



Report
2026:2



The Revised EU Blue Card Directive

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

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Regime for Highly Qualified Third Country
Nationals

Micheline van Riemsdijk

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Preface

As many employers in Sweden are experiencing skill shortages and are unable to meet their need for highly qualified labour nationally, Sweden has joined the European (and even global) “race for talent.” The Swedish government is attempting to make Sweden more attractive for highly qualified third country nationals. This effort comes at a vital time, as the country faces the realities of an ageing population, the green transition, and rapid technological developments. The Swedish “race for talent” concurs with the EU Blue Card Directive, an EU initiative which offers a combined residence and work permit for highly qualified workers and allows permit holders to take up employment in other EU Member States after twelve months.

Despite the country’s need for highly qualified workers, few EU Blue Card permits were issued since the implementation of the “original” EU Blue Card in Sweden in 2013. A new revised permit, implemented by Sweden on January 1, 2025, aimed to make the permit more attractive. This report examines the revision process for the EU Blue Card at the EU and national level, stakeholders’ perspectives on the proposed changes, and the possible national effects of the revised EU Blue Card, one year after its implementation in Sweden.

The author of this report is Micheline van Riemsdijk, Professor of Human Geography at the Department of Human Geography, Uppsala University. She finds that since the implementation of the “new” EU Blue Card, the large majority of highly qualified third country nationals continue to apply for a work permit under Sweden’s national scheme, and analyses why this is and what can be done about it.

External reviewers of this report have been Henrik Emilsson, Associate Senior Lecturer at Malmö University, and Almina Bešić, Researcher at Johannes Kepler University Linz. The progression of this report has been followed by Delmi committee member Anna Lindblad. At Delmi’s secretariat, Anna Hammarstedt and Suzanne Planchard have contributed to the review and the preparation of the publication of this report.

As always with Delmi-publications, the author is fully responsible for the report’s contents, including its conclusions and policy recommendations.

Stockholm, January 2026

Joakim Palme
Chair, Delmi

Agneta Carlberger Kundoori
Head of Secretariat, Delmi

Summary

The recruitment of highly qualified migrants is vital for Sweden's economy, productivity, and innovation capacity. 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. Despite upskilling and reskilling initiatives, many employers are unable to meet their need for highly qualified labor, and may try to recruit highly qualified migrants from abroad. But they are not alone in this need and have to engage in a European – and even global – "race for talent."

One way to attract highly qualified migrants is to offer attractive admission- and residence policies. The EU Blue Card Directive (2009/50/EC) is one such initiative, which was adopted at the EU level in 2009 and implemented in Sweden in 2013. The Directive sets the requirements for the EU Blue Card permit, a combined residence- and work permit that aims to make Member States attractive destinations for highly qualified third country nationals. The original EU Blue Card had a low uptake in most Member States including Sweden. Attempting to make the permit more attractive, the EU Blue Card Directive was revised in 2021, and implemented in Sweden on January 1, 2025. One year since its implementation, it is timely to take stock of the revision process and the preliminary "success" of the revised EU Blue Card in Sweden.

This report examines the revision process for the EU Blue Card at the EU and national level, stakeholders' perspectives on the proposed changes, and the possible effects one year after its implementation in Sweden. The findings are based on an analysis of legal documents, consultation statements, and interviews with three case workers and a unit manager at the Swedish Migration Agency, a legal expert, a labor market expert, five employers, an international mobility expert, and two officials at the Directorate-General for Migration and Home Affairs.

Sweden started the transposition process of the revised EU Blue Card Directive into Swedish law in May 2022. A proposal for implementation (Ds 2023:6) was presented in March 2023, followed by a consultation phase. Statements were submitted by government organizations, employer organizations, and labor unions. They commented, among others, on the complexity of Sweden's migration "system," the salary threshold, the rights for EU Blue Card holders, the wait time for decisions on permit applications, grounds for denying and revoking permits, and a proposed maintenance requirement for family members.

One year after the implementation of the revised EU Blue Card in Sweden on January 1, 2025, the number of applications for the EU Blue Card has increased. However, the large majority of highly qualified third country nationals continue to apply for a work permit under Sweden's national scheme due to employers' familiarity with the national permit, risk-aversion and desire for efficiency, and a lack of information and misinformation about the revised EU Blue Card.

Interviews with case workers at the Swedish Migration Agency revealed that since January 1, 2025, more than half of all EU Blue Card applications have been submitted by individuals who already work in Sweden. This trend weakens the permit's intended purpose of attracting "new" highly qualified migrants to Sweden. The interviews also highlighted the key role of the migration industry in the work permit application process.

Employers who participated in the study were aware that the revised EU Blue Card Directive bestowed enhanced rights on permit holders, but most did not see how the permit would benefit their companies. Several employers were misinformed about key aspects of the revised permit, underscoring the need for more information about the revisions and their benefits.

Officials at the Directorate-General for Migration and Home Affairs (DG HOME) observed a change in attitudes toward migration in Member States. In 2025, nine years since the start of the revision process for the EU Blue Card, Member States have become increasingly used to migration. It has also become easier to speak about migration in an era of increasing labor shortages and demographic challenges.

In conclusion, the report provides evidence-based policy recommendations for the Swedish Migration Agency, the Swedish government, employers, and highly qualified third country nationals.

Sammanfattning

Rekryteringen av högkvalificerade migranter är avgörande för Sveriges ekonomi, produktivitet och innovationsförmåga. Sverige förväntas behöva fler högkvalificerade arbetstagare inom en snar framtid på grund av en åldrande befolkning, den gröna omställningen och den snabba tekniska utvecklingen. Trots insatser för kompetenshöjning och omskolning kvarstår en brist på högkvalificerad arbetskraft, vilket innebär att många arbetsgivare kan behöva rekrytera högkvalificerade migranter från utlandet. Men de är inte ensamma om detta behov, utan måste delta i ett europeiskt – och till och med globalt – "race for talent".

Ett sätt att attrahera högkvalificerade migranter är att erbjuda tydliga och förmånliga regler för inresa och uppehållstillstånd. EU:s blåkortsdirektiv (2009/50/EG) är ett sådant initiativ. Direktivet antogs på EU-nivå 2009 och infördes i Sverige 2013. Direktivet fastställer villkoren för att beviljas ett EU blåkort – ett kombinerat uppehålls- och arbetstillstånd som syftar till att göra medlemsstaterna mer attraktiva för högkvalificerade tredjelandsmedborgare. Genomslaget för det ursprungliga EU-blåkortet var lågt i de flesta medlemsstater, inklusive Sverige. För att göra tillståndet mer attraktivt omarbetades blåkortsdirektivet 2021 och trädde i kraft i Sverige den 1 januari 2025. Ett år efter införandet är ett lämpligt tillfälle att utvärdera både revisionsprocessen och det preliminära genomslaget för det reviderade EU-blåkortet i Sverige.

Denna rapport granskar revisionsprocessen för EU-blåkortet både på EU-nivå och nationell nivå, olika aktörers perspektiv på de föreslagna förändringarna samt effekterna ett år efter införandet i Sverige. Resultaten baseras på en analys av juridiska dokument, remissyttranden samt intervjuer med tre handläggare och en enhetschef vid Migrationsverket, en juridisk expert, en arbetsmarknadsexpert, fem arbetsgivare, en expert inom internationell rörlighet och två tjänstemän vid Europeiska kommissionens generaldirektorat för migration och inrikes frågor (DG HOME).

Sverige påbörjade processen med att genomföra det reviderade blåkortsdirektivet i maj 2022. I mars 2023 presenterades ett genomförandeförslaget (Ds 2023:6), vilket följdes av en remissrunda med synpunkter från bland annat myndigheter, arbetsgivarorganisationer och fackförbund. Remissinstanserna lyfte frågor om komplexiteten i det svenska migrationssystemet, nivån på lönekravet, rättigheter för blåkortsinnehavare, handläggningstider, grunder för avslag och återkallelse av tillstånd samt det förslagna försörjningskravet för familjemedlemmar.

Ett år efter införandet av det reviderade EU-blåkortet i Sverige har antalet ansökningar ökat. Trots detta fortsätter majoriteten av högkvalificerade tredjelandsmedborgare att ansöka om arbetstillstånd inom det nationella systemet. Detta kan förklaras av arbetsgivarnas etablerade vana vid nationella arbetstillstånd, deras riskaversion och fokus på effektivitet, samt begränsad kännedom om- och i vissa fall felaktig information kring – det reviderade EU-blåkortet.

Intervjuer med handläggare vid Migrationsverket visade att mer än hälften av alla ansökningar om EU-blåkort sedan 1 januari 2025 har kommit från personer som redan arbetar i Sverige. Detta kan indikera att tillståndet i praktiken ännu inte uppfyller sitt huvudsakliga syfte: att attrahera "nya" högkvalificerade migranter till landet. Intervjuerna framhåller dessutom migrationsbranschens centrala roll i ansökningsprocessen.

De arbetsgivare som deltog i studien kände till att det reviderade blåkortsdirektivet ger innehavare utökade rättigheter, men de flesta såg ändå inte hur tillståndet skulle gynna deras verksamheter. Flera arbetsgivare hade dessutom felaktig eller bristfällig information om centrala delar av det reviderade blåkortet, vilket understryker behovet av tydligare kommunikationen om förändringarna och om de potentiella fördelarna med EU-blåkortet.

Tjänstemän vid DG HOME noterade en förändring i medlemsstaternas attityder till migration. År 2025, nio år efter att revisionsprocessen för blåkortsdirektivet inleddes, har medlemsstaterna blivit mer vana vid migration som politiskt och praktiskt fenomen. I takt med ökande arbetskraftsbrist och demografiska utmaningar har det dessutom blivit lättare att föra en konstruktiv diskussion om migration.

Slutligen presenterar rapporten evidensbaserade rekommendationer för Migrationsverket, den svenska regeringen, arbetsgivare och högkvalificerade tredjelandsmedborgare.

Table of Contents

List of abbreviations	13
1. Introduction	14
Research aim and research questions.....	18
Disposition.....	18
2. Background	20
Labor migration governance in Sweden	20
A short history of the EU Blue Card Directive.....	22
Transposition of the revised EU Blue Card Directive into Swedish law	24
3. Method and material	26
4. Analysis of consultation statements [<i>remissvar</i>]	29
Complex and ambiguous regulatory framework	31
Salary threshold.....	32
Lower salary threshold for recent graduates and shortage occupations.....	35
Equal treatment.....	35
Wait time for a decision on a work permit application.....	37
Enhanced rights for EU Blue Card holders	37
Grounds for denying/ revoking permits	39
Requirement for a legally binding employment contract.....	40
Maintenance requirement for accompanying family members	41
5. Requirements for the original and revised EU Blue Card and the national work permit in Sweden.....	42
6. Experiences of the Swedish Migration Agency with the revised EU Blue Card	47
Permit holders' rights under the revised EU Blue Card	48
"Competence expulsions" [<i>kompetensutvisningar</i>]	49
Grounds for rejection/ revocation of a revised EU Blue Card	50
Remaining legal challenges	52
7. Employers' perspectives on the EU Blue Card	56
Business as usual.....	56
Risk management	58
The migration industry	59
Misinformation.....	60
Rights of accompanying children	62

8. Experiences of an International Mobility Expert.....	64
9. Perspectives of DG HOME officials.....	67
10. Conclusion.....	70
11. Policy recommendations.....	73
Recommendations for the Swedish Migration Agency	73
Recommendations for the Swedish government.....	74
Recommendation for employers	75
Recommendation for highly qualified third country nationals	75
References	76
Appendix 1. Legislative chain for the EU Blue Card revision at EU level	83
Appendix 2. Legislative chain for the revised EU Blue Card Directive in Sweden	85
Appendix 3. List of interviews	87
Appendix 4. Interview guide for the Swedish Migration Agency.....	88
Appendix 5. Interview guide for International Mobility Managers.....	91
Appendix 6. Interview guide for officials in DG-HOME	93
List of previous publications.....	95

Figures and tables

Figure 1. Number of EU Blue Cards issued to primary applicants in Sweden 2015–2024.....	17
Table 1. Submitted consultation statements	29
Table 2. Requirements for the original EU Blue Card, the revised EU Blue Card, and the national work permit in Sweden.....	43
Table 3. EU Blue Card holders in another Member State who applied for an EU Blue Card in Sweden.....	49

List of abbreviations

CSN	The Swedish Board of Student Finance
DG HOME	Directorate-General for Migration and Home Affairs
EU	European Union
HR	human resources
ICT permit	Intra-corporate Transfer permit
LO	The Swedish Trade Union Confederation
SACO	The Swedish Confederation of Professional Associations
SKR	The Swedish Association of Local Authorities and Regions
SMA	The Swedish Migration Agency
SSYK codes	Swedish Standard Classification of Occupations codes [standard för svensk yrkesklassificering]
SULF	Sweden's Association of University Teachers and Researchers
SÄPO	The Swedish Security Service
TCO	The Swedish Confederation of Professional Employees
TFEU	Treaty for the Functioning of the European Union

1. Introduction

The regulations for highly qualified labor should be improved. Sweden should be an attractive country for highly qualified workers, and it must be ensured that employers in highly qualified occupational sectors receive the labor they need on time. This is an important part of the government's work to strengthen Sweden's competitiveness.

Swedish Minister for Migration, Johan Forssell,
September 24, 2024 (Government Offices of Sweden 2024)

The Swedish Minister for Migration, Johan Forssell, made these remarks when the government submitted a bill (2024/25:18) to the Swedish Parliament on September 24, 2024. The bill concerned the implementation of the revised EU Blue Card Directive in Sweden, which regulates the admission and residence of highly qualified third country nationals.¹ The Directive was recently revised in an attempt to make Member States more attractive destinations for prospective highly qualified migrants.

Sweden's center-right government, in power since 2022 and consisting of the Moderate Party, the Christian Democrats and the Liberal Party, openly supports highly qualified migration as reflected by the quote above. In 2023, the government tasked the Swedish Migration Agency (SMA) with the promotion of highly qualified labor migration to Sweden. This included a shortening of 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).² The SMA started to use the Swedish Standard Classification of Occupations codes, so-called SSYK codes, to classify work permit applications by occupation or work responsibility. It also ensured a decision within 30 days for complete applications for highly qualified professions. The classification system replaced the certification of

¹ Highly qualified migrants are persons who have completed 180 higher education credits or have five years of professional experience at a level comparable to higher education (Sweden's Aliens Act [*Utlänningslag*] (2005:716) Chapter 6a(1) on the EU Blue Card). A third country national is a citizen of a country outside the EU.

² 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).

employers, a system that provided faster processing times for employers who met certain requirements (Swedish Migration Agency 2023b).³

In 2024, the Swedish government allocated funds to enhance cooperation between government agencies, provide better support for employers in the recruitment process, and assist with the integration of highly qualified migrants and their families after arrival (Swedish Agency for Economic and Regional Growth [*Tillväxtverket*] n.d.). These efforts are part of a broader, self-proclaimed paradigm shift in Sweden's migration policy which means that "Sweden is redirecting its focus from being a country for asylum immigration to now being a country for labour immigration" (Government Offices of Sweden n.d.). This position is reflected in an opinion piece written by the Swedish Minister for Migration Johan Forssell and members of the Business Council, a group that was established in 2024 in order to strengthen Sweden's talent attraction:

For a long time, the debate has had a one-sided focus on asylum related migration. We want to broaden that perspective and shift focus from low-skilled to high-skilled labour migration. Because immigration is also about Sweden's competitiveness. It is about people who want to work, invest and build a future in our country.

Forssell et al. 2025⁴

This statement draws a sharp distinction between "desired" highly skilled migrants and "less desirable" low-skilled migrants and asylum seekers, a categorization that is also present in other European countries (van Riemsdijk 2026).

Many employers in Sweden are experiencing skill shortages, and the demand for skills is expected to rise with an ageing population, rapid technological developments, and the green transition (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), and may try to recruit highly qualified migrants from abroad. Currently, the biggest labor shortages in highly qualified sectors are found in information and communication technologies, physical and engineering sciences, nursing, and among medical doctors (Statistics Sweden 2025).

³ The SMA started working on faster processing times for national work permits for highly qualified applicants in 2021 and 2022.

⁴ Throughout this report, the term "highly qualified" is used in accordance with the revised EU Blue Card Directive (2021/1883) and is limited to formal education and credentials. Forssell et al. (2025) use the term "highly skilled" which encompasses both formal education and professional experience (European Commission n.d.).

The recruitment of highly qualified migrants is vital for Sweden's economy, productivity, and innovation capacity. However, Sweden engages in a global "race for talent" with other European countries and even globally, to attract these migrants (Shachar 2006). The United States, Canada and Australia remain the top destinations for highly qualified migrants due to English-language employment, the countries' advances in science and technology, and career advancement opportunities (Kotavaara and Prokkola 2023).

Thus, highly qualified migrants have many destinations to choose from if their skills are in high demand. The destination choice is based on numerous factors, including career development, opportunities to work with leaders in the field, lifestyle factors, and place attraction. In addition, work-life balance and family-friendly policies can play a role (van Riemsdijk 2025). Liberal migration policies, such as the EU Blue Card Directive, can be a contributing factor in the choice of destination.

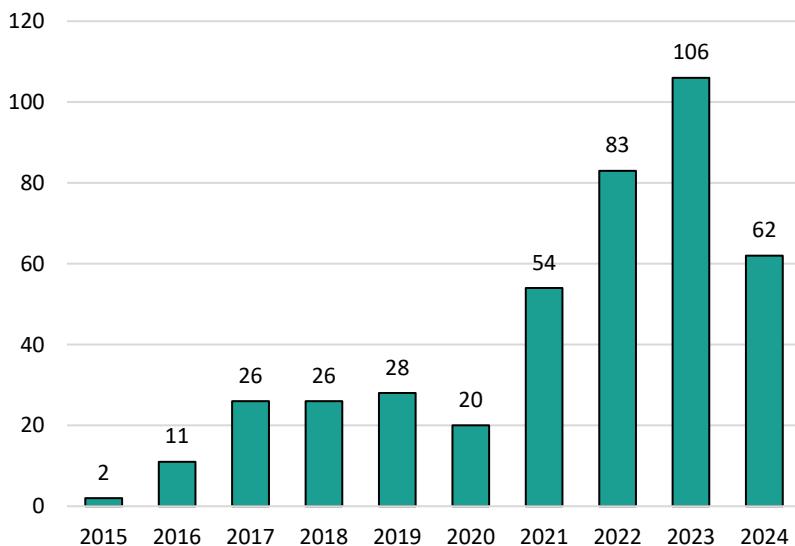
As a result of the need for highly qualified migrants, the European Commission has sought to highlight and enhance the region's attractiveness for highly qualified migrants for the past twenty-five years (Presidency conclusions, Lisbon European Council, 23 and 24 March 2000). A key strategy for gaining an international advantage is to offer favorable admission policies and settlement conditions for third country nationals (Shachar 2006). The EU Blue Card has been an EU-wide effort to make Europe a more attractive destination for third country nationals. Individual Member States have also liberalized their national migration policies over time (Kolbe 2021), including Sweden.

This report analyzes the implementation and possible effects of the revised EU Blue Card Directive in Sweden. Since the adoption of the original EU Blue Card Directive at the EU level in 2009, few EU Blue Card permits have been issued in Member States except for Germany (Eurostat 2025b). The permit has also had little uptake in Sweden, where the EU Blue Card Directive was implemented 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).⁵ 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 in 2022, whereof 8,317 permits were for highly qualified professions. That same year, the SMA issued only 83 EU Blue Cards (EU Blue Card Proposal Ds 2023:6).

⁵ Data on the number of issued EU Blue Cards in 2013 and 2014 cannot be reported, as Eurostat data is only available from 2015.

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



Source: Eurostat 2025a.

The low uptake of the original EU Blue Card in Sweden (2013–2024) can be attributed to the attractiveness of Sweden's national work permit system. The more restrictive eligibility requirements for EU Blue Cards may have led highly qualified migrants to apply for a national work permit instead of an EU Blue Card (Confederation of Swedish Enterprise [*Svenskt Näringsliv*] 2023b). In addition, 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 (*Ibid.*).

The original EU Blue Card's high salary threshold of 1.5 times the average gross salary was also a deterrent. The high threshold excluded recent graduates and professions with lower average salaries, including many medical professions and teachers. Another reason for the “failure” of the original EU Blue Card in Sweden – and other permit issuing countries except for Germany – was its few added benefits (Parusel 2020).

There was also a lack of promotion of the original EU Blue Card (Parusel 2020; Swedish Government Official Reports 2024), and case workers in migration agencies in Member States did little to advertise the permit. Interestingly, a study of practitioners' viewpoints has observed that immigration officers have

little incentive to advertise the permits as they are not used to the processing procedure and “naturally, they will not promote this scheme as it makes their work more complex” (Antoons and Ghimis 2020: 269).

Recently, the European Commission revised the EU Blue Card Directive to make Member States more attractive destinations for highly qualified migrants. The revised EU Blue Card Directive took effect in Sweden on January 1, 2025. As of October 5, 2025, nine months after its implementation, 248 EU Blue Cards had been issued, including 58 renewals (e-mail from the Swedish Migration Agency, October 6, 2025). As the revised EU Blue Card Directive was implemented in Sweden a year ago, it is timely to examine the revised EU Blue Card Directive, as well as Sweden’s “competing” national work permit system that the majority of highly qualified third country nationals apply for.

Research aim and research questions

This report aims to analyze the design, implementation and possible effects of the revised EU Blue Card Directive in Sweden and identifies opportunities and challenges in Sweden’s current migration policy regime for highly qualified workers. The report addresses the following research questions:

1. What were the key concerns of government agencies, employer organizations, and labor unions regarding the implementation of the revised EU Blue Card Directive in Sweden?
2. What are the key obstacles for the revised EU Blue Card in Sweden?
 - What initiatives have been developed in Sweden to make the revised EU Blue Card permit more attractive for employers and employees?
3. How do case workers at the SMA, employers, international mobility experts, officials at DG HOME, and other stakeholders experience the revised EU Blue Card Directive?
 - According to these stakeholders, what measures are needed to improve the work permit system?

Disposition

The report begins by providing a short overview of the history of labor migration governance in Sweden, followed by background information regarding the original EU Blue Card Directive (2009/50/EC), which was adopted at the EU level in 2009 and implemented in Sweden in 2013. Together, these sections outline the socio-political context that shaped the negotiations of the revised EU Blue Card at the EU level and in Sweden.

Thereafter, the report analyzes the revision of the EU Blue Card Directive (2021/1883), adopted at the EU level in 2021. This is followed by an analysis of consultation statements in response to the proposal for the revised EU Blue Card in Sweden (Ds 2023:6) before its implementation on January 1, 2025. These findings provide insights into the perspectives of government agencies, employer organizations and labor unions on plans for the revision of the EU Blue Card in Sweden and the country's governance of highly qualified migration more generally. This section is followed by an overview of requirements for the original and revised EU Blue Card in Sweden, as well as Sweden's national labor migration scheme.

The subsequent chapters contain analyses of interviews with case workers and a unit manager at the SMA, employers, an international mobility expert, and officials from DG HOME. These chapters provide insights into stakeholders' experiences with the revised EU Blue Card and migration regulations for highly qualified workers in Sweden. The findings are used to generate evidence-based policy recommendations that aim to help shape future policy decisions regarding the recruitment and retention of highly qualified third country nationals in Sweden.

2. Background

This chapter provides a short overview of labor migration governance in Sweden, a history of the original EU Blue Card Directive, and the transposition of the revised EU Blue Card Directive (2021/1883) into Swedish law. These sections show the development of a policy regime for labor migration in Sweden, and the European Commission's challenges in trying to harmonize migration policies across Member States.

Labor migration governance in Sweden

Sweden has a collective bargaining system where labor unions and employer organizations make collective agreements regarding salary raises, overtime pay, parental leave, pensions, and so forth (Bender 2023). This system extends power to the social partners (labor unions and employers), with limited state intervention (Ibid.). Sweden has one of the highest unionization rates in the world, but it has declined over time from 85 percent in 1993 to 68 percent in 2023 (Kjellberg 2025). Approximately 90 percent of employers engage in collective bargaining in Sweden (Bender 2023).

State agencies and labor unions used to control international labor migration in Sweden (Emilsson 2014). The Swedish Labor Market Board performed a labor market test to assess whether suitable workers were available in the domestic or EU labor market (Berg and Spehar 2013). Thereafter, a labor union verified that the employment conditions were on par with industry standards and collective agreements (Emilsson 2014). If this was not the case, the labor union could reject an application.

Since the early 2000s the influence of labor unions has declined with falling membership and internal divisions over international labor migration (Boräng and Cerna 2019). The Swedish Confederation of Professional Associations (SACO) and the Swedish Confederation of Professional Employees (TCO) supported liberalization of migration policies for low-qualified workers, but SACO was opposed to increasing the number of highly qualified migrants to protect its members from competition (Boräng and Cerna 2019). The Swedish Trade Union Confederation (LO), the central organization for 13 blue collar unions, continued to have a restrictive view on all labor migration due to concerns about deteriorating wages and working conditions (Bender 2023). These factors combined weakened the labor unions' influence on labor migration policy and implementation.

During the 2004 and 2007 EU enlargements, Sweden, the United Kingdom and Ireland were the only three countries that opened their labor markets immediately to citizens of the accession countries. Berg and Spehar (2013) explain the support for intra-EU mobility and labor migration of third country nationals at the time as an “unholy coalition” between the Green Party and the center-right parties that created a parliamentary majority in Sweden. In 2002, these parties together with the Confederation of Swedish Employers [*Svenskt Näringsliv*] started to advocate for the liberalization of labor migration policies. The Green Party supported the migration reform by highlighting migrants’ contributions to society, and the center-right parties favored it on the basis of business interests. The Social Democrats and the Left Party opposed the reform out of concern for “social dumping” and exploitation of migrant workers (Ibid.).

In 2006, when a center-right alliance between the Moderates, Center Party, the Liberal People’s Party and Christian Democrats took power, the government and the Green Party proposed a new immigration bill that aimed to make Sweden a more attractive destination for foreign-born workers and to make it easier for employers to recruit third country nationals (Prop. 2007/08: 147). When the new law went into effect on December 15, 2008, labor unions retained the right to comment on employment conditions but lost their de facto veto power (Emilsson 2014). This is still the case today.

The migration regulations that were implemented in Sweden in 2008 were some of the most liberal in Europe as they did not require professional qualifications or admission quotas (Parusel 2020). High-qualified, low-qualified and seasonal workers could apply for the same permit, and all permit holders were granted the same residency-, citizenship- and voting rights. With the 2008 migration policy reform, Sweden was “swimming against the tide” when other countries took a more selective and restrictive stance on migration in response to the global economic downturn and fears about “mass migration” (Berg and Spehar 2013). The 2008 reform placed the employers in charge of admitting migrant workers that they needed.

Boräng and Cerna (2019) explain Sweden’s shift from a highly restrictive migration policy to a very liberal one by power shifts in Sweden’s labor market institutions, particularly the weakened position of labor unions. The latter have historically had a strong influence in politics in Sweden, and immigration policies were negotiated between the state, employer associations, and employee organizations. The labor unions’ influence was further strengthened by a coalition between LO and the ruling Social Democratic Party, and labor unions had de facto veto power over immigration policy from the 1970s until 2008 (Boräng and Cerna 2019).

A short history of the EU Blue Card Directive

Since the early 2000s, the European Commission has tried to harmonize labor migration policies across Member States. These efforts were initiated with the Lisbon Strategy, launched in the year 2000, which 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). Attracting and retaining highly qualified migrants, and the development of the EU Blue Card Directive, fell under this Strategy.

The EU and its Member States share competences in the area of legal migration, as established in the Treaty on the Functioning of the European Union (TFEU 2016). Under Article 79 in the TFEU, the EU is responsible for developing a common immigration policy, including the conditions of entry and residence and the right of third country nationals to move within the EU and reside in other Member States. Member States retain the right to decide on the number of third country nationals to admit for employment.

In 2001, the Commission proposed a legislative framework for *all* international labor migration from third countries (not just highly qualified workers). However, some Member States were reluctant to cede control over admission (Cerna 2014), and were concerned that this measure could increase the number of migrants (de Lange 2020). Member states' skepticism to a harmonized migration framework resulted in a legal migration *acquis* with a “patchwork” of seven EU directives that govern family reunification, long-term residence, students and researchers, highly qualified workers (i.e. the EU Blue Card Directive), seasonal workers, intra-company transferees, and the Single Permit Directive (de Lange and Groenendijk 2021).

The idea for a Blue Card for highly qualified third country nationals, a “European version of the Green Card,” was initially proposed in a policy paper by the Brussels-based think tank Bruegel in 2006 (Von Weizsäcker 2006, mentioned in Bešić, Diedrich and Karabegovic 2025) The European Commission adopted the idea a year later, and drafted a plan for an EU-wide residence- and work permit for highly qualified third country nationals. After two years of negotiations, the EU Council approved the EU Blue Card Directive in May 2009 (Council Directive 2009/50/EC).

The Directive established a “minimum framework” where Member States retained the right to determine the number of highly qualified third country nationals they wanted to admit, and they could keep their national migration schemes (Cerna 2014: 74). After 18 months, permit holders and their family members had the right to relocate to another EU Blue Card issuing country,

but they had to apply for a new permit (Cerna 2014). Cerna (2014) attributes the “less ambitious outcome” of the Directive to Member States’ diverging positions.

The EU Blue Card Directive left substantial discretion to Member States with a large number of optional provisions or so-called “may” clauses, resulting in divergent transpositions into national law and a low level of harmonization (Farcy 2020). The national laws of Member States define the rights of highly qualified migrants, “since EU law does not oblige them, but only allows them, to act in a given manner” (Ibid.: 207). Thus, “labour immigrants are admitted on the *national*/territory and to the *national* labour market. In other words, the admission of labour immigrants is still conceived as a national prerogative” (Ibid.: 222, italics in original). It has been challenging for EU policymakers to convince Member States of the need for and added value of a harmonized approach to international labor migration (Hooper, de Lange and Slootjes 2025, Cerna 2014), including the EU Blue Card Directive.

Farcy (2020) notes that admission regulations in national schemes are more flexible and can respond more rapidly to labor needs, while EU instruments take a long time to amend. While common admission standards and intra-EU mobility for highly qualified third country nationals could enhance the attractiveness of Europe as a whole, Member States want to retain their competitive advantage. In addition, most Member States do not need a common admission policy for highly qualified migration (Ibid.).

In May 2014, the European Commission (COM(2014) 287 final) took stock of the implementation of the EU Blue Card Directive and identified several shortcomings:

- marked differences in the number of permits issued in Member States
- competing national schemes
- lack of reliable data from Member States
- need for better information to employers and potential migrants.

The European Commission noted that the negotiations over the EU Blue Card Directive required unanimity in the Council, as the Treaty of Lisbon with qualified majority had not taken effect. This requirement resulted in many “may-clauses” that allowed Member States considerable leeway in the implementation. In response to the findings, the Commission launched a review of the Directive in 2015, including a public consultation and impact assessment.

In June 2016, the European Commission proposed a reform of the EU Blue Card Directive, whereafter the European Parliament and the Council engaged in four-year long negotiations over the revision. The main points of contention concerned the salary threshold, the Commission's proposal to abolish parallel national schemes for efficiency purposes (Bešić, Diedrich and Karabegović 2025), the planned broadening of the definition of skills (i.e. extending eligibility to three years of work experience), and the proposed expansion of intra-EU mobility rights (de Lange 2020).

The New Pact on Migration and Asylum, proposed in September 2020 (European Commission 2020), revitalized the negotiations, and the Commission no longer tried to abolish national parallel schemes (de Lange 2020). In May 2021, an agreement was reached, and the revised EU Blue Card Directive ((EU) 2021/1883) was adopted on October 20, 2021.⁶ The revised Directive entered into force the next month, and the deadline to transpose the Directive into national law was set for November 18, 2023. The revised EU Blue Card allowed Member States to have parallel national schemes, and they could set more favorable standards for specific issues (Peers 2022).

Transposition of the revised EU Blue Card Directive into Swedish law

Since the adoption of the revised EU Blue Card Directive by the European Parliament and the Council of the EU in October 2021, Swedish authorities have taken several steps to transpose the revised Directive into national law. The process began with a government investigation in May 2022, when an analyst [*utredare*] and a secretary were appointed. They made suggestions for the revision of existing legislation, resulting in a Proposal for Implementation (Ds 2023:6) presented in March 2023. During the writing process, the secretary consulted with the SMA, labor unions, employer organizations, and The Confederation of Swedish Enterprise (interview with a legal expert at the Swedish Ministry of Justice, 29 September 2025).

After the launch of the Proposal for Implementation (Ds 2023:6), a public consultation was carried out to elicit input from various stakeholders. The Swedish Ministry of Justice prepared a list of stakeholders that were likely to be affected by the proposal, in consultation with other government offices. When the list was complete, stakeholders were invited to submit a consultation response [*remissvar*] (interview with a legal expert at the Swedish Ministry of Justice, 29 September 2025).

⁶ For an overview of the legislative chain for the revision of the EU Blue Card Directive at the EU level, see appendix 1.

After the consultation statements were submitted, the responses were compiled by theme, identifying the different views and key disagreements, and presented to the political leadership. Based on this information and in consultation with other government offices, the government made a decision on the direction of the proposal and the salary threshold (interview with a legal expert at the Swedish Ministry of Justice, 29 September 2025). The government decided on a salary threshold of 1,25 the average gross annual salary, reduced from the proposal's recommended 1,5 times (ibid.).

After all decisions were made, the government submitted a bill to the Legislative Council and thereafter to the Swedish Parliament (Prop. 2024/25:18, Implementation of the New EU Blue Card Directive). After the Social Insurance Committee submitted a report to Parliament, the bill was approved on November 28, 2024.

The revised EU Blue Card Directive took effect in Sweden on January 1, 2025. Compared to the original Directive, the revised Directive is meant to ensure "faster procedures, more flexible and inclusive criteria for entry and residence, and more extensive rights regarding f.ex. intra-EU mobility" (Swedish Ministry of Justice 2023b: 51).

Close to the implementation of the revised EU Blue Card in Sweden, another proposal with new rules for labor migration had been submitted (SOU 2024:15). The proposal suggests making the EU Blue Card more attractive (ibid.: 264-266) with a lower salary threshold, to extend the permit duration, and to bring back employer certification. The proposal calls for a long-term national strategy on highly qualified migration and coordination between ministries, state agencies and companies (ibid.: 269).

3. Method and material

The research project is designed as a policy analysis that examines the proposal, implementation and preliminary effects of the revised EU Blue Card Directive in Sweden. Methodologically, the project follows the five sequences of public policy (Knoepfel and Larhue 2007: 31):

- The **emergence of a problem** (in this case: the low number of issued EU Blue Card permits and a desire to attract more highly qualified third country nationals to Member States including Sweden)
- The **agenda-setting phase**, which involves the responses of various actors to the identified problem (consultation statements from 37 consultation bodies [*remissvar*] on plans for the revised EU Blue Card in Sweden)
- The **problem formulation and adoption phase**, which defines suitable and acceptable solutions (consultation with the Swedish Council on Legislation for a bill for the implementation of the revised EU Blue Card [*lagrådsremiss*])
- The **policy implementation phase** (Government Bill 2024/25:18), and a **policy evaluation** that determines the (preliminary) effects of the policy (through interviews with stakeholders).

For the agenda-setting phase, consultation statements [*remissvar*] were analyzed regarding support for and concerns about the proposed regulations for the transposition of the revised EU Blue Card Directive into Swedish law. For the consultation phase, various stakeholders including government agencies, employer organizations and labor unions, were invited to provide input on the proposal for the revised EU Blue Card in Sweden (DS 2023:6) before the bill was finalized.

Of the 37 submitted responses, 16 stakeholders either responded with “no opinion,” “no objection,” had no reservations, refrained from commenting, or did not have the opportunity to provide an opinion.⁷ The 21 remaining

⁷ The Embassy of Sweden in Beijing, the Labor Court, the Equality Ombudsman, the Administrative Court in Stockholm, the Office of the Chancellor of Justice, the Swedish National Mediation Office, the Swedish Tax Agency, the National Government Service Center, and the Swedish Council of Higher Education responded with “no opinion.” The Swedish Bar Association had no reservations and referred to its comments on the proposal for the original EU Blue Card. The Courts of Sweden and the Swedish Police Authority had no objection. The Swedish Pension Agency agreed with the section on pension. The Parliamentary Ombudsmen refrained from commenting. Engineers of Sweden shared SACO’s opinion, and Uppsala University did not have the opportunity to provide an opinion.

consultations were analyzed in five steps. First, preliminary codes were created based on the scholarly literature on the revised EU Blue Card Directive, including salary threshold; permit holder rights; family member rights; definitions of qualifications and skill; and national competence. Second, in vivo codes were added to each printed consultation response. Third, an Excel file was populated with stakeholders, themes, and text from the consultation statements, translated from Swedish into English. Fourth, all themes and corresponding text were copied into a Word file. Themes were adjusted and new themes were added in the coding process (Cope 2010). Fifth, each theme was analyzed and included in the report.

To gain more insight into the experiences of stakeholders after the implementation of the revised EU Blue Card Directive in Sweden, six sets of interviews were conducted (for interview guides, see appendix 3-6):

- a) Three case workers and a unit manager at the SMA were interviewed about the national work permit scheme for highly qualified third country nationals and the revised EU Blue Card Directive (for the interview guide, see appendix 4). Some of the themes discussed were: why have few EU Blue Card permits been issued in Sweden? What are the advantages and disadvantages of an EU Blue Card versus a national work permit? What trends do the case workers and the unit manager see in work permit applications since the revision of the EU Blue Card Directive?
- b) Four International Mobility Managers who are involved in work permit applications for highly qualified third country nationals were interviewed about their selection of work permits (see appendix 5). What work permit do they prefer and why? Does the company hire an intermediary to handle the work permit application process?⁸ If so, why, and what are the companies' experiences with intermediaries? What more needs to be done to attract more highly qualified third country nationals to Sweden?
A short telephone conversation with a fifth International Mobility Manager discussed the company's reasons to apply for EU Blue Card permits for all employees who qualify.

⁸ Intermediaries are for-profit third parties that assist with the work permit application process. These can be relocation agencies, legal firms, or consultancy firms. Interviewees referred to these agents by company name or "third parties."

- c) An interview with an international mobility expert in a relocation company explored the pros and cons of the revised EU Blue Card Directive and Sweden's national work permit scheme. The interview provided insights into the role of intermediaries in the work permit application process, and in advising employers. This interview was also used to triangulate findings from other interviews.
- d) A legal expert at the Swedish Ministry of Justice discussed the mandate for the Proposal for Implementation (of the revised EU Blue Card in Sweden) (Ds 2023:6), the writing phase, the consultation process, and the steps leading to the final version of the proposal.
- e) An interview with a labor market expert at The Confederation of Swedish Enterprise discussed the organization's views on the EU Blue Card and migration policies in Sweden more broadly.
- f) Two officials at DG HOME in Brussels shared insights into the negotiations for the revised EU Blue Card Directive, Member States' attitudes toward highly qualified migration, and current initiatives to enhance skill supplies in the EU (see appendix 6).

As several interviewees desired to remain anonymous, no names of persons or companies are included in the text. Those who consented to be named are included in the list of interviews in appendix 3. In all other cases, descriptions of interviewees' roles are provided.

Information from the interviews has been used to exemplify work permit application practices and policy outcomes. They also inform the policy recommendations made in this report.

Due to time constraints, this report does not include interviews with highly qualified work permit holders. Future research could address this gap by examining permit holders' motivations for choosing specific permits, their sources of information, awareness of alternative options, the role of employers and intermediaries in permit selection, and their experiences with the application process.

4. Analysis of consultation statements [*remissvar*]

This chapter analyzes the consultation statements submitted in response to the Proposal for Implementation (Ds 2023:6), which outlines Sweden's plans for the revision of the EU Blue Card. These statements, submitted to the Swedish Ministry of Justice by June 1, 2023, provide insights into the perspectives of various stakeholders on the EU Blue Card and, more broadly, the governance of highly qualified migration in Sweden at that time. The consultation statements highlight key areas of consensus and contention concerning the admission, residence, and rights of highly qualified third country nationals.

On March 16, 2023, the Swedish Ministry of Justice invited 44 stakeholders to submit feedback on the proposal for the revised EU Blue Card (Ds 2023:6; Ju2023/00690), hereafter referred to as "the proposal". All stakeholders except for embassies were based in Sweden. The Swedish Ministry of Justice received 37 responses by the deadline of June 1, 2023, whereof 30 are available on a website of the Government Offices of Sweden.⁹

Table 1. Submitted consultation statements

Government agencies	Employer organizations	Labor unions
Embassy of Sweden, Washington	The Swedish Federation of Business Owners [<i>Företagarna</i>]	The Swedish Trade Union Confederation (LO) [<i>Landsorganisationen i Sverige</i>]
The Swedish Public Employment Service [<i>Arbetsförmedlingen</i>]	The Confederation of Swedish Enterprise [<i>Svenskt Näringsliv</i>]	The Swedish Confederation of Professional Associations (SACO) [<i>Sveriges akademikers centralorganisation</i>]

⁹ The responses from seven invited organizations are missing from the website where the consultation statements are posted: the employer organization Almega, the Embassy of Sweden in London, the Embassy of Sweden in New Delhi, Business Sweden, Chalmers University of Technology, the ILO committee, and Stockholm Chamber of Commerce.

Government agencies	Employer organizations	Labor unions
The Swedish Agency for Government Employers [<i>Arbetsgivarverket</i>]	The Swedish Association of Local Authorities and Regions (SKR) [<i>Sveriges Kommuner och Regioner</i>]	Sweden's Association of University Teachers and Researchers (SULF) [<i>Sveriges universitetslärare och forskare</i>]
The Swedish Board of Student Finance (CSN) [<i>Centrala studiestödsnämnden</i>]	Technology Industries of Sweden [<i>Teknikföretagen</i>]	The Swedish Confederation of Professional Employees (TCO) [<i>Tjänstemännens centralorganisation</i>]
The Swedish Social Insurance Agency [<i>Försäkringskassan</i>]	-	-
The Court of Appeal in Stockholm [<i>Kammarrätten i Stockholm</i>]	-	-
Lund University	-	-
The Swedish Migration Agency (SMA) [<i>Migrationsverket</i>]	-	-
The Swedish Better Regulation Council [<i>Regelrådet</i>]	-	-
The Swedish Institute [<i>Svenska institutet</i>]	-	-
The Swedish Security Service (SÄPO) [<i>Säkerhetspolisen</i>]	-	-
The Swedish Agency for Economic and Regional Growth [<i>Tillväxtverket</i>]	-	-
Sweden's Innovation Agency [<i>Vinnova</i>]	-	-

The analysis examines the perspectives of government agencies, labor unions, and employer organizations on the proposed revision of the EU Blue Card through the following themes:

- Complex and ambiguous regulatory framework
- Salary threshold
- Lower salary threshold for recent graduates and shortage occupations
- Equal treatment

- Wait time for a decision on a work permit application
- Enhanced rights for EU Blue Card holders
- Grounds for denying/ revoking permits
- Requirement for a legally binding employment contract
- Maintenance requirement for accompanying family members

Complex and ambiguous regulatory framework

The complexity of Sweden's migration system was the most commented upon topic in 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 2025d). In addition, highly qualified third country nationals 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. This system is difficult to navigate for employers and employees.

A possible solution to this complexity would be to simplify the work permit system. The employer organization Technology Industries of Sweden [*Teknikföretagen*] argued that the national migration system and the EU Blue Card should have "a uniform structure" [*enhetlig systematik*] to make the application process "simple and predictable for employees, employers and the handling authority" (Technology Industries of Sweden [*Teknikföretagen*] 2023: 2). The organization is a proponent of:

a unified system with identical requirements for the national residence and work permit system, and permits based on EU law.

Many companies and individuals find that the large number of permit types, each with different requirements and structures, result in a complex regulatory framework that makes it difficult to choose the correct permit. In addition, consistent requirements could ease staffing for the [permit] processing authority, as the need for specialized expertise for specific types of permits would decrease and more case officers could handle different types of permits

Technology Industries of Sweden [*Teknikföretagen*] 2023: 3

Technology Industries of Sweden frames the harmonization of national permits and the EU Blue Card as a triple-win solution for employers, employees, and the SMA. It does not, however, address the benefits and strengthened rights of the EU Blue Card for employees – reflecting the employer-based perspective that the organization represents.

The longest and most detailed consultation statement was submitted by the SMA, the authority that issues work permits to third country nationals. In a 15-page statement, the SMA raised legal and practical concerns regarding the planned changes in the legislation for the EU Blue Card in Sweden. It expressed concerns as to how SMA case workers should apply the new rules in their decisions on EU Blue Card applications, and called for more precision in the regulations (Swedish Migration Agency 2023a).

The SMA noted that the current legislation for labor immigration for both national permits and EU Blue Cards in Sweden “is characterized by optional [*fakultativa*] and imprecise provisions and practices with many assessment elements” (*Ibid.*: 2). In its consultation response, the SMA identified legal inconsistencies, asked for clarifications and more concise definitions, and requested guidance in the application of principles (for example what does “comprehensive health insurance” cover; how is a “serious deficiency” in employer behavior defined and in which cases is this a ground for rejection; how is an “uninterrupted” period of stay defined). The SMA argued that unclear definitions cause difficulties in the assessment process, highlighting the challenges in the implementation of the regulatory framework for the revised EU Blue Card Directive.

The SMA also raised concerns about the proposed transposition deadline of November 18, 2023 – half a year after the agency submitted its response.¹⁰ The SMA noted that the proposed revisions would require the agency to create new application forms and templates, train staff, and build up expert knowledge. The administrative burden would also increase if the number of EU Blue Card applications would increase (Swedish Migration Agency 2023a).

Salary threshold

As expected, the most mentioned – and most polarized – issue was the proposed salary threshold for the revised EU Blue Card in Sweden. Article 5(3) in the revised EU Blue Card Directive stipulated that Member States should set

¹⁰ Sweden did not meet the deadline. The Swedish Parliament approved the bill for the revised EU Blue Card Directive on November 28, 2024, and the revised EU Blue Card Directive entered into force in Sweden on January 1, 2025.

the salary threshold between 1.0 and 1.6 times the Member State's average gross annual salary. The proposal for Sweden recommended to keep the threshold at 1.5 – the same level as the original EU Blue Card.

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 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.

In their statements, the labor unions underlined the central role of social partners in collective agreements and wage formation. For example, the Swedish Trade Union Confederation (LO) (2023: 2) "would like to emphasize that it is the [social] partners who regulate the conditions in the Swedish labor market and that the clash that arises between the Aliens Act and the partner system regarding labor immigrants is unfortunate." The labor union criticized the employers' increased influence in the admission of third country nationals:

Since the introduction of the new labor immigration system for third country nationals in 2008, LO has been critical of how the system works, not least because of how power has shifted to employers and increased the risk of exploitation and, in the worst case, labor exploitation and modern slavery.

Swedish Trade Union Confederation [LO] 2023: 1

Another labor union, the Swedish Confederation of Professional Associations (SACO) (2023: 3) argued that salary formation "is and should remain a national competence," referring to article 153 in the TFEU. A salary threshold that establishes a minimum wage for employees who work in Sweden:

runs counter to the Swedish collective agreement model, in which salary formation is traditionally regarded as the responsibility of the social partners. Even though the current regulation falls under administrative law and concerns access to the labor market, the salary threshold in the Blue Card Directive risks in practice to function as a statutory minimum wage [*lagstadgad lönetröske*] for Blue Card holders' employment.

Swedish Confederation of Professional Associations
[SACO] 2023: 3

SACO called for an appendix that explains how the salary threshold in the Directive relates to salary levels in collective agreements, and to assess the possible effects of a salary threshold on salary formation in Sweden.

A labor union and an employer organization both argued for a lower salary threshold than the proposed 1.5 times (amounting to 55,650 Swedish kronor in 2023) by providing examples of professions with labor shortages that have average wages below the salary threshold. The largest employer organization in Sweden, the Swedish Association of Local Authorities and Regions (SKR), showed that the average salaries of case workers, psychologists, midwives, nurses, teachers, counselors, social workers, and engineers – all occupations with labor shortages – were below the 1.5 threshold. Only the salaries of medical specialists exceeded that threshold. Similarly, the labor union Swedish Confederation of Professional Employees (TCO) showed that the average salaries for electrical engineers, software engineers, system developers, and test leaders were also below the 1.5 times threshold, and that women's salaries were lower compared to men's salaries, except for IT-related professions. Based on the provided salary data, the two organizations argued for a lower salary threshold for the revised EU Blue Card.

The argument for a lower salary threshold also involved an age aspect, which was highlighted by two employer organizations. The Confederation of Swedish Enterprise (2023b) noted that university-educated work permit holders in Sweden are, on average, just under 33 years old. These permit holders are approximately ten years younger than the average age of Swedish-born employees with a university education. As younger employees tend to be paid lower salaries than older workers, it is more difficult for young work permit holders to meet the salary threshold. The Swedish Federation of Business Owners (2023) provided salary data to illustrate this point. In 2021, the average salary in Sweden was 33,200 Swedish kronor, whereas the salary for 33-year-olds was significantly lower at 28,933 Swedish kronor. Based on the lower salaries for young permit holders, the Federation argued for a salary threshold for the EU Blue Card of 1 time the average salary – considerably lower than the proposed 1.5 threshold.

After the completion of the consultation process, the committee that prepared the proposal for the revised EU Blue Card in Sweden (Ds 2023:6) made a recommendation for the salary threshold to the Swedish Minister for Migration Johan Forssell. After consulting with political parties, a salary threshold of 1.25 the average gross annual salary was decided, reduced from the proposals' recommended 1,5 times (interview with the Swedish Ministry of Justice, September 29, 2025).

Lower salary threshold for recent graduates and shortage occupations

The revised EU Blue Card Directive offered Member States the option to set a lower salary threshold for recent graduates from third countries (Recital 27) and migrants with skills in shortage occupations (Recital 25). The lower salary thresholds would broaden eligibility for the EU Blue Card.

Two government agencies that work with international students favored a lower threshold for recent graduates from a national competitiveness perspective. Legal scholars at Lund University argued that these persons are more inclined to migrate (Stoyanova et al. 2023). The Swedish Institute (2023) noted that recent graduates may select other destinations if Sweden would not lower its threshold. The Embassy of Sweden in Washington (2023) and The Confederation of Swedish Enterprise (2023b) favored a lower threshold for recent graduates if Sweden would decide to keep the 1.5 times threshold.

A labor union argued that the threshold functions like a labor market test:

A system in which the state defines the need for skills in the labor market risks to create major problems. If an employer advertises a vacant position, there is a need and demand for a certain type of labor. This means there is a shortage of a specific expertise in that organization, which cannot be determined in advance by a government agency.

Swedish Confederation of Professional Associations
[SACO] 2023: 3

Here the Swedish Confederation of Professional Associations make the same objection as for the general salary threshold, arguing against an increased state influence in the labor market.

Equal treatment

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, two government agencies drew attention to two issue areas where this may not be the case.

The Swedish Social Insurance Agency noted that the conditions for social security benefits eligibility might be easier to meet for Swedish citizens than for migrant workers. The agency therefore requested an investigation into

whether regulations in the Social Insurance Code could indirectly discriminate against workers (Swedish Social Insurance Agency 2023).

Another government agency, the Swedish Board of Student Finance (CSN), observed that a projected increase in the number of issued EU Blue Cards in Sweden could lead to more family members receiving study allowances and financial supplements. However, since only three family members of EU Blue Card holders received such support in 2021 and 2022, the agency anticipated only a marginal impact (Swedish Board of Student Finance [CSN] 2023).

Another issue regarding equal treatment concerned the right of work permit holders' newborn children. Two labor unions, a government agency, and legal scholars at Lund University noted that the proposal for the revision of the EU Blue Card in Sweden failed to include a safeguard for the rights of children of EU Blue Card holders.¹¹ They referred to an issue that emerged under the original EU Blue Card Directive and that continued to affect EU Blue Card holders, researchers and intra-company transferees: 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.

This situation has recently been remedied. On September 4, 2025, the Migration Court of Appeal ruled that parents can now apply for a residence permit for the newborn child from within Sweden (MIG 2025:10):

In its decision, the Migration Court of Appeal states that the main rule in Chapter 5, Section 18 of the Aliens Act, that an application for a residence permit may not be granted after entry into Sweden, cannot be used when examining an application for a residence permit for a child who was born in Sweden and is still in the country. This is because the child has not entered Sweden.

Swedish Migration Agency 2025a

The recent decision of the Migration Court of Appeal has strengthened the rights of parents of a newborn child. However, the permanent residence rights of older children and accompanying spouses continue to remain an issue in Sweden, as discussed in the chapters on the SMA and employers' perspectives.

¹¹ The issue of residence permits for newborn children was mentioned by the SMA, Sweden's Association of University Teachers and Researchers (SULF), the Swedish Confederation of Professional Associations (SACO), and legal scholars at Lund University.

Wait time for a decision on a work permit application

During the time of the consultation process in mid-2023, decisions on applications for an EU Blue Card took a long time. The Swedish Agency for Government Employers (2023) observed that applications for work permits under the national system had shorter processing times compared to EU Blue Card applications because the SMA offered a fast-track for certified employers under the national system. The agency suggested that the shorter processing times likely had led many third country nationals who would have qualified for an EU Blue Card to apply for a national permit instead.

In this issue area, three employer organizations and a labor union advocated for a decision-making period of maximum 30 days – thereby harmonizing the decision-making time for the national work permit and the EU Blue Card.¹² However, legal scholars at Lund University questioned whether the SMA would be able to make a decision within 90 days, as required by the revised EU Blue Card Directive (Stoyanova et al. 2023).

Article 11 of the revised EU Blue Card Directive requires that a decision on a complete EU Blue Card application should be made within 30 days. While the 30-day requirement already applied to the national permit at that time, extending it to the EU Blue Card aligned Swedish practice with the revised EU Blue Card Directive. Since January 2024, the 30 day target has been met for most complete applications for highly qualified work permits in Sweden (Swedish Migration Agency 2025b).

Enhanced rights for EU Blue Card holders

The revised EU Blue Card Directive has enhanced the rights of permit holders in several ways. First, it is now easier for permit holders to obtain long-term resident status in Member States (Recital 51). They are allowed to count residency on other permits and in other Member States toward long-term resident status, and residence for study purposes can be counted as half-time (*Ibid.*).

Second, EU Blue Card holders are allowed to retain their permit during periods of unemployment – three months for persons who have held an EU Blue Card for less than two years, and six months for those who have held it longer (Article 8(5)). Member States have the option to allow longer periods of unemployment.

¹² The Swedish Federation of Business Owners, The Confederation of Swedish Enterprise, the Swedish Association of Local Authorities and Regions (SKR), and Sweden's Association of University Teachers and Researchers (SULF).

The proposal suggested the minimum unemployment period allowed – three months for EU Blue Card holders for less than two years, and six months thereafter. The Swedish Trade Union Confederation (LO) (2023) supported the measure, but the Swedish Confederation of Professional Employees (TCO) (2023) and legal scholars at Lund University (Stoyanova et al. 2023) argued that three months may be too short to find other employment.

The final version kept the proposed change – i.e. a three-month unemployment period for EU Blue Card holders who have held the permit for less than two years; and six months for persons who have held an EU Blue Card longer than that.

The revised EU Blue Card Directive has also made it easier for permit holders to change jobs and professions compared to the original EU Blue Card. Member States can require that permit holders inform the competent authorities of a change in employer or other significant changes within the first 12 months of holding an EU Blue Card. Member States are also allowed to perform a labor market test during this time (Recital 43). After an EU Blue Card holder has held the permit for 12 months, “Member States may require only that a change of employer or a change affecting the fulfilment of the criteria for admission [...] be communicated in accordance with the procedures laid down by national law” (Article 15(3)).

A revised EU Blue Card is issued for a specific employer and a specific position, but permit holders are allowed to change jobs. Permit holders have to inform the SMA of the change, but they do not have to apply for a new permit. After two years, a permit holder is allowed to change profession as well.

Two labor unions supported the measure. The Swedish Confederation of Professional Employees (TCO) (2023: 2) welcomed the measure as it “strengthens the employees’ position and helps to counteract labor-related crime.” The Swedish Agency for Economic and Regional Growth (2023) also supported the measure as it increased flexibility for employees.

The revised EU Blue Card also broadened eligibility for the permit to include beneficiaries of international protection:

In order to enhance their labour market opportunities across the Union, beneficiaries of international protection who are highly qualified should be entitled to apply for an EU Blue Card in Member States other than that which granted them international protection [...]. Beneficiaries of international protection are also entitled to apply for an EU Blue Card in the Member State that granted them international protection.

Recital 16 of Directive (EU) 2021/1883

A labor union and a government agency supported the expansion of eligibility for persons under international protection. The Swedish Confederation of Professional Employees (TCO) (2023) noted that this provision enables those who already reside in Sweden to apply for an EU Blue Card, and the Swedish Better Regulation Council (2023) commented that this measure would enable persons under protection to move within the EU.

The Swedish Trade Union Confederation (LO) (2023) supported the provision that the EU Blue Card cannot be used for a "track change" when a decision on an asylum application is pending. Until April 2025, persons under temporary protection could "change tracks" from applying for a residence permit based on international protection to one based on work, if they worked in Sweden during the time when their asylum application was rejected. These persons thus "changed tracks" from asylum to a work permit (Swedish Migration Agency 2025e). The track change granted these persons an exemption from the general rule that one had to apply for a work permit from outside Sweden. From April 1, 2025, the Swedish Parliament decided to abolish the possibility to change tracks (Swedish Migration Agency 2025f).

Grounds for denying/ revoking permits

The revised EU Blue Card Directive provides several grounds for rejecting an application or revoking an existing work permit, including a threat to public health or security (Recital 31), an applicant's failure to comply with regulations (Recital 31), and, in certain cases, employer misconduct (Recital 33).

The Swedish Trade Union Confederation (LO) (2023) supported the proposed regulation that permits cannot be issued to employers who have sanctions against them. But the Swedish Confederation of Professional Employees (TCO) and legal scholars at Lund University (Stoyanova et al. 2023) argued that employees should not be negatively affected when their employer makes a mistake in the application process or breaks the law. In addition, it is unclear how the competent authorities should determine "severe deficiencies" that are ground for rejecting a work application (Stoyanova et al. 2023, Swedish Migration Agency 2023a).

Legal scholars at Lund University and the Swedish Confederation of Professional Associations (SACO) refer in their statements to the so-called "competence expulsions" [*kompetensutvisningar*] when highly qualified migrants were expelled from Sweden due to administrative mistakes made by their employers. This issue received widespread attention in media outlets in Sweden and abroad a few years ago. It gave Sweden a bad reputation for making ruthless decisions on work permit applications (Technology Industries of Sweden

[Teknikföretagen] 2024). SACO (2023) argued that the rules should not be followed in such a strict manner that it creates problems for employees. This recommendation was adopted in the final version of the revised EU Blue Card regulations for Sweden.

Requirement for a legally binding employment contract

The revised EU Blue Card Directive requires a work contract or binding job offer for employment of at least six months (Recital 21). This requirement differs from the original EU Blue Card Directive, which required a valid work contract, or a binding job offer.

Stakeholders' opinions on this issue diverged considerably. The labor unions supported the proposed change as it would strengthen the rights of employees. An employer organization, on the other hand, expressed concerns that the requirement would negatively affect employers. The Confederation of Swedish Enterprise (2023) was concerned that the requirement would increase the wait time for a decision, as all contracts need to be checked for authenticity by the SMA. The Confederation observed that the case processing time had increased since the implementation of an employment contract requirement in the Aliens Act in June 2022. It had also increased the administrative and economic costs for the SMA and companies.

The SMA (2023) supported the requirement as it would create a uniform national system. The agency noted that when the EU Blue Card and the national migration system both require a legally binding employment contract, it will make it easier to apply for a permit and reduces the chance that an applicant submits the wrong documents.

The Swedish Better Regulation Council [*Regelrådet*] (2023) – an independent decision-making body within the Swedish Agency for Economic and Regional Growth consisting of members appointed by the government – identified two potential challenges for employers. First, they may have to engage in more extensive planning for international recruitment. Second, the obligation to provide an employment contract may be perceived as increasing the level of risk for employers. However, the Council noted that the latter concern could be reduced by conditional clauses in the employment contract.

The latter concern raises an interesting point. While the requirement for a binding employment contract is intended to offer employees greater protection and stronger rights, it can paradoxically lead to reduced job security. The SMA noted in its consultation statement (2023) that the number of work permits

issued for probationary employment had risen sharply since the introduction of the legal requirement for a binding employment contract in Chapter 6(2), first paragraph of the Aliens Act. These probationary contracts can be offered for up to six months and may be extended when the probationary period is turned into a permanent position.

Recent data from the SMA however, does not confirm this trend. Between January 1, 2025, and October 5, 2025, only 24 EU Blue Cards were issued to primary applicants for less than one year. Of these, three were renewals. It is not possible to determine whether the first-time permits were issued for probationary employment, but it is likely (e-mail from the Swedish Migration Agency, October 6, 2025).

Maintenance requirement for accompanying family members

The proposal for the revised EU Blue Card suggested a maintenance requirement for accompanying family members, arguing that it would make requirements for the national system and the EU Blue Card more uniform. It also argued that uniform rules for maintenance requirements make it easier to apply the provisions.

Legal scholars at Lund University argued that the maintenance requirement should be placed in the framework of international laws that specified Sweden's obligations toward children and family unity (Stoyanova et al. 2023). The scholars argued that the maintenance requirement contradicts the goal of attracting highly qualified migrants to Europe and Sweden. In addition, they noted that the maintenance rules are "already complex and difficult to understand [*svåröverskådlig*], which is why the argument for uniformity is not convincing" (*Ibid.*: 7). The final version of the revised EU Blue Card in Sweden does not have a maintenance requirement.

5. Requirements for the original and revised EU Blue Card and the national work permit in Sweden

This chapter shows the requirements for the revised EU Blue Card in Sweden, which were implemented after the consultation phase, as discussed in the previous chapter. For comparison, Table 2 also shows the requirements for the original EU Blue Card in Sweden (2013-2024) and work permits under Sweden's national scheme.

The vast majority of highly qualified third country nationals apply for a work permit under the national scheme in Sweden. As Table 2 shows, the requirements for these work permits are more liberal with a lower salary threshold and a shorter minimum time for employment contracts. But holders of national permits also have more limited rights compared to revised EU Blue Card holders in Sweden, as they have to apply for a new permit if they change roles or employers and they have more restrictive unemployment rights.

Table 2. Requirements for the original EU Blue Card, the revised EU Blue Card, and the national work permit in Sweden

	Original EU Blue Card in Sweden (2013-2024)	Revised EU Blue Card in Sweden (2025)	Work permit in Sweden under the national scheme
Passport requirement	Yes	Yes	Yes
Education requirement	Higher education of at least three years or at least five years professional experience	Higher education (180 credits) or at least five years of relevant professional experience	No
Salary threshold	1.5 times the gross national salary in Sweden	At least 1.25 times gross national salary in Sweden (SEK 52,000 from July 9, 2025) (no maintenance requirement)	At least 80% of gross national salary in Sweden (SEK 29,680 from June 17, 2025) plus a maintenance requirement
Employment contract needed	Valid work contract or binding job offer	Yes - for a highly qualified profession	Yes
Permit duration	At least 12 months	Minimum length 6 months; For employment contract shorter than 2 years, a permit is issued for the contract duration plus an additional 3 months	Between 3 months and 2 years
Terms of employment	Salary and employment conditions should be at least same level as Swedish collective agreements or customary in the profession or industry	Salary and employment conditions should be at least same level as Swedish collective agreements or customary in the profession or industry	Salary and employment conditions should be at least same level as Swedish collective agreements or customary in the profession or industry

	Original EU Blue Card in Sweden (2013-2024)	Revised EU Blue Card in Sweden (2025)	Work permit in Sweden under the national scheme
Right to intra-EU mobility	Yes, after 2 years EU Blue Card holders were allowed to work in another Member State. They had to apply for an EU Blue Card in the receiving state and were subject to the admission criteria of that state	Yes. After 12 months, a holder of an EU Blue Card issued by a Member State can apply for an EU Blue Card in another Member State. No labor market test will be performed	No
Can apply from within Sweden if holding another permit	No	This depends on the previous permit. For example, a holder of a national work permit can apply from within Sweden	It depends on the type of permit, for example a person with a study permit can apply from within Sweden
Permit tied to an employer and profession	EU Blue Card holders need prior authorization before they can change employers	No. Permit holders can change employer and start working. The SMA should be informed of the change, but no new permit is necessary	During the first 2 years, the permit is tied to an employer and profession. After 2 years it is limited only to the profession. Permit holders are required to apply for a new permit if changing employer or profession

	Original EU Blue Card in Sweden (2013-2024)	Revised EU Blue Card in Sweden (2025)	Work permit in Sweden under the national scheme
Health insurance	Proof of health insurance required	A permit holder must take out health insurance if staying less than one year in Sweden. If staying longer: the permit holder should register in Sweden's population registry to gain access to Sweden's healthcare system ¹³	No private health insurance is required for the permit holder
Employment-related insurances	Employer must take out health insurance contributions, life insurance, work injury insurance, pension contribution	Employer must take out health insurance contributions, life insurance, work injury insurance, pension contribution	Employer must take out health insurance contributions, life insurance, work injury insurance, pension contribution
Family members can join primary permit holder	Yes	Yes	Yes. Maintenance requirement
Family members have right to work	Yes	Yes	Yes

¹³ An applicant has to show that health insurance in the home country has sufficient coverage and is valid during the stay in Sweden, or show proof of private insurance. If the applicant is registered in Sweden's population registry (and is thereby covered by Sweden's health insurance), the requirement is met (e-mail from the SMA, December 2, 2025).

	Original EU Blue Card in Sweden (2013-2024)	Revised EU Blue Card in Sweden (2025)	Work permit in Sweden under the national scheme
Unemployment	3-month period to find new employment if the permit is still valid	If an EU Blue Card has been held for less than 2 years: 3-month period to find new employment; Held for 2 years or more: 6-month period	3-month period to find new employment if the permit is still valid
Permanent residency	After 4 years.	After 4 years.	After 4 years
Processing time	90 days	30 days	30 days (if highly qualified applicant)

Sources: Swedish Migration Agency 2025h & 2025g; e-mail correspondence with the SMA September 25, 2025 & December 2, 2025; Directive (EU) 2021/1883.

The following sections analyze interviews with case workers and a unit manager at the SMA, employers who hire highly qualified third country nationals, an international mobility expert, and officials at DG HOME. These interviews reflect on the revised EU Blue Card and work permits under Sweden's national scheme.

6. Experiences of the Swedish Migration Agency with the revised EU Blue Card

The Swedish Migration Agency has two tasks when assessing work permit applications: to verify information [in applications] and to make fast decisions according to the [government's] assignment to increase the flow of people we need. But sometimes these perspectives compete.

Interview 2, Swedish Migration Agency, September 24, 2025

This quote sums up the competing interests between the government's – and employers' – desire for fast processing times on work permit applications, and the SMA's remit to check information for accuracy and compliance with Sweden's laws and regulations. This chapter presents the SMA's experiences with the revised EU Blue Card, based on three interviews conducted with four employees.

In 2023, the Swedish government tasked the SMA with making the application process for highly qualified permits more efficient (Swedish Ministry of Justice 2023a). In order to achieve this, the SMA hired a Communications Officer [*informatör*] who answers questions about work permits for the highly qualified (the EU Blue Card, the intra-corporate transfer (ICT) permit, the regular work permit, and the researcher permit). This person works as information officer and case manager (interviews 1 and 2, Swedish Migration Agency, September 26, 2025). The Communications Officer receives between zero and ten questions a week and provides information about migration laws and permit requirements. In certain cases, the Communications Officer supports companies and intermediaries in all steps of the work permit application process (interview 2, Swedish Migration Agency, September 24, 2025). For the review of EU Blue Card applications, the SMA currently has 2 full-time case workers and a part-time decision-maker (e-mail from Swedish Migration Agency, December 2, 2025).

In Fall 2024, employees at the SMA prepared for the revised EU Blue Card that was to be implemented in Sweden on January 1, 2025. They designed internal routines for decision-making on EU Blue Card applications, adapted an existing template to the new regulatory framework, and created an application form for the website. These documents and the routines had to be verified with the

SMA's Communications Unit and the Legal Unit (interview 3, Swedish Migration Agency, September 24, 2025).

Since the implementation of the revised EU Blue Card in Sweden on January 1, 2025, the majority of applications for an EU Blue Card have been submitted by holders of national work permits who already are employed in Sweden. These workers can switch from a permit under the national system to an EU Blue Card if they meet the requirements (interview 3, Swedish Migration Agency, September 24, 2025). In these cases, the revised EU Blue Card did not have the intended outcome of attracting "new" highly qualified migrants to Sweden.

In terms of information provision about the EU Blue Card, an interviewee responded that "[w]e provide information on our website, but we do not advertise [the EU Blue Card]" (interview 1, Swedish Migration Agency, September 24, 2025).

Permit holders' rights under the revised EU Blue Card

Several interviewees commented on permit holders' enhanced rights under the revised EU Blue Card Directive. A case worker at the SMA was positive about the revised EU Blue Card regulations for changing employment and an extended period of unemployment:

They [employees] can change employers without a decision for a new work permit. [The rule] is clear and prevents exploitation. If you lose your job, you now have three months to find a new one. Later [after 2 years of holding an EU Blue Card] you have six months, if you can support yourself. This is positive.

Interview 2, Swedish Migration Agency, September 24, 2025

The right for EU Blue Card holders in other Member States to work in Sweden has so far rarely been used (see Table 3). The number has slightly increased since the revised EU Blue Card was implemented in Sweden but is still very low. The SMA does not keep statistics from which countries employees applied (e-mail from the Swedish Migration Agency, October 6, 2025).

Table 3. EU Blue Card holders in another Member State who applied for an EU Blue Card in Sweden

Year	Number of permits: primary applicants	Number of accompanying family members
2022	20	25
2023	17	7
2024	13	12
2025 (until October 5, 2025)	24	21

Note: The number of EU Blue Card permits applied for in Sweden by EU Blue Card holders in other Member States.

Source: E-mail from the SMA, October 6, 2025.

“Competence expulsions” [*kompetensutvisningar*]

In recent years, so-called “competence expulsions” [*kompetensutvisningar*] have received widespread attention in the media in Sweden. These are cases when highly qualified migrants are expelled from Sweden due to administrative mistakes made by their employers. In response to previous deportations of highly qualified migrants, a case worker responded that the rules for assessing work permit applications have changed. The SMA used to have to make a month-to-month assessment of a permit holder’s income, highly qualified employment, and employer insurance, which could lead to deportation if one of these requirements was not met. Following a decision by the Migration Court of Appeal (MIG 2018:12), the SMA conducts a forward-looking and backward assessment that evaluates the severity of a deviation if there is one (interview 1, Swedish Migration Agency, September 24, 2025). In the past, case officers were required to deny a permit if there were discrepancies in an applicant’s work history. A complete assessment [*helhetsbedömning*], on the other hand, assesses an applicant’s entire record (interview 1 and 2, Swedish Migration Agency, September 24, 2025).

Relatedly, the case worker observed a shift in the SMA’s attitude:

We have to be more active in our narrative about migration. That is the role of the Communications Officer [*informatör*]. We have to explain why things are the way they are. Why does a person get a rejection [on a work permit application]? We have to increase predictability [*förutsägbarhet*].

Interview 1, Swedish Migration Agency, September 24, 2025

The SMA's increased awareness of the importance of narratives of migration is similar to the European Commission's framing of highly qualified migration, which is discussed in a later chapter. Both agencies work actively with a positive framing of migration and clearly communicating the organization's activities to the general public.

Grounds for rejection/ revocation of a revised EU Blue Card

In its decision-making on applications for a revised EU Blue Card, the SMA follows the regulations in the revised EU Blue Card Directive and Sweden's Alien's Act. When an application does not meet these requirements, an application may be rejected.

One of the most common reasons for rejections of EU Blue Cards is that an employer fails to advertise the position in Sweden, the EU/EEA and Switzerland for ten days, the so-called EU preference rule [*unionsföreträde*]. As a case worker explains: "[i]f a contract is signed within those ten days the employer does not meet the requirements. This is an absolute rule" (interview 3, Swedish Migration Agency, September 24, 2025).

In some cases, the advertised position does not meet the requirement for a highly qualified position. A case worker notes:

Employers think that paying [a salary of] 52,000 Swedish kronor [per month, the current salary threshold for the EU Blue Card in Sweden] is enough to meet the requirement [for an EU Blue Card]. But the application is rejected if it is not a highly qualified position. We look at the job duties and the job ad, if it has a requirement for highly qualified work.

Interview 3, Swedish Migration Agency, September 24, 2025

The case worker added that it can be difficult to assess whether a position is highly qualified, as a clear definition is missing. In this case, "[w]e hope for an appeal, guidance from the court. That establishes a practice" (interview 3, Swedish Migration Agency, September 24, 2025).

The job offer may also fail to meet the requirements for a job offer, as determined by "collective agreements or standards that are customary in the occupation or industry" (Swedish Migration Agency 2025c). For each work permit application, the relevant labor union has the right to comment on the terms of employment [*yttranderätet*]. A case worker explained: "[t]he unions do

not want salary dumping, human trafficking. We [the SMA] do not want that the employer exploits workers [driver rovdrift på arbetskraft]" (interview 2, Swedish Migration Agency, September 24, 2025).

If an employer does not have a collective bargaining agreement, the SMA requires an insurance certificate for medical-, life-, occupational injury- and occupational pension insurance and the SMA assesses the salary for the profession (Aliens Act Chapter 6(2); for EU Blue Card, see Chapter 6a(1.2)). If an employer does not meet the legal requirements, the following can happen:

When we discover misconduct [by the employer] when you have a work permit, we can withdraw the permit. But we often do not know this until you seek an extension. You can get a renewed permit, but the employer will not be granted permits any more. If this happens at a renewal, the employee often does not know that the employer does not follow the law.

Interview 2, Swedish Migration Agency, September 24, 2025

If the SMA detects a problem with an employer, it issues a work permit for two years, and does not renew the permit (interview 2, Swedish Migration Agency, September 24, 2025).

It is primarily smaller companies that do not meet the requirements for the EU Blue Card. For many, "[t]his is the first time they [employers] come into contact with the union. Employers may have failed to take out insurance [...] Small companies may not have HR. Like business startups that recruit from third countries. The others [i.e. Swedish-born colleagues] may have better employment conditions" (interview 2, Swedish Migration Agency, September 24, 2025).

Smaller companies are often not used to hiring internationally and may not know about work permit application requirements (interview 2, Swedish Migration Agency, September 24, 2025). An interview with a labor market expert at the employer organization, The Confederation of Swedish Enterprise, explains the challenges of smaller companies in the application process for EU Blue Cards:

Many of our members have small companies, and many lack the resources [necessary to familiarize themselves with the migration regulations for highly qualified workers]. Employers need to know all the details [for a work permit application], all the requirements, but they may have forgotten to check something. They learn the hard way [when an application is denied]. In the end they may not dare to hire from abroad since it is too big a risk [that the permit is denied].

Interview with a labor market expert at The Confederation of Swedish Enterprise, November 3, 2025

Applications for an EU Blue Card can also be rejected because the applicant does not meet the requirements. Applicants may not meet the education requirements for the EU Blue Card, may not have shown their passport in an embassy or have not signed the passport. Additional grounds for rejection have to do with applicants' conduct [*vandel*] and criminal acts.¹⁴ If a person has stayed in Sweden illegally before, or has been flagged by the Security Police, these issues can be ground for rejection (interview 3, Swedish Migration Agency, September 24, 2025).

Remaining legal challenges

The interviewees identified several legal challenges with the revised EU Blue Card in Sweden in relation to the rights of accompanying children and spouses, and EU Blue Card holders in other Member States' right to apply for a revised EU Blue Card from within Sweden.

The first issue concerns the rights of children of work permit holders to reside in Sweden. The age limit for residing in Sweden is 18 years for children of holders of an EU Blue Card, and 21 years for holders of a work permit under Sweden's national scheme. In this issue area, the requirements in the revised EU Blue Card Directive (2021/1883) are more stringent than Sweden's Aliens Ordinance (2006:97, *Utlämningsförordningen*), which regulates the rights of national work permit holders.¹⁵

¹⁴ The Aliens Act (Chapter 6a(3.1-3) stipulates that EU Blue Card permits should not be issued to persons who are a threat to public order, safety or health, or who have submitted false documents.

¹⁵ 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.

The rights of children of EU Blue Card holders starts with (1) the revised EU Blue Card Directive, (2) via the Right to Family Reunification (Directive 2003/86/EC), to (3) Sweden's Alien's Act (2005:716, *Utlänningslagen*). The three steps are outlined below.

1. The rights of accompanying children start with the revised EU Blue Card Directive's definition of families as: "third-country nationals who are family members as referred to in Article 4(1) of Directive 2003/86/EC" (revised EU Blue Card Directive 2021/1883, Article 2(6)).
2. Directive 2003/86/EC, the Right to Family Reunification, defines family members as spouses and **minor children** (Article 4(1)). The children "must be below the age of majority set by the law of the Member State concerned and must not be married" (Article 4(1), Directive 2003/86/EC). As an exception, Member States may grant a residence permit to adult unmarried children who are dependent on their parents for health reasons (Article 4(2), Directive 2003/86/EC).
3. Sweden's Alien's Act defines a child as a person under 18 years old (2005:716, Chapter 1(2)).

Children of national work permit holders fall under Sweden's Alien's Ordinance (2006:97, *Utlänningsförordningen*). Under this regulation, residence permits may be granted to a spouse or cohabiting partner of a work permit holder, or a "relative [who is] dependent on either of them [the permit holder and spouse or cohabiting partner] for support or is **under 21 years of age**" (Chapter 4(4a), Alien's Ordinance 2006:97).

In this case, Sweden's Alien's Ordinance has a higher age limit for accompanying children's right to reside in Sweden (21 years old) than the revised EU Blue Card Directive (18 years old).

A case worker in the SMA experiences this issue as follows:

Something that bothers me, it is hard when children have turned 18 or 21 years old, who have had a previous [residence] permit through a connection to their parents. They are expected to have their own employment that meets the requirements [for a residence permit]. If not, they are deported. Not all jobs meet the requirement. It is hard to send them home. They are well-established young people.

Interview 2, Swedish Migration Agency, September 24, 2025

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.¹⁶ When a co-applicant becomes a primary applicant, that person cannot count the time as co-applicant toward permanent residency (interview 3, Swedish Migration Agency, September 24, 2025). This issue came to the fore when the battery company Northvolt went bankrupt in April 2025. When co-applicants (or “accompanying spouses”) became the family’s primary breadwinner, they discovered that they could not count their residence in Sweden toward permanent residency, and “their stay in Sweden was set to zero” (interview 1, International Mobility Manager, September 22, 2025). Only if they had worked as a PhD student or a researcher, would they be able to count that time toward permanent residency (interview 3, Swedish Migration Agency, September 24, 2025).

An International Mobility Manager mentioned that they had observed an additional challenge when a co-applicant becomes a main applicant for a work permit. In one case, the primary applicant in a dual-career household lost his job. His wife, who was listed as a co-applicant on his work permit, then applied for her own work permit. She was required to leave Sweden to wait for a decision from the SMA before she could work in Sweden again. She first took a leave of absence, and thereafter worked remotely in her home country until she was allowed to return to Sweden (interview 1, International Mobility Manager, September 22, 2025).

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 Swedish Migration Agency 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. The position had to be advertised and the SMA had to make a new assessment (interview 3, Swedish Migration Agency, September 24, 2025).

¹⁶ 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)).

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).

7. Employers' perspectives on the EU Blue Card

This chapter presents findings from interviews with four International Mobility Managers who handle residence- and work permit applications for companies based in Sweden, a short phone conversation with a fifth International Mobility Manager, and a labor market expert in Sweden's largest business organization, The Confederation of Swedish Enterprise.

The interviewees reiterated that Sweden has a complex regulatory system for work permits for highly qualified third country nationals. Themes that emerged include companies' desire to conduct business as usual, risk management, the role of the migration industry, misinformation about the EU Blue Card, and the rights of accompanying children.

Business as usual

Without prompting, all employers commented on the complexity of Sweden's migration regulations for highly qualified workers. They noted that "the system" was difficult to understand, and that frequent changes in migration regulations made it challenging to keep up. While all companies included in the study hired an intermediary to handle the permit application process, International Mobility Managers tended to decide to apply for national work permits because they were familiar with the regulations and the application process.

The companies of two International Mobility Managers decided to only apply for national permits for efficiency reasons (interview 1, International Mobility Manager, September 22, 2025; interview 3, International Mobility Manager, November 11, 2025). One of these managers explained that, as more third country nationals meet the eligibility criteria for the national work permit scheme, it is easier for the company to apply for those permits. In addition, they find it easier to apply for one permit that they are familiar with (i.e. the national work permit), rather than staying up to date on two schemes. Although an intermediary handles the permit applications, the company decided to standardize the process by only applying for national work permits (interview 1, International Mobility Manager, September 22, 2025).

One company only applies for an EU Blue Card when a new employee already holds an EU Blue Card permit in another Member State (interview 2, International Mobility Manager, October 7, 2025). In all of these cases, approximately

five applicants per year, these card holders relocated from Germany to Sweden (ibid.). This is not surprising as Germany has issued, by far, the largest number of EU Blue Cards of any Member State (Eurostat 2025). The International Mobility Manager explained the company's preference for national permits as follows:

For EU Blue Cards, we hesitate. The Swedish Migration Agency knows the national [work] permits and knows what is required. Few employers apply for EU Blue Cards. The Swedish Migration Agency asks employers more questions [when they apply for an EU Blue Card]. It is less certain [whether the application will be approved]. We may have missed something [that was required in the application]. We experience that the Swedish Migration Agency is greener [in the decisions on EU Blue Card applications compared to applications under the national migration scheme].

Interview 1, International Mobility Manager, October 7, 2025

Another International Mobility Manager explained that the EU Blue Card would require new processes and routines in the company. So far no one had taken the initiative to investigate whether the EU Blue Card would benefit the company, and if so how:

We don't have a new process [for the EU Blue Card]. No one has driven the process, what are the benefits. No one is driving the car, we're all in the backseat. We keep with the process of the so-called "normal" permit [...] The aim is for someone to take ownership, to evaluate which permits to use, what is beneficial.

Interview 4, International Mobility Manager, November 19, 2025

The interview findings indicate that the International Mobility Managers preferred to apply for work permits under the national scheme based on considerations about familiarity, efficiency, and a learning curve for employers and the SMA for the revised EU Blue Card. Familiarity with work permits under the national scheme was reflected in the reference to a "normal" permit above, or to "common" permits [*vanliga uppehållstillstånd*] (interview 3, International Mobility Manager, November 11, 2025) when referring to the national scheme.

In response to the question if persons who have to renew their national work permits ask the company if they can apply for an EU Blue Card, an International Mobility Manager answered: "knowledge about the Blue Card [among our employees] is very low, it is a very complicated domain. Most [employees] expect that we do our best for them [when we apply for a renewal of their work permit on their behalf]" (interview 3, International Mobility Manager,

November 11, 2025). In these cases, when the company decides on a national work permit, employees miss out on the rights that an EU Blue Card would bestow on them.

While the revised EU Blue Card confers significant rights and benefits to permit holders, some of these can actually have a negative impact on employers. One such issue is the right to intra-EU mobility. As an International Mobility Manager explains: “[f]rom the employer perspective it is not more attractive with a Blue Card. If an employee is more mobile in the EU, that is not good for the employer” (interview 3, International Mobility Manager, November 11, 2025). However, another manager believed that few of their employees had a desire to use their right to intra-EU mobility, noting that “many [of our employees] want to stay in Sweden. It is not an advantage for them that they can seek employment in other Member States” (interview 2, International Mobility Manager, October 7, 2025).

While the EU Blue Card can be beneficial for companies that want to send employees to work in other Member States for a limited time, none of the interviewed International Mobility Managers regarded this as an added value. A manager explained that in their company, most employees on international secondments work in the United States, concluding that “we are global; we are not focused on activities in Europe” (interview 2, International Mobility Manager, October 7, 2025).

Risk management

Another interesting finding concerned the International Mobility Managers' perception of risk in the work permit application process. Companies weigh the “risk” of applying for a revised EU Blue Card permit against the more “secure” option of a national permit. An International Mobility Manager explained: “[i]t is complicated with two work permits with different requirements. From a risk management perspective, it is easier to have one system” (interview 3, International Mobility Manager 3, November 11, 2025). The manager and his colleagues try to assess how changes in migration legislation may affect the recruitment process:

The immigration laws change every year or every two years, with new requirements all the time. It is difficult to predict what will happen two or three years from now, what risks are inherent in recruiting from outside the EU. What risks will the [new] legislation bring? We have to connect the dots [to understand] what will happen with complex immigration questions. How do we recruit talent fast? It takes a broad understanding of migration

laws and the Swedish Migration Agency [to understand what consequences changes in legislation will have on the recruitment of highly qualified third country nationals].

Interview 3, International Mobility Manager, November 11, 2025

Risk management is not just about *perceptions* of risk, as mistakes in work permit applications can have severe consequences. An International Mobility Manager explained: "If a case is stuck with the Swedish Migration Agency it can take a very long time. Then you can lose the talent [that the company is trying to recruit]" (interview 3, International Mobility Manager, November 11, 2025).

A labor market expert at The Confederation of Swedish Enterprise observed that employers have a lot of responsibility in the work permit application process. If an employer makes a mistake, an employee may have to go home. The recruitment has failed when an employee has to be deported and the employer may be blacklisted by the SMA (interview with labor market expert, The Confederation of Swedish Enterprise, November 3, 2025). As shown in the previous section, companies may decide to opt for the "safer," better-known option of a work permit under the national scheme to reduce the risk of mistakes – even if they use the services of an intermediary.

The migration industry

The "migration industry" is widely involved in the work permit application process for highly qualified third country nationals, which entails the commercialization of migration services where private actors offer for-profit services to prospective migrants, employers, and governments (Gammeltoft-Hansen and Sørensen 2013).

Case workers in the SMA have estimated that approximately 90 percent of all employers that apply for a work permit – either under the national scheme or the EU Blue Card Directive – hire an intermediary to handle the work permit application process (interviews 2 and 3, Swedish Migration Agency, September 24, 2025). The HR Department prepares the required employer documentation, and the intermediaries file an application on behalf of the employer and the employee (interview 1, HR manager, September 22, 2025). The intermediaries stay up to date on changes in Swedish migration legislation and ensure compliance with Swedish migration and social security laws and ensure that the employment offer is on par with collective agreement requirements (interview 3, International Mobility Manager, November 11, 2025). An International Mobility Manager summed up the role of the migration industry as follows:

One needs a third party for [the work permit application process] to be done correctly. There is a risk that the application gets stuck, then it can take a long time. The new employee is waiting for a job, is waiting to move. There is a whole industry around work permits, it could be more cost-effective.

Interview 3, International Mobility Manager, November 11, 2025

The manager noted that the services of an intermediary were necessary to ensure that the permit application complied with the regulations, but that this brought about an additional cost.

Although intermediaries are not direct recipients of EU Blue Cards, they account for the largest share of issued EU Blue Cards in Sweden. Between January 2022 and October 23, 2025, four of the five companies associated with the highest number of EU Blue Cards were intermediaries (statistics received from the SMA, October 23, 2025). This underscores the central role of the migration industry in facilitating highly qualified migration in Sweden.

An International Mobility Manager gave two reasons as to why the company decided to hire an intermediary to apply for work permit applications. First, it is administratively and operatively difficult to handle the changing volume of work permits over time, which creates an uneven workload for the HR department. Second, outsourcing to an intermediary ensures quality assurance, as the intermediary is an expert on immigration regulations and remains up to date on changes. The intermediaries work closely with case workers at the SMA during the application process and know how the case workers work. As the manager explained: “[i]t is not just about the law, it is often about interpretation [of the law]” (interview 3, International Mobility Manager, November 11, 2025).

Misinformation

Frequent changes in Sweden's migration regulations and a lack of information have contributed to misinformation about the revised EU Blue Card among employers. This misinformation may guide employers' decision to apply for a national permit instead of an EU Blue Card. This chapter provides three examples of misinformation.

An International Mobility Manager preferred the national permit scheme as it did not require the company to pay for comprehensive health insurance (interview 3, International Mobility Manager, November 11, 2025). The manager believed that the revised EU Blue Card Directive required companies to provide health insurance for all holders of an EU Blue Card. The manager wanted to avoid this additional cost by applying for a national work permit instead. The

interviewer responded that only EU Blue Card holders who have received a job offer for less than one year are required to have comprehensive health insurance. If an EU Blue Card is issued for more than one year, the employee should register in Sweden's population registry to gain access to health insurance coverage in Sweden.

Another example of misinformation concerns the decision-making time on work permit applications for highly qualified third country nationals. An International Mobility Manager mentioned that the processing time for an EU Blue Card was 90 days, considerably longer than the 30-day processing time for work permits under the national scheme (interview 2, International Mobility Manager, October 7, 2025). When the interviewer mentioned that the processing time for *all* work permits for highly qualified workers (including the EU Blue Card) was reduced to 30 days in January 2024, the manager did not know about this change.

Additionally, some International Mobility Managers were not aware of the benefits of the revised EU Blue Card for employers. In some companies, employees change roles within the company soon after they are hired. This is often the case in a company included in the study where a change in roles – such as moving from a research and development position to a marketing role – is a strategy for employees to increase their salaries (interview 4, International Mobility Manager, November 19, 2025). The company currently only applies for work permits under the national scheme, as it lacks the internal policies and procedures required to support EU Blue Card applications. But the International Mobility Manager was not aware that the revised EU Blue Card allows card holders to change employment without having to apply for a new permit; they only have to inform the SMA of the change. Holders of national permits have to apply for a new permit when they change roles, and the company has to advertise the position for ten working days and pay for the application fee.

An International Mobility Manager noted that in the past, the SMA had invited her HR department and other certified companies to meetings to inform about changes in Swedish migration regulations. Recently, these meetings had not taken place. Instead, the company tries to stay informed about changes on the website of the SMA, but information had moved when the website was redesigned (interview 2, International Mobility Manager, October 7, 2025).

These examples illustrate how misinformation can inform International Mobility Managers' decision to apply for work permits under the national scheme, and the challenges of staying informed about changes in migration regulations.

Companies that know about these benefits can use them to their advantage. A large Swedish company has decided to apply for EU Blue Cards for all employees who qualify. An International Mobility Manager for that company explained that it is common in large companies that employees change roles. The manager regarded that possibility as important for the company's development: "[i]t is quite common [that employees change roles], so that the organization stays alive [*organisationen lever*]" (interview 5, International Mobility Manager, December 5, 2025). The manager explained that "the EU Blue Card is more advantageous [than a work permit under the national scheme]. It gives the employer and employees more flexibility, a possibility to move [professionally] within the company [*att röra sig i roller*]. It is a matter of cost and flexibility" (ibid.).

Rights of accompanying children

One factor that makes the national work permit currently more desirable than the EU Blue Card concerns the residence rights for accompanying children, as discussed in the previous chapter. In this issue area, EU law has stricter conditions than the Swedish laws that govern work permits under the national scheme.

An International Mobility Manager recommends families with teenage children to apply for a national permit, as it allows accompanying children under the age of 21 to stay with their parents in Sweden. For EU Blue Card holders, this is only until age 18 (interview 2, International Mobility Manager, October 7, 2025).

Another International Mobility Manager explained that there is a gap in Sweden's legislation when third country nationals transition from a work permit to permanent residency. For permanent residency, children over 18 years of age have to be able to provide for themselves (interview 3, International Mobility Manager, November 11, 2025). The company has approximately ten families in this situation. The manager remarked: "A 15-year-old moves from India to Sweden with their family. Should that child return to India when the family applies for permanent residency?" (ibid.).

It may appear that the revised EU Blue Card Directive discriminates against the rights of accompanying children by setting a lower age limit for residence rights. The EU principle of non-discrimination also concerns the revised EU Blue Card Directive (Recital 7):

Member States should ensure a level playing field between EU Blue Cards and national residence permits for the purpose of highly qualified employment, in terms of procedural and equal treatment rights, procedures and access to information. In particular, Member States should ensure that the level of procedural safeguards and rights granted to EU Blue Card holders and their family members is not lower than the level of procedural safeguards and rights enjoyed by holders of national residence permits.

This principle aims to ensure that EU Blue Card holders do not have less rights than holders of national permits. These rights concern, for example, labor laws, social rights, and education. But this case does not fall under the EU principle of non-discrimination since the revised EU Blue Card Directive has defined the stricter rules, not Sweden's national legislation.

Overall, the EU Blue Card needs to provide an added value to employers to make them likely to apply (Antoons and Ghimis 2020, Hooper et al. 2025). For employers who have international operations in other Member States, it is efficient that an EU Blue Card holder can work for 90 days within a 180-day period in another Member State without having to apply for a new permit, and it is convenient that it suffices to inform the SMA of a change in employment. This benefit, however, is not known to some internationality mobility managers, and does not apply to companies that do not do business in other European countries.

8. Experiences of an International Mobility Expert

“[As work permit] applications affect people’s lives, it is important that we do everything right from the beginning.” This is how an International Mobility Expert explained the importance of tailoring the selection of a work permit to an applicant’s personal situation.¹⁷ They explained that for each application “we take the entire person into consideration,” and thus, “no case is the same” (interview with an International Mobility Expert, December 9, 2025). In the assessment, an applicant’s family situation plays a major role in the selection of a work permit. If the applicant has a child that is 15 or 16 years old, the expert recommends a “regular” work permit, i.e. a work permit under Sweden’s national migration system. As explained in the previous chapter, a child that accompanies a holder of a national permit has the right to reside in Sweden until the age of 21, whereas it is the age of 18 for a child of an EU Blue Card holder. When a work permit holder applies for permanent residency, accompanying children can reside in Sweden until they turn 18.

The International Mobility Expert noted another challenge with the revised EU Blue Card Directive that concerns a switch in employers. If an employee has to seek a new job, for example due to a redundancy, that person may accept a salary below the threshold for the revised EU Blue Card. In that case, the person has to leave Sweden to apply for a permit under the national scheme. It may take three to four months until that person can return to Sweden and start working in the new position. This requirement can have big implications as all accompanying family members have to leave Sweden, including children who have to be taken out of school (interview with an International Mobility Expert, December 9, 2025). This example shows that one of the key advantages of the EU Blue Card – its flexibility for permit holders – can have negative implications when EU Blue Card holders have to switch employment quickly.

¹⁷ The International Mobility Expert works for a relocation company, and is hired by employers to apply for work permits for third country nationals. They takes care of the entire work permit process – collecting and reviewing the required documents from the employer and the employee, checking compliance with migration regulations and insurance requirements, and ensuring that the job offer is on par with collective bargaining agreements. They then submit the application on behalf of the employee, and follow up with the SMA when necessary.

In some cases, work permit applicants can wait in another Schengen country until a decision has been made. It has happened that applicants waited in Denmark or Poland, and Iranian citizens who had to change tracks waited in Turkey as they have the right to reside in that country for ninety days (interview with an International Mobility Expert, December 9, 2025).

Another challenge concerns the frequent changing of employers, which is allowed under the revised EU Blue Card Directive as long as the permit holder informs the SMA of the change. When an EU Blue Card holder applies for a renewal after two years, the SMA checks whether all employers have fulfilled all requirements, including insurance and tax contributions. If one of the employers has not met a requirement, the renewal may be denied (interview with an International Mobility Expert, December 9, 2025). These possible violations are first revealed when an extension application has been submitted, an issue that has also been noted by case workers in the SMA. Holders of a work permit under the national scheme have to apply for a new permit when they change employers, and in those cases, the SMA checks the new employer's compliance with all requirements.

The International Mobility Expert confirmed that it is common that work permit holders change roles or employers. In the latter case, a company may have created a new structure with new roles. This is particularly common in the information technology industry, which is developing rapidly and offers fast career paths (interview with an International Mobility Expert, December 9, 2025).

The International Mobility Expert explained that the EU Blue Card is beneficial for employers in four situations. First, it is convenient for companies with operations in other Member States that EU Blue Card holders can work in those countries without having to apply for a new permit.¹⁸ Second, it is beneficial for companies that residency in Sweden and other Member States can be counted toward permanent residency. An employee's time on an EU Blue Card can in certain cases be counted toward long-term residency status in the EU and can under current legislation obtain permanent residency. When an employee has permanent residency, a company does not have to renew the permit every two years. Third, the EU Blue Card is an advantage for companies that develop quickly and offer rapid promotions. In those cases, companies do

¹⁸ In certain cases, companies can benefit from the Van der Elst provision, which allows lawfully employed third country nationals to carry out a specific service for their employer in another Member State without needing to apply for a new work permit (e-mail from an International Mobility Expert, December 23, 2025). However, some posted workers have experienced irregularity in their migration or employment status, or have experienced problems with salary payments, social security payments, or annual leave (European Labour Authority 2025).

not have to advertise positions for EU Blue Card holders who already work in the company. And fourth, in the case of a merger, EU Blue Card holders do not have to apply for a new work permit if their salary meets the threshold (interview with an International Mobility Expert, December 9, 2025).

9. Perspectives of DG HOME officials

This chapter presents findings from one interview conducted with two officials at the Directorate-General for Migration and Home Affairs (DG HOME) in Brussels. The interview discussed the revision process of the EU Blue Card Directive, experiences with the revised EU Blue Card Directive, and recent initiatives for skills development and talent attraction in the EU.

At the start of the interview, the revision process for the EU Blue Card and its outcomes were discussed. Reflecting on the attempt to harmonize migration policies across Member States, one of the officials observed that:

In hindsight, it was wishful thinking to get rid of national schemes. Or a test. The objective of the common asylum system was harmonization [of asylum policies] and to harmonize implementation. In parallel we hoped that the Member States were convinced about the same on legal migration. Eventually the proposal [to abolish national migration schemes for highly qualified third country nationals] was not accepted. We would not do the same in 2025. The situation has not changed [how Member States think about harmonization of migration legislation].

Interview with two officials at DG HOME, October 23, 2025

The official observed that the European Commission recently changed its approach to harmonization, that “[w]e need a Team Europe spirit when it comes to migration, not the EU level on one side and Member States on the other” (interview with two officials at DG HOME, October 23, 2025). An example of this new approach is the establishment of Talent Partnerships that provide a cooperation framework for interested Member States and Tunisia, Morocco, Egypt, Bangladesh and Pakistan to promote legal labor migration. Under this initiative, the Commission facilitates support for professional and vocational skills training in the partner countries, promotes mechanisms for the recognition of professional qualifications, and advances fair recruitment (European Commission 2025). The interviewee explained: “[w]e never thought that we could have fully harmonize partnerships with third countries. Instead, we assessed which Member States were interested [in participating in the partnerships]. We now focus on the objective instead of the process” (*ibid.*).

The policymaking process for the Talent Partnerships differs markedly from the negotiations for the original and the revised EU Blue Card Directive. For the partnerships, the goal is not to harmonize migration policies across all Member States. Instead, participation in these initiatives is optional, and includes Member States who express an interest. As an official explained: “[the Talent Partnerships] are a voluntary tool. There is a shift in how we make our policy now” (interview with two officials at DG HOME, October 23, 2025).

The official also observed a change in attitudes toward migration in the Member States. The revision process for the EU Blue Card coincided with the “refugee crisis” in 2016, when migration was highly politicized at the EU level. The official remarked that nine years later “we have become used to migration,” and it has become “a regular hot topic.” The interviewee noted that it has become easier to talk about migration in an era of increasing labor shortages and demographic challenges: “the competitiveness angle allows us to discuss this [labor migration],” and “talent attraction is more delinked from the toxic discourse on migration” (interview with two officials at DG HOME, October 23, 2025).

It is also easier to talk about *highly qualified* migration when it is presented in a neutral manner, as an official explained:

We say *talent* and *mobility* instead of *migration*. Words are important. There is a positive consensus on talking about this type of migration [i.e. labor migration] [...] Member States are talking about this in a positive way. But there is the issue of brain drain when talking to third countries. Highly qualified migration is now accepted quite well at the EU level. There is interest [in economic competitiveness]. It has an effect on the adaptation and uptake of the Blue Card. There is a global competition for highly qualified migrants in the EU and between Member States. It is part of the economic talent attraction strategy, and competitiveness is linked to innovation capacity. Highly qualified migration has become more explicit, more visible.

Interview with two officials at DG HOME, October 23, 2025

Thus, skill shortages and declining fertility rates, the linking of labor migration to economic development and innovation, and the use of more neutral terminology all help to make highly qualified migration more acceptable to Member States and their political constituencies.

When discussing the benefit of intra-EU mobility for EU Blue Card holders, one of the officials referred to migrants who make use of this right as “the niche of the niche,” i.e., the first niche referring to highly qualified migrants, and the second to wanting to move frequently within the EU (interview with two officials at DG HOME, October 23, 2025).

Both DG HOME officials underlined the key role of employers in selecting the EU Blue Card (interview with two officials at DG HOME, October 23, 2025). In order to reach employers, one of them noted that the European Commission could publicize the permit more. The Commission will also focus on improving consular capacities to process applications for residence- and work permits, and the recognition of professional qualifications through a new initiative for skills portability.

In conclusion, one of the officials remarked that measures are also needed to *retain* highly qualified migrants: “[f]or highly qualified migrants, it matters with children’s enrollment in schools, tax incentives, etcetera. We need different policies for that. And a multi-stakeholder approach” (interview with two officials at DG HOME, October 23, 2025). Thus, migration policies such as the EU Blue Card alone are not sufficient for *retaining* highly qualified migrants long-term.

10. Conclusion

The revised EU Blue Card Directive aims to attract highly qualified migrants to the EU and its Member States by offering advantageous conditions for employers and employees. Employers do not have to apply for a new permit when their employees switch roles within the company, and when they have short-term business in another Member State. Employees can change positions within the same company and change employers without having to apply for a new permit, they have access to intra-EU mobility, and they have a right to a longer term of unemployment compared to national permits. Despite these benefits, however, the EU Blue Card remains under-used in Sweden, and the report has provided several reasons for this.

One of the key reasons for the low uptake of the revised EU Blue Card is a lack of information, combined with misinformation among employers. The Swedish legislative framework for highly qualified third country nationals is complex, and changes frequently. It is time consuming to stay up to date on changes in these regulations and work permit requirements. International Mobility Managers interviewed for this report opted to apply for work permits under the national system since they were more familiar with it, and they regarded it as less risky compared to an application for a revised EU Blue Card. Even though some employers would benefit from the revised EU Blue Card, a lack of information or misinformation resulted in a decision for the "normal" permit.

Another source of under-use of the revised EU Blue Card in Sweden concerns the decision-making power of employers on the type of work permit that their employees apply for. Even if an employee prefers an EU Blue Card, an employer can decide to apply for a work permit under the national scheme.

Despite a continued under-use of the EU Blue Card, the number of issued permits has risen in Sweden since the implementation of the revised EU Blue Card on January 1, 2025. However, more than half of these permits are issued to third country nationals who are already employed in Sweden and want to change from a national permit to an EU Blue Card when their national permit is up for renewal. In this respect, the revised EU Blue Card has a limited effect on attracting "new" highly qualified migrants to Sweden. These workers may be more informed about the existence and benefits of the revised EU Blue Card compared to first time applicants, and have employers who are willing to sponsor an EU Blue Card.

An under-used feature of the revised EU Blue Card thus far is the increased flexibility for permit holders to take up employment in another Member State. So far, few card holders in other Member States have applied for an EU Blue Card in Sweden. The limited intra-EU mobility to Sweden confirms that these persons are the “niche of the niche,” as a DG HOME official remarked (interview with two officials at DG HOME, October 23, 2025). Unfortunately, no data is available on the number of EU Blue Card holders in Sweden who have applied for an EU Blue Card in another Member State.

It remains to be seen whether additional proposed changes to the EU Blue Card Directive in Sweden (SOU 2024:15) will be implemented, and if so, what the outcomes will be. The proposed legislation change entails a lower salary threshold, an extended duration of the permit, and would bring back employer certification for faster processing of work permit applications. The lower salary threshold would extend the eligibility for the EU Blue Card, and thereby likely increase the use of the permit. The employer certification system is likely to strengthen the influence of the migration industry, as intermediaries can apply for certification and ensure fast processing times for their clients.

The report has shown that intermediaries, which are part of the migration industry, play a large role in the work permit application process. These actors help companies navigate the complex migration “system.” They assist with compliance with migration regulations, insurance requirements, and they ensure that the job offer is on par with collective bargaining agreements. Small companies may not have the resources to hire intermediaries and may not have the required knowledge about the requirements for work permits. As a result, case workers at the SMA have observed that small companies are more likely to be asked 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.

This uneven access to administrative support intersects with broader debates on labor migration policy, particularly the promotion of the EU Blue Card as a response to labor shortages. 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 (Irastorza and Bevelander 2021, Engdahl and Sjödin 2024). These barriers consist of, among others, difficulties with the recognition of professional qualifications acquired outside of 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.

Moreover, the effectiveness of labor migration instruments such as the EU Blue Card must be placed in a broader context of the recruitment and retention of highly qualified migrants. 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 wider "attraction package." Other factors include, among others, career opportunities, a welcoming culture, openness to immigrants, a good work-life balance, family friendly policies, lifestyle factors, international schools, and housing (van Riemsdijk 2026). While some of these factors can be facilitated by government agencies, others lie within the realm of companies and municipalities.

11. Policy recommendations

This section provides policy recommendations to improve Sweden's highly qualified migration regulations, based on the literature review, analysis of consultation statements, and interviews conducted for this report. The section is divided into policy recommendations for the Swedish Migration Agency (SMA), the Swedish government, employers, and highly qualified third country nationals.

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 others, 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.

References

Antoons, J. & A. Ghimis (2020) What it takes to have a successful new Blue Card scheme: The practitioner's viewpoint. *European Law Journal*, 26, 264-273.

Bender, G. 2023. Swedish trade unions and migration: challenges and responses. In *Migration and Integration in a Post-Pandemic World: Socioeconomic Opportunities and Challenges*, 199-231. Springer International Publishing Cham.

Berg, L. & A. Spehar (2013) Swimming against the tide: why Sweden supports increased labour mobility within and from outside the EU. *Policy Studies*, 34, 142-161.

Bešić, A., A. Diedrich & D. Karabegović (2025) Translating policy harmonization into practice—The case of the EU Blue Card Directive. *European Policy Analysis*, 11, 94-113.

Better Regulation Council. 2023. Remissyttrande: Remiss av departmentspromemoriam. Genomförande av det nya blåkortsdirektivet (Ds 2023:6) [consultation response to Ds 2023:6 Implementation of the new blue card directive]. Swedish Ministry of Justice.

Boräng, F. & L. Cerna (2019) Constrained politics: labour market actors, political parties and Swedish labour immigration policy. *Government and Opposition*, 54, 121-144.

Cerna, L. (2014) The EU Blue Card: preferences, policies, and negotiations between Member States. *Migration Studies*, 2, 73-96.

Confederation of Swedish Enterprise [*Svenskt Näringsliv*]. 2023a. Företagens behov av internationell kompetens [Companies' need for international competence]. Stockholm.

---. 2023b. Remissyttrande: Remiss av departmentspromemoriam. Genomförande av det nya blåkortsdirektivet (Ds 2023:6) [consultation response to Ds 2023:6 Implementation of the new blue card directive]. Swedish Ministry of Justice.

de Lange, T. (2020) A new narrative for European migration policy: Sustainability and the Blue Card recast. *European Law Journal*, 26, 274-282.

de Lange, T. & K. Groenendijk. 2021. The EU's legal migration acquis. Patching up the patchwork. European Policy Centre.

de Lange, T. & Z. Vankova (2022) The recast EU Blue Card Directive: towards a level playing field to attract highly qualified migrant talent to work in the EU? *European Journal of Migration and Law*, 24, 489–515.

Directive (EU) 2021/1883. of the European Parliament and of the Council of 20 October 2021 on the conditions of entry and residence of third-country nationals for the purpose of highly qualified employment, and repealing Council Directive 2009/50/EC. Official Journal of the European Union, 28.10.2021.

Embassy of Sweden in DC 2023. Remissytrande: Remiss av departmentspromemoriam. Genomförande av det nya blåkortsdirektivet (Ds 2023:6) [consultation response to Ds 2023:6 Implementation of the new blue card directive]. Swedish Ministry of Justice.

Emilsson, H. (2014) Who gets in and why? *Nordic Journal of Migration Research*, 4, 134–143.

Engdahl, M. & E. Sjödin. 2024. *Arbetskraftsinvandring till Sverige från tredjeland* [labor migration to Sweden from third countries]. Stockholm: Delmi.

European Commission. 2020. Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions on a New Pact on Migration and Asylum (COM(2020) 609 final.

--- (2025) Talent partnerships. https://home-affairs.ec.europa.eu/policies/migration-and-asylum/legal-migration-and-resettlement/talent-partnerships_en. Access date December 19, 2025.

European Labour Authority. 2025. Posting of third-country nationals: contracting chains, recruitment patterns, and enforcement issues. Luxembourg: ELA Strategic Analysis, Publications Office of the European Union.

Eurostat (2025a) 89 000 EU Blue Cards issued for skilled workers in 2023. <https://ec.europa.eu/eurostat/web/products-eurostat-news/w/edn-20250508-1>. Access date August 30, 2025.

--- (2025b) EU Blue Cards by type of decision, occupation and citizenship. https://ec.europa.eu/eurostat/databrowser/view/migr_resbc11/default/table?lang=en. Access date August 30, 2025.

Farcy, J.-B. (2020) Labour immigration policy in the European Union: How to overcome the tension between further Europeanisation and the protection of national interests? *European Journal of Migration and Law*, 22, 198–223.

Forssell, J., M.-B. Arfert, K. Berg, E. Johansson, F. Hillelson & M. Yazdi (2025) Sweden can't wait for talent. Opinion piece by Minister for Migration Johan Forssell in *Dagens Industri*, 26 June 2025.

<https://www.government.se/opinion-pieces/2025/07/sweden-cant-wait-for-talent/>. Access date June 26, 2025.

Gammeltoft-Hansen, T. & N. N. Sørensen. 2013. *The Migration Industry and the Commercialization of International Migration*. Abingdon, Oxon: Routledge.

Government Offices of Sweden (2023) Remiss av Ds 2023:6 Genomförande av det nya blåkortsdirektivet [consultation responses to Ds 2023:6 Implementation of the new blue card directive].

<https://www.regeringen.se/remisser/2023/03/remiss-av-ds-2023-6-ett-hjortforsjningskrav-for-arbetskraftsinvandrare/>. Access date March 16 2025.

--- (2024) EU-blåkort ska främja den högkvalificerade arbetskraftsinvandringen [the EU Blue Card should promote immigration of highly qualified workers].

<https://www.regeringen.se/pressmeddelanden/2024/09/eu-blakort-ska-framja-den-hogkvalificerade-arbetskraftsinvandringen/>. Access date December 17, 2025.

--- (n.d.) About the Government's prioritisation: Migration and integration.

<https://www.government.se/government-policy/the-governments-priorities/migration-and-integration/about-the-governments-prioritisation-migration-and-integration/>. Access date July 9, 2025.

Hooper, K., T. de Lange & J. Slootjes. 2025. How Can Labor Migration Policies Help Tackle Europe's Looming Skills Crisis? MPI Europe.

Iraastorza, N. & P. Bevelander (2021) Skilled migrants in the Swedish labour market: An analysis of employment, income and occupational status. *Sustainability*, 13, 3428.

Kjellberg, A. (2025) Changes in union density in the Nordic countries. *Nordic Economic Policy Review* 1, 123-149.

Kolbe, M. (2021) Who liberalizes high-skilled immigration policy and when? Partisanship and the timing of policy liberalization in 19 European states. *Ethnic and Racial Studies*, 44, 618-638.

Kotavaara, N. & E.-K. Prokkola (2023) Employers, the state and highly skilled migration: an employer-based study on ICT sector companies in Finland. *European Planning Studies*, 31, 2110-2127.

OECD. 2024. Strengthening the Governance of the Swedish Skills System. Final Report, OECD Skills Studies. Paris.

Parusel, B. 2020. Legal migration for work and training. Mobility options to Sweden for those not in need of protection. Stockholm: Delmi.

Peers, S. 2022. Migration for labour purposes: the EU's piecemeal approach. In *Research Handbook on EU Migration and Asylum Law*, 327-341. Edward Elgar Publishing.

Shachar, A. (2006) The race for talent: Highly skilled migrants and competitive immigration regimes. *New York University Law Review. U Toronto, Legal Studies Research Paper No. 883739*, 81.

Statistics Sweden (2025) Total shortage of 70 000 people in various occupations. <https://www.scb.se/en/finding-statistics/statistics-by-subject-area/labour-market/labour-force-demand/job-openings-and-recruitment-needs/pong/statistical-news/job-openings-and-recruitment-needs-3rd-quarter-20242/>. Access date 12 September 2025.

Stoyanova, V., N. Selberg, L. Häckner Posse & A. Loxa. 2023. Remissyttrande: Remiss av departmentspromemoriam. Genomförande av det nya blåkortsdirektivet (Ds 2023:6) [consultation response to Ds 2023:6 Implementation of the new blue card directive]. Swedish Ministry of Justice.

Swedish Agency for Economic and Regional Growth [*Tillväxtverket*]. 2023. Remissvar - Genomförande av det nya blåkortsdirektivet (Ds 2023:6) [consultation response to Ds 2023:6 Implementation of the new blue card directive]. Swedish Ministry of Justice.

---. 2024. Arbetskrafts- och kompetensbrist - en kunskapsöversikt [Labor- and competence shortage - a knowledge review]. Östersund.

--- (n.d.) Work in Sweden. <https://tillvaxtverket.se/tillvaxtverket/omtillvaxtverket/varauppdrag/allauppdrag/workinsweden.7098.html>. Access date December 12, 2025.

Swedish Agency for Government Employers. 2023. Remissyttrande: Remiss av departmentspromemoriam. Genomförande av det nya blåkortsdirektivet (Ds 2023:6) [consultation response to Ds 2023:6 Implementation of the new blue card directive]. Swedish Ministry of Justice.

Swedish Better Regulation Council [*Regelrådet*]. 2023. Remissyttrande: Remiss av departmentspromemoriam. Genomförande av det nya blåkortsdirektivet (Ds 2023:6) [consultation response to Ds 2023:6 Implementation of the new blue card directive]. Swedish Ministry of Justice.

Swedish Board of Student Finance [*CSM*]. 2023. Remissyttrande: Remiss av departmentspromemoriam. Genomförande av det nya blåkortsdirektivet (Ds 2023:6) [consultation response to Ds 2023:6 Implementation of the new blue card directive]. Swedish Ministry of Justice.

Swedish Confederation of Professional Associations [*SACO*] 2023. Remissyttrande: Remiss av departmentspromemoriam. Genomförande av det nya blåkortsdirektivet (Ds 2023:6) [consultation response to Ds 2023:6 Implementation of the new blue card directive]. Swedish Ministry of Justice.

Swedish Federation of Business Owners 2023. Remissyttrande: Remiss av departmentspromemoriam. Genomförande av det nya blåkortsdirektivet (Ds 2023:6) [consultation response to Ds 2023:6 Implementation of the new blue card directive]. Swedish Ministry of Justice.

Swedish Institute. 2023. Remissyttrande: Remiss av departmentspromemoriam. Genomförande av det nya blåkortsdirektivet (Ds 2023:6) [consultation response to Ds 2023:6 Implementation of the new blue card directive]. Swedish Ministry of Justice.

Swedish Migration Agency. 2023a. Genomförande av det nya blåkortsdirektivet. Ds 2023:6 (Ju2023/00690).

---. 2023b. Redovisning regleringsbrevsuppdrag 3.8 – Främja högkvalificerad arbetskraftsvandring till Sverige [Report on government appropriation directive assignment 3.8 – Promote highly skilled migration to Sweden].

--- (2025a) Children born in Sweden to people with certain types of permits can now get a residence permit without leaving Sweden.
<https://www.migrationsverket.se/nyheter/news-archive/2025-09-04-children-born-in-sweden-to-people-with-certain-types-of-permits-can-now-get-a-residence-permit-without-leaving-sweden.html>. Access date October 3, 2025.

--- (2025b) Decision on the new Blue Card Directive. Access date January 6, 2025.

--- (2025c) Employers - you want to employ. EU Blue Cards.
https://www.migrationsverket.se/en/employers/you-want-to-employ/employing-someone-from-outside-the-eu-eea/employment/eu-blue-cards.html#svid10_2cd2e409193b84c506a2eb50. Access date

November 23, 2025.

--- (2025d) Employers. If you are employing highly qualified workers.
<https://www.migrationsverket.se/en/employers/highly-qualified-workers/if-you-are-employing-highly-qualified-workers.html>. Access date
August 28, 2025.

--- (2025e) From 1 April, the possibility of changing tracks will end.
<https://www.migrationsverket.se/nyheter/news-archive/2025-04-01-from-1-april-the-possibility-of-changing-tracks-will-end.html>. Access date
November 16, 2025.

--- (2025f) Track change abolished and rules on statutory limitation period changed. <https://www.migrationsverket.se/en/news-archive/news/2025-03-13-track-change-abolished-and-rules-on-statutory-limitation-period-changed.html>. Access date November 15, 2025.

--- (2025g) You want to apply. Employees.
https://www.migrationsverket.se/en/you-want-to-apply/work/employee-or-self-employed/employees.html#svid10_2cd2e409193b84c506a2ae73.
Access date September 25, 2025.

--- (2025h) You want to apply. EU Blue Cards.
https://www.migrationsverket.se/en/you-want-to-apply/work/employee-or-self-employed/eu-blue-cards.html#svid10_2cd2e409193b84c506a301d4.
Access date September 25, 2025.

Swedish Ministry of Justice. 2023a. Appropriation Directions for the 2023 Budget Year for the Swedish Migration Agency.

---. 2023b. Implementation of the new Blue Card Directive [Genomförande av det nya blåkortsdirektivet Ds 2023:6].

---. 2023c. Remiss av departementspromemorian Genomförande av det nya blåkortsdirektivet (Ds 2023:6) [consultation response to Ds 2023:6 Implementation of the new blue card directive].

Swedish Social Insurance Agency. 2023. Remissyttrande: Remiss av departmentspromemoriam. Genomförande av det nya blåkortsdirektivet (Ds 2023:6) [consultation response to Ds 2023:6 Implementation of the new blue card directive]. Swedish Ministry of Justice.

Swedish Trade Union Confederation [*LÖ*]. 2023. Remissytrande: Remiss av departmentspromemoriam. Genomförande av det nya blåkortsdirektivet (Ds 2023:6) [consultation response to Ds 2023:6 Implementation of the new blue card directive]. Swedish Ministry of Justice.

Technology Industries of Sweden [*Teknikföretagen*]. 2023. Genomförande av det nya blåkortsdirektivet Ds 2023:6 (Ju2023/00690) [consultation response to Ds 2023:6 Implementation of the new blue card directive]. Swedish Ministry of Justice.

---. 2024. Talangattraktion. Välkommen till Sverige? En jämförelse av sex länders arbete med att attrahera internationell kompetens [Talent attraction. Welcome to Sweden? A comparison of six countries' work with attracting international competence].

Treaty on the Functioning of the European Union. 2016. In *Official Journal of the European Union*. C202, 6 July 2016.

van Riemsdijk, M. 2023. Obstacles to the labour market integration of highly skilled refugees in Sweden. In *The Integration of Refugees in the Education and Labour Markets*, eds. K. Sobczak-Szelc, M. Pachocka & J. Szaławska, 138–151. Routledge.

---. 2026. Arbetskraftsinvandring och strategier för att attrahera och behålla högkvalificerade migranter– en forskningsöversikt [labor migration and strategies to recruit and retain highly skilled migrants – a research overview]. Swedish Agency for Economic and Regional Growth [*Tillväxtverket*].

van Riemsdijk, M. & L. Axelsson (2021) Introduction to special issue: Labour market integration of highly skilled refugees in Sweden, Germany and the Netherlands. *International Migration*, 59, 3–12.

Von Weizsäcker, J. (2006) Une blue card européenne – A European Blue Card proposal. *Horizons stratégiques*, 1, 72–81.

Öberg, S. A. & H. Wockelberg (2021) Agency control or autonomy? Government steering of Swedish government agencies 2003–2017. *International Public Management Journal*, 24, 330–349.

Appendix 1. Legislative chain for the EU Blue Card revision at EU level

2006. Idea for a European Blue Card

- The idea for a European Blue Card, a “European version of the Green Card,” was raised in a policy brief from the Brussels-based think tank Bruegel (Von Weizsäcker 2006, mentioned in Bešić, Diedrich and Karabegovic 2025)

2007. Start of policy-making process for the EU Blue Card

May 25, 2009. Adoption of the initial EU Blue Card Directive

- Adoption of Council Directive 2009/50/EC on the conditions of entry and residence of third-country nationals for the purposes of highly qualified employment

June 19, 2011. Transposition deadline

- Deadline for Member States to transpose the EU Blue Card Directive into national law

May 22, 2014. Implementation report

- Communication from the Commission to the European Parliament and the Council on the implementation of Directive 2009/50/EC on the conditions of entry and residence of third-country nationals for the purpose of highly qualified employment (COM(2014) 287 final)

May 13, 2015. Call for a review of the EU Blue Card

- Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions. A European agenda on migration (COM(2015) 240 final)

May-September 2015. Consultation phase

- An EU-wide online consultation on the EU Blue Card and the EU's labor migration policies was conducted (for details, see COM(2016) 378 final)

2016-2021. Negotiations between the European Parliament and the Council
(for an analysis, see de Lange and Vankova 2022)

2016. Impact assessment

- The European Commission conducted an impact assessment of a possible revision of the EU Blue Card Directive

June 7, 2016. Proposal to reform the EU Blue Card Directive

May 2021. Agreement between the European Parliament and the Council

October 20, 2021. Adoption of the revised EU Blue Card Directive

- The revised EU Blue Card Directive ((EU) 2021/1883) was adopted by the European Parliament and the Council

November 17, 2021. Revised EU Blue Card Directive enters into force

November 18, 2023. Transposition deadline

- Member States had to transpose the revised EU Blue Card Directive into national law

Appendix 2. Legislative chain for the revised EU Blue Card Directive in Sweden

May 6, 2022. Assignment to investigate the implementation of the EU Blue Card Directive in Sweden

- The Swedish Minister of Home Affairs, Anders Ygeman appointed the Swedish Court of Appeal Assessor and former Subject Advisor Jenny Wulker Roos to prepare a proposal for the implementation of the revised EU Blue Card Directive (Ju 2022:C)

March 16, 2023. Proposal for Implementation

- The Swedish Ministry of Justice received the Proposal for Implementation of the revised EU Blue Card Directive (Ds 2023:6) [*Promemoriam genomförandet av det nya blåkortsdirektivet*]. The proposal made suggestions for the implementation of the revised EU Blue Card Directive

March 16 – June 1, 2023. Consultation phase

- The Swedish Ministry of Justice invited authorities, organizations, municipalities, and other stakeholders to provide feedback on Proposal Ds 2023:6 (Ju2023/00690) (Government Offices of Sweden 2023)

November 18, 2023. Transposition deadline

- Deadline for Member States to transpose the EU Blue Card Directive into national legislation [Sweden did not meet the deadline]

February 14, 2024. Report on needs-tested migration [*behovsprövad arbetskraftsinvandring*]

- Swedish Government Official Report with proposed new rules for labor migration [*nya regler för arbetsmigration m.m.*] (SOU 2024:15)

August 15, 2024. Referral to the Swedish Legislative Council [*lagrådsremiss*]

- The Swedish government submitted a bill to the Swedish Legislative Council for the implementation of the revised EU Blue Card

September 24, 2024. Submission of bill to the Parliament

- The Swedish government submitted a bill to the Swedish Parliament for the Implementation of the new EU Blue Card Directive (Prop. 2024/25:18). The bill proposed legislative changes that are necessary to implement the revised Blue Card Directive

November 19, 2024. Swedish Social Insurance Committee report

- The Swedish Social Insurance Committee submitted a report to the Swedish Parliament [*Socialförsäkringsutskottets betänkande*] (2024/25:SfU6)

November 28, 2024. Swedish Parliament vote

- The Swedish Parliament approved the bill for the revised EU Blue Card Directive

January 1, 2025. Revised EU Blue Card Directive takes effect

- The legislative changes for the revised EU Blue Card Directive took effect in Sweden

Appendix 3. List of interviews

Swedish Migration Agency (all interviews were conducted at the Swedish Migration Agency on September 25, 2025):

- Erik Holmgren
- Johannes Wikman Franke
- Linda Öqvist
- Marita Tapper

International Mobility Managers:

- International Mobility Manager 1 (September 22, 2025, over Zoom)
- International Mobility Manager 2 (October 7, 2025, over Zoom)
- International Mobility Manager 3 (November 11, 2025, over Zoom)
- International Mobility Manager 4 (November 19, 2025, over Zoom)
- International Mobility Manager 5 (December 5, 2025, telephone conversation)

International Mobility Expert:

- Rozeta Zlattinger, Immigration Manager in Nimmersion AB (December 9, 2025, over Zoom)

Swedish Ministry of Justice:

- Legal expert (September 29, 2025, over Zoom)

Directorate-General for Migration and Home Affairs (DG HOME), European Commission in Brussels:

- Two DG HOME officials (October 23, 2025, interview conducted in Brussels)

The Confederation of Swedish Enterprise [*Svenskt Näringsliv*]:

- Labor market expert Amelie Berg (November 3, 2025, over Zoom)

Appendix 4. Interview guide for the Swedish Migration Agency

Introduction

- Please describe your role at the Swedish Migration Agency. How long have you worked there? In what way(s) are you involved in the work permit application process?

Original EU Blue Card

- Were you involved in the implementation of the original EU Blue Card? If so, in what way?
 - What were the main concerns/ challenges when the original EU Blue Card was implemented in Sweden in 2013?
- Why do you think that there was little interest in the original EU Blue Card?

Revision of the EU Blue Card

- Was the Swedish Migration Agency involved in the revision of the EU Blue Card?
 - If so, how?
- Were you involved in the agency's consultation statement for the revision of the EU Blue Card Directive in Sweden?
 - What were the main concerns that were discussed at the agency at the time?
- What do you think of the outcome of the revised EU Blue Card Directive?

Revised EU Blue Card

- Why do you think that most employers apply for a work permit under the national scheme instead of for an EU Blue Card?
- Has the agency seen an increase in applications for the revised EU Blue Card since January 1, 2025?
- Has the agency seen an increase in applications for EU Blue Card renewals since January 1, 2025?

- How common is it that a holder of a national work permit switches to a revised EU Blue Card?
- Does the Swedish Migration Agency promote the revised EU Blue Card? If so, how? To whom?
- Do you think that the revised EU Blue Card will be more popular than the original EU Blue Card? Why (not)?

Employers

- What are employers' most common questions when they contact the Swedish Migration Agency about work permits?
- What are the key bottlenecks in the application process?
- Do mostly large companies apply for work permits? What about small- and medium size enterprises?
- What companies receive the most national permits/ most EU Blue Cards?
 - For what kind of positions?
 - From which countries?
- How common is it that employers use an intermediary for applying for work permits?
- Do you see that employers provide more short-term contracts for the revised EU Blue Card – as it requires a binding job offer?
- Why do you think that most employers choose to apply for work permits under the national scheme – even if an applicant qualifies for an EU Blue Card?

Decisions on work permit applications

- What obstacles are most common in the decision on national permits and EU Blue Card permits?
- What are the most common reasons why a work permit for highly qualified work is denied?
- How did you speed up the decision-making process?
- Are "competence expulsions" [*kompetensutvisningar*] still happening? If so, why?

Complexity and predictability

- Several stakeholders have mentioned in their consultation statements that Swedish policies on migration and the Alien's Act are complex.
 - Why has the system become so complex?
 - Why did Sweden decide to have a parallel national scheme?

- What stands in the way of an easier system?
- Decisions on work permits should be predictable. How does the agency work on this?
- What does it take to reduce complexity and increase transparency in the work permit system?

Wrapping up

- What are the main obstacles in the work permit application process?
 - How can these be reduced?
- Whose responsibility is it to attract highly qualified migrants to Sweden?
 - What is the role of the Swedish Migration Agency in this?

Appendix 5. Interview guide for International Mobility Managers

Background

- Please describe your role in the company. What is your job title? How long have you worked for the company? How long have you worked in HR? In what way(s) are you involved in work permits for third country nationals?

Work permits

- Does the company have a designated HR specialist who deals with work permits?
- If so, how does that person get trained in work permit applications?
 - How does that person stay informed about changes in migration regulations?
- Does the company use an intermediary to assist with work permit applications?
 - If so, what are the company's experiences with this?
- How does the HR department decide what work permit to apply for?
- What work permit does the company apply most for? Why?
- Has the company experienced any difficulties in the work permit application process?
 - If so, what difficulties?
 - Did these difficulties influence the decision to apply for another permit the next time? If so, how?
- Do any employees switch to an EU Blue Card from another permit in Sweden – for example, switching from a national work permit? If so, what are the company's experiences with this switch? Why do these employees want to switch?
- Have you noticed improvements in the work permit application process? If so, which ones and what factor(s) contributed to these improvements?
- Do any difficulties in the work permit application process persist? If so, what kind of challenge and why?

- Have you hired any employees who have been EU Blue Card holders in another Member State?
 - If so, from which countries?
 - What are your experiences with this application process?
- With what kinds of questions does the company contact the Swedish Migration Agency?
 - Does the company receive the help required?
 - Does the company better understand the migration regulations thereafter? If not, why not?

Suggestions for improvement

- Do you have any suggestions as to how migration policies for highly qualified third country nationals can be improved?
 - What are the key challenges?
 - How could these challenges be addressed?
- Do you have any specific suggestions to improve policies for the national work permit and the EU Blue Card in Sweden?
 - What support would you like to receive in the work permit application process?

Appendix 6. Interview guide for officials in DG-HOME

Introduction

- What is your role in the (revised) European Blue Card Directive?

The revision process

- The Commission knew that Member States wanted to keep their national work permit schemes and that it would be difficult to pass the proposal in the European Parliament. In hindsight, why did the European Commission still try to abolish national schemes? What was the European Commission willing to compromise on?
- Why is the harmonization of migration policies still important for the European Commission?
- What does it take to harmonize migration policies at the EU level?

Outcomes

- What are the key challenges in making the EU Blue Card successful?
 - How do you define “success” for the revised EU Blue Card Directive?
- It may be too early to assess this, but what are the preliminary results of the revised EU Blue Card Directive? Are there any countries where the EU Blue Card has become successful (besides Germany)? Which ones, and why?
- Do you see much movement between Member States since the implementation of the revised EU Blue Card?
 - If it is too early to say if more intra-EU mobility has occurred since the revised EU Blue Card: How will you measure this?
 - What else is needed to promote intra-EU mobility?
 - According to you, who is responsible for promotion?
- Do you know how many revised EU Blue Cards are issued to persons already in the country?
- How do you inform about the revised EU Blue Card?
 - Do you provide guidance to Member States on how to provide information?

- What more is needed to make the EU Blue Card successful?

Wrapping up

- How does the EU Blue Card help Member States attract more highly qualified migrants if they compete with each other?
 - How is this discussed in the European Commission?
- Highly qualified migration seems to be a “hot topic” these days for the European Commission and Member States. Do you have the same impression? If so, why do you think that this is the case?
- Do you have the impression that it is easier to talk about highly qualified migration now compared to 2009? If so, how? Why?

List of previous publications

Report and Policy Brief 2014:1, *Radikala högerpartier och attityder till invandring i Europa*, Mikael Hjerm and Andrea Bohman.

Report and Policy Brief 2015:1, *Internationell migration och remitteringar i Etiopien*, Lisa Andersson.

Research Overview 2015:2, *Politiska remitteringar*, Emma Lundgren Jörum and Åsa Lundgren.

Research Overview 2015:3, *Integrationspolitik och arbetsmarknad*, Patrick Joyce.

Research Overview 2015:4, *Migration och företagens internationalisering*, Andreas Hatzigeorgiou and Magnus Lodefalk.

Report and Policy Brief 2015:5, *Svenskt medborgarskap: reglering och förändring i ett skandinaviskt perspektiv*, Mikael Spång.

Report and Policy Brief 2015:6, *Vem blir medborgare och vad händer sen? Naturalisering i Danmark, Norge och Sverige*, Pieter Bevelander, Jonas Helgertz, Bernt Bratsberg and Anna Tegunimataka.

Research Overview 2015:7, *Kategoriernas dilemman*, Per Strömlad and Gunnar Myrberg.

Report and Policy Brief 2015:8, *Valet och Vägen: Syriska flyktingar i Sverige*, Emma Jörum Lundgren.

Report and Policy Brief 2015:9, *Arbetskraftsinvandring efter 2008 års reform*, Catharina Calleman (red.) and Petra Herzfeld Olsson (red.).

Research Overview 2016:1, *Alla tiders migration!* Dick Harrison.

Report and Policy Brief 2016:2, *Invandringens arbetsmarknadseffekter*, Mattias Engdahl.

Report and Policy Brief 2016:3, *Irreguljär migration och Europas gränskontroller*, Ruben Andersson.

Research Overview 2016:4, *Diaspora – ett begrepp i utveckling*, Erik Olsson.

Research Overview 2016:5, *Migration within and from Africa*, Aderanti Adepoju.

Report and Policy Brief 2016:6, *Invandring, mediebilder och radikala högerpopulistiska partier i Norden*, Anders Hellström and Anna-Lena Lodenius.

Research Overview 2016:7, *Invandring och företagande*, Martin Klinthäll, Craig Mitchell, Tobias Schölin, Zoran Slavnić and Susanne Urban.

Report and Policy Brief 2016:8, *Invandringens effekter på Sveriges ekonomiska utveckling*, Bo Malmberg, Thomas Wimark, Jani Turunen and Linn Axelsson.

Research Overview 2017:1, *De invandringskritiska partiernas politiska inflytande i Europa*, Maria Tyrberg and Carl Dahlström.

Research Overview 2017:2, *Hatbrott med främlingsfientliga och rasistiska motiv*, Berit Wigerfelt and Anders S Wigerfelt.

Dissertation Series 2017:3, *Vägen till arbete. Utlandsföddas möte med den svenska arbetsmarknaden*, Moa Bursell, Mikael Hellström, Jennie K Larsson, Melissa Kelly, Martin Qvist and Caroline Tovatt.

Policy Brief 2017:4, *Integration och tillit – långsiktiga konsekvenser av den stora invandringen till Norge*, Grete Brochmann.

Research Overview 2017:5, *Invandringens historia – från "folkhemmet" till dagens Sverige*, Mikael Byström and Pär Frohnert.

Report and Policy Brief 2017:6, *Invandring i medierna – Hur rapporterade svenska tidningar åren 2010-2015?*, Jesper Strömbäck, Felicia Andersson and Evelina Nedlund.

Report and Policy Brief 2017:7, *Valdeltagande och representation – Om invandring och politisk integration i Sverige*, Pieter Bevelander (red.) and Mikael Spång (red.).

Report and Policy Brief 2017:8, *Responsibility Sharing for Refugees in the Middle East and North Africa*, Susan Martin.

Report and Policy Brief 2017:9, *Reforming the Common European Asylum System*, Bernd Parusel and Jan Schneider.

Report and Policy Brief 2017:10, *A Fair Share: Refugees and Responsibility-Sharing*, Alexander Betts, Cathryn Costello and Natascha Zaun.

Report and Policy Brief 2018:1, *Somali Diaspora Groups in Sweden – Engagement in Development and Relief Work in the Horn of Africa*, Nauja Kleist.

Report and Policy Brief 2018:2, *Akademiskt utbyte och internationell migration – En studie av stipendiater inom Svenska institutets Visbyprogram 1997–2015*, Andreas Åkerlund, Astrid Collsöö and Mikael Börjesson.

Report and Policy Brief 2018:3, *Ensamkommande barns och ungas väg in i det svenska samhället*, Eskil Wadensjö and Aycan Çelikaksoy.

Report and Policy Brief 2018:4, *Attityder till invandring – en analys av förändringar och medieeffekter i Sverige 2014–2016*, Jesper Strömbäck and Nora Theorin.

Report and Policy Brief 2018:5, *Familj, medborgarskap, migration – Sveriges politik för anhöriginvandring i ett jämförande perspektiv*, Karin Borevi.

Dissertation Series 2018:6, *Barn och migration*, Mehek Muftee, Lisa Ottosson, Gunilla Jarkman Björn, Anna Åhlund, Eva Skowronski and Michael Lindblad.

Policy Brief 2018:7, *Människohandel och människosmuggling i den irreguljära migrationen*, Ryszard Piotrowicz.

Report and Policy Brief 2018:8, *Asylsökandes möte med Sverige – Lärdomar från en panelundersökning*, Peter Esaiasson and Jacob Sohlberg.

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Report and Policy Brief 2019:1, *Bridging the Gaps – Linking Research to Public Debates and Policy-making on Migration and integration*, Martin Ruhs, Kristof Tamas and Joakim Palme.

Report and Policy Brief 2019:2, *Från Afrikas horn till Sverige: Smuggling, informella nätverk och diasporans engagemang*, Tekalign Ayalew Mengiste and Erik Olsson.

Report and Policy Brief 2019:3, *Thai berry pickers in Sweden – A migration corridor to a low-wage sector*, Charlotta Hedberg, Linn Axelsson and Manolo Abella.

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Few EU Blue Card permits were issued since the implementation of the “original” EU Blue Card in Sweden in 2013. A new revised permit, implemented by Sweden on January 1, 2025, aimed to make the permit more attractive.

This report examines the revision process for the EU Blue Card at the EU and national level, stakeholders’ perspectives on the proposed changes, and the possible national effects of the revised EU Blue Card, one year after its implementation in Sweden.

The author of this report is Micheline van Riemsdijk, Professor of Human Geography at the Department of Human Geography, Uppsala University.

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