work permit system. The requirements for a work permit under the national scheme were easier to understand and more predictable [*förutsebar*] for employers and employees than the EU Blue Card regulations (Confederation of Swedish Enterprise [*Svenskt Näringsliv*] 2023b). In addition, the EU Blue Card permit provided few added benefits compared to a work permit under Sweden's national scheme and received little promotion (Parusel 2020; Swedish Government Official Reports 2024).

## Revision of the EU Blue Card Directive

Five years after the implementation of the original EU Blue Card Directive in 2009, the European Commission reviewed its implementation (COM(2014) 287 final). It identified several shortcomings, including a marked difference in the number of issued permits in Member States, competing national schemes, a lack of reliable data, and a need for better information to employers and potential migrants (European Commission 2014). Based on these results, the European Commission launched a review of the EU Blue Card Directive, followed by a proposal for reform in 2016.

Several of the European Commission's proposed measures encountered considerable resistance from some Member States – most notably the suggested salary threshold, the proposed abolition of parallel national schemes (Bešić, Diedrich and Karabegović 2025), the expansion of the skills definition to three years of professional experience, and the recommendation to broaden intra-EU mobility rights (de Lange 2020). The strong opposition drew out the negotiations to five years.

An agreement on the revised EU Blue Card Directive (EU 2021/1883) was finally reached in May 2021, and the revised Directive was adopted at the EU level in October 2021. In the final version, Member States were allowed to keep their parallel national schemes, they could set a salary threshold between 1.0 and 1.6 the gross annual salary,<sup>4</sup> and the definition of highly qualified was kept at five years of professional experience. The minimum duration of a work permit was lowered from one year to six months.

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<sup>4</sup> Sweden established a salary threshold of 1.25; 52,000 SEK from July 9 2025.

Under the revised EU Blue Card Directive (2021/1883), permit holders:

- can work in another Member State after having held a valid EU Blue Card for at least 12 months
- can conduct business activities in another Member State for up to 90 days within a 180-day period without having to apply for a new permit
- have a greater possibility to change employment or occupation
- may remain unemployed for up to three months during the first two years, and up to six months thereafter, without losing their permit
- can count time on other residence permits and in other Member States toward long-term residency.

The EU Blue Card has two benefits for employers if these situations apply: employers do not have to apply for a new permit when an employee changes profession within a company, and it is easier to send employees to work in another Member State for a short period (van Riemsdijk 2026b). Despite the aforementioned benefits for employers and employees, the EU Blue Card remains underutilized in Sweden.

### Stakeholders' perspectives on the proposed revision of the EU Blue Card in Sweden (DS 2023:6)

The transposition of the revised EU Blue Card Directive started after its adoption at the EU level in 2021. In Sweden, a proposal for implementation (Ds 2023:6) was submitted to the Swedish Ministry of Justice in March 2023, followed by a consultation phase (Swedish Ministry of Justice 2023b). Selected government agencies, employer organizations, and labor unions were invited to comment on the proposal.

The complexity of Sweden's migration "system" was the most frequently commented upon topic within the consultation statements. Sweden offers three permits for highly qualified migrants: the EU Blue Card, a permit for researchers, and a permit for intra-company transfers (Swedish Migration Agency 2025). In addition, highly qualified migrants can apply for a permit under the national work permit system. Over time, new regulations and exceptions have been added to existing labor migration regulations, resulting in a complex web of rights and obligations that is difficult to navigate for employers and employees.

The most polarized issue was the proposed salary threshold for the revised EU Blue Card in Sweden. The revised EU Blue Card Directive (Article 5(3)) stipulated that Member States should set the salary threshold between 1.0 and 1.6 times the Member State's average gross annual salary. The labor unions were against the practice of setting a salary threshold, as it gave the Swedish state the power to determine salaries. With Sweden's strong tradition of salary negotiations between employers and labor unions, the labor unions regarded the decision on a salary threshold as undue state interference. But in this case the revised EU Blue Card Directive required Member States to set a salary threshold. Employer organizations argued for their right to decide on the recruitment of third country nationals, reflecting the demand-driven character of Sweden's labor migration policies.

Article 16 (Equal treatment) in the revised EU Blue Card Directive stipulates that "EU Blue Card holders shall enjoy equal treatment with nationals of the Member State issuing the EU Blue Card," including social security benefits. However, several stakeholders, in their consultation statements, drew attention to two issue areas where this may not be the case. First, conditions for social security benefits eligibility might be easier to meet for Swedish citizens than for migrant workers, including EU Blue Card holders. Second, parents of children born in Sweden were required to return to their countries of origin to apply for a residence permit for the newborn child. The latter issue was resolved in the Swedish Migration Court of Appeal, which ruled in September 2025 that parents can apply for a residence permit for the newborn child from within Sweden (MIG 2025:10).

Several stakeholders commented on the long processing time for EU Blue Cards, which was the case during the time of the consultation phase in mid-2023. The issue has since been resolved with the government's directive to the SMA to speed up the processing time for all complete work permit applications for highly qualified workers (Swedish Ministry of Justice 2023a).

## Preliminary experiences with the revised EU Blue Card in Sweden

The large majority of highly qualified third country nationals continue to apply for a work permit under Sweden's national scheme. Since the implementation of the revised EU Blue Card in Sweden on January 1, 2025, more than half of these permits have been issued to third country nationals who are already

employed in Sweden. Most of these persons wanted to switch from a national permit to an EU Blue Card when their permit was up for renewal (van Riemsdijk 2026b). In this respect, the revised EU Blue Card has had a limited effect on attracting “new” highly qualified migrants to Sweden so far.

One of the key reasons for the continuous low number of EU Blue Card permits is a lack of information and misinformation. International Mobility Managers interviewed for the study opted to apply for work permits under the national system because they were more familiar with it, and regarded it as less risky compared to an application for a revised EU Blue Card. Even though some employers would benefit from a revised EU Blue Card permit, a lack of information or misinformation resulted in a decision for a work permit under the national scheme.

In Sweden, the large majority of applications for work permits for the highly qualified are submitted by intermediaries. This “migration industry” helps companies navigate the complex migration “system” (Gammeltoft-Hansen and Sørensen 2013). They ensure compliance with migration regulations, insurance requirements, and collective bargaining agreements of relevant labor unions. Small companies may not have the resources to hire intermediaries and may not have the required knowledge about work permit requirements. As a result, case workers at the SMA have observed that small companies are more likely to have to submit additional information and have a higher chance to have their work permit applications denied compared to large companies. A delayed or aborted recruitment can result in operational disruptions and revenue loss.

While the revised EU Blue Card makes it easier to work in another Member State, so far, few card holders in other Member States have applied for an EU Blue Card in Sweden. Until October 5, 2025, Sweden received only 24 such applications, predominantly from Germany (e-mail from the Swedish Migration Agency, October 6, 2025).

### Remaining legal challenges

There are several remaining legal challenges related to the revised EU Blue Card. The first issue concerns the rights of children of work permit holders to reside in Sweden. These rights differ for the children of EU Blue Card holders and national permit holders. The former fall under the revised EU Blue Card Directive, which has an age limit for the rights of residence for

children of 18 years. The rights of children of work permit holders under the national scheme are regulated by Sweden's Aliens Ordinance (2005:716, *Utlänningsförordningen*), which has an age limit of 21 years.<sup>5</sup>

Another challenge also relates to family rights. While the EU Blue Card Directive allows permit holders to count stays on other residence visas, as well as stays in other Member States toward permanent residency, this does not apply to *co-applicants* for EU Blue Cards.<sup>6</sup> When a co-applicant becomes a primary applicant for an EU Blue Card, that person cannot count the time as co-applicant toward permanent residency (interview 3, Swedish Migration Agency, September 24, 2025).<sup>7</sup> Only the time worked as a PhD student or a researcher can be counted toward permanent residency (*ibid.*).

Another matter concerns EU Blue Card holders in other Member States who want to work in Sweden. If they start working in Sweden, they can apply for a new permit no later than one month after entering the country (Aliens Act Chapter 6a(4)). A case worker at the SMA mentioned that permit holders from Germany had started working in Sweden and applied for an EU Blue Card after the 30-day window. In those cases, they were not authorized to work in Sweden and had to return to Germany to apply for an EU Blue Card permit. The position had to be advertised and the SMA had to make a new assessment (interview 3, Swedish Migration Agency, September 24, 2025).

A subsequent challenge relates to the safeguarding of the terms of employment and employer insurance in the hiring of third country nationals. In the case of EU Blue Card holders in other Member States, the SMA does not check these conditions after a person has held an EU Blue Card from another Member State for more than twelve months (Aliens Act Chapter 6a(3c)) (interview 3, Swedish Migration Agency, September 24, 2025).

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<sup>5</sup> Recently, legal changes have been proposed to restrict the rights to family reunification in Sweden (SOU 2025:95, Stricter conditions for family reunification). If passed, this legislation will eliminate the national work permit's higher age limit for accompanying children.

<sup>6</sup> According to the Aliens Act Chapter 5(5.1), "a permanent residence permit may be granted to a foreigner who, for a total of four years during the past seven years, has held a **residence permit for work or an EU Blue Card** issued in Sweden" (bold added). Permanent residence permits may also be issued to holders of residence permits for higher education (Chapter 5(5.2)).

<sup>7</sup> Information about interviews and methodology can be found in the Delmi report that this policy brief is based on (van Riemsdijk 2026).



## Conclusions and recommendations

The Swedish government has recently proposed changes to the EU Blue Card Directive (SOU 2024:15). It remains to be seen whether these changes will be implemented, and if so, what the outcomes will be. The proposed changes entail a lower salary threshold for the EU Blue Card, an extended duration of the permit, and employer certification for faster processing of work permit applications. The extended duration of the permit would be beneficial for permit holders, as holders of four-year permits could apply for permanent residency right after the permit's expiration. The return of the employer certification system is likely to increase the influence of the migration industry, as these agencies can apply for certification and offer faster processing times to their clients.

Proponents of the EU Blue Card see the recruitment of highly qualified migrants from third countries as part of a solution to labor shortages. However, this reasoning directs attention away from the fact that there is already a sizeable labor supply in Sweden, consisting of immigrants who have the skills that are needed, but who experience difficulties entering the labor market. These barriers consist of, among others, difficulties with the recognition of professional qualifications acquired outside Sweden, language proficiency requirements, and discrimination in the labor market (for structural obstacles that highly skilled refugees experience in Sweden, see van Riemsdijk 2023, van Riemsdijk and Axelsson 2021). Individualized support can improve these migrants' chances to find employment in their area of expertise.

Migration policies alone, however, are not enough to attract highly qualified migrants to Sweden. Even though Sweden has fast processing times for work permit applications, offers favorable entry conditions, and secure rights for work permit holders, these conditions are only part of a larger "attraction package." Other factors include, among others, career opportunities, a welcoming culture, openness to immigrants, a good work-life balance, family-friendly policies, satisfying employment for spouses, lifestyle factors, housing, and international schools (van Riemsdijk 2026a). While some of these factors can be facilitated by government agencies, others lie within the realm of companies and municipalities.

## Recommendations for the Swedish Migration Agency

Three recommendations are directed at the SMA, the government agency that is responsible for providing information about work permit application requirements and issuing these permits:

- The first recommendation concerns **the provision of information about work permits**. In order to enhance information about work permits and their associated rights, the SMA could **develop a digital work permit selection tool** for its website. The tool could help employees and employers select a permit that is most beneficial for them.

For example, the tool could start with the question “Are you a citizen in an EU Member State or EEA state?” If no: “have you been offered employment with a gross salary of more than SEK 52,000 per month?” If yes: “Does the employment offered require completed studies corresponding to 180 higher education credits or do you have five years of professional experience at a level comparable to higher education in the profession or industry that the position relates to?” and so forth. After having answered all the questions, the tool will show the work permit(s) that apply to the applicant’s situation, and the rights conferred. The tool will enable applicants to select a permit that is most beneficial for their situation.

The SMA could also invite employers to meetings to inform about changes in Swedish migration regulations.

- The second recommendation also concerns **a digital tool that would enhance the permit application process**. The request came from an International Mobility Manager who wished to **track work permit applications** (interview 1, International Mobility Manager, September 22, 2025). Currently, employers do not know where in the process a work permit is, and they are sometimes not informed of the decision. The tracking tool would enable the employer and the employee to track the status of an application.
- The third recommendation concerns **information provision to small companies**. These organizations may lack the specialized HR expertise to meet the requirements for work permit applications and may lack funds for hiring an intermediary. More support specifically targeted at these stakeholders could create **a more level playing field** for *all* companies that want to hire highly qualified third country nationals.

## Recommendations for the Swedish government

- In terms of enhancing knowledge about the revised EU Blue Card, the government could **decide who should be responsible for providing information about the revised EU Blue Card**. The SMA's Help Desk and its Communications Officer answer questions from employers and intermediaries. Could the agency do more to reach employers with correct information? Or could the government funded initiative Work in Sweden, which is tasked with, among other things, enhancing collaboration between government agencies in the promotion of highly qualified migration, take the lead? Or another stakeholder? **Identifying the responsible party/parties would be a first step in creating an information strategy.**
- Another issue that deserves attention from the government is **the rights of accompanying children** of EU Blue Card holders to remain in Sweden past the age of 18, **and the right of co-applicants** to count their stay in Sweden toward permanent residency.
- In addition, **a long-term strategy on highly qualified migration should be developed** if Sweden wants to remain competitive in the "global race for talent" (Shachar 2006). The future development of migration regulations for highly qualified third country nationals will depend on political will. There are currently financial and structural means in place to enhance the recruitment of highly qualified third country nationals to Sweden. While skill shortages and an ageing population will likely continue to generate support for highly qualified migration in the near term, future recruitment and retention of highly qualified migrants will depend on long-term goals and strategies.

## Recommendation for employers

- As it is time-consuming and challenging to stay up to date on often-changing migration regulations, this report has shown that International Mobility Managers may decide to conduct business as usual, i.e. opting for the permit they know best. The report has also shown that this decision may not be in the best interest of the company. The recommendation for employers is therefore to **seek out reliable information**, to stay informed about changes in permit regulations, and to assess what permit is most beneficial for the company and the employee.

## Recommendation for highly qualified third country nationals

- The recommendation for highly qualified third country nationals is to **inform themselves about the work permits that are available, and the rights conferred by them.** This also concerns highly qualified migrants who already reside in Sweden, and who have to renew their work permits. Based on the information gathered, each migrant can then select the work permit that is most beneficial for that person. It does, however, depend on the employer's willingness to sponsor the selected permit.

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Delmi Policy Brief 2026:2  
Stockholm 2026  
ISBN 978-91-89993-54-9

The authors are fully responsible for the report's contents including its  
conclusions and policy recommendations.

