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Report
2025:2



Nordic cooperation within return and readmission

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Anna Hammarstedt & Iris Luthman

Report 2025:2



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Delmi Report 2025:2
Order: www.delmi.se
E-mail: ju.delmi@regeringskansliet.se
Cover: Photo by K8 on Unsplash
Stockholm 2025
ISBN: 978-91-89993-05-1

Preface

Return and readmission are some of the more critical issues in migration policy, both in the Nordic region and globally. The Nordic countries have a long tradition of cooperation based on cultural and institutional affinity, which creates unique opportunities to develop common strategies to address these issues. At the same time, differences in national systems and interests pose challenges to a coherent and effective Nordic approach. Moreover, without a clear and operational common normative agenda for the return and readmission policies it is difficult to actually steer the cooperation going forward.

This report, which is the second study in the AMIF-funded project 'Return as International Migration Policy: Coordination Within and Across National Borders', examines how Sweden, Denmark, Norway, Finland and Iceland cooperate on the return and readmission of migrants. The focus is on mapping the formal and informal networks that underpin cooperation and analyzing how these networks contribute to policy decisions and operational efforts. On this basis, the authors of the report formulate a set of recommendations for policy makers.

The report and the AMIF project were supported by a reference group consisting of the following members Bettina Chu from the Danish Refugee Council (DRC), Elisabeth Lindholm from Strömsund Municipality, Mikaela Hagan from the Swedish Red Cross, Mikaela Eriksson from the Swedish Ministry of Justice, Niko Remes from the Swedish Migration Agency, Madelaine Seidlitz, human rights lawyer specializing in international refugee and migration law, Svetlana Ripler from the Swedish Police Board, Alexandra Segenstedt from the Swedish Red Cross, Hugo Rickberg from the Swedish Migration Agency, Christina Jespersen from the Return and Reintegration Facility in Brussels, Åsa Göransson from Save the Children, Åsa Johansson from the Swedish Migration Agency, Lina Backman from the Swedish Police Board, Peter Kamenko from the Swedish Police Board, Kristina Hellgren from the Swedish Migration Agency and Jörgen Lindström from the Swedish Ministry for Foreign Affairs.

The report was written by **Anna Hammarstedt**, PhD in International Relations (Stockholm University), and **Iris Luthman**, MSc in Political Science (Uppsala University). It was reviewed by a steering group consisting of Delmi committee members Joakim Palme, Anna Lindblad and Annika Sundén. At the Delmi Secretariat, the report was reviewed by Pinar Aslan Akay and Daniel

Silberstein, who are both research coordinators at Delmi. An earlier version of the report was also reviewed by external researchers Grete Brochmann, Professor at the University of Oslo, and Martin Lemberg-Pedersen, Associate Professor at the University of Warwick. As always in the Delmi context, the authors are solely responsible for the content, conclusions and recommendations of this report.

Stockholm, March 2025

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Summary

This report examines Nordic cooperation on return and readmission policies and practices, offering an in-depth exploration of the formal and informal networks that underpin collaboration between Sweden, Denmark, Norway, Finland, and Iceland in this area. As the second study within Delmi's broader AMIF-funded project titled *Return as International Migration Policy: Coordination Within and Across National Borders*, it addresses key questions such as: How do these networks function? What opportunities and challenges do they present? And to what extent can Nordic cooperation – viewed from the perspective of those involved in policy creation and implementation in the Nordic countries – foster return and readmission processes that are effective, sustainable, and humane? The research draws on accounts from interviews with key stakeholders, offering valuable insights into the perspectives of those working with Nordic cooperation on return and readmission policies and practices.

Nordic cooperation on return and readmission is a rapidly evolving field, fuelled by growing political ambitions to enhance collaboration. This is reflected, for example, in the press release issued after the October 2023 meeting of the High-Level Nordic Cooperation on Refugee Issues (NSHF) in Copenhagen. The report thus provides a snapshot of the current state of Nordic cooperation on return and readmission, reflecting developments observed during the empirical phase of the study. Using mapping inspired by Actor Network Theory (ANT), the study identifies and analyses key intra-Nordic networks that are engaged in return and readmission. Among the highlighted networks are the formalized NSHF working group on return, which offers operational-level input to political decision-making, and the recently established charter flight working group, tasked with coordinating 'Joint Nordic Return Operations'. The study also examines the role of informal networks, such as an agency-to-agency network, and networks formed by return liaison officers and migration attachés. The decentralized and flexible nature of these networks renders them both influential and at the same time difficult to map.

The findings reveal that Nordic cooperation on return and readmission is predominantly operational, driven by a bottom-up approach that emphasizes collaboration at the civil-servant level. Similar administrative structures, along with linguistic and cultural affinities that create a sense of general Nordic like-mindedness, are key factors that facilitate cooperation among the

Nordic countries. However, significant challenges persist. While informal and semi-formal approaches foster flexibility and openness, they also raise concerns about transparency and accountability. The findings in this report underscore that the ability of each Nordic actor to bring something to the table – whether through expertise, resources, or operational capacity – is crucial in determining the level and nature of engagement within these networks. For instance, the exclusion of actors such as Iceland in certain contexts highlights how national interests and resource considerations can sometimes outweigh the collective Nordic vision.

The report concludes that a clearer common goal, formulated at the political level, is essential to ensuring the long-term sustainability of Nordic cooperation on return and readmission. Based on the findings, we emphasize that such a goal would provide coherence across political and operational levels while clarifying the rationale behind the allocation of resources for Nordic taxpayers. Furthermore, the report finds that key terms such as **effective**, **sustainable**, and **humane** should be unpacked and explicitly defined to ensure they are meaningful and actionable rather than being vague political buzzwords. A shared understanding of these terms would provide a foundation for evaluating the success of cooperative efforts.

Based on the findings, we further highlight the need for greater inclusivity within networks. Expanding participation to include relevant NGOs and ensuring that government agency level actors are meaningfully integrated into civil servant-led networks would strengthen cooperation. The report further emphasizes that operational efficiency could also be improved through standardized practices such as maintaining a shared registry of return liaison officers, and facilitating better access to embassies in neighbouring Nordic countries. Transparency, while maintaining operational flexibility, must be enhanced to align with public accountability and enable civil society to engage constructively with return and readmission policies.

In practice, Nordic cooperation has shown particular promise in third-country capacity-building projects, such as the NORAQ initiative in Iraq. These initiatives, as the report highlights, demonstrate the potential for joint efforts to address post-deportation challenges while avoiding resource overlaps. The research suggests that future cooperation should build on these successes, using them as models for coordinated and sustainable approaches to return and readmission. However, the report underscores that ensuring each actor contributes meaningfully to shared goals will remain critical, as the balance between collective and national interests continues to shape the trajectory of Nordic cooperation.

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List of abbreviations

AMIF	Asylum, Migration and Integration Fund
ANT	Actor Network Theory
ARLO	Ambulating Return Liaison Officer
CEAS	Common European Asylum System
CSDP	Common Security and Defence Policy
DAC	Development Assistance Committee
DRA	Danish Return Agency
DRC	Danish Refugee Council
EC	European Commission
ECHR	European Convention on Human Rights
ECtHR	European Court of Human Rights
EEA	European Economic Area
EMLO	European Migration Liaison Officer
EMN	European Migration Network
EMU	Economic and Monetary Union of the European Union
ERPUM	European Return Platform for Unaccompanied Minors
EU	European Union
EURA	European Union Readmission Agreement
EURLO	European Return Liaison Officer
ICMPD	International Centre for Migration Policy Development
ILO	International Liaison Officers
IOM	International Organization for Migration
JHA	Justice and Home Affairs

MRC	Migrant Resource Centre
NC	Nordic Council
NCM	Nordic Council of Ministers
NGO	Non-Governmental Organisation
NORAQ	Nordic Support on Return and Reintegration in Iraq
NORDEFCO	Nordic Defence Cooperation
NSHF	Nordic Joint Advisory Group on Refugee Policy
OECD	Organisation for Economic Co-operation and Development
RLO	Return Liaison Officer
RRF	Return and Reintegration Facility
SAMAK	Cooperation Committee of the Nordic Workers' Movement
SI-COM	Sweden-Iraq Cooperation on Migration Governance
SMA	Swedish Migration Agency
TPD	Temporary Protection Directive
UDI	Norwegian Directorate of Immigration
UN	United Nations

1. Introduction

1.1 Why a report on Nordic cooperation on the issues of return and readmission?

*De slog sig ned engang ved Nordens Kyst,
fem vilde Svaner, klæmdt i Sølvheramme.
Et Strejf af Dawning farved deres Bryst,
før Solen selv slog ud sin røde Flamme.
De sidste Taager veg. Et Vældigt Rum,
med Skyers Fjældpragt over Bølgers Skum,
sænked sin Blaahed i de dybe Vande,
der gynget Nordens unge, lyse Lande.¹*

The Danish poet Hans Hartvig Seedorff's emblematic words from 1936, written for the celebration of the first Nordic Day in October of the same year, made the five swans the very image of Nordic cooperation. These swans, currently the emblem of the Nordic Council, symbolize the spirit of collaboration and unity that has historically defined the Nordic countries. But in today's context, we might ask: if these swans were migrants landing on Nordic shores, would they be allowed to stay? And if not, would Nordic cooperation facilitate their return to their places of origin? This question brings us to the pressing contemporary issue of return and readmission policies and practices in the Nordic region.

¹ First stanza of the poem "Fem Svaner slog sig ned ved Nordens Kyst" (Five Swans Settled at the Coast of the North) by Danish lyricist Hans Hartvig Seedorff Pedersen. The poem was written for the celebration of Nordic Day on 27 October 1936, which was simultaneously and synchronously celebrated in the five Nordic countries. The festival was intended to show both the world and the Nordic population "a united Nordic region in a Europe in disharmony," as described by a Danish newspaper at the time (Hemstad, 2023, p. 44).

English translation (translated from Danish by ChatGPT, OpenAI, with revisions by Luthman):

They came to rest once by the Nordic coast,
five wild swans, clad in silver plumage.
A hint of dawn coloured their breasts,
before the Sun itself burst forth its crimson flame.
The last mists receded. A vast space,
with the mountainous splendour of the sky above the foamy waves,
sank its blueness into the deep waters,
that cradled the bright young lands of the North.

For decades, the Nordic countries – Sweden, Denmark, Norway, Finland, and Iceland² – have worked together on various issues under frameworks such as the Nordic Council (NC) and the Nordic Council of Ministers (NCM). This tradition of formalized cooperation has recently also extended into the area of return and readmission. After a two-day Ministerial meeting of the Nordic Joint Advisory Group on Refugee Policy (NSHF) in Copenhagen, Denmark, on 31 October 2023, the five Ministers of the Nordic countries distributed a press release. This press release described what the Ministers had agreed upon during their meeting, which boiled down to: “...three joint initiatives with a strong commitment to strengthen and expand Nordic cooperation in the area of return”³ (Government of Iceland, Ministry of Justice; Ministry of Immigration and Integration, Denmark; Ministry of the Interior, Finland; Royal Norwegian Ministry of Justice and Public Security; Government Offices of Sweden, Ministry of Justice, 2023).

These newly formalised ambitions for enhanced Nordic cooperation on return and readmission came at a time of significant political focus on these issues within the Nordic countries and the European Union (EU). According to the EU border and coast guard agency Frontex, 330,000 irregular migrants arrived in the EU in 2022, the highest number since 2016, thereby leading to increased political pressure on EU Member States to address the region’s low return rate for those residing in the region without legal permission (Baczynska, 2023). As Schengen countries, all Nordic countries have inevitably felt this pressure. Consider Sweden, for instance – a country that transitioned from a relatively deprioritized return policy in the 1970s and 1980s to implementing a proactive return policy focused on voluntary returns in the mid-1990s (Altamirano, 1995, p. 276). Today, return and readmission remain central to Sweden’s policy agenda, but with an increased focus on forced returns (while

² The Nordic region (Norden) is usually defined as consisting of the five sovereign states of Sweden, Denmark, Norway, Finland, and Iceland, plus the three autonomous territories connected to these states: the Faroe Islands, Greenland (Denmark), and Åland (Finland) (Hilson, 2019). In this report however, the Nordic Region refers solely to the common geographical and cultural region composed of the five sovereign states of Sweden, Denmark, Norway, Finland, and Iceland.

³ These three initiatives will be expanded on throughout this report. It may be noted, however, that they include “...strengthening reintegration projects in countries of origins, coordinating joint Nordic return operations in collaboration with Frontex and providing assistance to stranded irregular migrants in North Africa, who wish to voluntarily return to their own countries” (Government of Iceland, Ministry of Justice; Ministry of Immigration and Integration, Denmark; Ministry of the Interior, Finland; Royal Norwegian Ministry of Justice and Public Security; Government Offices of Sweden, Ministry of Justice, 2023).

still working with voluntary returns).⁴ As of 2022, the new Swedish Government, under the leadership of Prime Minister Ulf Kristersson, vowed to prioritize and strengthen return operations using a range of methods – from utilizing various diplomatic tools to intensifying the coordination of return operations between different national actors (Sweden Democrats; Moderate Party; Christian Democrats; Liberals, 2022).

Previous research, including Delmi's own previous studies on return, highlight that effective return and readmission procedures do indeed require cooperation and coordination between various stakeholders at various national, regional and international levels (Vera-Larrucea & Luthman, 2024; Malm Lindberg, 2020). However, apart from the more formalized cooperation that takes place within the framework of the EU, relatively little is yet known as to how these cooperative efforts are operationalised and implemented. In theory, we know that in the mid-1990s, Sweden's new and developing return programmes were not only adapting to the EU but were also "...formulated within the framework of Nordic cooperation" (Altamirano, 1995, pp. 276–277). Yet, given that the Nordic region has a long-standing tradition of interregional and cross-border cooperation, it is surprising how little is known about this framework, and about how the Nordic countries cooperate and coordinate with one another in the area of return and readmission. Are the Nordics "...more than a geographical area, more than a shared territorial landscape, or are Nordic states able to govern together?" (Stie & Trondal, 2020, p. 1) when it comes to these issues?

We do know, however, that formalized structures that would allow for institutionalized cooperation between Nordic countries to flourish are indeed in place, and have been for a number of years. As already mentioned, the governments and parliaments of the five Nordic countries work closely together in the Nordic Council of Ministers and the Nordic Council when it comes to policy areas that demand the region's collective attention. The governments of the Nordic countries also meet with one another for general policy consultations on asylum and migration within the framework of the

⁴ When using the terminology returns (i.e., forced returns and voluntary returns), as well as readmission, this report refers to the terms as defined by the European Migration Network (EMN) and/or the European Commission (EC). The authors of this report do however recognise that distinctions between forced and voluntary returns are, in practice, more complex than these terminologies allow them to be. See the section "A note on terminology" for a further elaboration on the terminology used within this report.

NSHF.⁵ Within this framework, one can find specialized working groups relating to specific areas such as labour migration, resettlement, and return (Skr. 2013/14:73, 2014, p. 54). Yet, previous research does not outline how the NSHF working group on return specifically functions in relation to the issues of return and readmission, as well as what additional formal and informal networks for cooperation between Nordic countries, besides the NSHF, exist for these issues.

However, times appear to be changing. The press release from the NSHF Ministerial meeting in October 2023 suggests a policy shift towards a more unified Nordic front on return and readmission. This development indicates that the roadmap for Nordic cooperation on this issue (at least the unclassified version) has been communicated to the public. Only time will tell whether the aspirations highlighted in the press release do in fact materialize. Previous research findings have highlighted that it is not uncommon to find a gap between aspiration and reality in institutionalized cooperation between the Nordic countries (such as the NCM and NC) when it comes to politically charged issues like migration control and asylum policy (Etzold, 2017, p. 2). According to Etzold, Nordic institutionalized cooperation has lacked not only political relevance and visibility, but has also been viewed by many as “...excessively bureaucratic and technical”. When it comes to migration control and asylum policy in particular, the way in which the individual Nordic countries have approached these issues differently has also contributed to the widening of this gap (Etzold, 2017, pp. 2-3).

Historically, there has been a divergence in migration and asylum policies among the Nordic countries. Until 2016, Sweden maintained one of Europe’s most generous refugee migration policies, while Denmark, Norway and Finland pursued more restrictive approaches (Etzold, 2017, p. 1). But with Sweden increasingly strengthening their policies and practices on return and readmission (as well as other policies and practices regarding asylum and integration matters), the gap between the Nordic countries and their policies on migration and asylum appears to be closing, in particular the gap between Sweden and Denmark/Norway (Garvik & Valenta, 2021). As the policy areas of return and readmission have increasingly gained political priority within each of the Nordic countries, we can witness the underpinnings of a potentially united Nordic political front on return and readmission, as expressed by the NSHF Ministerial press release.

⁵ We have not been able to find literature or documents that verify how often NSHF members meet for general policy consultations on migration and asylum. As specified in the empirical part of this report however, the NSHF working group on return meets twice a year to discuss matters related to return and readmission.

Nevertheless, in these times of historical migration policy changes and united Nordic policy fronts, the press release provided by the five Nordic Ministers encourages us, as the researchers behind this report, to not only take into account the three initiatives officially proposed within the press release, but to dig beneath the surface in our quest to understand how Nordic cooperation is, and has been, working according to those with a role to play in this cooperation. The greater public spotlight on the policy areas of return and readmission by Nordic country politicians, individually and collectively as a region, provides a troubling contrast to the limited amount of previous research on Nordic cooperation on these policy areas. As return and readmission policies and practices affect the lived realities of those residing in a country with no legal permission to stay, it is important to not only gain an understanding as to what the networks are in this terrain at a political and operational level, yet also examine how, in what ways, and whether Nordic regional cooperation promotes a return process that is, in fact, 'effective', 'sustainable' and 'humane'.⁶

1.2 Research aim

This report is part of a project funded by the Asylum, Migration and Integration Fund (AMIF) aimed at enhancing our understanding of how diplomatic tools and international (and national) cooperation can promote effective, sustainable, and humane return processes. The overarching project, titled *Return as international migration policy: coordination within and across national borders*, consists of three thematic reports, each addressing distinct yet interconnected aspects of diplomatic tools and (inter)national cooperation regarding these policy areas.

This report is the second thematic report within the project and focuses on *Nordic cooperation*. The aim of this report is to examine how, and to what extent, Nordic countries, i.e. Sweden, Denmark, Norway, Finland and Iceland, cooperate with one another when it comes to implementing and coordinating the return and readmission of migrants who have received a legally binding decision to return to their country of origin, or country of nationality or usual residence.

⁶ The terminology used in describing return processes as 'effective, sustainable, and humane' is unpacked in Section 1.4 of this report.

1.3 Research questions

Keeping this overarching aim in mind, the following questions have therefore guided this report:

- What formal and informal networks currently exist, at a political and operational level, between the Nordic countries when it comes to the cooperation and coordination of return and readmission policies and practices?
- What role do these networks play and how do they function?
- What opportunities and obstacles exist for improving intra-Nordic cooperation on return and readmission?
- From the perspective of those working with Nordic cooperation on return and readmission policies and practices, to what extent can Nordic cooperation regarding these policy areas promote return processes that are considered to be effective, sustainable and humane?

1.4 A note on terminology

As is often the case, the terminology used within research rarely captures the complexity of the real world phenomena that the terms aim to describe. Unpacking the reality behind the term *return migration* means coming face-to-face with a spectrum of reasons behind the return, levels of willingness of migrants to return, and levels of coercion used by states in implementing the return. It is important to note that the terms used to define returns are context-specific, and therefore vary "...both among countries and regions as well as among who is using it (e.g. scholars, policymakers, practitioners, migrants, diaspora groups) and for what purpose" (Sahin-Mencütek & Triandafyllidou, 2023, p. 5). Therefore, these terms are by no means neutral and play an active role in contributing to the shaping of governmental and intergovernmental perceptions and policies (Sahin-Mencütek & Triandafyllidou, 2023, p. 5). However, despite these challenges, attempts are continuously made by different actors to classify the phenomena of return migration.

In her research report for the International Organization for Migration (IOM), Newland (2017, p. 1) states that for migrants, the return spectrum can range from being entirely voluntary to entirely involuntary and can therefore be categorized into six identifiable types: *solicited, voluntary, reluctant, pressured, obliged or forced*. Despite the fact that the research distinguishes between these types of return as being on a continuum (meaning, for example, that a migrant can experience *more than one* of Newland's identifiable types

during the entirety of their return process, or *simultaneously*), policymakers and practitioners often classify return processes in binary terms such as: assisted/non-assisted returns and voluntary/forced returns (Sahin-Mencütek & Triandafyllidou, 2023, p. 15). Within this report, as researchers we have chosen to adopt similar terms to those used by policymakers and practitioners, whilst acknowledging the challenges that these binary distinctions present. This choice was made to avoid confusion, as the report's findings are based on empirical interviews conducted with policymakers and practitioners, in which these binary terminologies were often used within the interview process.

Hence, this report refers to **returns** as defined by the European Migration Network (EMN) and/or the European Commission (EC), meaning "(t)he movement of a person going from a host country back to a country of origin, country of nationality or usual residence usually after spending a significant period of time in the host country whether voluntary or forced, assisted or spontaneous" (EMN, 2022). The term **forced return**⁷ is used to refer to, "(i)n the global context, [the] compulsory return of an individual to the country of origin, transit or third country (i.e. country of return), on the basis of an administrative or judicial act" (EMN, 2022). **Voluntary return** "...refers to the assisted or independent return of an individual to a third country based on the free will of the returnee" (European Commission, 2021a). When it comes to *assisted voluntary returns*, this refers to a "(v)oluntary return or voluntary departure supported by logistical, financial and/or material assistance" (EMN, 2022).

Readmission refers to the "(a)ct by a State accepting the re-entry of an individual (own national, third-country national or stateless person)" (EMN, 2022). Readmission can refer to the act of accepting the re-entry of voluntary and/or forced returnees. According to an obligation under customary international law, states are expected to readmit their own nationals, and thus *readmission agreements* between contracting parties can help facilitate this obligation (Cassarino, 2010, p. 13). It should be noted, however, that many researchers question the voluntariness of voluntary returns where the only alternative to a state-funded return process is forced deportation (Biehler, Koch, & Meier, 2021, p. 8), and/or strategies of social exclusion (Weber, Mohn, Vecchio, & Fili, 2020, p. 78); or where migrants are "...rarely included in the decision-making during State-induced returns" (Sahin-Mencütek &

⁷ The actual implementation of forced returns is often referred to as *deportation* in academia and in civil society or among activists (Sahin-Mencütek & Triandafyllidou, 2023, p. 8). Some researchers however apply the term deportation to "...wherever individuals leave the sovereign territory to comply with formal legal orders...with or without the application of physical force, and with varying degrees of 'voluntariness' on the part of the individuals concerned" (Weber, Mohn, Vecchio, & Fili, 2020, p. 66).

Triandafyllidou, 2023, p. 10). Hence, researchers have been found to critique the voluntary/forced return binary (Fine & Walters, 2022; Webber, 2011).

In a similar way to the voluntary/forced return conundrum, the EU objective that return processes should be **effective**, **sustainable**, and **humane** has also sparked debate within academia and amongst certain actors, and therefore deserves a moment of reflection here. As stated by Biehler et al. “[w]hile most policy papers continue to concentrate on more efficient and humane ways to implement return policy, empirical research in the academic realm is increasingly exploring the social and political consequences of return” (Biehler, Koch, & Meier, 2021, p. 28). According to the EU New Pact on Migration and Asylum, both voluntary and forced returns are essential to an effective return policy, as the EU needs to have the capacity to provide return processes that are both effective and humane (European Commission, 2021a, p. 1). Voluntary return in particular “...aims to ensure the humane, effective and sustainable return of irregular migrants” (European Commission, 2021a, p. 1). Similar to the EU New Pact on Migration and Asylum, the common EU rules on return, known as the Return Directive, also uses the terms **effective**, **sustainable**, and **humane** to describe the desired characteristics of return policies. However, these value-laden and normative concepts lack universally accepted definitions, leaving them open to interpretation depending on the actor or context in which they are used.

For instance, in policy discussions, the term **effective** returns often refers to the *number* of successfully implemented returns. This *return rate* is “...the ratio of the number of actual returns to the total number of persons required to leave” (Biehler, Koch, & Meier, 2021, p. 11). Certain researchers, however, problematize this definition for several reasons (Stutz & Trauner, 2022). These reasons include the difficulty in comparing return statistics between countries, as countries not only “...employ different mobility control tactics at different points in time”, but may also classify and report what counts as a voluntary versus forced return differently (Weber, Mohn, Vecchio, & Fili, 2020, pp. 68, 76). Also, many countries do not record self-organised returns to the country of origin (Biehler, Koch, & Meier, 2021, p. 11).

In addition, there is little agreement on what **sustainable** return/reintegration means: whether it is assumed to be aligned with the IOM’s definition, which is often the case, where sustainable reintegration is achieved when “...returnees are economically self-sufficient, socially accepted and enjoy psychosocial well-being” (Newland, 2017, p. 5) once they have returned; or whether a sustainable return is equated with returnees not re-migrating irregularly to the host country that implemented their return.

Nor is there consensus on what is meant by a **humane** return process, with certain scholars critical of the term arguing that a deportation is never in itself a humane act (Fine & Walters, 2022; Walters, 2002). Does a humane return process, as described in the EU Return Directive, imply procedural fairness, including access to legal recourse and appeal mechanisms? Or does it require independent monitoring of forced returns by professionals with relevant legal and medical expertise (Walters, 2019)? And to what extent do the perceptions of the individual migrants undergoing the process play into what is considered a 'humane' return?

As Dimitriadi and Malamidis (2019, p. 7) observe, the values underpinning normative concepts (such as 'effective', 'humane', and 'sustainable') are often left vague in EU institutional narratives regarding migration. This vagueness allows for varying interpretations and applications of these terms, granting institutions and actors flexibility in shaping policy responses and narratives. However, such ambiguities also expose divisions among EU Member States. According to Dimitriadi and Malamidis, these divisions became particularly pronounced following the 'refugee crisis' in 2015, when geographical and political rifts between Northern, Southern, and Central Europe deepened (Dimitriadi & Malamidis, 2019, p. 7).

While the migration policies of all five Nordic states (including Norway and Iceland as Schengen countries) are deeply embedded within the broader framework of the European Union, it cannot be assumed that the values or norms underpinning the concepts 'effective', 'sustainable', or 'humane' are uniformly shared across all EU Member States – or even among the Nordic countries or individual stakeholders. These complexities, along with the challenges they pose for operationalizing such concepts, underscore the need for a critical examination of how these terms are understood and applied by the various actors involved in Nordic cooperation on return and readmission – particularly as differing interpretations and the lack of a shared normative framework has the potential to create friction or inconsistencies in collaborative efforts.

As previously mentioned, the findings of this study are based on empirical interviews in which at times these terms were also used by the interviewees. Given the above, as researchers we acknowledge the normative nature of these terms, particularly as they are shaped and interpreted in the context of our interviews.

1.5 Outline of this report

This report unfolds across ten chapters, guiding readers through the rapidly evolving landscape of Nordic cooperation on return and readmission. In this chapter, we have provided the rationale behind the study, as well as the research aim and research questions that guided this study. We have also provided a note on the terminology used to frame the discussion. In the next chapter, Chapter 2, we provide an overview of the governance of returns, tracing the historical evolution of Nordic cooperation on returns and examining the significant policy shifts that followed the post-2015 ‘return turn’ in the Nordics. We highlight how political and EU influences have shaped this trajectory and identify the critical gaps in both research and practice that this report seeks to address.

Chapter 3 introduces the theoretical framework that underpins the analysis. This framework is based on an Actor Network Theory (ANT)-inspired approach, and uses the concept of ‘Nordicity’ as an added benefit to this approach. Chapter 4 brings the report’s methodology to the forefront. The chapter details how an ANT approach was also used as a mapping methodology, describes what empirical material was used in this report, and explains how interviews and documents were analysed to provide a solid foundation for our findings, which are mainly outlined in Chapters 5 to 8.

These findings include taking a look at *formal* intra-Nordic networks, including the NSHF working group on return and the charter flight working group (Chapter 5); and *informal* networks, such as agency-to-agency collaboration and collaboration between return liaison officers/migration attachés (Chapter 6). On the one hand, Chapter 7 introduces the potential of Nordic cooperation through networks, such as the benefits of shared values, combined strength, and efficient information sharing, illustrated through compelling case studies. On the other hand, Chapter 8 introduces the challenges of Nordic cooperation through networks, including the obstacles that hinder progress: from disparities in national systems to issues of transparency and the friction between Nordic and EU frameworks.

In Chapter 9, we synthesize our findings, reflecting on their broader implications. This chapter considers the future of a ‘whole-of-Nordics’ approach, emphasizing the importance of clearly defined goals and shared understandings to ensure meaningful cooperation over time. Finally, Chapter 10 offers actionable policy recommendations based on these findings.

2. The Evolution of Nordic Cooperation within Return and Readmission

This chapter explores the historical and institutional evolution of Nordic cooperation, with a particular focus on migration management and return policy. Drawing on existing literature, it provides a detailed account of how this collaboration has developed over time, emphasizing key milestones and challenges. By examining both national developments and broader trends, the chapter sheds light on the mechanisms and dynamics that shape contemporary Nordic cooperation in this domain. This context is crucial for understanding the structural and political factors influencing current practices and for uncovering the underlying whys and hows of Nordic cooperative networks. It also serves as a foundation for evaluating their role and function in facilitating the cooperation and coordination of return and readmission policies and practices.

The chapter is structured as follows. Section 2.1 defines migration governance and examines how return migration is governed and by whom. Section 2.2 provides historical context for Nordic cooperation, focusing on the development of a shared Nordic identity, or Nordicity, shaped by cross-border collaboration (Section 2.2.1). Drawing on Stie and Trondal's (2020) concept of differentiated integration, Section 2.2.2 explores the institutionalization of cross-border collaboration in the Nordic region. Section 2.3 analyses the development of national migration policies in each Nordic country, highlighting key political and EU influences. Section 2.4 discusses the post-2015 return turn, which reflects a paradigm shift towards stricter return policies across the region. Section 2.5 examines uncoordinated responses amid this apparent policy convergence, identifying the challenges and limitations of Nordic collaboration during periods of acute migration pressure. Finally, Section 2.6 reviews existing formal and informal Nordic cooperation networks on return and readmission, identifying gaps in the research and practices that this report seeks to address.

2.1 The governance of returns

Migration in general is governed in countless ways by numerous actors, and through a multitude of logics and practices. This is often referred to in the research as **migration governance**. When speaking about governance in this context, it can be understood as “...the techniques through which subjects are constituted in line with particular administrative rationalities, including that of the modern territorial state” (McNevin, 2014, p. 296). This can be simplified to mean that various administrative and bureaucratic procedures determine who is classified as a migrant and who has the authority to legitimize, manage or control the migrant’s legal status and mobility. At times, migration governance is also referred to as **mobility governance** in the research. Weber et al. (2020), for example, use the concept of flows to describe how state practices govern borders, and create “channels” or “eddies” in order for “flows” to be selected, redirected or stopped. They state, “[t]he imagery of flows also enables us to see both inward and outward mobility as a continuum on which sharp distinctions between voluntary and involuntary movements are called into question, and different combinations of mobility governance can be discerned” (Weber, Mohn, Vecchio, & Fili, 2020, p. 67). They use the concept of flows in order to describe how state practices control migrant mobilities by reacting to them as flows. It is important to note that the researchers do not claim that migrant mobilities *are* flows, as they problematize using language to dehumanize migrants, such as equating them with “...the imagery of floods, tides and swamping...” (Weber, Mohn, Vecchio, & Fili, 2020, p. 67).

Hence, border control strategies shift and change, often in response to cross-border migration patterns and depending on who is crossing the border (Weber, Mohn, Vecchio, & Fili, 2020, p. 67). However, migration is not solely governed at the territorial border of the nation state. The research shows us that migration controls have increasingly become extra-territorialized, as governments have increasingly attempted to regulate “...international movements outside their juridical borders” (Ostrand, 2022, p. 42), through the role of actors such as International Liaison Officers (ILOs), Return Liaison Officers (RLOs), European Return Liaison Officers (EURLOs),⁸ and Frontex. Research on migration governance often stresses and analyses the level of importance that certain actors have in governing migration. Analyses range from focusing on mid-level officials such as liaison officers, who negotiate and

⁸ ILOs, RLOs and EURLOs are officers that are “...posted to foreign jurisdictions, who make decisions and take actions abroad to support their country’s immigration goals” (Ostrand, 2022, p. 41). They either represent their country in terms of achieving immigration or return goals in relation to third countries (i.e., ILOs and RLOs), or represent EU Member States in terms of achieving return goals in relation to third countries (i.e., EURLOs).

contest migration control practices; to the role of frontline migration and border control officers on the ground/in the air, such as "...local immigration, police, security, and airline staff" (Ostrand, 2022, p. 46 & 56). Regardless, research on migration governance from a more critical perspective often highlights that mobility is regulated by various technologies, institutions and actors, as well as through infrastructures that encompass commercial, regulatory, humanitarian and social dimensions (Andersson R. , 2016, p. 24).

Since the 1970s, researchers have begun to pay an increasing amount of attention to the phenomena of return migration in particular (Dziekońska, 2023, p. 1), and to the **governance of return**. Researchers increasingly stress the notion that return is not always as linear a process as policymakers portray it to be, especially in a world characterized by transnational migration, hence making the governance of it even more complex. Rather than viewing return migration as the final stage of international migration, some researchers highlight the importance of viewing return as a point in the mobility continuum (Dziekońska, 2023; Sahin-Mencütek & Triandafyllidou, 2023; Weber, Mohn, Vecchio, & Fili, 2020). Critical migration scholars in particular emphasize the need to view deportations as part of a broader state effort to control the movement of people, rather than as a "stand-alone practice" (Weber, Mohn, Vecchio, & Fili, 2020, p. 66). The subfield of deportation studies in general emphasizes this continuum, and the "...widening of the understanding of deportation beyond a single act, policy or event, to include a whole range of places, relations, and effects" (Walters, 2019, p. 163).

Policy efforts that focus on returning migrants who do not obtain a legal right to remain in the host country play an important role for governments wanting to demonstrate to their citizens that they are able to uphold the rule of law (Biehler, Koch, & Meier, 2021, p. 2) as they are understood to be "...an essential element of effective management of orderly migration" (Newland, 2017, p. 2). However, when governments attempt to implement returns, they are often met with a variety of challenges. These can range from (but are not limited to) financial costs to political risks to diplomatic challenges (Weber, Mohn, Vecchio, & Fili, 2020, pp. 65–66). In order to understand what formal and informal policy instruments and practices governments use in implementing returns as an essential element of effective migration governance, Sahin-Mencütek and Triandafyllidou (2023) propose the following three mechanisms of return governance: pushing, imposing and incentivising. *Pushing returns* refers to the formal policy instrument of stricter border controls on first arrivals, which is often informally put into practice through pushbacks and preventing admission and asylum claims. *Imposing returns* "...means officially enforcing an order to leave that has to be obeyed by the 'irregular' migrants or

refused asylum seekers". This includes formal policy instruments such as the Dublin Regulation, readmission agreements, detention, and mass voluntary repatriation. *Incentivising returns* entails "...persuading refused asylum seekers or migrants without regularised status to 'voluntarily' return by offering some financial assistance" as facilitated through assisted voluntary return and reintegration programmes (Sahin-Mencütek & Triandafyllidou, 2023, pp. 13-14).⁹

The way in which actors organize the governance of migration in general, and the governance of return in particular (whether it be by pushing, imposing and/or incentivising returns), has often occupied the core of multilevel governance research within migration studies. Multilevel governance scholars often stress the "...dispersion of authority away from central government – upwards to the supranational level, downwards to subnational jurisdictions, and sideways to public-private networks" (Panizzon & van Riemsdijk, 2019, p. 1226), which is often the case in a world increasingly characterized by transnational migration. Scholten and Penninx (2016) have thus identified four patterns of multilevel governance when it comes to migration: a centralist mode (governance as top-down); a localist mode (governance 'from below'); a multi-level style of cooperation and engagement; and a de-coupled mode (where actors that were previously cooperating with one another disengage in order to increase their own mandate and power) (Panizzon & van Riemsdijk, 2019, pp. 1231-1232). According to previous research, migration governance at a regional level has "...been the most progressive," as "...states are willing to cooperate with each other outside the multilateral level..." due to shared common interests, the possibility to forge deeper commitments with fewer actors, and the fact that cross-border movements often occur within regions (Bisong, 2019, p. 1294).

Hence, a state's political commitment to EU regional cooperation on migration, inevitably affects EU Member States and the way in which they govern returns nationally (Weber, Mohn, Vecchio, & Fili, 2020, p. 79), especially because the policy area has been high on the political agenda in the EU (Biehler, Koch, & Meier, 2021, p. 2). Although this report focuses on Nordic cooperation when it comes to the policy areas of return and readmission, Nordic cooperation will inevitably be affected by EU cooperation, especially considering that three of the five Nordic countries (Sweden, Finland and Denmark) are members of the EU, and the remaining two (Norway and Iceland) have a close relationship and

⁹ When it comes to Nordic cooperation on and coordination of return and readmission policies and practices, this report focuses on forced and voluntary returns, which are two types of return that would qualify as being within Sahin-Mencütek and Triandafyllidou's categories of imposing returns and incentivising returns.

cooperation with the EU. Hence, it is worth mentioning that previous research has identified the emergence, since the mid-2000s, of two types of EU activity on return policy: the increasing replacement of bilateral readmission agreements with EU-level readmission agreements; and Frontex's role in implementing returns (including joint deportation flights) (Biehler, Koch, & Meier, 2021, p. 22). The EU's New Pact on Migration and Asylum aims to establish a common EU system for returns and emphasizes that the EU must have the capacity "...to provide effective and humane processes to return people who are not entitled to stay" (European Commission, 2021a, p. 1) and improve cooperation with external partners to become more effective when it comes to readmission (European Commission, 2021b, p. 1). But in spite of the EU Member States' commitment to a New Pact on Migration and Asylum, as well as the EU Return Directive, Nordic cooperation on return and readmission policy appears to be taking shape simultaneously.

2.2 Nordic regional cooperation

Understanding the historical foundations of Nordic regional cooperation is essential for understanding the current political focus on enhancing Nordic collaboration on returns and readmission. Let us therefore travel back to 1919, the year that the *Norden Associations* were founded in Sweden, Denmark and Norway. These independent, nonpartisan associations brought together key politicians, business leaders and cultural figures from all the Nordic countries (Iceland and Finland joined a couple of years later)¹⁰ to foster social, cultural and economic ties within the Nordic region (Hovbakke Sørensen, 1996, p. 89). This level of cooperation would scarcely have been conceivable just a few years prior, when the dissolution of the union between Sweden and Norway in 1905 had sown deep divisions and disrupted cooperation across many essential sectors (Ahtola Nielsen, 2006, p. 173).

However, the trials of World War I had contributed to reigniting Nordic regionalism. Amid the pressures of a global conflict, a newfound spirit of Nordic unity took root, paving the way for the establishment of regional cooperation. Initially, Sweden proposed that the Norden Associations should promote political and economic unity among the Nordic countries. Norway, which had the period of Swedish supremacy fresh in its nation's memory, was however strongly opposed to a political focus, leading to a revised emphasis

¹⁰ The Norden Association was founded in Iceland in 1922 and in Finland in 1924. Norden Associations have since also been set up in the Faroe Islands (1951), Åland (1979) and Greenland (1991). In 1965, a joint Nordic umbrella organization – the Confederation of Norden Associations (FNF) – was formed, with a joint board consisting of the chairpersons from each sister association (Föreningen Norden, n.d.).

on enhancing cultural and economic ties instead (Ahtola Nielsen, 2006, p. 214). During the interwar period, the Norden Associations launched several initiatives aimed at fostering Nordic solidarity.¹¹

For example, the relationships between the Nordic countries were extended and formalised further in 1932 with the founding of the SAMAK conferences – a cooperation committee for the Nordic Social Democrats and their associated trade unions. A key aspect of this cooperation involved coordinating Nordic policies in relation to international organisations (Hemstad, 2023, p. 40). This desire to present a unified Nordic front internationally was crucial for promoting the concept of a Nordic (or Scandinavian) model as an international brand in the decades that followed (Kettunen, Lundberg, Österberg, & Petersen, 2015, p. 71). This model, which emphasized social equality, comprehensive welfare systems, and state responsibility for the well-being of citizens, positioned the Nordic region as a “democratic, Protestant, progressive and egalitarian” antipode to the “Catholic, conservative, and capitalist Europe” and “the communist Eastern Bloc” (Jalava, 2013, p. 152).

2.2.1 Building the Nordic identity: from altruism to pragmatic collaboration

The ‘Nordic way of doing things’ arguably helped to cultivate a shared identity in the Nordic region (Browning, 2007, p. 27). However, as Jalava (2013, p. 254 & 251) notes, the notion of ‘Nordicity’ – best described as a common Nordic identity based on a distinct linguistic and cultural affinity – is still constructed on the basis of independent nation states. Or, as Browning (2007, p. 30) puts it: “... the Nordic countries generally narrate Nordicity in slightly different ways for different historical reasons”. Deliberate and collective efforts to construct a ‘Nordic brand’ have nonetheless meant that Nordicity as a “meso-regional identity” has been built into what it means to be a Swede, Dane, Norwegian, Finn or Icelander, “instead of being an addition to the (primary) national identifications” (Jalava, 2013, p. 251).

A key aspect of the construction of this common identity or ‘regional brand’ according to Browning (2007, p. 27) has been the idea that “to be Nordic one has to be ‘exceptional’ (or at least different from the norm)”. By positioning themselves as different, the Nordics have “perceived themselves as having no responsibility for Europe’s exploitation of the rest of the world” (Østergård,

¹¹ These initiatives included offering courses for pupils and teachers, facilitating exchanges between compulsory school and upper secondary school pupils, and organizing *‘Nordens Dag’* (Nordic Day) in 1936. Additionally, the Association undertook a systematic review of Nordic history textbooks to remove any unfounded negative references to other Nordic nations and coordinated trips to neighbouring Nordic countries (Hovbakke Sørensen, 1996, p. 89).

2006, p. 288). Østergård (2006, p. 288) elaborates on how the Nordic countries, as part of this identity-building project, have devoted a significant portion of their international efforts to rectifying the wrongdoings of their fellow Europeans towards the “Third and Fourth Worlds”. According to Karahan (2022, p. 100), the generally positive image of these aid efforts is bolstered by the Nordic countries’ minimal colonial or political influence on distant territories. This minimal influence is attributed to the fact that, unlike major colonial powers such as Spain, Portugal, Britain and France, the Nordic countries played a relatively minor role in European colonization.¹² Consequently, Nordic aid – with Sweden, Denmark and Norway as the primary donors within the region – has traditionally been seen by the international community as driven by “solidarity, altruism, and moral duty” rather than political interests and alliances (Karahan, 2022, p. 100).

Research on donor behaviours in bilateral aid allocation has found that, compared to other members of the OECD’s Development Assistance Committee (DAC), Nordic aid has indeed been found to be less driven by ‘selfish’ national interests, focusing more on democracies rather than commercial or political allies (Gates & Hoeffler, 2004; Berthélemy, 2006). Moreover, the Nordic aid model has historically featured less coordination between development assistance and business interests, along with greater NGO representation in domestic policymaking and implementation than other DAC countries (Marklund, 2016, p. 6).

Given the alignment of Nordic countries’ aid efforts and priorities, it is not surprising that these countries – when they first began developing their aid initiatives in the 1950s – initially considered joint Nordic projects over establishing their own bilateral aid programmes. Although this idea was eventually discarded, several joint Nordic projects were launched, such as the Scandinavian teaching hospital in South Korea in 1958, and the Nordic Tanganyika Project in Kibaha, Tanzania, in 1963. These were followed by numerous cooperative projects in Kenya, Tanzania, Mozambique and Namibia during the 1960s, 70s and 80s (Odén, 2011, p. 17).

¹² The relatively small-scale imperialism of some of the Nordic countries, primarily Sweden and Denmark, should not be downplayed, however. The countries did play a small but not insignificant role in European colonisation of the Americas, Africa and Asia. The real union of Denmark-Norway for example was relatively active in claiming several colonies from the 17th to the 19th centuries, namely the Danish Gold Coast, the Nicobar Islands, Serampore, Tharangambadi, the Danish West Indies, and Greenland (Brimnes, 2021). Sweden’s colonial activities were less extensive and more short-lived compared to Denmark-Norway, including the establishment of New Sweden in present-day Delaware, USA, between 1638 to 1655; and Saint Barthélemy, which Sweden controlled from 1784 to 1878 (Uppsala University, n.d.; Andrews, 2023).

However, the implementation of joint Nordic-funded aid projects proved to be complicated, leading to a gradual shift towards alternative approaches (Odén, 2011, p. 19). Regular coordination meetings, at political and senior official levels, were initiated as an alternative, and some still continue to this day. In certain instances, delegated cooperation has been adopted, where one country manages the aid programme of another in addition to its own in a specific partner country. Examples include Sweden administering Norwegian support to Mali, and Norway overseeing Swedish support to Malawi (Odén, 2011).

Denmark's accession to the European Community (EC) in 1973 and Sweden and Finland's entry into the European Union (EU) in 1995 eventually contributed to shifting the Nordic aid model towards alignment with international trends – emphasizing political and economic conditionality, participation in military coalitions, and a new readiness to use humanitarian action and Official Development Assistance (ODA) as foreign policy tools (Marklund, 2016). Since the turn of the millennium, shifting political landscapes in the Nordic countries have further contributed to a growing emphasis on using development aid more strategically to serve national interests.

In Denmark, for example, this shift became particularly pronounced in the early 2000s under the Venstre-led government, supported by the nationalist Danish People's Party, which explicitly prioritized aligning migration and development policies (Nyberg Sørensen, 2016, p. 68). From this period onwards, Danish development policy documents have included 'nexus statements' highlighting the Government's commitment to linking migration and development in bilateral and multilateral assistance (Nyberg Sørensen, 2016, p. 68). An illustrative example of this is *The World 2030*, the development cooperation strategy adopted by the Danish Government in 2017, which identifies supporting peace, security, and protection in developing countries where "Danish security and migration policy interests are involved" as a key priority (Ministry of Foreign Affairs of Denmark, 2017, p. 18). Additionally – and of particular relevance for the present study – the strategy emphasizes Denmark's commitment to leveraging development cooperation and other foreign policy instruments, such as trade and policy dialogue, to facilitate effective agreements on readmission (Ministry of Foreign Affairs of Denmark, 2017, p. 23).

Denmark is not alone in this approach, as other Nordic countries have also utilized aid for reasons that might not be considered purely altruistic. For instance, economic benefits have been identified as a secondary motive for the allocation of foreign aid in Sweden and Norway, respectively (Karahana, 2022, p. 100). When it comes to linking development to national interests in migration management, the Swedish Government's 2023 Reform Agenda for

Development Assistance offers another illustrative example. It highlights a key priority to “safeguard Swedish interests in countering irregular migration and its risks, promoting return, voluntary repatriation, sustainable reintegration, and addressing the root causes of irregular migration and forced displacement” (Swedish Ministry for Foreign Affairs, 2023, p. 16).¹³

This increased role of national strategic interests, in contrast to the historically more unified Nordic approach with an emphasis on poverty reduction and global solidarity, reflects a significant shift in how development aid is conceptualized and implemented. Yet, despite these changes, the longstanding tradition of Nordic collaboration in international aid has continued to foster practical working relationships and a shared sense of identity among the Nordic countries. Building on this notion of Nordicity, the Nordic countries should still be able to project a unified front in international collaborations, potentially leveraging their collective reputation for fairness and humanitarian engagement to enhance both the legitimacy and impact of their efforts. Moreover, within the context of international aid, the Nordic countries have demonstrated a pragmatic approach to cooperation, prioritizing mutual benefit where possible. Even when joint funding of projects has proven difficult, they have shown the ability to adapt their cooperation strategies, opting for flexible and coordinated solutions.

2.2.2 Intensified Nordic institutionalisation – a process of differentiated integration

The process of “Nordic cross-national identification” (Jalava, 2013, p. 151) not only shaped – and was shaped by – the image of Nordic ‘exceptionalism’ on the international scene, but also set the stage for intensified Nordic institutionalization in other policy areas. During the postwar era up until the collapse of the Soviet Union in 1991 – a period marked by widespread devastation across Europe and an uncertain political future – the Nordic countries recognized an opportunity to capitalize on their linguistic and cultural affinity. By formalizing Nordic cooperation, they aimed to amplify their influence and present “a stronger, more unified voice” (Bergum Kinsten & Orava, 2012, pp. 8,9). The Nordic Council (NC) was accordingly established in 1952 as an inter-parliamentary body aimed at promoting stronger international and regional co-operation in the wake of World War II. The year 1952 also saw the realization of the Nordic Passport Union, followed by a common labour market in 1954 and the harmonization of laws,

¹³ While linking development aid to migration management is a common policy approach, research suggests that economic development in recipient countries does not necessarily reduce outward migration as intended. Studies, including those by Hein de Haas (2010), have shown that development often leads to an initial increase in migration due to improved resources and opportunities.

such as the Nordic Convention on Social Security in 1955. Through these initiatives, the Nordic region “pioneered free movement and transnational residence and labour rights decades before other European countries” (Gammeltoft-Hansen & Ford, 2022, p. 2).

Building on these efforts, the establishment of the Nordic Council of Ministers (NCM) in 1971 marked a further step in formalizing inter-governmental cooperation among the Nordic countries (Bergum Kinsten & Orava, 2012, p. 13). It falls under the responsibility of the Ministers for Nordic Cooperation, as stipulated by the 1962 Helsinki Treaty which regulates cooperation between the Nordic countries. According to this Treaty, “...co-operation ministers assist the [Nordic] prime ministers in the coordination of Nordic issues” (The Nordic Council and the Nordic Council of Ministers, n.d.). The NCM is responsible for implementing common policies and coordinating cooperation across various policy areas, including social affairs, culture, environment, research and education – areas vital for sustaining and strengthening a shared ‘Nordic identity’ (Etzold, 2020, p. 14).

To better understand the nature of Nordic cooperation that takes place within and beyond these formalised structures, Stie and Trondal (2020) have developed a ‘conceptual grammar’ that provides a useful analytical framework for understanding and capturing the “great variety and differentiation” in Nordic cooperation (Stie & Trondal, 2020, p. 1). Their framework outlines three ‘theoretical images’ to describe the varying levels of integration within Nordic cooperation. The first image – referred to as One Common Political Order – suggests that Nordic cooperation is “characterized by deep integration into one political order”, where political institutions at the Nordic level, e.g. the NC and NCM, have significant authority to influence and coordinate policies independently of national governments (Stie & Trondal, 2020, p. 2). The second image – Largely Absent Cooperation – depicts a situation where Nordic cooperation is “weak, disintegrated, hollowed-out and characterised by separate policy agendas driven by non-cooperating states and administrative bodies” (Stie & Trondal, 2020).

The third image is that of Differentiated Integration. According to Stie and Trondal (2020) this is the description most applicable to contemporary Nordic cooperation, i.e. Nordic cooperation in the wake of EU integration. This image depicts a model where Nordic cooperation is not uniform across all policy areas but is instead characterized by varying levels of integration depending on the policy area, timing and specific national interests (Stie & Trondal, 2020, p. 3). They argue that this differentiated model allows Nordic cooperation to remain flexible and resilient as faltering cooperation in one policy domain does not necessarily result in faltering cooperation in another (Stie & Trondal, 2020, p. 5).

The depiction of Nordic cooperation as characterized by differentiated integration aligns with Etzold's (2020) analysis of the recent structural and procedural changes within the Nordic Council of Ministers since 2014, as well as Læg Reid and Rykkja's (2020) findings on Nordic administrative collaboration. Etzold highlights that, while the NCM provides formal structures for cooperation, it often lacks the capacity to influence national policy decisively due to the absence of mechanisms like majority voting or an opting-out system. As a result, cooperation within the NCM tends to be pursued selectively based on mutual interest, which leads Etzold to conclude that the NCM is best understood through the lens of differentiated integration. In essence, this means that cooperation within the NCM allows countries to integrate at different speeds without forcing consensus in politically challenging areas such as foreign policy, security, and immigration and asylum policy (Etzold, 2020, pp. 17,18). However, according to Etzold the reticence towards formalised cooperation in these areas has resulted in the emergence of informal cooperation to address these gaps (Etzold, 2020, pp. 17-18).

This aligns with Læg Reid and Rykkja's (2020) findings that much of the Nordic administrative collaboration takes place at the civil-servant level through informal networks and direct partnerships. These networks, sometimes far removed from the bureaucratic formalities of the NCM, allow for a more flexible, responsive form of "soft and dialogue-based" cooperation, characterized by "bottom-up negotiation processes regarding goals and targets" (Læg Reid & Rykkja, 2020, p. 22). It is in this informal, decentralized space that much of the real work of Nordic cooperation seems to happen. A telling example of this is that, among the 32% of Norwegian central government civil servants who in 2016 reported contact with public bodies in other Nordic countries, only 17% had done so within the context of a formal Nordic committee or working group. However, there was a statistically significant correlation between participation in such working groups and maintaining contact with other Nordic public bodies (Læg Reid & Rykkja, 2020, p. 26), suggesting that participation in these more formalized forums can indeed promote informal cooperation. However, Læg Reid and Rykkja found that the scope of Nordic cooperation varies significantly with the civil servants' "organizational affiliation, position, and main tasks" (Læg Reid & Rykkja, 2020, p. 28). Civil servants in leadership positions, with planning and coordination as their main tasks, seem to be "more integrated into a Nordic contact pattern" in comparison to those focused on organizational development or reorganization, which is more internally focused (Læg Reid & Rykkja, 2020, p. 28).

According to Stie and Trondal, this form of cooperation is particularly important in technical and administrative areas, where agencies from different Nordic countries can work together more effectively without needing formal political mandates from the NC or NCM. As they note, “Nordic cooperation is vibrant and largely facilitated by agency-to-agency cooperation and only weakly coupled to the Nordic Council (NC) and Nordic Council of Ministers (NCM)” (Stie & Trondal, 2020, p. 2), underscoring the informal and pragmatic nature of cooperation in the region. This highlights that while the NC and NCM provide a necessary institutional foundation, the real engine of Nordic cooperation often lies in these decentralized, sector-specific networks.

Thus, as outlined by Stie and Trondal the nature of Nordic cooperation, with its emphasis on differentiated integration and agency-to-agency collaboration, demonstrates that Nordic institutionalism is not a monolithic structure but a dynamic, adaptable system. This flexibility allows the Nordic region to maintain a coherent identity while navigating the complexities of international and EU relations, leveraging both formal and informal cooperation mechanisms to achieve common goals.

2.3 Political and EU influences on migration policies in the Nordics

The Nordic region has historically been characterized by a convergence and consensus across various policy areas that include labour market policy, the welfare state, and international aid. In the realm of human mobility and refugee rights, the Nordic states – particularly Sweden, Denmark and Norway – have also traditionally been seen as “liberal forerunners” exemplified by their early adoption of the 1951 Geneva Convention Relating to the Status of Refugees, with Denmark even chairing the negotiations (Gammeltoft-Hansen & Ford, 2022, p. 2). Legislation on migration and integration has been similarly progressive at the national levels. For example, the Nordic countries introduced forms of complementary and humanitarian protection before these concepts had been established internationally (Gammeltoft-Hansen & Ford, 2022, p. 2).

However, the image of a shared Nordic approach to immigration and human mobility, based on principles of humanitarianism and progressiveness, is increasingly under scrutiny.¹⁴ This scrutiny is not unjustified. In recent decades, the Nordic countries have pursued noticeably different policy pathways regarding human mobility and immigration, with several examples of divergent interpretations of international migration and refugee law

¹⁴ See for example Ciesnik (2023), O’Sullivan (2023), Traub (2021) and Peroni (2021).

(Gammeltoft-Hansen & Ford, 2022, p. 2). This has led researchers such as Brochman and Hagelund (2011, p. 13) to conclude that when it comes to questions of migration, “the Nordic countries appear as peripheral and in no way as one *model*”. Denmark, Finland, and Norway, for example, have pursued more restrictive approaches since the early 1990s, while Sweden – up until 2015 – maintained one of the most generous refugee policies in Europe (Etzold, 2017). The fact that Sweden has traditionally been the most generous, welcoming and inclusive country, while Denmark has been the most restrictive, has been asserted in several previous comparative studies on the inclusion of refugees and immigrants in the Nordic region¹⁵ (Garvik & Valenta, 2021, p. 14).

One might naturally attribute the significant variations in immigration policies among the Nordic countries – especially between Sweden and Denmark – to differences in the composition of their migrant populations in terms of country of origin and reason for immigrating. However, this analysis falls short, as the types of migrants entering the Nordic countries – at least Sweden, Denmark and Norway – have been relatively uniform since the 1970s (Brochman & Hagelund, 2011, p. 15). Migration was initially characterized by significant labour migration between the Nordic countries (primarily from Finland to Sweden) and from Southern Europe and Turkey. This was followed by relatively high proportions of humanitarian migration, particularly from the Middle East and the Global South, after the introduction of ‘immigration stops’ in the mid-1970s rerouted migration for labour to other channels such as asylum and family reunification (Cooper, 2005; Swedish Migration Agency, 2022a; Wium Olesen, Elkjær Sørensen, Borring Olesen, & Farbøl, 2019).

External factors, such as the war in Yugoslavia and political turmoil in the Middle East, also contributed to the predominance of refugee migration to Sweden, Denmark and Norway during the 1980s and 1990s. It was also during this period that Finland switched from being a country of net emigration to a country of immigration. However, immigration to Finland during the 1980s was mainly characterized by Finnish returnees from primarily Sweden and Russia. It was not until the 1990s that Finland began to see significant immigration from third-country nationals (Korkiasaari & Söderling, 2003, p. 7). As a result, the immigration of third-country nationals was a marginal political issue in Finland in the post-World War II era. This changed, however, in the mid-1980s when Finland, like its Nordic neighbours, began to see an increase in refugee migration (Hinnfors & Jungar, 2024, p. 48). Similar to Finland, migration to Iceland was a limited phenomenon during the 20th century. However, this has

¹⁵ It should be noted that most of the previous research cited in Garvik and Valenta (2021) focuses primarily on the ‘Scandinavian’ countries, i.e., Sweden, Denmark and Norway, thus excluding Finland and Iceland from the comparative analysis.

changed in the last 20 years, as the proportion of immigrants in Iceland's population has steadily increased from 3.6% in 2001 to more than 16% in 2022 (Statistics Iceland, 2022; Meckl & Gunnþórsdóttir, 2020, p. 5). While there has been a surge in refugee migration to Iceland in the last couple of years, mainly as a result of the Russian invasion of Ukraine, since the turn of the century, immigration to the country has primarily been characterized by labour migration from mainly Poland, Romania and Lithuania.

However, while the *type* of migration might have been relatively uniform across the Nordics (at least when considering Sweden, Denmark and Norway), the *size* of immigration has differed quite significantly. In Sweden, which is the largest country by population, the proportion of the foreign-born population is 20% (SCB, 2024). The size of the foreign-born population in Norway is similar to that in Iceland, with foreign-born residents making up 16.7% of the population (although the demographic change in Norway has not been quite as dramatic as that in Iceland). In Denmark, immigrants currently make up 12% of the Danish population (Statistics Norway, 2024; Statistics Iceland, 2022; Statistics Denmark, 2024). Out of the Nordic countries, Finland has the lowest proportion of foreign-born individuals in its population, amounting to 6.7% in 2023 (Tilastokeskus, 2023).

The demographic changes resulting from immigration have had significant political and social implications across all the Nordic countries. The arrival of refugees and asylum seekers to Sweden, Denmark and Norway during the 1980s and 1990s, along with their needs for services and integration into the welfare state, became a key topic in national political debates about immigration and integration, and has remained near the top of the political agenda ever since (Brochman & Hagelund, 2011, p. 17). In Norway, for instance, the increase in asylum seekers contributed to the electoral success of the anti-immigrant Norwegian Progress Party (*Fremskrittspartiet*). In the 1987 local government elections, the party campaigned not only against asylum immigration but also against the perceived preferential treatment these individuals received from the welfare state. Special measures and benefits were a key part of the party's rhetoric, portraying migrants as recipients of welfare benefits at the expense of Norwegian-born citizens (Brochman & Hagelund, 2011, p. 17).

The Norwegian Progress Party's namesake, the Danish Progress Party (*Fremskrittspartiet*), had enjoyed a significant following since the 1970s with its right-wing, anti-taxation platform. However, because of increased refugee migration in the 1980s, immigration became increasingly incorporated into the party's key concerns (Brochman & Hagelund, 2011, p. 17). Eventually, the more immigration-critical faction of the party broke away and formed the nationalist

Danish People's Party (*Dansk Folkeparti*) in 1995. While the Danish People's Party saw a period of significant growth in the years following its founding, the same cannot be said for its Swedish counterpart, New Democracy (*Ny Demokrati*), which combined criticism of immigration with liberal economic policies (Hinnfors & Jungar, 2024, p. 85). New Democracy had short-term success, securing 6.7% of the votes in the 1991 election, but then lost all of their parliamentary seats in the 1994 elections, receiving only 1.2% of the votes (Swedish National Election Studies, 2020; Brochman & Hagelund, 2011, p. 17).

The success of the anti-immigration parties in Denmark and Norway during the 1990s and early 2000s illustrates that, unlike Sweden's New Democracy party, they were "able to take advantage of the situation and profit politically on popular scepticism against immigration" (Brochman & Hagelund, 2011, p. 17). As a result, while the Norwegian Progress Party and Danish People's Party were able to contribute to significantly tighter immigration policies in their respective countries during the early 2000s, Sweden maintained a more liberal approach, which was further strengthened under the Reinfeldt government in the years 2006–2014 (Hinnfors & Jungar, 2024).

In addition to the influence of immigration-critical parties on domestic politics since the late 1990s, the countries' relationships with the EU have also shaped their divergent national policies and practices on migration-related matters. Sweden and Finland, for instance, are the only Nordic countries fully bound by EU law and the jurisdiction of the EU Court of Justice in the areas of migration and asylum. Moreover, while as non-members Norway and Iceland are not bound by the Charter of Fundamental Rights of the European Union, they are still party to and thus observe the rights and principles recognised by the European Convention for the Protection of Human Rights and Fundamental Freedoms and its Protocols (ECHR). As such, they are bound by the legal protection obligations stemming from the Convention and its legal interpretations through the European Court of Human Rights (ECtHR). This includes the principle of non-refoulement, and its scope is considered to be broader in the ECHR than in the 1951 Geneva Convention (Wijnkoop, Pronk, & Neumann, 2024, p. 9).

Finally, Denmark holds a unique position of 'soft-Euroscepticism' when it comes to its relationship with the EU and its common rules in the area of migration and asylum (Wijnkoop, Pronk, & Neumann, 2024, p. 1). When Denmark became the first Nordic country to join the European Community (the predecessor to the EU) in 1973, it was "cautiously committed" to all aspects of the policies of the community (Dubinka-Hushcha, 2020). However, as the scope of the EU expanded, Denmark negotiated four major derogations or opt-outs from EU cooperation. These original four opt-outs concerning the Monetary Union (EMU), Common Security and Defence Policy (CSDP), Justice and Home Affairs (JHA),

and Citizenship of the European Union, were established through the Edinburgh Agreement of 1992 following Denmark's initial rejection of the Maastricht Treaty, which aimed to further European integration.

The Danish opt-out on Justice and Home Affairs means that the country does not participate in a large part of the Common European Asylum System (CEAS). Unlike EU Member States Sweden and Finland, Denmark is therefore exempt from implementing the obligations stemming from the EU's New Pact on Migration and Asylum, formally adopted by the European Commission on 14 May 2024, into its national legislation. Denmark is also not formally bound by the EU Qualification Directive (2011/95/EU), which establishes common standards for the qualification of third-country nationals or stateless persons as eligible for international protection. Specifically, Danish law excludes Article 15 of the Qualification Directive, which offers subsidiary protection to those facing the death penalty, execution, torture, or threats to life due to indiscriminate violence in situations of international or internal armed conflict (Directive 2011/95/EU, p. 18). As a result, many asylum seekers from Afghanistan, Iraq and Somalia, who often receive subsidiary protection in other EU states, have been largely denied such protection in Denmark (Kreichauf, 2020, p. 52).

However, Protocol No 22 on the position of Denmark, appended to the Treaty on European Union and the Treaty on the Functioning of the European Union, does leave Denmark the possibility to opt-in on certain legislative proposals and measures that build on the Schengen acquis (Protocol (No 22) on the position of Denmark, 2012, p. 326). This possibility has been applied by Denmark in its adoption of the EU Return Directive from 2008 (Directive 2008/115/EC, 2008),¹⁶ which sets common standards and procedures in Member States and Schengen countries for returning third-country nationals who do not or who no longer fulfil the conditions for entry, staying or residence in a Member State.¹⁷

¹⁶ Though Denmark has ratified the Return Directive (2008/115/EC) on a bilateral level, only select aspects of it have actually been implemented in national legislation (Kalir, et al., 2021, p. 133).

¹⁷ These common standards include rules on the issuing and enforcement of return decisions, issuing of entry-ban decisions, and the use of detention. The Directive states that these measures should be implemented "in accordance with fundamental rights as general principles of Community law as well as international law, including refugee protection and human rights obligations" (Directive 2008/115/EC, p. 100). Specifically, Article 5 of the Agreement stipulates that Member States shall take "due account" of the best interests of the child, family life and the state of health of the third-country national concerned, as well as respect for the principle of non-refoulement (Directive 2008/115/EC, p. 102). The Directive also places an emphasis on prioritizing voluntary returns, stipulating that a return decision needs to provide for an appropriate period for voluntary departure of between seven and thirty days. The Directive nonetheless allows for wide interpretation as regards the grounds on which a voluntary departure can be refused, resulting in different practices among Member States (Dumbrava & Radjenovic, 2024, p. 5).

While all Nordic countries, through the application of the Return Directive, can be considered fully integrated into the internal dimensions of EU return policy, the same cannot be said to apply when it comes to the external dimensions of EU policymaking on returns. The external dimensions are primarily focused on enhancing cooperation on readmission with non-EU countries (third countries) through, for example, the conclusion of EU readmission agreements (EURAs). These agreements, which are treaties between the EU and third countries that establish the procedures for the return of individuals who do not have a legal right to stay in the EU, are not considered to form part of the Schengen acquis. As such, Iceland and Norway are excluded from the development of the common readmission policy. Through its opt-out, Denmark is also excluded from participating in readmission agreements negotiated by the EU (Coleman, 2009, p. 52 & 109).

However, on 15 March 2000, the Committee of Permanent Representatives of the Governments of the Member States to the European Union (Coreper) decided that Norway and Iceland should receive regular updates on the conclusion of EURAs. Additionally, Coreper included two standard declarations in each EURA text addressing the special status of Denmark, Norway and Iceland (Coleman, 2009, p. 109). The declaration concerning Norway and Iceland underscores the “close relationship between the European Union and the Republic of Iceland and the Kingdom of Norway” and highlights the appropriateness of concluding bilateral readmission agreements under similar terms to the EURAs (see for example p. 52 of the Agreement between the European Union and Georgia on the readmission of persons residing without authorisation, 2011). The declaration regarding Denmark, while noting Denmark’s exclusion from the EURAs, similarly highlights that it would be “appropriate” for the contracting third country to conclude a bilateral readmission agreement with Denmark on the same terms as the EURA in question.

Thus, while the Nordic countries’ relationships with the EU and their participation in readmission agreements may differ, they are all affected by the broader EU framework on migration. These agreements have shaped national policies, particularly in the realm of return and readmission, highlighting the interplay between EU-level initiatives and national sovereignty. As Nordic countries continue to navigate this complex landscape, the focus on return policies has gained prominence in recent years, marking a shift towards more restrictive approaches to migration governance throughout the region.

2.4 The post-2015 'return turn' in the Nordic region: a paradigm shift

As previously described, the Nordic countries have *historically* been recognized for their humanitarian and progressive stance on migration and asylum, with policies reflecting a commitment to international refugee protection and integration. However, as outlined in the section above, this image of a unified Nordic approach has been increasingly challenged by divergent national policies and varying interpretations of international migration law since the early 1990s, when the varying influence of anti-immigration parties on national policymaking created a rift between the Nordic countries in their approach to refugee immigration in particular.

These differences became particularly pronounced in the immediate aftermath of the significant arrival of asylum seekers in 2015, with noticeable differences in how the Nordic countries responded to the situation. These initial differences reflected varying national priorities and political landscapes, with some countries, like Denmark, quickly adopting more restrictive measures such as reducing asylum-seeker benefits and reintroducing border controls; while Sweden, throughout the summer and early autumn of 2015 maintained more open policies, emphasizing a "humanitarian position on welcoming refugees" (Hagelund, 2020, pp. 7, 11).

However, by late 2015 Sweden also pivoted towards a more restrictive approach, introducing tighter border controls, making temporary residency the norm for protection seekers, and implementing stricter requirements for permanent residence and family reunification (Hagelund, 2020, p. 8). The Swedish Prime Minister at the time, Stefan Löfven, stated in a press conference preceding the changes that new legislation was needed to "provide a breathing space for Swedish refugee reception" (Wiese Edeler, 2015). This policy shift in Sweden marked the beginning of what researchers like Hernes (2018) describe as a "goal convergence" among the Nordic countries, where all aimed to use integration policies to decrease the number of asylum seekers.

The legislative changes that underpinned this goal convergence can be seen as the beginnings of the 'paradigm shift' in how the Nordic countries approach migration management, shifting their focus towards more restrictive measures and the return of migrants. This paradigm shift, also referred to as the 'deportation turn' or return turn, marked a departure from the earlier – albeit since the 1990s somewhat eroded – emphasis on integration and long-term settlement, refocusing migration policies on managing 'flows' and facilitating the return and readmission of those deemed ineligible for asylum or whose protection needs were considered temporary.

This paradigm shift or return turn in the Nordic region belongs, however, to a broader development of what researchers have termed the ‘deterrence paradigm’, which, since the end of the Cold War, has increasingly taken precedence over ideologically driven refugee protection in the Global North (Gammeltoft-Hansen & Tan, 2017, p. 29). At the core of this paradigm shift lies the adoption of deterrence strategies – defined by Gammeltoft-Hansen (2017, p. 107) as “policies intended to discourage or prevent migrants and refugees from either arriving in the territory of a prospective destination state or accessing its asylum system”. These strategies can be categorized as *direct* or *indirect*. Direct deterrence typically involves non-admission measures such as stricter border controls and non-arrival measures aimed at preventing access to asylum territories through migration controls. Examples include expedited deportations and return procedures. In contrast, indirect deterrence does not explicitly prevent access to asylum but instead employs policies that are “designed to make asylum systems and protection conditions appear as unattractive as possible” (Gammeltoft-Hansen T. , 2017, p. 100). Examples of indirect deterrence include restrictive integration measures, cuts to social welfare benefits, and limitations on family reunification. In essence, direct deterrence, sometimes referred to as ‘defence measures’ (see for example Norman and Tennis (2020)), targets migrants’ physical ability to enter or remain in a host state, whereas indirect deterrence seeks to undermine their motivation to do so.

While Denmark, in particular, had been a forerunner in applying both direct and indirect deterrence measures before 2015 (Gammeltoft-Hansen T. , 2017), the refugee crisis nonetheless acted as a pivotal moment, prompting the introduction of increasingly restrictive migration policies across the Nordic region. The convergence of the Nordic countries’ approaches to the adoption of deterrence measures, particularly through the lens of the return turn, illustrates a broader alignment with global trends in migration governance that prioritize control and efficiency over humanitarian commitments and protection. The following sections delve into how this paradigm shift unfolded in each Nordic country, offering a closer look at the specific policies, practices and national contexts that have shaped the return turn in Denmark, Sweden, Norway, Finland and Iceland. These deep dives reveal the nuanced and, at times, divergent paths that define the Nordic region’s approach to migration management in the post-2015 era.

2.4.1 Denmark

In Denmark, the focus on returns became a central pillar of its asylum and migration policy through a series of legislative changes starting in 2015. That year, Denmark introduced temporary protection status as a separate asylum category, shifting its policy focus “from integration to return, from permanent residence to revocation of protection” (Wijnkoop, Pronk, & Neumann, 2024, p. 4). The Danish Government justified these changes as necessary to make the country “less attractive” to asylum seekers and to ensure that refugees could be sent back as soon as conditions in their home countries permitted (Kreichauf, 2020, p. 54; Vedsted-Hansen, 2022, p. 17). As part of the Government’s efforts to encourage people whose asylum applications had been rejected to cooperate with the authorities on their return, Denmark opened its first return centre in Sjælsmark, north of Copenhagen, in February 2015. These centres, where migrants without permission to stay in Denmark can be required to remain until their departure, represented “a new political innovation” aimed at signalling to rejected asylum seekers that they had reached “the last stop in Denmark” and had to return to their country of origin (Lindberg, 2022, p. 94).

The real paradigm shift in Danish migration policy, however, was announced in 2019, following a proposal from the Danish People’s Party in 2017 (Vedsted-Hansen, 2022; Lindberg, 2022). The proposal eventually resulted in a comprehensive reform that amended multiple laws, including Denmark’s Aliens Act, Integration Act and Repatriation Act. As part of the pronounced focus on returns, the Government also renamed the existing integration programme to the “self-provision and return programme”. Additionally, the integration benefit was rebranded as the “self-provision and return benefit” (Vedsted-Hansen, 2022, p. 20). Moreover, the Government restricted various rights for those granted temporary protection, including family reunification – a move later modified after the European Court of Human Rights held it to be in violation of Article 8 of the ECHR (Vedsted-Hansen, 2022, p. 31).

The Danish Return Act (Lov nr 982 af 26/05/2021 om hjemrejse for udlændinge uden lovligt ophold (hjemrejseloven)), passed in 2021, further consolidated Denmark’s approach. It was the first law explicitly designed to ensure that individuals without legal residency are returned to their countries of origin. The Act introduced guidelines for return processes, including incentives for voluntary return such as offering rejected asylum seekers a cash bonus of DKK 20,000 to withdraw their appeals and return home (Danish Return Agency, 2021). Minister of Immigration and Integration, Mattias Tesfaye, described the law as a crucial “next step towards a coherent return and readmission policy” (Danish Return Agency, 2021). Alongside this, the Danish

Government established the Return Agency (*Hjemrejsestyrelsen*) in 2020 to enforce these return policies as well as the establishment of new return centres (Danish Return Agency, 2021).

In tandem with the Return Act and the establishment of the Danish Return Agency, amendments to the Aliens Act allowed for the transfer of asylum seekers outside the EU, placing the responsibility for returning rejected asylum seekers on the third country processing the asylum request (DRC, 2022, p. 2). Although the amendment has yet to be put into practice,¹⁸ arguably it has symbolic significance, as illustrated by Tesfaye's comment on the introduction of the amendment "[i]f you apply for asylum in Denmark, you will be sent back to a country outside Europe, and therefore we hope that people will stop seeking asylum in Denmark" (ECRE News, 2021).

The changes introduced in 2021 have contributed to the characterization of the Danish legislation in this area as unique in its adoption of legal mechanisms to transfer asylum seekers outside Europe (Tan & Vedsted-Hansen, 2021). However, this unique position is not new, as it springs from a long-standing Danish focus on the externalization of asylum procedures. In fact, Denmark was one of the first countries to develop and discuss ideas on externalizing asylum procedures, putting forward a draft resolution in the United Nations General Assembly in 1986 which proposed creating UN centres where asylum claims could be processed (Leclerc, Mentzekopoulou, & Orav, 2024, p. 1).

In line with its reputation as a forerunner of externalizing EU management of asylum and migration, Denmark recently headed a group of 15 EU Member States to issue a joint statement calling for new solutions to address irregular migration to Europe. The statement, which was made public on 17 May 2024, calls for the outsourcing of migration and asylum policy and the partial shifting of tasks from national authorities in Member States to third countries outside the European Union (Liboreiro, 2024). The statement also highlights that the return of those not in need of international protection is crucial for an EU-wide response to managing irregular migration. To ensure more effective return systems, the signatory states thus propose that the EU should look into "potential cooperation with third countries on return hub mechanisms, where returnees could be transferred to while awaiting their final removal" (Stoyanov, et al., 2024, p. 3).

¹⁸ In May 2021, Danish news media reported that the country had signed a Memorandum of Understanding (MoU) with Rwanda on asylum matters; however this was later refuted by the Danish Minister of Immigration and the Rwandan Ministry of Foreign Affairs and International Cooperation, who claimed no such agreement had ever been reached (Lemberg-Pedersen, Whyte, & Chemlali, 2021).

2.4.2 Sweden

In Sweden, although return policy had already become a growing priority over the past decades – a notable example being the 49% increase in the budget for deportation enforcement between 2011 and 2022 (Lindberg, 2022, p. 35) – the refugee crisis brought the issue into sharper focus. Both left- and right-wing parties emphasized the need for more effective return procedures, including enhanced identification measures and detection of irregular migrants, and the deployment of special liaison officers at key embassies and consulates abroad (Vera Larrucea, Malm Lindberg, & Asplund, 2021, p. 45). Legislative changes in 2016–2017 further clarified the division of responsibilities between government agencies for enforcing return decisions (Malm Lindberg, 2020, p. 28).

Moreover, in June 2022, the Government tasked the Swedish Migration Agency, the Swedish Police Authority, and the Swedish Prison and Probation Service with streamlining return activities. They were instructed to increase the number of deportations by 50% in 2023 compared to 2021, and to report on the progress of their return activities (The Swedish Government, 2024, p. 15). Simultaneously, an inquiry chair was appointed to propose measures to strengthen return processes (Swedish Ministry of Justice, 2022).

However, a significant shift in emphasis occurred during autumn 2022 with the formation of the current coalition government under current Prime Minister Ulf Kristersson. While the previous government had focused on “ensuring a long-term sustainable migration policy that safeguards asylum rights”, the Kristersson government has pursued what they describe as a more “responsible” and “restrictive” migration policy (The Swedish Government, 2024, p. 5). This approach includes a heightened focus on returns, with measures aimed at ensuring that “those without legal grounds for residence in Sweden leave the country” (The Swedish Government, 2024, p. 5). Moreover, in the 2025 Budget Bill (Govt Bill 2024/25:1), the Kristersson government emphasized that “a well-functioning return system is a crucial part of implementing the paradigm shift in migration policy” (The Swedish Government, 2024, p. 28). While framed by the Government as a paradigm shift, this policy direction can also be understood as a continuation of the increasingly restrictive and deterrence-focused migration policies that gained momentum in the aftermath of the refugee crisis.

In line with this deterrence-focused approach, and following in the footsteps of its southern neighbour, the Government instructed the Swedish Migration Agency in June 2023 to establish return centres for asylum seekers who had received return orders. The Agency was also tasked with actively motivating those placed in these centres to return voluntarily, providing advice, guidance and practical support. Five centres with a total of approximately 1,200 places are now operational in Sigtuna, Burlöv, Malmö, Mölndal and Stockholm, with

the largest centre in Sigtuna hosting around 500 places. The Government has announced that its intention is for asylum seekers to reside in reception centres while their applications are processed, and for those with enforceable expulsion orders to stay in return centres until they leave the country (The Swedish Government, 2024, p. 15).

Consistent with the heightened focus on return, the current government also allocated additional funding in the 2024 budget to expand detention facilities, i.e. secure facilities which are primarily used to ensure that individuals are available for departure and to prevent them from evading or otherwise obstructing the return process. The Government has also announced that it has intensified political dialogue with third countries that do not adequately cooperate on returns. This includes leveraging other policy areas such as visa, trade, aid¹⁹ and foreign policy in order to pressure partner countries into better cooperation, notably by increasing the use of development cooperation as leverage in the 2024 budget (The Swedish Government, 2024, p. 28).

2.4.3 Norway

Norwegian and Finnish policymaking on returns post-2015 has followed a similar trajectory to that in Sweden and Denmark. Reflecting a broader Nordic trend, numerous changes have been introduced in recent years with the aim of restricting the possibilities for obtaining residence in both countries. Many of the changes introduced in Norway have been adopted as a result of the political majority in Norway being of the opinion that “too many migrants” have entered Norway in the last decades (Bahus, 2024). In line with the heightened focus on temporary protection in the immediate aftermath of the refugee crisis throughout the region, the Norwegian Government increased its focus on cessation (Immigration Act, § 37) and revocation (Immigration Act, § 63).²⁰

¹⁹ In October 2024, the Swedish Government presented its new strategy for Sweden's international development cooperation on migration, returns and voluntary repatriation. The strategy was allocated SEK 3 billion for the period 2024–2028 and is part of Sweden's development aid framework, aiming to strengthen synergies between migration and development policies. Its primary goals are to address challenges related to irregular migration and forced displacement, as well as to promote returns and voluntary repatriation (Swedish Ministry for Foreign Affairs, 2024). The strategy explicitly states that “[a]ctivities should, to the extent possible, be carried out in collaboration with the Nordic countries, not least to strengthen local capacity and infrastructure for returns such as return centres [*translation from Swedish*]” (Swedish Ministry for Foreign Affairs, 2024, p. 4). However, since this strategy was announced after the empirical phase of this report had been completed, we were unable to ask our respondents about it and have thus not been able to examine in detail what implications it might have for Nordic cooperation in this policy area.

²⁰ While *revocation* refers to the formal withdrawal of a status or right previously granted to a foreign national with permanent residency or citizenship, *cessation* pertains only to refugees with temporary protection.

While this did not result in amendments to the Act itself, it did lead to a series of instructions to the Directorate of Immigration (UDI) from the Ministry of Justice and Public Security following a political agreement between a majority of the parties in the parliament (Brekke, Vedsted-Hansen, & Stern, 2020, p. 17).

Moreover, following the 2017 elections, the Solberg coalition government made it one of their key priorities “to effectively return rejected asylum seekers and people without legal residence” (EMN, 2019). This ambition, formulated in a context where the practice of cessation and revocation had led to a situation where a number of people had lost their permission to stay but had not been returned to their countries of origin,²¹ was expressed in the 2018 Political Platform of the Norwegian Government. The Platform explicitly stated the Government’s continued commitment “to force the return of illegal immigrants and facilitate more assisted returns” (Regjeringen Solberg, 2018, p. 28). The 2018 platform also expressed the Government’s ambition to use Norway’s position and role as an aid donor to secure readmission agreements with third countries (Regjeringen Solberg, 2018, p. 11).

The focus on returns has remained consistent in Norway, even after the government changed in 2021, when the Høyre-led government under Erna Solberg lost its majority. The current government, under the leadership of Jonas Gahr Støre, has maintained an emphasis on reducing the number of asylum seekers without protection needs, accelerating the settlement process for those granted residency, and ensuring quicker returns for those without legal residency (Ministry of Justice and Public Security, 2024a). Return has been upheld as a “central instrument in achieving one of the main objectives of the justice and public security sector, namely that of controlled and sustainable immigration” (Ministry of Justice and Public Security, 2024b). In March 2023, the Ministry of Justice and Public Security presented a new comprehensive Return Strategy for the period 2023–2029. The primary goal of the strategy is to ensure that “persons without legal residence shall return to their country of origin or to another country where they have a legal right to stay” (Ministry of Justice and Public Security, 2023). This objective is supported by five priority areas: effective and lawful returns; national cooperation and coordination; European return cooperation; cooperation with countries of origin; and sustainable return and reintegration. This Return Strategy arguably

²¹ In 2018 and 2019, analyses of the Directorate of Immigration’s practices in Norway revealed that the revocation and cessation processes had led to numerous open cases. Particularly among Somali nationals, many cases remained unresolved for extended periods. Out of the 1400 individual cessation procedures initiated related to Somali nationals, only 300 were actually processed and only 30 cases ended with the cessation of temporary protection permits. Out of these 30 cases, none could be forcefully returned during the period covered (Brekke, Vedsted-Hansen, & Stern, 2020, p. 20).

reaffirms Norway's ongoing commitment to returns as a central pillar of its immigration policy, aligning with the broader Nordic return turn, and the introduction of more restrictive migration policies following the 2015 refugee crisis.

2.4.4 Finland

In Finland, policymaking on returns has similarly aligned with this regional shift, with significant amendments to Finland's Aliens Act (*Ulkomaalaislaki*) in the years following the refugee crisis. Notably, in 2015 a provision was introduced that established a timeframe of "at least seven and at most thirty days" for voluntary return following a decision on expulsion or deportation. In 2020, another provision was added, mandating the Non-Discrimination Ombudsman to oversee the enforcement of deportations from the country at all stages. While these and other amendments to the Act have primarily been driven by the need to comply with EU legal obligations, such as the Return Directive, according to Palander and Pellander (2022), they also reflect a growing perception of immigration, particularly for humanitarian reasons, as a threat to Finland's national security.

Building upon the anti-immigration sentiments prompted by this securitized discourse, further amendments to the Finnish Aliens Act are anticipated. The current Government Programme of Prime Minister Petteri Orpo, formed following the 2023 Finnish parliamentary election, includes several measures to reform Finland's migration policy. These measures aim to "offer assistance to the most vulnerable people and prevent abuse of the system" (Finnish Ministry of the Interior, 2024). Notably, the programme aims to tighten Finnish asylum policy to align with the policies of other Nordic countries, including new legislation that will reduce the period of validity for international protection to the minimum permitted under EU law (Finnish Government, 2023, p. 220). These changes mirror the amendments made to the Danish Aliens Act in 2015 and the Swedish Aliens Act in 2021, which mandate that residence permits granted to individuals in need of protection are generally temporary.

Return is also specially mentioned in the programme, outlining plans to introduce more stringent provisions and best practices in line with the provisions of the EU Qualification Directive, the Asylum Procedures Directive, and the Return Directive. The programme also makes explicit the goal to return rejected asylum applicants to their countries of origin "as soon as possible" (Finnish Government, 2023, p. 220). To achieve this objective, the Government intends to implement targeted return counselling starting at the asylum application interview. Additionally, the amount of assistance for voluntary return will be increased to match levels in reference countries. The

use of reporting and residence obligations²² will also be expanded to ensure the enforcement of expulsion orders. Moreover, the programme also explores the possibility of imposing prison sentences for illegal stays in the country, considering the impact on public finances. Additionally, for those staying or residing in the country without permission, the right to anything other than urgent health and social services and social security will be withdrawn, restoring the legal situation to that which existed before the previous parliamentary term. The Government also intends to follow the example of Denmark by opening up the possibility of returning people staying or residing without permission in Finland to third countries when they cannot be returned to their home countries, and to making bilateral financial assistance to third countries conditional upon the country readmitting their citizens who are to be returned (Finnish Government, 2023, pp. 222-223).

Finland's new government has described these changes as part of a larger paradigm shift in immigration policy,²³ mirroring the rhetoric used by policy-makers across the Nordic region. Finland's participation in the May 2024 joint statement issued by 15 EU Member States calling for new solutions to address irregular migration, including cooperation with third countries on return hubs, further underscores this alignment with the broader regional shift.

2.4.5 Iceland

As outlined above, the refugee crisis of 2015 catalysed a convergence in migration policies across the Nordic region with a heightened emphasis on return – particularly in Denmark, Sweden, Norway and Finland. However, Iceland presents a somewhat different case. Due to its geographical isolation, Iceland was only moderately affected by the high number of migrants arriving in Europe during 2015.

The country's shift towards more restrictive policies and an intensified focus on return occurred rather more recently, in response to a significant increase in arrivals of Venezuelan and especially Ukrainian refugees between 2021 and 2022 (Horwood, 2024). Iceland's right-of-centre ruling coalition, with support from the anti-immigration People's Party, introduced significant changes to its

²² The Finnish Aliens Act (301/2004) provides for both a 'reporting obligation' (*anmälningskyldighet*) and a 'residence obligation' (*boendeskyldighet*) as measures to ensure that individuals subject to deportation or removal orders remain accessible to the authorities. Under Section 118, individuals may be required to report regularly to the police or border control authorities or a reception centre at regular intervals. Section 120a stipulates that they may also be required to live at a specified address, such as a reception centre, to ensure ease of monitoring and the enforcement of expulsion orders (Ministry of the Interior, Finland).

²³ See for example Dowling (2023).

asylum policies in 2023. In March of that year, the Government passed legislation allowing migration authorities to withhold essential services, such as healthcare and housing, from asylum seekers 30 days after their claims have been refused (Horwood, 2024).

The enhanced focus on deterrence was further demonstrated in November 2023, when the Icelandic authorities – in cooperation with the European Border and Coast Guard Agency (Frontex) – organized the return of 180 Venezuelan nationals, including 25 children, via a direct charter flight to Caracas (Ćirić, 2023a; Ministry of Justice, 2023). According to the Ministry of Justice, all individuals involved had been residing in Iceland as applicants for international protection but had either been denied asylum or withdrawn their applications and had accepted assistance to return voluntarily, in line with Iceland's policy on assisted voluntary return (Ministry of Justice, 2023).

Nevertheless, the removal sparked public protests outside the Directorate of Immigration's office in Hafnarfjörður, where demonstrators voiced concern about the treatment of the returnees and the broader implications of Iceland's evolving migration policy (Ćirić, 2023b; Arnardóttir, 2023a). Media reports also cited accounts from individuals on the flight who alleged that they were not allowed to move freely upon arrival in Venezuela (Arnardóttir, 2023b). In response, the Ministry of Justice initiated follow-up efforts, including sending an email in Spanish to returnees to gather more information about their post-arrival situation (Ministry of Justice, 2023). The Ministry reported that most respondents confirmed they were free to move and in possession of their travel documents, though some claimed that part or all of their financial assistance had been confiscated.

While Iceland's adoption of return measures came later than in the other Nordic countries, these recent developments signal the country's alignment with the broader regional shift towards deterrence-based migration control, illustrating the continued diffusion of the 'return turn' across the Nordic region.

2.5 Uncoordinated responses amid policy convergence

Though implemented at different times and at varying speeds, the paradigm shift or return turn in migration policies across the Nordic region outlined above has marked a significant change from earlier approaches, which focused on protection and long-term integration. Each country has enacted reforms aimed at managing migration more restrictively and ensuring the return of those deemed ineligible for asylum or whose protection needs are

considered temporary. This trend has fundamentally reshaped migration management across the region, signalling a broader movement towards more restrictive and controlled migration policies, where the return of persons without legal residence is considered a central instrument in achieving this.

However, while the paradigm shift towards more restrictive migration policies and a focus on returns highlights a growing convergence in the Nordic countries' approaches, moments of acute migration pressure have exposed persistent limits on regional cooperation. The 2015 refugee crisis, while serving as an impetus for a shared emphasis on return and deterrence across the Nordic region, also revealed a striking absence of coordination between the countries.

One illustrative example of these uncoordinated responses was Sweden's decision to reintroduce border controls at internal borders on 12 November 2015, targeting travellers from Denmark and Germany (SOU 2017:12; Øresundsinstitutet, 2024). These border controls, justified as necessary measures to manage the large 'influx' of migrants, began on the same day at 12:00 PM (SOU 2017:12, p. 298; Øresundsinstitutet, 2024). Initially intended to last for ten days, the controls remain in place to this day. Shortly thereafter, on 4 January 2016, the Swedish Government introduced carriers' liability, requiring transport companies operating buses, ferries and trains to conduct identity checks. This legislation, passed with remarkable speed, was introduced alongside continued border controls, and was aimed at addressing the large numbers of migrants arriving to Sweden from Denmark (SOU 2017:12, p. 358; Øresundsinstitutet, 2024). The rules mandating identity controls for travellers from Denmark to Sweden were initially in effect from 4 January 2016 to 3 July 2016, and were then extended multiple times up until 4 May 2017. Notably, while the law was designed as a temporary measure and included a sunset clause set for 21 December 2018– as noted in the Swedish Government Official Report 2017:12 *Receiving Refugees: Sweden in Autumn 2015*²⁴ – it nonetheless represented a significant deviation from established norms, including the free movement principles traditionally upheld within the Nordic Passport Union (SOU 2017:12, p. 359).

The introduction of border controls, coupled with statements by Sweden's then Minister for Justice, Morgan Johansson, urging Denmark to also "take responsibility for the migration and the security situation in Europe", eventually pressured Denmark to follow suit (Wicklén & Einarsson, 2015). On 4 January 2016, Danish Prime Minister Lars Løkke Rasmussen announced the

²⁴ The original Swedish title of SOU 2017:12, '*Att ta emot människor på flykt: Sverige hösten 2015*', has been translated by the authors.

introduction of border controls on its borders with Germany. According to news articles published at the time, Rasmussen felt “forced” to introduce the measure due to Sweden’s implementation of identity checks (Andersson C. , 2016). However, Denmark did not go as far as Sweden and refrained from introducing carriers’ liability.

However, to avoid long-term disruption of passport-free travel between the Nordic countries, a couple of weeks later, the Danish Prime Minister at the time, Lars Løkke Rasmussen, proposed the establishment of a joint Nordic border. He suggested that closer collaboration between the Nordic countries could replace the heavy internal border controls then in place. Rasmussen also warned that failure to address the broader issue of Europe’s external borders could lead to the negative consequence of reintroducing internal borders within the Nordics (Uldbæk Skjødt, 2016). While the proposal garnered some support in Sweden, including from Jimmie Åkesson, leader of the nationalist Sweden Democrats,²⁵ it faced strong opposition from Finland. Concerned about its external border with Russia, Finland rejected the idea. Former Finnish Prime Minister Alexander Stubb emphasized the importance of maintaining the principles of the Schengen Agreement, arguing that the European Union already had an external border and that introducing internal barriers within the region would be counterproductive (Larsson, 2016).

These events, which unfolded during late 2015 and early 2016, arguably reflect the broader trend of differentiated integration previously described, where Nordic states tend to cooperate only when it aligns with their national interests. Finland’s rejection of the joint Nordic border proposal underscores its prioritization of sovereignty over its external border with Russia, while Sweden’s unilateral decision to introduce border and identity checks illustrates a lack of coordination with its Nordic neighbours. These measures, driven by Sweden’s aim to quickly reduce migration into its territory, highlight the challenges of achieving deeper Nordic cooperation when national concerns take precedence. Yet, while Nordic cooperation on migration and border management during the most intense phase of the refugee crisis was largely absent, collaboration in other policy areas – such as environmental and climate, education and research policy; as well as foreign and security policy, including through the defence cooperation framework NORDEFCO – remained intact and even “deepened” according to the Swedish Government (The Swedish Government, 2017).

The Nordic countries’ responses to the arrival of Ukrainian refugees in 2022 provide another compelling example of uncoordinated action during moments

²⁵ See for example (Åkesson & Emilson, 2016).

of acute migration pressure. While all Nordic states demonstrated solidarity with displaced Ukrainians by swiftly implementing the EU's Temporary Protection Directive (TPD) or similar frameworks,²⁶ their approaches to reception and integration diverged significantly, reflecting national priorities and capacities. The lack of coordination across the Nordic region became evident in the varying degrees of support and differing policies regarding housing, financial assistance, and access to integration programmes (Tyldum, Kjeøy, & Lillevik, 2023; Hernes & Danielsen, 2024). Sweden, for example, stood out among its Nordic neighbours as the only country that did not grant Ukrainian protection permit holders the same financial and integration rights as other refugees – only granting them asylum-seeker benefits.²⁷ Denmark, traditionally the frontrunner in restrictive policies towards migrants in the region, adopted a more generous stance – introducing a somewhat more liberal policy compared to other groups by, for example, allowing displaced persons from Ukraine to find accommodation outside the public reception system during the application process (Hernes & Danielsen, 2024, p. 10).

In Norway, Ukrainian refugees were initially very much included in the already established integration programme, and the financial support was higher than in many other countries. However, by early 2023, Norway faced a sharp increase in arrivals compared to other Nordic countries, and in December 2023, 1.3% of the Norwegian population were temporary protection permit holders, compared to Sweden's 0.6% (Eurostat data cited in Hernes & Danielsen, 2024, p. 5). In a 2023 Policy Brief from the independent social science research foundation, Fafo, researchers Guri Tyldum, Ida Kjeøy and Ragna Lillevik present the possibility that the relative difference between benefits and rights for Ukrainians in Sweden and Norway is responsible for the reduction in arrival numbers in Sweden and the increase in Norway (Tyldum, Kjeøy, & Lillevik, 2023, p. 9). This sentiment aligns with previous

²⁶ After Russia's full-scale invasion of Ukraine in March 2022, all EU Member States bound by the Common European Asylum System (CEAS) –thus excluding Denmark – implemented the Temporary Protection Directive (TPD) as part of a unified response to the reception of displaced persons from Ukraine (European Commission, 2024). However, both Denmark and Norway (a non-EU member) enacted national legislation that largely mirrored the TPD. In Denmark, individuals from Ukraine can receive temporary residence permits under the Act on Temporary Residence Permits for Persons Displaced from Ukraine (The Danish Immigration Service, 2024); while in Norway, Ukrainians may be granted residency for one year at a time under the Temporary Collective Protection Scheme (Ministry of Justice and Public Security, 2022).

²⁷ Since June 2024, individuals who have moved to Sweden from Ukraine and received residence permits under the Temporary Protection Directive can now register their move to Sweden and be included in the population register (The Swedish Tax Agency, 2024). Those with temporary protection who are registered in the population register are eligible for the Swedish Public Employment Service's establishment programme (Swedish Association of Local Authorities and Regions, 2024).

research suggesting that domestic policies aimed at deterring asylum applicants – such as Sweden’s decision to only grant asylum-seeker benefits to Ukrainians under temporary protection – can create a ‘beggar-thy-neighbour’ effect by diverting asylum seekers to other countries (Gammeltoft-Hansen T. , 2017, p. 115). To mitigate such effects, the Norwegian Government also implemented stricter measures, becoming the first country in Europe to ban Ukrainian citizens with temporary protection permits from visiting their homeland without risking the loss of their residency (Aurstad & Knudsen, 2024). Moreover, in September 2024, the Norwegian Minister of Justice and Public Security, Emilie Mehl, defended the implementation of stricter measures on collective temporary protection, emphasizing that “immigration to Norway must be controlled and sustainable, and not disproportionately greater than in comparable countries, such as the Nordic nations” (Ministry of Justice and Public Security, 2024c).

The statement by the Minister illustrates the pressing need for enhanced coordination across the Nordic region to avoid disproportionate burdens and to foster more balanced policy outcomes. Yet, the Ukrainian refugee situation demonstrated how these challenges persist, despite a shared history of cooperation through frameworks like the Nordic Passport Union, the NCM and the NC. The absence of a formal Nordic mechanism for coordinating responses to migration crises left each country to act independently within the broader European context, further exposing the limitations of Nordic solidarity when national priorities clash during periods of heightened migration pressure.

This fragmentation, as seen during both the 2015 refugee crisis and the Ukrainian refugee situation, underscores the enduring tensions between national priorities and regional collaboration in the Nordic response to migration pressures. Moments of crisis, such as Sweden’s unilateral measures to manage migration arrivals, and Finland’s rejection of a joint Nordic border proposal, exemplify the pitfalls of differentiated integration, where national sovereignty often overrides regional solidarity. These dynamics not only highlight the challenges of deeper cooperation but also contribute to a beggar-thy-neighbour effect, as countries implement policies that shift migration pressures onto their neighbours rather than addressing them collectively. While the convergence in restrictive migration policies across the Nordic region signals a shared policy trajectory, the absence of a unified mechanism for managing migration and asylum crises has resulted in fragmented approaches that put strain on the ideals of Nordic cooperation. This context sets the stage for Section 2.6 below, in which we delve into how the Nordic countries navigate the increasingly central issue of return and

readmission, where the intersection of national and regional interests continues to shape cooperation efforts.

2.6 Nordic cooperation/networks on return and readmission

As highlighted in the previous sections, the Nordic countries have experienced significant shifts in their national migration policies, particularly since 2015, where the focus increasingly turned towards the return and readmission of migrants. While these national policies have evolved separately – influenced by political priorities, public discourse, and international agreements – the Nordic countries share a long tradition of cooperation in various policy areas. This raises the question of how, and to what extent, the Nordics also coordinate their efforts in return and readmission, especially as these issues have now become increasingly central in their respective national migration frameworks.

Yet, previous research on this topic is difficult to come by. At best, previous research or government agency websites will indicate what *formal* Nordic networks cooperate on the issue of asylum seekers and migration *in general*, yet whether these networks also specifically deal with the policy areas of return and readmission often remains a mystery to the reader. Previous research tells us that in the late 1980s, there was an increase in Nordic collaboration on discussing *repatriation*²⁸ issues within the NCM (Malm Lindberg, 2020, p. 27). In contemporary times, however, the most obvious Nordic cooperation within the NCM on issues pertaining to asylum seekers and migration in general, is often centred on issues relating to *integration*. The NCM, for example, has spearheaded a new programme (2022–2024) that will “...focus more closely on education, training and jobs as ways of improving the integration of new arrivals” (The Nordic Council and the Nordic Council of Ministers, n.d.).

Politically sensitive questions pertaining to *migration* (besides integration) have largely been excluded from the NC and NCM, as individual Nordic countries have differed from one another on their policies and practices regarding asylum and migration. In 2016 as well, the refugee crisis led to the introduction of temporary border controls in the Nordic region, which thereby “...called into question the guiding principles of Nordic cooperation” (Etzold,

²⁸ According to the EMN, repatriation means, “[t]he personal right of a refugee or a prisoner of war to return to their country of nationality under specific conditions laid down in various international instruments and human rights instruments as well as in customary international law” (EMN, 2022).

2017, pp. 2-3), such as free movement within the region. This thereby added further fuel to the fire regarding the politically sensitive issue of migration within the region. The NC and NCM have been criticized for lacking “...political relevance and visibility...”, and for being “...excessively bureaucratic and technical” (Etzold, 2017, pp. 2-3). Despite the NCM’s attempts to mobilize around issues of integration, according to Stie and Trondal, Nordic cooperation is often only “weakly coupled” to the NC and NCM (Stie & Trondal, 2020, p. 2). If the NC and NCM are struggling with mobilizing and implementing a common Nordic agenda outside of the context of European institutions, this could mean that “...Nordic cooperation mainly takes place in loosely coupled administrative networks, which sometimes run via and often outside the NC and the NCM” (Stie & Trondal, 2020, p. 5).

Despite historical differences in refugee migration policies, however the governments of the Nordic countries have met, on a regular basis since 1986, for general policy consultations on asylum and migration within the framework of the NSHF (Skr. 2013/14:73, 2014, p. 54). Policy documents tell us that these consultations within the NSHF framework are often centred around the drafting of immigration and asylum policy, and the development of legislation and preparation of statistical reports (Ministry for Foreign Affairs of Finland, 2023, p. 37). In addition to the annual Ministerial meetings, the work of the NSHF takes place through meetings at the civil servant level and in special working groups (Skr. 2013/14:73, 2014, p. 54). Within the NSHF framework, four thematic working groups currently exist relating to the following areas: (1.) re-migration and return; (2.) resettlement; (3.) integration; and (4.) labour migration. In 2022, the Nordic countries have also collaborated with one another in working groups on questions pertaining to citizenship and free movement within the European Economic Area (EEA) (Ministry for Foreign Affairs of Finland, 2023, pp. 37-38). The main purpose of the thematic working groups is to foster a regular exchange of knowledge and experience relating to these issues (Skr. 2013/14:73, 2014, p. 54).

When it comes to international cooperation, the Swedish Migration Agency (SMA) mentions on their website that the Nordic Immigration Committee (*Nordiska utlänningsutskottet*) is a forum in which the Directors General of the migration agencies of Nordic countries meet twice a year in order to discuss migration-related challenges and developments. Working groups, which include experts from the SMA, are created when necessary as a result (Swedish Migration Agency, 2022b). It is, however, unclear to what extent, if at all, the issues of return and readmission feature within that committee. Previous research also tells us that in 2011 to 2014, Nordic countries were heavily involved in the evolution of the (now discontinued) European Return

Platform for Unaccompanied Minors (ERPUM), an EU project developed in 2009 (Garvik & Valenta, 2021, p. 5). Despite the active engagement of Nordic countries within the ERPUM project, it also remains unclear to what extent Nordic countries chose to cooperate with one another in return processes pertaining to unaccompanied minors. Thus, in general, we find that previous research, as well as government agency websites, have failed to specify what formal and informal networks exist between Nordic countries when it comes to return and readmission policies and practices, as well as what role they perform and how they function. Hence, in a time where we are witnessing an increased political will for Nordic cooperation on return and readmission, despite the limited amount of research on these issues, this report intends to fill this gap. All in all, we are left with one confirmed *formal* network working on the issue of return through Nordic cooperation: the NSHF.

3. Guiding theoretical perspective

As previously stated, the aim of this report is to examine how, and to what extent, Nordic countries cooperate with one another when it comes to implementing and coordinating return and readmission policies and practices. Hence, the main component of this report entails mapping out what formal and informal networks exist between the Nordic countries when it comes to these policy areas, as well as what role these networks perform and how they function. This report also examines what opportunities and obstacles exist for improving intra-Nordic cooperation on return and readmission policies and practices. The overarching theoretical *and* methodological approach guiding this report is *Actor Network Theory (ANT)*. As a complement to the ANT approach, we also use the theoretical concept of *Nordicity*.

It should be noted that ANT is used *primarily* as a methodological tool in this report. This approach facilitates the mapping of human and non-human actants within a network, tracing chains of association, and identifying processes of translation and enrolment. As previous research on migration governance highlights, migration is governed through various technologies, institutions, actors and infrastructures (Andersson R. , 2016, p. 24). Return governance, in particular, involves "...a whole range of places, relations and effects" (Walters, 2019, p. 163). Given the complex terrain of return governance, where various technologies, institutions, actors and infrastructures interact, ANT provides a valuable framework for examining the roles and dynamics within Nordic cooperation on return and readmission. To fully utilize this framework, it is essential to understand its theoretical underpinnings and methodological applications.

This chapter therefore delves into the theoretical foundations of ANT, helping the reader grasp how networks are formed and maintained. While ANT's theoretical depth is scaled back in the presentation of the results in Chapters 5 to 8 to preserve the clarity and flow in the text, it remains a guiding principle for tracing and analysing the networks examined in this report. Thus, Section 3.1 begins with a short introduction to how network analysis theories have reflected on the examination of networks. Section 3.2 introduces the theoretical approach of ANT. ANT is used within this report because it helps us with tracing and mapping which networks exist, and describing what roles these networks perform and how they function. Section 3.2.1 outlines the three

main processes within an ANT approach: association, translation and enrolment. In Section 3.2.2, we introduce how the concept of Nordicity helps us in examining processes of translation, i.e. how networks are shaped and maintained. Finally, Section 3.3 outlines the benefits of using an ANT approach in this report.

3.1 Examining networks

In a field where little is known about Nordic cooperation on these policy areas, laying the groundwork by tracing these networks is fundamental to understanding the bigger picture. When examining Nordic cooperation in particular, *informal* cooperation within networks can be just as, if not more, important than *formal* cooperation, as some researchers claim that “...informal cooperation in the Nordic community takes place to a greater extent than formal cooperation; informal links being the norm and ideal for Nordic cooperation” (Schrama, Martinsen, & Mastenbroeck, 2020, p. 68). Network analysis theories will often begin their analysis by identifying key network features, including identifying the network’s central actors and marginal actors, and the power dynamics therein.

According to these theories, the outputs of network relationships are often seen as dependent on these central actors, who “...have the potential to impose their approaches or perspectives on the whole network” (Abdou & Pettrachin, 2023, p. 1018). These network relationships are also entangled in the production of “...information, understandings, and beliefs” (Abdou & Pettrachin, 2023, p. 1018). In the grand scheme of things, in general networks operate and function in different ways, such as through being information-based or problem-solving. In information-based networks, actors exchange information and seek advice regarding the implementation and enforcement of practices, as well as share best practices with one another. Actors in problem-solving networks may, for example, solve cases together (Schrama, Martinsen, & Mastenbroeck, 2020, p. 67). In reality, this binary distinction between information-based and problem-solving networks is not always so clear cut, as networks can possess both characteristics. Regardless, when successful these networks can help teach “...actors about new or different approaches to implementation-related problems and facilitate expert-driven policy learning...” (Stie & Trondal, 2020, p. 67).

3.2 Actor Network Theory (ANT)

Although many network analysis theories share common (and at times rigid) underpinnings regarding how networks should be analysed, this report specifically adopts an Actor Network Theory (ANT) approach as its methodological tool for tracing and examining networks. It is important to note that ANT employs an abductive approach, where the theory is not a pre-existing framework ready to be applied but is instead developed, refined and adapted within specific research practices. This flexibility enables a dynamic exploration of networks and their components in particular contexts (Law & Singleton, 2013, p. 486).

However, in order to understand how ANT can be used as a methodological tool for exploring networks, one must first understand its theoretical underpinnings. ANT provides a creative, flexible and open approach to examining networks, which as researchers we deem necessary when attempting to map a field which has not, to the best of our knowledge, previously been mapped before. In the words of Bruno Latour, the French philosopher, anthropologist and sociologist often credited with being the founding father of ANT, “no science of the social can even begin if the question of who and what participates in action is not first of all thoroughly explored” (Latour (2005), cited in Dijstelbloem & Broeders, 2015, p. 27).

According to an ANT approach, a network must consist of **actants** (Marino, Schapendonk, & Lietaert, 2023, p. 1037). An actant is someone or something that acts and makes a difference by “making something happen” (either intentionally or non-intentionally) within the network (Bellanova & Duez, 2012, p. 112 & 113). Actants can either be **human** or **non-human**. Hence, they can be beings and objects (Jeandesboz, 2016, p. 295), as long as their interaction with one another contributes to the functioning and overall existence of the network.²⁹ ANT bases this principle of including human *and* non-human actants on the fact that as human beings, we interact endlessly with other materials within our social networks in our everyday lives (Law, 1992, p. 382). For example, our interactions with other human beings are often “...*mediated through* objects...” such as a computer keyboard, paper or printing press, (Law, 1992, pp. 381-382) or mobile phone. Hence, as human actants, we need these non-human actants for our social networks to function and exist.

²⁹ Within ANT theory, human actants can also be referred to as *social actants*, while non-human actants can be referred to as *technological actants*. For the sake of consistency, we have chosen to solely use the terms *human actants* and *non-human actants* throughout this report.

The recognition of non-human actants is unique to ANT theory. Hence, it is not uncommon to find ANT-inspired studies on border security/control, due to the overwhelming presence of technology in achieving the goal of border security/control (Jeandesboz, 2016; Salter, 2015; Schouten, 2014). For example, when examining EU border control, we can identify the existence of human actants, such as decision-makers within the European Commission, street-level bureaucrats within Frontex, and EU coastguards. Yet, in order for these human actants to be able to function, they are reliant on non-human actants such as fingerprint databases, fences, control rooms and policy documents (Dijstelbloem & Broeders, 2015, p. 27; Andersson R. , 2016, pp. 24-25). Together, these human and non-human actants constitute the network of EU border control, as they rely on one another for the network of EU border control to function and exist.

3.2.1 Association, translation and enrolment

Three main processes are examined in the ANT approach: **association**, **translation** and **enrolment** (Jeandesboz, 2016, p. 293). The process of **association** entails the type of action flowing from one actant to another (Latour, 2005, p. 130 & 143). Once an actant is identified, we are able to trace the action from this actant to additional actants, places, moments, and/or other policy areas (Jeandesboz, 2016, p. 300). Hence, an ANT approach is interested in what **chains of association** emerge, as well as the consequences that this might have on the network itself (Dijstelbloem & Broeders, 2015, p. 27). In this report, tracing chains of association helps us in the descriptive mapping of intra-Nordic networks working on return and readmission issues. By tracing these associations, we not only identify where connections exist, but also understand the effects or consequences that these connections have on the network as a whole.

The second process examined in an ANT approach is **translation**. The process of translation is a continual process, where actants negotiate and define their identities and roles, as well as demarcate the possibility of interaction based on common interests (Callon, 1984, p. 203). The process of translation is of particular importance for this report, as it helps us to examine how networks are shaped and maintained (Jeandesboz, 2016, p. 296). The process of translation turns "...a network from a heterogenous set of bits and pieces each with its own inclinations, into something that passes as a punctualized actor" (Law, 1992, p. 386). In short, it explains the process in which a network becomes a network.

Enrolment is a third process examined in an ANT approach. Through looking at the process of enrolment, the researcher can investigate whether or not the operations of translation were successful (Jeandesboz, 2016, p. 296).³⁰

Enrolment entails a process of meaning-making whereby the identities and roles are accepted by actants (Callon, 1984, p. 211). The ascription of these identities and roles, however, can be “...countered, accommodated or resisted” by others (Jeandesboz, 2016, p. 300 & 296). Yet if the defined identities and roles are accepted, translation is successful. As intra-Nordic cooperation on return and readmission issues is a relatively new area, the process of enrolment is not analysed extensively within this report, as the aim of this report is not to investigate the durability of these networks over time.

3.2.2 The role of Nordicity in the process of translation

Within this report, we use the concept of **Nordicity** as a complementary concept when examining processes of translation. We introduced this concept into our overarching theoretical approach in order to help us examine how actants potentially negotiate and define their identities and roles within intra-Nordic networks on return and readmission *in relation* to a Nordic identity. Hence, we are able to examine the role that Nordicity plays in the process of translation. Researchers such as Browning (2007) equate the concept of Nordicity to a Nordic model historically based on the idea of Nordic exceptionalism. This model is said to have had its ‘Golden Age’ between the postwar era and the 1989–1991 collapse of the Eastern Bloc, in which the Nordic welfare state ideology became a marker of identity separating the Nordics from the rest of Europe (Jalava, 2013, p. 251). As outlined in the background chapter of this report, the idea that the Nordics have a particular way of doing things (often in the name of progress and modernization) and have been “...different from or better than the norm” has been “...a central element in Nordic and national *identity* construction for the Nordic states...” (Browning, 2007, pp. 27–28).

³⁰ According to the work of Callon (1984), enrolment is a stage within translation, rather than a process that comes after translation. Translation, according to Callon, is comprised of four stages: (1) problematization (a problem is identified, and forces join to attain a certain goal); (2) interessement (identities and roles are defined); (3) enrolment (if successful, identities and roles defined through the process of interessement are accepted by actants); (4) mobilization (the actants support the defined objectives of the network). However, the work of other researchers using ANT treat enrolment as a process that comes after translation, rather than being embedded within the process of translation. Hence, we have opted to follow this route as well within this report.

Hence, the Nordic model is portrayed as both an identity and as a model to copy, and thereby has become a 'Nordic brand', i.e. a package of a specific set of ideas, norms and practices (Browning, 2007, p. 28 & 29). According to Browning, "...for the Nordic brand to exist it has also been important that collective Nordic positions built around cohesive policy preferences could be framed, and that there has been acceptance that each country has authority to speak on behalf of the Nordic collective" (2007, pp. 30-31). Previous research, however, warns us that in the post-Cold War period the Nordic brand has been increasingly undermined as the Nordics have increasingly become intertwined with EU practices and processes, since three of five of the Nordic countries are currently EU Member States (Browning, 2007, pp. 27,40). Hence, when examining processes of translation, it is interesting to look at the role of Nordicity, especially in a time where the Nordics are collectively involved in a return turn, i.e. collectively leaning towards cohesive policy preferences when it comes to return and readmission issues; but previous research states that the concept is increasingly being undermined.

3.3 Advantages of using an ANT approach

As previously outlined in Chapter 3, an ANT approach is used in this report as both an overarching theoretical approach and a methodology. The public is given little access to what Nordic cooperation looks like when it comes to returns and readmissions, despite playing a role in funding this system through their taxes. However, a first glance was provided through a press release highlighting three joint Nordic initiatives in these areas, distributed to the public after a two-day NSHF Ministerial meeting in Copenhagen on 31 October 2023. This allowed us to begin our mapping of intra-Nordic networks on return and readmission by identifying the NSHF as our network to start with, urging us to examine the actants that comprise this network. Through using ANT as our overarching approach, we can also begin to trace the chains of association that emerge from this network.

The inclusiveness of an ANT approach also allows us as researchers to be open to the existence and role of non-human actants such as identification databases, deportation flights and policy documents, and the idea that they can play a substantial role within the network. Additionally, it allows us to pay attention to the fluidity of networks, as networks can be unstable and incomplete, and they can shift (Müller & Schurr, 2015, p. 222). In conclusion, an ANT approach helps us descriptively, as it allows us to engage with an unmapped field, and approach it with an open mind in order to examine what actants comprise a network, the chains of association that arise from these actants, and the processes of translation and enrolment at play (Jeandesboz,

2016, p. 306). The added concept of Nordicity helps us examine processes of translation, and whether the Nordic brand plays a role in shaping and maintaining these networks. Overall, our mapping will provide a snapshot of what formal and informal networks *currently* exist between the Nordic countries when it comes to return and readmission policies and practices at the time of writing this report.³¹

³¹ See Chapter 4 regarding when we conducted our interviews about Nordic networks, and thereby what time period we are able to provide a snapshot of regarding these networks.

4. Research Design

This chapter outlines the research design for this report. Section 4.1 outlines the materials used including questionnaires, certain documents and semi-structured interviews. As the bulk of our empirical analysis is based on these semi-structured interviews, this section explains more specifically how interviewees were accessed, how the interviews were conducted, and how an ANT approach helped us to define where to start with our mapping of networks (i.e. who we chose to interview first). Finally, Section 4.2 explains how we chose to draw a distinction between *formal* and *informal* networks in this report, who/what qualified as an actant within these networks, how we coded our empirical data based on the appearance or dominance of keywords and/or common themes, and what we have called “stick phrases”.

4.1 Material

A flexible methodology is important when engaging with a field (in this case, Nordic cooperation on return and readmission) in which there is little previous research available. As we are tasked with discovering what is out there, a flexible methodology provides scope for trial and error in this quest. In the words of Allison Howell, “[w]hile policy documents are a useful place to begin, they can only tell us about the aspirations of their authors. In order to get at the *messy actualities* of governing, it becomes important to go beyond policy” (Howell, 2013, p. 130). Questionnaires on national policies and practices in relation to return and readmission were sent out to representatives within the Ministry of Justice in each Nordic country. This was done in order to obtain an up-to-date understanding of each Nordic country’s national legislation and practices regarding these issues. Answers from each of the Nordic countries were obtained. These questionnaires, however, were only used to provide background information for us as researchers and are not used within the analysis of this report. Several attempts were made to engage in participatory observation by being granted access to meetings discussing Nordic cooperation on the issues of return and readmission, but these attempts were unsuccessful.

The analysis within this report is therefore based on certain documents and semi-structured interviews. The documents used in this report were obtained through interviewees, and entail a concept paper and agendas from different meetings mentioned by the interviewees in their interviews. The *bulk* of the analysis in this report, however, is based primarily on semi-structured

interviews with participants in each of the five Nordic countries.³² In total, 35 individuals were interviewed. This number includes 12 interviewees in Sweden, 7 interviewees in Denmark, 5 interviewees in Norway, 8 interviewees in Finland, and 3 interviewees in Iceland. Each interviewee was contacted on the basis of having experience (or assumed to have experience) of participating in intra-Nordic regional and/or bilateral collaborative activities regarding return and readmission processes, at a political or operational level. This includes both state actors and non-state actors (i.e. relevant NGOs). Interviewees were contacted through our project's reference group to begin with, but as the interview process commenced, many interviewees put us in touch with additional interviewees.

We did, however, begin our interviewing process by focusing specifically on individuals within the NSHF network, both within Sweden and within the other four Nordic countries. As previously mentioned, and based on previous research and background information, we had previously identified the NSHF as the only formal and pre-defined network working with Nordic cooperation on return and readmission issues, hence why we began our empirical data collection by trying to trace and interview individuals involved in the NSHF. Through our interviews, we found out whether we could classify the interviewee, according to an ANT approach, as an *actant* within this network, and were then able to trace additional chains of association from them. According to Latour, the founding father of ANT, "...it is crucial that enquirers do not in advance, and *in place* of the actors, define what sort of building blocks the social world is made of" (Latour, 2005, p. 23). However, we needed to identify a network as our starting point (in this case: the NSHF) when mapping intra-Nordic networks on return and readmission, in order to then map the actants within it, and the chains of association that emerged from these actants. This then led us to additional networks comprised of additional actants.

Core questions were prepared ahead of time, so that interviewees with similar job titles were always asked similar questions in order to maintain a baseline of consistency across interviews. A semi-structured interview process was chosen in order to provide us as interviewers with the option to ask spontaneous follow-up questions to the answers provided by the interviewee. Hence, a semi-structured interview approach also meant that discussions could drive "...nuanced findings which were unintended outcomes of

³² It should be noted that the majority of our interviews were carried out between October 2023 and March 2024. Two additional interviews and two follow-up interviews were carried out between May 2024 and October 2024. It is therefore important to note that the mapping of Nordic networks within this report is reflective of the information obtained during this time period.

discussions" (Canning, 2021, p. 3). Most of our interviews were conducted digitally due to geographical distance and/or pressing schedules and lasted between 30 and 90 minutes each. Every interview (except for one interview, which was off-the-record)³³ was recorded and transcribed. Every interviewee was also offered anonymity³⁴ and given the opportunity to approve direct quotes used in the report.³⁵

4.2 Coding

For the sake of operationalizing our findings, a distinction had to be made between what qualifies as a **formal network** versus an **informal network**. We therefore decided that a network can qualify as formal if it has a name/working name (for example: NSHF, or charter flight working group) and established meeting times (for example: twice a year, or once a month). All other networks that do not fulfil these criteria are considered to be informal networks within this report. In order to establish whether or not an actant "makes a difference to the network" and can thereby considered to be an actant, Latour suggests, "...try the trick of removing it" (Walters, 2019, p. 163). Hence, when mapping our networks, we have tried this trick methodically in order to assess the role of the potential actant. It should be noted that in our empirical chapters, we use the word *actant* instead of *interviewee*. This is because after using this methodological tool in our mapping process, we found that all of those interviewed for this report were indeed actants within different networks on return and readmission. After establishing this criterion, we manually coded the transcripts of our interviews, in order to flesh out the networks, i.e. the roles that they perform and how they function.

The data was manually coded based on the appearance or dominance of keywords and/or common themes (Mutlu & Salter, 2013, p. 116). Common themes were allowed to emerge as naturally as possible, as to not pre-

³³ This means that the interviewee wanted the information provided in the interview to be used solely by the researchers as a form of background knowledge for writing the report. The interviewee did not want to be recoded or transcribed, nor for their answers to be used for the analysis. This request has been respected.

³⁴ It should be noted that interviewees are sometimes mentioned by name and job title in relation to their quotes, and sometimes mentioned solely by job title (either directly or indirectly). This is dependent on the wishes of the interviewee. When an interviewee has requested to not have their name included, we have also excluded any indications of the interviewee's sex. As researchers, we sometimes refer to the empirical material by using an interview code rather than the interviewee's name and job title, as it is not deemed relevant in that context to include this information.

³⁵ Interviewees were given the opportunity to slightly revise their quotes. These requests were accepted solely if the changes were minimal and did not change the meaning or context of the quote.

ascribe the data with meaning. Inspired by an approach used by Canning, the coded responses were then “...analysed from an interpretative perspective..., read literally first and then deconstructed in relation to wider literature and the socio-structural and political context from which they responded” (Canning, 2021, p. 2). This means that the responses given by the interviewees were analysed in relation to the context of the interviewee, for example, their job title, the Nordic country in which they were working, and the national return policies and practices of that country. Although we primarily analysed the material for the appearance or dominance of keywords and/or common themes, we were also attentive to ‘stick phrases’ (Hammarstedt, 2021, p. 84). Stick phrases means here keywords or discussions that stood out to the researcher, despite being uncategorizable into a common theme. Stick phrases can be one-off pieces of information that captured the attention of the researcher (Tamas, 2009, p. 86 & 88). They will be identified as such if included in the analysis.

5. Formal intra-Nordic networks focusing on return and readmission

This chapter examines what *formal* networks currently exist between Nordic countries when it comes to cooperation on and the coordination of return and readmission policies and practices. Section 5.1 introduces the first formal network found: the NSHF working group on return, a subgroup of the NSHF. Section 5.1.1 maps the structure of this working group (including its actants),³⁶ its role in exchanging information and experience, how it functions at an operational level within a formal structure, and how it feeds information on return and readmission higher up to a political level within the NSHF. Section 5.1.2 introduces the strengths and limitations of this limited group, according to the actants, including the informal benefits found within a formal network. In Section 5.1.3, we examine a relatively new non-human actant (the NSHF Ministerial meeting press release), which has grown out of the NSHF working group on return's groundwork.

Section 5.2 introduces a newly established formal network: the charter flight working group, found through its association to the press release. Section 5.2.1 examines the operational role of this network (including its connection to Joint Nordic Return Operations) and how it functions, while Section 5.2.2 outlines the benefits, according to actants, of Joint Nordic Return Operations, if implemented successfully. Finally, Section 5.3 provides a summary of the two formal networks (the NSHF working group on return and the charter flight working group), their roles, and how they function.

³⁶ As explained in Chapter 3 of this report, *actant* is a term used within an ANT approach and describes someone or something that acts and makes a difference in a network by "making something happen." We use the word *actant* instead of *interviewee* when referring to those that we interviewed for this report, as during our mapping process and through our interviews, we found that all of our interviewees were actants within different networks on return and readmission. Although the people we interviewed are inevitably and obviously *human* actants, we've decided to not state the obvious, and just refer to them in the report as actants. Sometimes the interviewee is referred to by their name and job title. In these cases, they are still actants, but are specifically mentioned by name and job title, as this is deemed relevant to the quote.

5.1 Nordic Joint Advisory Group on Refugee Policy (NSHF)

5.1.1 Mapping the structure of the NSHF working group on return

As previously mentioned, the only *formal* intra-Nordic network when it comes to cooperation and coordination of return and readmission policies and practices found when conducting background research for this report was the Nordic Joint Advisory Group on Refugee Policy (NSHF) and their specific working group on re-migration and return (Skr. 2013/14:73, 2014, p. 54). Hence, the NSHF became the first network (pre-defined as a network) for us to unpack within this report – in hopes that not only would we gain an understanding of the role that this network performs and how it functions, but that identifying its actants would potentially lead us to additional chains of association. The NSHF is evidence of Nordic regional cooperation on these issues. As previous research shows, migration governance at a regional level is not uncommon, due to states in the same region often sharing common interests and cross-border movements, and being able to forge deeper commitments (Bisong, 2019, p. 1294).

The NSHF *in general* is comprised of different levels, including both political and operational levels. A report by the Ministry for Foreign Affairs of Finland states that current information regarding immigration and asylum issues is often exchanged at NSHF Ministerial meetings and within the high-level official group. According to the same report, the working group on re-migration and return deals with the issues of return and readmission at a more operational level (Ministry for Foreign Affairs of Finland, 2023, p. 37). Although the Nordic countries have been meeting to discuss general consultations on asylum and migration within the framework of the NSHF since 1986 (Skr. 2013/14:73, 2014, p. 54), it is unclear, from the background research (and our interviews with actants involved in the NSHF), when exactly the working group on re-migration and return was established.³⁷ According to the Swedish Government, the official purpose of the working group is to promote a regular exchange of knowledge and experience on the policy area (Skr. 2013/14:73, 2014, p. 54). However, apart from the information provided above in government documents, we have had to rely on the actants involved in the NSHF network for additional information and context, as follows.

³⁷ According to one actant, there was already an established working group back in 2013, but it is unclear how long it had been established prior to this (Interview In01).

According to one actant involved in the working group on re-migration and return, around 2017 the working group officially decided to focus mainly on issues of return rather than re-migration, as return, according to the actant, was considered a priority for the Nordic countries at that time.³⁸ This focus has continued since then. When asked if any of the Nordic countries in particular pushed for the working group to shift focus and prioritize mainly issues of return rather than re-migration, Mikaela Eriksson, at the Swedish Ministry of Justice, and a Swedish representative at the NSHF working group meetings on return explained:

We [*Sweden*] were a driving force, but I also believe that the Danes and the Norwegians were as well. Everyone was, I think. The Icelanders were probably the ones who were most laid back because, at that time, they had almost no one to return at all. But today, even they have become more interested.

Thus, a shift appears to have occurred in which return issues, since 2017, have become a priority for all of the Nordic countries (perhaps as a reaction to the refugee crisis),³⁹ and the working group therefore switched its focus accordingly. The term re-migration has also increasingly been hijacked as a discursive term used by the global far right (Kassam, 2024). As a result of this information, the working group will be referred to as the **return working group/working group on return** (or just **working group**) from here on within this report.

According to an actant, the NSHF is divided into three levels (thus adding a level to what was outlined in the report by the Ministry of Foreign Affairs of Finland): the Ministerial level, the Senior Officials level, and the civil servant level.⁴⁰ When it comes to the structure of the working group, it functions as a sort of subgroup of the NSHF and discusses return issues at a civil servant level (i.e. more *operational* level), although these topics continue to be discussed at the Senior Officials level and Ministerial level as well (i.e. a more *political* level).⁴¹ According to one actant, the Ministerial level meets once a year, and often wants to discuss the issue of returns. Hence, the working group provides information to the Ministerial level.⁴² According to one actant who has attended the working group meetings at times, the working group

³⁸ Interview In01.

³⁹ See Chapter 2 in this report on how restrictive policies and practices regarding migration were enforced in the Nordic countries in response to the refugee crisis.

⁴⁰ Interview In01.

⁴¹ Interview In01.

⁴² Interview In07.

therefore provides information to the higher levels in the hierarchy, within the NSHF: the Senior Officials level and the Ministerial level. The higher levels are then expected to continue to work with and develop the information provided to them.⁴³

Natalya Carlsson, Desk Officer at the Ministry of Justice and frequent attendee at the working group on return meetings, explains the shift in the information on returns from the working group (i.e. the more operational level) to the Ministerial level (i.e. the more political level):

[i]t's very good that it [*the information*] is built from the bottom up, so to speak. Because the knowledge, the detailed knowledge comes from there [*i.e. the working group*]. The Minister shouldn't have to know all the details. Instead, the Minister receives the groundwork that is based on the knowledge brought forth by the practitioners, so to speak.

This synthesis is developed through meetings between the group members of the working group. These group members are employed as civil servants at every Nordic country's equivalent of Sweden's Ministry of Justice. The working group's presidency rotates between the Nordic countries.⁴⁴ The group meets physically once per term, in which the Nordic country having the presidency during that period is responsible for organizing this meeting in their capital city. However, the agenda for the actual meeting is decided unanimously among the group's members beforehand.⁴⁵

Regular items on the agenda often involve sharing information in the form of a status report and the current situation within each Nordic country.⁴⁶ According to Anita Vardoy, Policy Director at the Division for Migration and Refugees at the Ministry of Justice and Public Security in Norway, as well as a Norwegian representative in the working group, the agenda is "...not very strict. It's not like this year we will do this and that, so there aren't many proclamations in a way, it's more like return and what way it will go. It can be assisted returns, forced returns. We even speak about repatriation...". At times, the group has also focused on common 'problematic countries' (i.e. countries that are labelled as difficult to return individuals to, with Somalia being a recurring

⁴³ Interview In16 and In18.

⁴⁴ Interview In01.

⁴⁵ Interview In01 and In07.

⁴⁶ Interview In01.

example within these meetings, as well as Iraq and Ethiopia)⁴⁷, and/or how the Nordic countries can cooperate with one another on a common project.^{48 49}

According to Eriksson, the return working group members (i.e. the network's most obvious actants) decide who from their country (alongside themselves) are invited to attend the meetings.⁵⁰ However often a total of around ten people are present per meeting. She explains in her interview that she thinks that Sweden is "...more governed by the agenda than other countries are" when it comes to who is invited to attend the meetings alongside her, and that this could be a result of Sweden having bigger government agencies working on these issues, than for example Norway, which often has the same representatives present at every meeting. According to Eriksson, when it comes to representatives from Sweden attending the meetings, the Ministry of Justice is always represented (at the time of writing this report: currently in the form of Eriksson, plus or minus additional colleagues). But depending on the agenda for the specific meeting and what points will be discussed, representatives from the Swedish Police Authority and/or Swedish Migration Agency (i.e. actants identified through chains of association) are sometimes also invited to attend the meetings, especially when operational questions involving these actants (who originally belong to other networks for return and readmission) are discussed. For example, Eriksson might invite the Swedish Police Authority when discussing issues of forced returns. According to another actant, despite an agreement within the working group on needing to cooperate closer with practitioners at the operational level, the Nordic countries vary in how often they choose to include these operational actants in the meetings. While Norway often includes these actants, one interviewee described Sweden and Finland as being less inclined to.⁵¹

⁴⁷ Interview In07.

⁴⁸ Interview In01 and In16.

⁴⁹ We were granted access to one agenda for the NSHF meeting in the working group on return held in Copenhagen, on 28-29 August 2023. Alongside an afternoon activity and a dinner together at a restaurant, the following agenda items were allocated time: developmental aid and reintegration in Ukraine; detention centres; and the Nordic attaché cooperation. It is fair to say that the agenda does not provide details as to what exactly will be discussed within each topic, but instead states "further details will follow." One can therefore assume that these details have been shared internally within the group.

⁵⁰ Also confirmed in Interview In16.

⁵¹ Interview In07.

5.1.2 Strengths and limitations of the NSHF working group on return

Despite the formal aspect of the NSHF – three different hierarchical levels that cover operational to political levels; as well as a return working group with an official name, regular meetings, and a specific role and function – informal consequences of an established working group were often mentioned by their actants as positive. Mikaela Eriksson, for example, describes the working group meetings in her interview as “a kind of special type of meeting in one way, as...people are very outspoken, and they share, [*they’re*] very generous in sharing information, and [*it’s*] a pretty friendly atmosphere as well.” The Nordic country that holds the working group’s presidency for the term is responsible for producing a short report on what was discussed during the meeting, although documentation during the actual meeting is not necessary, according to Eriksson, as the role of the group is to share information and exchange experiences, not make decisions. Eriksson explains in her interview that documenting details during the meeting when the group is in fact not a decision-making body as such, and sharing those details with the public, would risk “...killing the conversational climate” that has been established within this limited group.

According to actants involved in the working group, the group has also provided a forum for Nordic non-EU Member States to receive up-to-date information from the Nordic EU Member States as to what is happening in these policy areas within the EU. Thus, Nordic non-EU Member States are given an insight into what is happening at a return and readmission level within the EU. Information is therefore exchanged within a Nordic micro-structure environment in comparison to the megastructure of the EU. As Anita Vardoy explains from the Norwegian perspective, “[m]ore and more also we have been included in the EU because of the Return Directive, and the Schengen Agreement covers quite a lot of return issues, so we also meet there obviously, but in [*the*] NSHF it’s more, we can go straighter to the point in some way.” The open and honest “conversational climate” of the NSHF working group on return, as explained by the two actants above, appears to have had a spill-over effect where the members of the working group often reach out to one another through e-mails when they need information or an answer to a question between meetings, and they organize study visits to visit and learn from one another.⁵²

⁵² Interview In07, In01 and In08.

In the words of one actant, a Migration Advisor at a Norwegian embassy, and someone who has attended some NSHF working group meetings, “[t]here are no radical thoughts that have come out of those meetings. So, what is positive is that we have met...the most important thing is: meet, talk together, see how others do things, learn from them...” The overlap between the Nordic countries’ efforts and EU initiatives such as the Return Directive and the Schengen Agreement, also entails members of the working group on return regularly bumping into one another at meetings in Brussels,⁵³ which means that actants within the NSHF can often be found to simultaneously be actants within other networks working on return and readmission as well, thereby creating chains of association between the networks.

According to the actants above, the formal structure of the NSHF working group on return has thus led to an informal “conversational climate” among actants that persists in forums outside of the framework of the NSHF. This aligns with previous research, which shows that within the Nordics, more formalized forums can promote informal cooperation (Læg Reid & Rykkja, 2020, p. 26). However, the potentially negative consequences of having a *limited* group (in terms of a small number of invite-only participants) were a recurring theme brought up by the interviewees (usually those who were not members of the working group). For those working on return and readmission outside of the NSHF and at an operational level, at times the NSHF was described as difficult to access due to its image of formality.⁵⁴

An actant working on return issues at an operational level explained that, alongside the Finnish Immigration Service, the Swedish Migration Agency (until a meeting very recently) had not been invited to attend the NSHF working group on return for several years.⁵⁵ They explained that there had been no involvement by the Agency in the preparations for the NSHF meetings, nor had the Agency received any feedback from the meetings, despite the operational nature of the meetings.⁵⁶ Another actant working with return and readmission at an operational level in Sweden had not either recalled being called to attend the meetings in their current position within the Swedish Police Authority.⁵⁷ The same confusion as to how the NSHF working group functions, and the experienced exclusion from these meetings, was echoed by another actant working at an operational level with return and readmission

⁵³ Interview In01 and In23.

⁵⁴ See for example: Interview In04.

⁵⁵ Interview In06; also confirmed in Interview In07.

⁵⁶ Interview In06.

⁵⁷ Interview In02.

issues in Finland.⁵⁸ Hence, there appears to be a gap between the aspiration of the NSHF working group on return to embrace an operational spirit, and the actual inclusion of operational actants within meetings.

5.1.3 NSHF Ministerial Meeting in Copenhagen, October 2023

By now we know that the NSHF working group on return is a formal network, whose role is not only to exchange knowledge and experience on return (and readmission) between the Nordic members of the group, but also to provide information up the chain of command within the NSHF. Previous research tells us that Nordic cooperation is often characterized by a 'bottom-up dimension' which entails "...informal collaboration among national bureaucrats to coordinate policy positions, seeking inspiration and learning, exchange of contacts, discussing EU regulations, providing help in single cases, and pooling resources and competences..." (Stie & Trondal, 2020, pp. 4-5). All these characteristics listed in previous research can be found within the NSHF working group on return. Although situated within a formal framework, the working group functions through a more informalized culture between the working group members that represent the five different Nordic countries. Additional operational actants originally belonging to other networks on return and readmission are often invited to the meeting, depending on the agenda. When invited, they serve a role within the working group's network.

From the actants comprising the NSHF working group network who we interviewed for this report, we quickly began to understand the communicative role of the press release distributed to the public on 31 October 2023 after a two-day NSHF Ministerial meeting in Copenhagen, Denmark.⁵⁹ As mentioned in the introduction of this report, within this press release, the five Nordic Ministers announced "...three joint initiatives with a strong commitment to strengthen and expand Nordic cooperation in the area of return" (Government of Iceland, Ministry of Justice; Ministry of Immigration and Integration, Denmark; Ministry of the Interior, Finland; Royal Norwegian Ministry of Justice and Public Security; Government Offices of Sweden, Ministry of Justice, 2023). According to one of our actants involved in the NSHF working group on return, the ideas behind these three initiatives had already been discussed within the

⁵⁸ Interview In12.

⁵⁹ We were granted access to the agenda for the NSHF Ministerial meeting held in Copenhagen on 30-31 October 2023. It should be noted that the issue of return was given a 55-minute timeslot during the two-day meeting in which "joint Nordic return initiatives" were allocated 10 minutes of those 55 minutes. The remaining 45 minutes were allocated to a presentation from the Danish Return Agency on Danish return procedures and outreach approach (including a Q&A session), and a roundtable discussion focusing on returns to Iraq.

working group, prior to the Ministerial meeting.⁶⁰ The first initiative announced involves strengthening reintegration projects in countries of origins by allowing “...Nordic migration and return attachés to coordinate and support voluntary returns from Nordic countries to countries of origin in close cooperation with concerned reintegration projects” (Government of Iceland, Ministry of Justice; Ministry of Immigration and Integration, Denmark; Ministry of the Interior, Finland; Royal Norwegian Ministry of Justice and Public Security; Government Offices of Sweden, Ministry of Justice, 2023). The second initiative entails “...coordinating joint Nordic return operations in collaboration with Frontex...”, and the third focuses on “...providing assistance to stranded irregular migrants in North Africa, who wish to voluntarily return to their own countries” by assisting IOM as an implementing partner (Government of Iceland, Ministry of Justice; Ministry of Immigration and Integration, Denmark; Ministry of the Interior, Finland; Royal Norwegian Ministry of Justice and Public Security; Government Offices of Sweden, Ministry of Justice, 2023). Thus, the three initiatives cover different aspects of the return continuum – from deportation to post-deportation.

According to Saila Heinikoski, a Senior Specialist at the Migration Department at the Ministry of the Interior in Finland and an attendee of NSHF Senior Officials meetings, the initiatives discussed in the press release had already been discussed and approved at the Senior Officials level, meaning that the press release figured as a kind of stamp of approval from the Ministers. As Heinikoski further explained:

...I think, well [for] Finland, I think perhaps for all Nordic countries, this is also a kind of symbolic matter: that you want to show that you are... actually putting emphasis on this matter, and you're cooperating. So I think being able to, sort of, give this public statement is also important as such, even though perhaps there is not that much change in the concrete cooperation that you have.

Hence, although the press release may solely be communicating to the public the forms of Nordic cooperation that have already been on the back burner at the lower levels of the NSHF, the press release becomes a non-human actant within the NSHF. It makes a difference in the working group network's existence by “making something happen” within the network. Communicating the initiatives to the public also allows scrutiny from the public – is Nordic cooperation on return and readmission a new buzz-phrase, or will the NSHF follow through on these initiatives, from theory to practice? By looking at the press release as a non-human actant within the network of the NSHF working

⁶⁰ Interview In07.

group on return, we are introduced to additional chains of association (and thereby additional actants) through the initiatives described within this press release, as they appear to be slowly materializing into practice.

5.2 Charter flight working group

5.2.1 Mapping the structure of the charter flight working group

The charter flight working group⁶¹ is a formal network associated with the second initiative mentioned in the press release, and linked to the actual act of deportation when it comes to the return continuum. According to one actant within the NSHF working group on return, the idea that the Nordics should organise joint Nordic charter flights through Frontex (i.e. Joint Nordic Return Operations⁶²) was introduced by the Danes in one of the working group's meetings prior to the Ministerial meeting.⁶³ According to Vladimir Petrovic, Expert at the Swedish Prison and Probation Service and member of the charter flight working group, the group's first meeting was held on 9 November 2023, almost a week after the Ministerial meeting in Copenhagen. It is therefore a relatively recently established network. The idea of organizing joint Nordic charter flights through Frontex, as a complementary system alongside Frontex's already existing Joint Return Operations, was brought up in the NSHF working group on return meeting in September 2023, and then presented as an initiative in the Ministerial press release in October 2023. Thereafter the first meeting of the charter flight working group took place in November 2023.

Police authority representatives from Sweden, Denmark, Finland and Norway⁶⁴ (as well as the Swedish Prison and Probation Service which oversees the physical implementation of transports in Sweden when it comes to returns,

⁶¹ The name charter flight working group has been chosen by the researchers in this report to be able to refer to the group using the same terminology consistently. It is otherwise referred to unofficially by interviewees as the charter group.

⁶² Please note that Joint Nordic Return Operations would entail a Nordic collaboration on what is currently known as Joint Return Operations through Frontex. Whether these operations will officially be called 'Joint Nordic Return Operations' is unknown to the researchers at the time of writing. However, this name was used by the researchers and actants within this project in order to refer to this upcoming collaboration.

⁶³ Interview In01.

⁶⁴ It is unclear why Iceland has not attended, but Petrovic speculates that this could be due to their limited amount of return cases in comparison to the other Nordics.

and the Return Agency in Denmark),⁶⁵ attended the first meeting alongside the Nordic representative for Frontex. A second meeting was held on 25 January 2024, with the same attendees as the first meeting, and the group intends to keep meeting regularly.⁶⁶ The Swedish Police Authority's Border Police Division at its Department of National Operations hosted the first meeting and could thus be considered an early-stage actant within the network. The actual charter flights are the non-human actants within this network, as without them, the network would not even exist.

According to Petrovic, the role of the first meeting was to discuss, among other topics, Joint Nordic Return Operations through Frontex. With Sweden's higher number of return caseloads compared to its Nordic neighbours, discussions were centred around how Denmark, Norway and Finland could 'piggyback' onto Swedish charter flight operations and include their own returnees, thus contributing to more 'effective' returns (i.e. an increase in the return ratio) for each of the Nordics. The participants at the meeting also discussed the possibility of joint Nordic training efforts in order to train new return escort leaders, as well as the importance of sharing experience between the return escort leaders within the different Nordic countries (for example, utilizing Norway's International Liaison Officer in Iraq in order to help prepare for the arrival of returnees from Sweden).⁶⁷

At the second meeting, Sweden's representatives presented their charter flight plan for the upcoming year. Petrovic explained as follows:

...Sweden has a one-year plan for planned charters, where we roughly plan for 2024: when will a charter flight to [*country X*] depart, when to [*country Y*], to [*country Z*], and so forth, and so forth. And so we presented this one-year plan to our Nordic neighbours at our last meeting on the 25th, so that they can also plan if they have these nationalities amongst their 'open cases' for return. If they are interested in implementing a Joint Return Operation with Sweden, then they can come with their returnees.

⁶⁵ We were granted access to the list of participants at the first meeting held on 9 November 2023.

⁶⁶ The network and its two first meetings were also confirmed in Interviews In13 and In15. The network's existence was additionally confirmed in Interview In19.

⁶⁷ We were granted access to the agenda and summary of issues discussed for the first meeting held on 9 November 2023. According to the summary, the following issues were discussed: the need for a Frontex organized training course for future escort leaders, hosted by Norway; the need to share best practices and information about cooperation with airlines and ways of communication and planning; the need for Joint Nordic Return Operations due to the Nordic countries' different caseloads and Frontex's demand for cost efficiency; and Joint Reintegration Services in relation to Joint Nordic Return Operations.

Hence, the network has thus far focused on the *operational* aspect of planning return activities together, from Nordic joint training efforts to Joint Nordic Return Operations as managed by Frontex. Petrovic describes the operational aspect of the network in his interview:

My impression now is that this is the 'right level' when it comes to participants. We're talking about operative personnel. It's not policymaking. It's concrete: "We have four nationals that we need to, well, use force to remove from the country...can we travel with you on your planned charter flight to [country X] now?" For example, this question from Norway is concrete and it's also been done. So I think, without knowing how it was earlier, that participants are coming from the 'right operative level' ...[they] work, well, purely operative with the enforcement itself.

This could be interpreted as the actants within the network seeking concrete answers to concrete questions from one another and wanting to implement policy without engaging with the political aspects.

According to the project manager for the Rapid Deployment Officers (ARLO II) project at the Swedish Police Authority's Border Police Division at the Department of National Operations, an operational intra-Nordic network such as this working group, "...would never even have been possible two years ago." Actants that have attended the first two meetings or have had colleagues who have attended describe this network as successful thus far. This success is defined in relation to operational coordination, as it is too soon to judge the number of 'effective' returns as a result of the network. These experiences coincide with the findings of previous research on Nordic cooperation, as civil servants in leadership positions, with planning and coordination as their main tasks, are "more integrated into a Nordic contact pattern" (Lægneid & Rykkja, 2020, p. 28). Previous research also shows us that Nordic cooperation at its best can often be found at an agency-to-agency level (Stie & Trondal, 2020, p. 2). The "transnational bureaucracy" of interconnected agencies such as the Nordic police authorities can be read as a "...development towards a common Nordic administrative space" (Stie & Trondal, 2020, p. 5) when it comes to Joint Nordic Return Operations.

5.2.2 Actant reflections on Joint Nordic Return Operations

As mentioned earlier, the idea of Joint Nordic Return Operations, *managed* by Frontex (and thereby connected to the charter flight working group through a chain of association) was an idea that appears to have begun to take shape within the NSHF working group on return, before materializing into a policy initiative at the political level: the NSHF Ministerial level. Thereafter, this policy

initiative continues to be deconstructed into practice at an operational level (the charter flight working group). After being mentioned in the NSHF press release, the idea of Joint Nordic Return Operations was discussed, with many of our actants occupying different positions within the return and readmission area, hence further augmenting the role of the press release as a non-human actant. Regardless of whether these interviewees were actants within the charter flight working group or actants within other networks working on intra-Nordic return and readmission, their reflections helped us to gain a better understanding of why this initiative may have been proposed, and hence why the charter flight working group is deemed to be needed. According to one of our actants working within the Swedish Prison and Probation Service, organising charter flights at a Nordic regional level rather than with other Frontex-affiliated states (i.e. EU Member States plus the other Schengen countries), would reduce travel time for escorts. Instead of flying with returnees to Germany, Austria or France, for example, to join a charter flight departing from those destinations, the charter flight would instead depart from a Scandinavian airport, thus reducing travel time and logistics, and thereby contributing to a better work environment for escorts.⁶⁸

The idea of organizing charter flights from the Nordic countries themselves, rather than having to travel through Central or Western European countries, and thereby saving money, eliminating awkward departure times due to connecting flights, and saving time in general, was mentioned as a logistical benefit by other actants as well.⁶⁹ Working 'effectively' in the context of Joint Nordic Return Operations was often described in terms of respecting rest time for escorts,⁷⁰ or in terms of financial resources, i.e. getting more returnees on a charter flight reduces the price per returnee; or saving money on reducing the length or necessity of connecting flights.⁷¹ Logistically, this was also described as especially beneficial to Iceland, a country that has more connecting flights to Nordic capital cities per day than to other Schengen countries.⁷² The idea that the Nordic countries also have quite similar nationalities in terms of returnees was also mentioned as a logistical benefit of Joint Nordic Return Operations, i.e. more returnees on the same flight to the same country of return.⁷³ Thus, according to the actants interviewed, an 'effective' return in this context referred not only to an increase in the number

⁶⁸ Interview In05.

⁶⁹ See for example: Interview In10.

⁷⁰ Interview In05, In10 & In13.

⁷¹ Interview In13.

⁷² Interview In09.

⁷³ Interview In13 & In15.

of successfully implemented returns. An 'effective' return also had a financial aspect (i.e. the implementation of the forced return as cost-effective for the state), and a humane aspect regarding the escorts (i.e. honouring labour-law stipulated rest time).

It is also worth mentioning that joint Nordic charter flights were mentioned as equally beneficial to the Nordic countries with lower caseloads than Sweden. For example, as Bjørn Bruun Østergaard, a deputy within the Return Division at the Danish Ministry of Immigration and Integration, explained from the Danish perspective:

...If we [*Denmark*] go to Frontex and say: "we have two guys we want to put on a charter flight to...", I don't know, wherever, they will go: "all right, well, we can't work with that." But if Sweden comes and says, "we have 150 that have to go back to this country with a charter flight," then they're more willing to hear what they're saying. So our role in this, actually, has more to do with just going along or attaching ourselves to other countries.

Similarly to the Danish perspective mentioned above, Sweden's high return caseloads compared to Finland were also mentioned as beneficial to Finland when it comes to the logistical organisation of Joint Nordic Return Operations.⁷⁴ This is supported by Stie and Trondal's third image of Nordic cooperation, which they call "differentiated integration". According to this image, Nordic cooperation can be characterized by varying levels of integration depending on policy area, timing, and specific national interests (Stie & Trondal, 2020, p. 3). Hence, Sweden's high return caseloads become the catalyst to other Nordic countries being able to implement their own forced returns via charter flights. Nordic cooperation on joint return flights thereby benefits the specific national interests of Sweden's Nordic neighbours.

As Maria Lundström, a member of a team responsible for the national coordination of readmission at the Helsinki Police Department described, sharing information beforehand between the Nordic countries (such as the number of return cases per nationality) in order to plan as a regional unit would be beneficial, as a "proactive," rather than a "reactive" system would be created. Hence, if successful, the charter flight working group would be a step towards creating this proactive system. The benefits of a Joint Nordic Return Operations, from the perspective of the actants interviewed, would confirm the role that a charter flight working group could continue to play. It should, however, once again be noted that these benefits were seen by actants as

⁷⁴ Interview In13.

important in ensuring 'effective' returns. Thus in this context, an 'effective' return was framed by the logistical perspective and the wallets of the Nordic countries. Although an 'effective' return in this context would strive to ensure the well-being of the *escorts*, the effects of these operations on the *returnees* was not mentioned by those interviewed. Therefore, no account was provided by the actants of how an 'effective' return within a Joint Nordic Return Operations framework would ensure a 'humane' return for returnees.

5.3 Summary of this chapter

This chapter has outlined two formal intra-Nordic networks centred on the cooperation and coordination of return and readmission policies and practices. Beginning with the NSHF as our first, albeit pre-defined, network, we were able to delve into the workings of the NSHF working group on return. The working group on return is composed of actants from all five of the Nordic countries (i.e. civil servants within each Nordic country's Ministry of Justice). The group has a formal structure, as they have a rotating presidency between the Nordic countries and meet twice a year, although the agenda is decided upon unanimously by the key actors in concert. Depending on the agenda and the inclination of the actants representing the five Nordic countries, additional actants (i.e. more operational staff) can be invited to attend these meetings. According to those interviewed, the inclination to invite additional actants can differ however, depending on the Nordic country. The role of the working group is to exchange knowledge and experience on the issues in this area (for example, common 'problematic countries') in an honest and open climate, as well as provide information to the higher levels within the NSHF, such as the Ministerial level (thereby translating the groundwork from an *operational* level to a *political* level). This transition is characteristic of the bottom-up approach often found within Nordic cooperation.

The transfer of knowledge from an operational level to political level leads us to the NSHF Ministerial press release as a non-human actant, a press release that grew out of the NSHF working group on return. Through this actant, we are introduced via a chain of association to a newly established formal network referred to as the charter flight working group. This group is associated with one of the initiatives proposed in the press release regarding the coordination of Joint Nordic Return Operations in collaboration with Frontex. Although it is early days, the group has met more than once, and operates through a formal get-together of police authorities (including the Swedish Prison and Probation Service and the Danish Return Agency), from

all Nordic countries except for Iceland.⁷⁵ The role of the network is purely operational, and is centred on the joint planning of return operations, from the organisation of Joint Nordic Return Operations to joint Nordic training efforts. According to the actants, if successful this agency-to-agency form of Nordic cooperation will be beneficial from a financial and logistics perspective, especially for Nordic countries with lower return caseloads.

⁷⁵ It should be noted that the group had already had two meetings at the time of our interviews. It is unknown to us as researchers how many meetings the group has continued to have, or if Iceland has now joined the group.

6. Informal Nordic networks focusing on return and readmission

This chapter examines what *informal* networks currently exist between Nordic countries when it comes to cooperation on and the coordination of return and readmission policies and practices. Section 6.1 introduces the first informal network found: the agency-to-agency network, established by the SMA, with hopes of becoming an ad hoc semi-formal network in the future. The section traces how this informal network, during the course of writing this report, has transitioned into a *formal* network, as it is now going to be included in the NSHF working group on return. Section 6.1.1 maps the origins of this network when it was still an informal agency-to-agency network, how its first (and only) meeting laid the groundwork in hope for the network to continue to function on an ad hoc operational level, and its role in information and experience sharing, especially regarding capacity-building projects in specific third countries. Section 6.1.2 introduces the Nordic Support on Return and Reintegration in Iraq (NORAQ) platform, a Nordic platform for capacity-building projects in Iraq involving Sweden, Denmark, Norway and Finland, which grew out of the agency-to-agency network's first meeting. In Section 6.1.3, we trace how the agency-to-agency network transitioned from an informal to a formal network, by being included in the NSHF working group on return.

Section 6.2 introduces the informal networks of Nordic return liaison officers/migration attachés when it comes to cooperation on and the coordination of return and readmission policies and practices. Section 6.2.1 examines the role that these networks perform and, when possible, traces how they function at an operational level. In Section 6.2.2, we introduce the case of Ethiopia, often regarded as an ongoing success story after the formation of an informal network between two Nordic liaison officers on the ground. Finally, Section 6.3 provides a summary of the two informal networks (the agency-to-agency network and the networks of Nordic return liaison officers/migration attachés), the roles that they perform, and how they function.

6.1 The incorporation of an agency-to-agency network within the NSHF

6.1.1 Mapping the origin of the ‘agency-to-agency’ network

As the researching and writing of this report progressed, as researchers, we witnessed the evolution of an ad hoc, informal, nameless agency-to-agency network, which slowly become incorporated into the NSHF framework as it developed into a subgroup of the working group on returns. Before this evolution, the agency-to-agency network had established key participants to become a part of this network and had a two-day meeting in Stockholm, with the ambition to become a semi-formal network that continued to meet on an ad hoc basis. Hence, this network regarding intra-Nordic return and readmission (the agency-to-agency network) was embraced and eventually swallowed up by the NSHF network itself (or more specifically, the NSHF working group on return). This section therefore traces the origins of this informal agency-to-agency network and what came out of it, before mapping its transition into a subgroup of the NSHF working group on return.

According to an actant working on returns at an international and European level at the SMA, the SMA invited the Nordic authorities to a two-day meeting in Stockholm in February 2023 to discuss bilateral relations with Iraq and Somalia. The actant was inspired by Norway’s approach to returns to Somalia. Hence, the first meeting in February included participants from the Nordic countries (except for Iceland), involving representatives from the countries’ migration agencies, police authorities and in the Danish case, their Ministry. The actant experienced the operational agency-to-agency meeting as positive, and the *ambition* was to continue meeting on an ad-hoc basis. The role of the first meeting was to share knowledge and information at an operational level in terms of the status of each Nordic country when it comes to return and reintegration issues, bilateral/development cooperation with these countries, as well as a discussion on potential Nordic coordination/cooperation on return and reintegration to Iraq and Somalia. One actant who had participated in the meeting stated that the agency-to-agency network was beneficial to people like them, as they were often not invited to take part in the NSHF meetings.⁷⁶ As the actant working on returns at an international and European level at the SMA explained, “[e]very country shared the latest on developments and experiences on these issues and there was a lot of interaction, and an obvious interest to exchange information which we haven’t done on an agency level for a long time, so everyone thought it was very useful to meet.”

⁷⁶ Interview In12.

Norway gave a presentation and shared their experience regarding their long-term and, what is seen as successful, bilateral cooperation with Somalia, and Denmark shared information about their projects, mainly in Iraq. Sweden also shared information on their ideas for capacity-building activities in Somalia. As the actant working on returns at an international and European level at the SMA explained, “[i]n this first meeting, Finland and Sweden were more listening in on our Nordic neighbours...[T]hey [*Denmark and Norway*] had more concrete experiences to share with us with regard to bilateral cooperation with these countries.” Hence, Danish and Norwegian actants played an important role within this network, as they had obtained knowledge that was viewed by Swedish and Finnish actants as potentially key to the achievement of successful bilateral relations with, in particular, Somalia and Iraq.

Despite this initial power imbalance in terms of obtaining ‘valuable’ information, the actant wanted to see that the establishment of the agency-to-agency network⁷⁷ leading to better and structured cooperation/coordination between the Nordic countries when it comes to capacity-building projects in third countries, including collectively finding the answers to questions such as:

Do we have similar ideas and ambitions when it comes to different countries? Can we initiate a dialogue together? Can we act stronger together vis-à-vis the authorities of a [*third*] country, instead of having parallel bilateral contacts and show that we can act in a coordinated Nordic way?

Questions such as those posed above can be of importance when it comes to cooperating on capacity-building projects in third countries,⁷⁸ not only in terms of the financial benefits of cooperating, but also due to the governments of the Nordic countries pushing for an intra-Nordic agenda on these issues, as made clear in the Ministerial press release. A successfully coordinated Nordic implementation of capacity-building projects in third countries could thus play an important role in ensuring a ‘sustainable’ return for the returnee, depending on the services provided and whether they support a reintegration process that, according to the IOM, would ensure that “...returnees are economically self-sufficient, socially accepted and enjoy psychological well-being” (Newland, 2017, p. 5). However, the role that these Nordic projects can play in ensuring a ‘sustainable’ return, and what ‘sustainable’ would mean in these post-deportation contexts, was not specifically mentioned by the actants.

⁷⁷ It should be noted here that the actant is referring to the agency-to-agency network as a forum rather than a network. We have however chosen to classify it as a network in accordance with an ANT approach.

⁷⁸ Also confirmed in Interview In12.

Not only do the Nordic countries have different capacities in terms of obtaining information that is valuable in the eyes of their counterparts, but the different structures in the Nordic countries and the division of labour regarding how authorities work with return and readmission was made apparent at the meeting, with the Danish system and its Return Agency differing from the other Nordic systems. The Norwegian Directorate of Immigration's close relationship with the Norwegian Ministry of Justice and Public Security was also a unique relationship in comparison to the Swedish and Finnish systems, where actants often talked about a finer line being drawn in the sand between the migration agencies and the Ministries, although this line is slowly disappearing due to the adoption of a whole-of-government approach.

When asked what the goal of creating an intra-Nordic agency-to-agency network on return, reintegration, and bilateral relations with third countries should be, the actant answered to "...make use of each other's good examples and best practices in different areas when it comes to return, reintegration and development cooperation. Both at a more overall and a strategic level, albeit at an authority level. But also when it comes to operational issues." Hence, they explain in their interview that there are advantages and disadvantages to including the network within the NSHF. An advantage would be, aligning with the whole-of-government approach, bringing policymakers (i.e. the Ministerial staff) and operational staff together (i.e. the authorities/agencies), as representatives from both Ministries and authorities/agencies can be invited to attend NSHF meetings. This would *ensure* the presence of operational staff at NSHF meetings, thus closing the gap between the operational and strategic levels. This advantage could also serve as a disadvantage, according to the actant, as the attendance of Ministerial representatives might inhibit purely operational discussions between government agencies, i.e. the reason that the network was created to begin with.

As previous research shows, Nordic cooperation "...is largely facilitated by agency-to-agency cooperation" (Stie & Trondal, 2020, p. 2). These "...interactions are mainly informal, i.e. without formal decision-making authority, and take place predominantly among national civil servants handling day-to-day activities," which allows for "...civil servants in governmental sub-units [*to*] maintain considerable independence vis-à-vis their political principals" (Schrama, Martinsen, & Mastenbroeck, 2020, p. 68). According to previous research, this spirit of informality has become the "...norm and ideal for Nordic cooperation" (Schrama, Martinsen, & Mastenbroeck, 2020, p. 68). Hence, incorporating this agency-to-agency network within the NSHF could potentially blur these already established lines, i.e. civil servants maintaining independence from their political principals, and the idea of informality as a Nordic norm and ideal.

6.1.2 NORAQ: a product of the first agency-to-agency network meeting

According to our interview with the actant working on returns at an international and European level at the SMA, the agency-to-agency network's first meeting contributed to the development of a Nordic platform for capacity-building activities in Iraq: The Nordic Support on Return and Reintegration in Iraq (NORAQ) platform.⁷⁹ At the time of writing this report, the NORAQ platform includes Sweden, Denmark, Norway and Finland. The February meeting introduced relevant actors to one another, which led to follow-up meetings, which in due time led to the NORAQ platform. The NORAQ platform entails that the International Centre for Migration Policy Development (ICMPD) implements activities on the ground in Iraq, to help partners of the Government of Iraq and partners of the Kurdistan Regional Government with migration management. It is thereby funded as an intra-Nordic initiative, by Sweden, Denmark, Norway and Finland, which ensures that projects are in sync with each other, rather than overlapping.

In alignment to what was stated by the actant working on returns at an international and European level at the SMA, Knut Holm, Return Coordinator at the Norwegian Directorate of Immigration (UDI) and present at the February agency-to-agency meeting, explained in his interview that Denmark had been engaged in comprehensive activities with partners in Iraq under the umbrella of the ICMPD. When the UDI were given the responsibility to manage certain funding that had formerly been the responsibility of the Norwegian Ministry of Justice, they began a dialogue with Denmark. Thereafter, the February meeting occurred, thus introducing Sweden and Finland into the mix. When Holm was interviewed by us in January 2024, he explained:

It's in the beginning phase...and...it's a very interesting example of the first time [*that*] we have been able to identify Nordic cooperation including...Sweden, Denmark and Norway, and maybe Finland.⁸⁰ We have a lot of examples of cooperation between Norway and Denmark in, for example, Turkey, [*and*] in Somalia, but the Swedes have never been a part of that up until now, with NORAQ in Iraq.

Hence, the NORAQ platform's origins can be traced back to the agency-to-agency network's February meeting, but were cemented in an already functioning migration-related relationship between Norway and Denmark

⁷⁹ Also confirmed in Interview In11.

⁸⁰ At the time of this interview, Finland had not yet officially joined the NORAQ platform.

prior to this meeting. As explained by Kjell-Terje Torvik, project manager at the SMA, Denmark has been the leading country when it comes to the NORAQ platform, despite having a lower number of return cases to Iraq in comparison to, for example, Sweden. Hence according to Torvik, the NORAQ platform shows that there is not always a correlation between an interest in working with return issues, and how many actual returnee cases the Nordic country has. Although the term 'sustainable' wasn't specifically mentioned by actants, the NORAQ platform is indeed described, through an ICMPD press release, as focusing on the "...sustainable reintegration of Iraqi returnees..." (ICMPD, 2024). The implementation of 'effective' returns is not mentioned. For countries such as Denmark and Norway, working actively on return and readmission practices consistently and over time has been a political question. Hence, the image of "differentiated integration" can be found once again, as an intra-Nordic cooperation is, in this case, still also driven by specific national interests (Stie & Trondal, 2020, p. 3).

When asked about the topic of how the Nordic countries were able to coordinate and implement a project platform in Iraq, Bjørn Olaf Pettersen, in charge of liaison officers in the International Section of the National Police Immigration Service in Norway, stressed the relevance to the project of Norway's current position: a small financially stable country that does not belong to a big union. He stated:

...[W]e don't belong to a big union, so, saying yes to us doesn't necessarily mean that you have to open all the doors. We have, to a certain extent, financial muscles, so we can do some project cooperation. But we always try to look for: where can we do Nordic cooperation? So, as you say, Iraq is a good example, so always...with the process, we have to say, "okay, if we join with Sweden, Denmark, what kind of effect or consequences will it have on the cooperation?"

Thus, the significance of Norwegian and Danish actants within the NORAQ platform should not be underestimated. Despite a common ambition for joint Nordic programmes, the consequences of this cooperation for the individual Nordic countries, especially those with more to lose, entails a strategic balancing act where Nordic regional strategies for cooperation cannot outweigh the desire of individual Nordic countries to retain a degree of flexibility regarding their own specific national interests.

Prior to writing this report, a Migrant Resource Centre (MRC), funded by the Danish government, opened in Baghdad in December 2020. As part of the NORAQ platform, a second MRC was also established in June 2024 in the city of Erbil, in the Kurdistan Region of Iraq (KR-I). In contrast to the centre in Baghdad, the MRC in Erbil is funded by the Norwegian government (ICMPD, 2024, p. 18). In order to get an idea of what a project belonging to the NORAQ platform can look like, we consulted a concept note on the NORAQ platform's ICMPD MRC in Erbil that we were granted access to. According to this concept note, for the MRC in Erbil in particular, a budget of EUR 517,241.38 for the total period of November 2023 to December 2024⁸¹ was proposed. The overall objective of the project is "...to contribute to increased awareness and access to services on migration processes, referral mechanisms, and return and reintegration for outgoing, intending, and returning migrants in the Kurdistan Region of Iraq (KR-I), and strengthened capacities of the Government of Iraq (GoI) and of the Kurdistan Regional Government (KRG) in migration management."

The specific objectives include, "...to facilitate timely, accurate, and comprehensive information flow on migration, including reintegration and referrals to the available services, to targeted audience in KR-I and beyond, through the Migrant Resource Centre in Erbil and in partnership with the KRG", and "...to increase capacity of the KRG in migration management, including return and reintegration." Hence, with this project, the NORAQ platform has a clear objective to help KRG partners in Erbil to facilitate the reintegration of returnees, but also, according to the concept note, to prevent irregular migration from occurring. Thus, it covers several aspects of the return continuum.

According to a news article published in June 2024 on the SMA website, the NORAQ platform has officially been put into action. A Swedish contribution to the NORAQ platform includes the project Sweden-Iraq Cooperation on Migration Governance (SI-COM), running from June 2024 to May 2026 (Swedish Migration Agency, 2024). In the case of Sweden, administering aid funds is a new responsibility since the beginning of 2024. As stated in the news article by Kjell-Terje Torvik, project manager at the SMA, "[w]ith these funds, the Swedish Migration Agency steps in and strengthens Iraq's ability to take care of the needs of its own citizens in the area of migration, something that in the long term promotes work with return and reintegration" (Swedish Migration Agency, 2024). By joining together as a Nordic platform, and building on the notion of Nordicity, through NORAQ the Nordic countries are able to project a united front in their collaboration with Iraq (the Government of Iraq and the Kurdistan Regional Government).

⁸¹ Note that the centre opened later than initially planned.

This 'joining together' also aligns with previous research, which shows that the Nordic aid model has shifted towards an alignment with international trends and its usage of aid (or in this case, through funds) as foreign policy tools (Marklund, 2016). A focus on implementing a 'sustainable' reintegration process for Iraqi returnees is prioritized discursively in the ICMPD press release (over an increase in the number of 'effective' returns to Iraq).

A 'sustainable' social and economic reintegration process is also mentioned numerous times in the NORAQ platform's ICMPD Migrant Resource Centre (Erbil) concept note, yet what is meant by 'sustainable' is not unpacked. The importance of a 'humane' return process for returnees accessing the services provided by NORAQ was not mentioned in NORAQ statements by the SMA or ICMPD (Swedish Migration Agency, 2024; ICMPD, 2024), nor is the term mentioned in the concept note that we were granted access to.

In an interview with Christina Jespersen, head of the Project Development and Implementation team at the ICMPD's Return and Reintegration Facility (RRF) in Brussels, and previously appointed as Senior Advisor on migration issues within the Ministry of Immigration and Integration in Denmark from 2017 to 2022, she explained that a joint Nordic project had been on the table for several years, with funding being the largest obstacle in the way of achieving this goal:

During the five years I was involved in the NSHF, we spent a lot of time trying to figure out how to create a joint programme or project with funding from different Nordic countries. And it was massively difficult because the type of funding available in each country was so different. Sweden had one kind of funding, Norway had its own funding available through, I believe it was the Ministry of Justice, and Denmark had these flexible return funds which were DAC [Development Assistance Committee] funds, so essentially ODA [Official Development Assistance]. These different types of funding streams and their different requirements made it incredibly difficult for us. But now, I think they've found a way to make it work – at least in Iraq. From what I understand, each country has its own project, but they're all coordinated on a common platform, targeting the same beneficiaries, like Iraqi government entities and stakeholders. So I think that's how they cracked that nut.

Hence, the NORAQ platform might have been the first intra-Nordic project on return to have "cracked the tough nut" of coordinating different funding streams. It is worth noting that there appears to have been a willingness to collaborate on an intra-Nordic project well before the Ministerial press release

that called for initiatives on return and readmission. This suggests that overcoming the funding stream obstacle may have required either a shift in which entity controlled the funding in each Nordic country (such as the change in the SMA's responsibility for certain funding), and/or the issue needed to be addressed within a more operational level network than the NSHF. An example of such a network could be the agency-to-agency network, where the right people are in the right place at the right time, creating a perfect opportunity to find a solution. Regardless, since the February 2023 meeting and the creation of NORAQ the agency-to-agency network has been incorporated into the NSHF, a process which is described in the following section.

6.1.3 Incorporating the agency-to-agency network into the NSHF

The following section is based on our follow-up interview with the actant working on returns at an international and European level at the SMA. During the course of writing this report, the actant informed us that the agency-to-agency network had been incorporated into the NSHF, thereby changing its status from informal to formal, and changing the actants involved. This is not surprising, as we know that networks are fluid (Müller & Schurr, 2015, p. 222). In August 2023, a representative from the SMA was invited to attend an NSHF working group on return meeting in Copenhagen, in which they brought up the potential continuation of the agency-to-agency network, especially in relation to intra-Nordic project coordination. According to the actant, it was at this meeting in Copenhagen that it was therefore decided that what was the agency-to-agency network, in terms of content, would be included in the NSHF in order to avoid the existence of too many forums. After this decision, Denmark called a meeting in February 2024, focusing on which Nordic countries are currently running what projects related to returns, and in which third countries. The aim of this meeting was to find out whether the Nordics can continue to work together on specific capacity-building and/or development projects in third countries.

It was decided that the re-formed group would continue to meet twice a year, as a sort of subgroup of the NSHF working group on return, yet mainly focusing on capacity-building/development projects. Norway also suggested having third country-specific, ad hoc meetings in addition to these meetings, when deemed necessary. The difference, however, between the old informal agency-to-agency network and the new formal subgroup of the NSHF working group on return, is the actants involved in the network. The February 2024 meeting included solely Ministry staff from both Denmark and Finland, but a mixture of Ministry and national authorities from Sweden and Norway. In the case of Sweden, the mixing of Ministry staff with Swedish government agency

staff was perceived as positive by the actant and aligned with a whole-of-government approach, as the SMA manages their own development projects, but the Ministry of Justice also finances and manages a number of projects. The actant describes how, in the Swedish case, the communication and information sharing between the Ministry and the SMA on these issues has developed and improved a lot.

6.2 Cooperation between Nordic return liaison officers/migration attachés

6.2.1 Mapping the informal cooperation between Nordic return liaison officers/migration attachés

In our interviews, primarily with actants either working as coordinators for return liaison officers within the Nordic countries or Nordic return liaison officers/migration attachés working on the ground in third countries, we were quickly made aware of the informal cooperation between Nordic staff working with return in these third countries in the form of experience sharing, contact details sharing, or approaching third country authorities together.⁸² Liaison officers, in general, can be referred to as “...‘knowledge brokers’-intermediaries that connect different sources and users of knowledge, and, through their interpretation, produce knowledge” (Ostrand, 2022, p. 46). A network of liaison officers working with return issues is characterized by “...an interconnected system of nation-states and interdependencies, requiring mid-level officials from multiple nation-states to interact, learn, and negotiate the management of migration flows” (Ostrand, 2022, p. 42). Christina Jespersen, head of the Project Development and Implementation team at the ICMPD’s Return and Reintegration Facility (RRF) in Brussels, and previously appointed as Senior Advisor on migration issues within the Ministry of Immigration and Integration in Denmark from 2017 to 2022, provides the following insights regarding Nordic cooperation on these matters:

“... [I]t’s been a long time coming, and it’s been around for, well, I can only speak for the period since 2017, but I believe it’s been there ever since the NSHF was first conceived. Over time, it’s waxed and waned with the changing political landscapes in the Nordic countries, but it’s never really disappeared – it’s always been present...”

⁸² Interviews In02, In07, In01, and In03.

Jespersen further elaborated that, while political ambitions regarding return and readmission have recently shifted, paving the way for a more unified Nordic agenda at the political and strategic levels, “[a]t the operational level, [...] there’s always been a really good sense of collaboration between the liaison officers.” In alignment with this notion, one actant, with expert insight into the field, testified that informal networks of Nordic liaison officers or embassy officers can be found in key cities covering key countries/regions such as Nairobi, Amman, Istanbul and Ankara.⁸³ Hence, there was no doubt in our minds that there was cooperation out there between liaison officers, as this was confirmed by many actants involved in other intra-Nordic networks on return and readmission. We had heard from actants interviewed that sometimes Nordic cooperation just occurred due to circumstance (i.e. being European countries in the same place at the same time).⁸⁴ However, when such cooperation is actively pursued, it becomes interesting to understand how it occurred, to what extent, and in which third countries.

One actant who had previously worked as a liaison officer in Kabul described a network called Nordic Plus (i.e. liaison officers/embassy staff from the Nordic countries, minus Iceland, but plus the Netherlands). During the actant’s time in Kabul, this network held regular strategic and operational meetings to discuss challenges, enhance processes, and effectively utilize diplomatic tools. Actants within the network would also make a point of repeating each other’s messages to the Afghan Government. Despite the actant stating that they believed Nordic Plus existed in more cities than Kabul, this was the only mention of a formal liaison officer network by an actant interviewed. Actants who had worked as or with Nordic liaison officers in countries other than Afghanistan, or currently in such roles, were unaware of the network. Instead, they described informal networks of information exchange between Nordic liaison officers and migration attachés.

Considering this lack of formal networks, when asked how contact with Nordic counterparts is established when first arriving in a third country, Kirsten Merete Tvilum Nielsen, based in Rabat (but covering the whole of North Africa, Somalia, and Nigeria) and employed as the Danish Embassy’s migration attaché working on returns, stated, “I mean, it’s just established.” She described establishing contacts with other Nordic counterparts when stationed in other countries and running into the same people again when

⁸³ Interview In11. Successful Nordic cooperation between Nordic liaison officers in Nairobi was also mentioned in Interview In07. It should also be noted that one actant (Interview In03) also stressed the cooperation of Nordic embassy staff, for example in Iraq, where Nordic embassy staff share information and experiences with one another.

⁸⁴ Interviews In08 and In19.

stationed in new countries, as well as joining International Liaison Officer (ILO) country-specific working groups. When it comes to the case of Somalia for example, a country covered by Nielsen, she described Sweden and Finland as wanting to approach the resources and return agenda in Somalia together as a Nordic *whole*, despite Denmark and Norway not wanting to jeopardize their already functioning relationship with Somalia.⁸⁵ As a result of this perhaps one-sided ambition, Nielsen stated that when it comes to Somalia in particular, Nordic cooperation can be found "...informally and formally. It's like, we meet a lot, and we discuss a lot, and we exchange a lot of knowledge experience, more than we do in just the general working group."

The idea that Norway has been one step ahead of the other Nordics, not only in terms of their bilateral relations with Somalia, but also when it comes to the placement of liaison officers abroad, was echoed by another actant, a Migration Advisor at a Norwegian Embassy. As they explained in their interview regarding bilateral relations:

...Norway has probably been the most active country over this time period, meaning from 2007 up until today, we have been the most active country working on readmission agreements...There has been contact, of course, with other countries but it has very often been country-related, not a general network. Which is to say, that for all those years that I sat in Norway working on Norwegian bilateral agreements, I didn't have a counterpart in Stockholm, Helsinki or Copenhagen that I could call on a regular basis. But I did have that counterpart in...Switzerland and the Netherlands, [which] I would say, over all these years, have been a closer counterpart or network than both Sweden and Denmark. But we also have to remember, in these years, Sweden was in a way on the outside and not even wanting to talk about returns. It's rather been the other way around, and as you say...there's been a slight turn of events in Sweden. So, it makes sense that there was no one to talk to in Sweden, because your door opened the other way from ours. Denmark was more similar to Norway, but at the same time, did not work the same way, at least this was not clear to us, that Denmark would have the same interest. They had an interest in readmission agreements and...our work with ILOs outside.

⁸⁵ The art of balancing what information to share in order to not compromise one's own bilateral relations was also echoed in Interview In03.

Hence, Norway has been leading the way with placing liaison officers abroad to work with these issues, and therefore might be found playing a pivotal role in these informal networks today. A political and strategic shift in return and readmission policies and practices in Sweden consequently implies that Sweden wants to join the ranks, thereby seeking cooperation from its Nordic counterparts (i.e. Denmark and Norway) that have been in the field for longer, especially when it comes to bilateral relations with specific countries such as Somalia. Sweden's specific national interest regarding Somalia therefore plays a role in Sweden's desire for intra-Nordic cooperation when it comes to Somalia. Thus, one could argue that informal networking between Nordic liaison officers might benefit those Nordic countries new to the field more than it benefits those Nordic countries that, prior to this shift, have had to look beyond their Nordic neighbours for cooperation.

However, the project manager for the Rapid Deployment Officers (ARLO II) project at the Swedish Police Authority's Border Police Division at the Department of National Operations, explains that there might be a simple explanation as to why Sweden cooperates differently with their Nordic counterparts. They argue that, compared to earlier, Sweden might just be more active in asking questions and highlighting that Sweden too has something to bring to the information-sharing table:

I believe that now, after the pandemic...there might also be new requirements, but maybe we, Sweden, have been a little bit more active as well, in asking other countries, but also saying, "we can contribute with this, and we need you: what did you do regarding Somalia? What did you do with Iraq?" Because now, it's definitely on the table. So, it might be that these countries would have actually shared a little [*with us in the past*], but we haven't asked, or have cautiously asked a bit diplomatically or something, so maybe you didn't see a great need. Because, I remember other countries like Denmark, they have mostly felt sorry for Sweden. Every meeting that we were at, they would come with their 12 cases and have a huge problem with Tunisia, [and ask], "and you Sweden?" "Yes, we have maybe 100 [*cases*], we also have problems." "Oh wow, don't you have a liaison officer?" "No, no." "Why not? Oh, how it is going to go for you?" It was kind of there it stopped. They felt sorry for us and thought, "well..." But then there was maybe a country where we were more successful than them, and they asked us of course, and were happy for our success...

In this context, 'success' is related to an 'effective' return, in which fruitful liaison officer relationships with third-country authorities are assumed to contribute to an increase in implemented returns. The narrative above not only describes Sweden as more active in seeking out knowledge from and asking questions of their Nordic counterparts, but also not shying away from what they themselves believe they can bring to the table in Nordic cooperation. This contradicts the 'poor little old Sweden' discourse and tries to establish their liaison officers as actants who can make something happen within informal return liaison officers/migration attaché networks. Bringing something to the table was mentioned by actants involved in the different intra-Nordic networks as important when it comes to Nordic cooperation, especially between Nordic return liaison officers/migration attachés.⁸⁶ When asked whether there is an imbalance where Swedish actants collect more information from Danish actants at the moment, or whether it goes both ways, Bjørn Bruun Østergaard, a deputy within the Return Division at the Danish Ministry of Immigration and Integration answered in his interview:

...getting inspiration and copying some of this stuff that other nations do, perfectly fine with that. That's not a problem. We do the same. We go around Europe and see what is working and get inspiration. That's not rocket science. That's fine by us. But when it comes to [*migration*] attachés, it's a different thing, because there has to be a balance between countries benefitting from each other's work. So in that area, it's more required that you, as you said, bring something to the table yourself.

Hence, bringing something to the table appears to be key for Nordic cooperation between Nordic return liaison officers/migration attachés to be balanced. But bringing something to the table involves a delicate balancing act where one must figure out what information to bring to the table, but also make sure that the information is not too sensitive to share.

Sweden has been quite unique compared to its Nordic counterparts through the Rapid Return Liaison Officers project. Rather than be stationed abroad as a Return Liaison Officer (RLO) for a long and fixed amount of time, this means that Swedish RLOs are sent to a focus-area third country for a short amount of time, ranging from a couple of days to a few weeks to several months. The idea behind this system is to not only keep costs down, but to efficiently pool resources in a shorter, concentrated amount of time, and if need be, to be able to cover more countries. In this context, an 'effective' return process means efficiently pooling resources rather than the number of successfully

⁸⁶ See for example Interview In14.

implemented returns. One could assume, however, that by efficiently pooling resources, the end goal is to increase the number of successfully implemented returns, thus leading us back to the original common understanding of the term 'effective' returns within the policy contexts.

According to the project manager for the Rapid Deployment Officers (ARLO II) project, Norway and Denmark have both shown interest in learning more about the Swedish Rapid Return Liaison Officer system.⁸⁷ One actant, a Migration Advisor at a Norwegian embassy, questioned the Swedish approach, explaining that the continuous presence of a person (i.e. liaison officer) in the third country is preferable, as building personal relationships with relevant people takes time, and the goal of the job in itself is "...building relationships with the government in question." The actant referenced their encounter with a Swedish liaison officer whom they had met in Addis Ababa in order to highlight the difference between the Swedish and Norwegian system. They stated:

[t]he way I understand his mandate, he does, what do you call it, he puts out the fires that have come up. While our idea is to be there before the fire starts. But we know that there will be a fire, but we just try to be there before it starts. And the Swedes then wait until the fire is up and running, and then you go to try to put it out...I'm not saying that one is better than the other.

Hence, different Nordic strategies are still used to achieve the same goal: building relationships with third-country authorities to facilitate a functioning and smooth return and readmission process. On the one hand, relying on the continuous presence of a liaison officer in a third country could lead to a 'sustainable' readmission process (for the Nordic country) over time if that liaison officer is able to build and maintain successful relationships with third-country authorities. On the other hand, rotating liaison officers for shorter periods of times and in target countries might not only lead to a more efficient utilization of resources, but could end up being a more 'sustainable' option, as the fragility of basing a successful readmission process on the personal relationships of just one person over an extended period of time is minimized.

Whether these differences either hinder or facilitate Nordic cooperation on these issues remains to be seen, especially as the NSHF Ministerial press release has communicated the need to "...allow Nordic migration and return attachés to coordinate and support assisted voluntary returns from Nordic countries..." (Government of Iceland, Ministry of Justice; Ministry of

⁸⁷ When it comes to Norway having shown interest in the Swedish Rapid Return Liaison Officer system, this was also confirmed in Interview In08.

Immigration and Integration, Denmark; Ministry of the Interior, Finland; Royal Norwegian Ministry of Justice and Public Security; Government Offices of Sweden, Ministry of Justice, 2023).⁸⁸ This prioritized initiative, according to one actant working on the ground, has come from the top-down rather than the bottom-up, as cooperation was already alive and kicking on the ground between liaison officers. Surprised by what instigated this NSHF initiative, the actant stated, "...on the ground, it's not like we do not like to cooperate?"⁸⁹ thereby pointing to a potential discrepancy between the political and operational levels within the NSHF.

6.2.2 The effects of Nordic return liaison officer cooperation in Ethiopia

Ethiopia was often mentioned by actants belonging to different intra-Nordic networks as an example of where Nordic liaison officers have yielded successful results through their informal network. This success is not defined in terms of an 'effective' return rate or a large overall *number* of implemented returns from the Nordics to Ethiopia. Instead it is defined in terms of an *ongoing dialogue* with the Ethiopian authorities which, from the perspective of relevant actants interviewed, is deemed to be promising. Maria Lundström, a Coordinator at the Helsinki Police Department, for example, explained in her interview:

I know that Sweden and Norway both have a really good presence in Addis Ababa. They really also kept our cases on top, with their own cases, and it led to the readmission of several persons. I think we were on Norway's return operation [*prior to the pandemic*], they organized a charter flight...their presence in Addis really helped Finland's cases to be accepted.

Other actants also commented on the ongoing success of the Swedish and Norwegian informal network in Addis.⁹⁰ Hence, to understand this network, we interviewed Robert Mattebo, a Swedish European Return Liaison Officer (EURLO) stationed in Addis Ababa, who stated that actants from primarily Norway and Sweden have been successful in getting the Ethiopian Government to cooperate (and thereby potentially avoid visa restrictions) by coming to the Nordic region on an identification mission, while Finnish and

⁸⁸ According to Interview In22, an actant with expert insight into the topic, Denmark and Norway are already ahead when it comes to the initiative proposed in the press release in comparison to the other Nordic countries.

⁸⁹ Interview In21.

⁹⁰ Interview In25 and In14.

Danish actants have “tagged along” as beneficiaries of the mission.⁹¹ An identification mission is meant to help facilitate a successful readmission process, as it “...is an operation conducted at the national level...by which teams of experts from...third countries are invited to/deployed in EU Member States in order to officially confirm the nationality and complete the identification process of their nationals who are not eligible to stay in the EU” (EMN, 2022).

According to Mattebo, together with the Norwegian Immigration Liaison Officer (ILO) and the German European Migration Liaison Officer (EMLO), they have become what the EMLO called ‘the Gang.’ A Swiss actant is also a core member of the Gang. Mattebo describes the Gang as a sort of “network slash friendship group” and explains that their successful relationship is unique to Addis: a result of trusting each other, working together without individual pre-eminence (which according to Mattebo can be a rarity in the liaison officer world), and a good mix of personalities. But when Mattebo arrived in Addis as a EURLO, his initial intention was not to seek out Nordic cooperation in particular, but instead “think EU with a dash of Sweden”. Upon hearing that Norway had an immigration liaison officer however, Mattebo got in touch, and their networking began from there. Even if the intention of this informal network was not Nordic cooperation between Sweden and Norway, in the eyes of many of our actants interviewed, the results thus far have become proof of what Nordic countries can achieve when they work together.

As Bjørn Olaf Pettersen, in charge of liaison officers at the International Section at the National Police Immigration Service in Norway, explained:

Ethiopia is the same example; we have this Norwegian and Swede working together and discussing with the Ethiopian authorities. And now they are discussing, we are actually talking about possible returns back to Ethiopia, and also Ethiopia coming to the Scandinavian countries. And what’s interesting is that the Ethiopians themselves asked for the Scandinavian countries to be the first when they develop their cooperation with Europe.

⁹¹ It should be noted that Denmark and Finland do not have Return Liaison Officers working in Addis Ababa but do have embassy staff on the ground.

When asked why Ethiopia requested that the Scandinavian countries be the first, Pettersen credits this to Norway's longstanding and continuous presence with a liaison officer in Ethiopia, currently supported by the EURLO from Sweden (Mattebo), and the German EMLO who, together with Switzerland, have established good contact with the Ethiopian authorities, thus step-by-step encouraging Ethiopia to re-visit and comply with the readmission agreement that was signed.

6.3 Summary of this chapter

This chapter has outlined what started off as two informal intra-Nordic networks centred on the cooperation and coordination of return and readmission policies and practices. Beginning with the agency-to-agency network, we were able to delve into how an informal network transitioned into being incorporated into the NSHF working group on return. The SMA provided an actant who actively spearheaded this informal network, which was expected to function at an operational level. As previous research shows, it is in this informal, decentralized space that the real work of Nordic cooperation appears to happen (Lægreid & Rykkja, 2020, p. 22). Although the network had only one two-day meeting in February 2023 before its incorporation into the NSHF, the role of the network was to bring together agency staff at an operational level from the different Nordic countries, to exchange knowledge regarding the state of returns in the Nordics, and share experience regarding capacity-building projects in third countries.

With Norwegian and Danish actants sitting on more experience when it came to their relations with specific third countries (Somalia and Iraq), their actants play key roles within their networks through sharing this information. The foundation of the NORAQ platform is said to have developed out of this first meeting, putting relevant actants in touch with one another, and became the first of its kind regarding Nordic capacity-building projects functioning as part of a platform in a third country. The agency-to-agency network is now incorporated into the NSHF working group on return, thus bringing together operational and ministerial staff (and thereby the operational level and the political level) to talk about capacity-building projects in third countries.

In comparison to the agency-to-agency network, the origins and mapping of networks between Nordic return liaison officers/migration attachés is a more difficult endeavour to embark on. What we know is that Nordic return liaison officers/migration attachés do have informal networks with one another, especially in key cities, and that this cooperation has been ongoing for a long time. At times, these informal networks are created with a Nordic intention in mind (such as the Nordic Plus network in Kabul), and at times they are created

by circumstance (i.e. not due to a unified sense of Nordicity, but due to being European country representatives in the same place at the same time). Thus, the roles and operational functions of these networks are difficult to map. In the case of Ethiopia, although the Gang only involves two Nordic actants from Sweden and Norway, it has been credited by many actants to be a success story in terms of what Nordic return liaison officers can achieve when they work together. Besides the example of Ethiopia, we know that in other countries as well, the goal of return liaison officers/migration attachés in general entails building relationships with third-country authorities to facilitate a functional and smooth return and readmission process.

Thus cooperation between Nordic return liaison officers/migration attachés often involves sharing information and experience to help one another achieve this common goal. Due to the sensitivity involved in establishing personal relationships between individual Nordic countries and relevant third-country authorities, there is more of a balancing act involved in what information is shared between Nordic return liaison officers/migration attachés, with Norway presumably playing a pivotal actant role in many of these networks due to its longer history of having liaison officers in the field. Hence, due to this balancing act, there is also more pressure on actants from individual Nordic countries who want information (i.e. usually Sweden and Finland, due to a recent change in return policies and practices) to also bring something to the table.

7. The potential benefits of Nordic cooperation on return and readmission

Although we have located Nordic cooperation on return and readmission within both formal and informal networks within this report, common themes regarding the potential benefits of this cooperation emerged primarily through our interviews. These common themes were often not dependent on the *type* of network that the interviewee belonged to, and thus crossed network boundaries. In order to understand how networks function according to their actants, this chapter examines what actants describe as the benefits of cooperating with their Nordic counterparts on these issues, i.e. what is the glue holding the cooperation (and thus the network) together? Looking more closely at these benefits will give us an indication of the opportunities that exist when it comes to improving intra-Nordic cooperation on return and readmission, if this is the goal and, as covered in Chapter 8, what obstacles exist.

Hence, in this chapter, Section 7.1 introduces the idea of Nordic like-mindedness as both a concrete and abstract idea that holds networks together. Section 7.1.1 maps how the Nordic region has been undergoing a transition to like-mindedness recently when it comes to return policies and practices, as in recent years, Sweden and Finland have begun to actively mirror their policies and practices based on what is deemed to be working in Denmark and Norway. Section 7.2 examines the idea of strength in numbers, as actants often explain that the Nordic region is stronger when it comes to return and readmission issues when they are represented as a like-minded unit rather than as smaller, independent, individual countries. In Section 7.3, we trace how information sharing between the Nordic countries is often portrayed as the main goal of all of our intra-Nordic networks on return and readmission, hence can be seen not only as a benefit to intra-Nordic networks on these issues, but also as the glue holding these networks together. Section 7.3.1 examines the advantages and disadvantages of intra-Nordic information sharing through the case of Somalia. Finally, Section 7.4 tackles the idea of Nordic cooperation as an added benefit to be had alongside EU cooperation, according to our actants.

7.1 The idea of Nordic like-mindedness

A common benefit repeatedly mentioned by the actants interviewed was the idea of like-mindedness. Like-mindedness among the Nordic countries was often depicted by actants as the reason why one could, and should, seek cooperation within intra-Nordic networks. Hence, it was a characteristic that was commonly portrayed as beneficial, and often already in place, in order for cooperation to prosper, rather than a characteristic that was questioned or problematized. The roots of this like-mindedness can be traced back to the concept of Nordicity – a shared common identity in the region (Browning, 2007, p. 27), based on a distinct linguistic and cultural affinity (Jalava, 2013, pp. 254,251).

Actants often described cooperating with their Nordic counterparts in other network meetings in non-Nordic cities/countries⁹² (often Brussels). This could mean bumping into their fellow actants from intra-Nordic networks on return and readmission in other migration networks, and thereby continuing to cooperate in other migration networks together.⁹³ It could also mean establishing contacts in other migration networks with new potential actants for their intra-Nordic networks on return and readmission and continuing this cooperation back at home, thereby contributing to new chains of association.⁹⁴ Meeting the same network actants in other working groups and networks was also described as beneficial for communication purposes. Actants could follow up (face-to-face) with one another on issues previously discussed at their network meetings on return and readmission, rather than send an e-mail,⁹⁵ once again reaffirming the idea that participation in more formalized forums can continue to promote informal cooperation (Lægreid & Rykkja, 2020, p. 26).

As one actant within a Nordic network on return and readmission explained in their interview⁹⁶ when asked if they continue to cooperate with their fellow network actants outside of return and readmission network meetings:

⁹² Interview In01, In02, In06, In07, In10, and In22.

⁹³ Interview In01.

⁹⁴ Interview In22.

⁹⁵ Interview In07.

⁹⁶ Interview In01.

Yeah, it kind of ends up that way. I met them, both Norway and Denmark, at a meeting in Vienna...and it kind of becomes natural to 'hang out' with those [*people*] that you know from the Nordic countries, because we often share the same view on the questions being discussed. So we still have quite a lot in common. You don't think about it, but when you see each other in other contexts, you realize, well, we usually think alike.

According to this actant, it sometimes takes placing the Nordics in non-Nordic contexts to actually understand the similarities between them, thus continuing to feed the engine of potential cooperation. According to this actant, these similarities include problematic countries and the challenges that these might entail, as well as common friends, i.e. countries that that Nordics have a successful cooperation with when it comes to return and readmission.⁹⁷ Another actant stressed that although different Nordic countries may have different priorities when it comes to problematic countries, the point is that they trust one another's advice and support when it comes to best practices on this issue, due to a history of Nordic cooperation on other issues.⁹⁸

When asked to elaborate on what they meant when they said that it was easy to cooperate with Nordic countries because "...we work in a similar way," another actant explained "...that it is easier to talk to someone with whom you have something in common. You know where you come from, you have visited each other's countries...there is, like, a bond somehow."⁹⁹ This like-mindedness – at times concrete (such as sharing problematic countries), and at times abstract (such as sharing a bond) – was often described as a prerequisite for successful cooperation. When Nordic counterparts meet one another in other working groups and networks in the EU, one actant described how discussions tend to be meaningful, as Nordic countries understand each other's "set-up".¹⁰⁰

A like-minded set-up in the Nordic countries was described by actants in various ways, ranging from a shared cultural heritage/values,¹⁰¹ sharing a common history of cooperation,¹⁰² being countries with strong principles regarding the rule of law,¹⁰³ sharing similar nationalities when it comes to

⁹⁷ Interview In01.

⁹⁸ Interview In10. Note that this feeling of basic trust was also mentioned in Interview In26.

⁹⁹ Interview In02. Note that a similar description of Nordic like-mindedness was presented in Interview In16.

¹⁰⁰ Interview In07.

¹⁰¹ Interview In04, In10, In13, In15, In21, In26, and In28.

¹⁰² Interview In13.

¹⁰³ Interview In10.

returnees,¹⁰⁴ having similar public administration structures,¹⁰⁵ to having similar organizational structures (i.e. flat),¹⁰⁶ using tax money in similar ways,¹⁰⁷ and having similar legal systems¹⁰⁸/legislation.¹⁰⁹ Hence, the concept of Nordicity appears to play a role in the process of translation for intra-Nordic networks on return and readmission, as actants appear to negotiate and define their identities and roles in relation to the characteristics of Nordicity.

However in their interviews, actants did not, for example, philosophize around questions such as can like-mindedness lead to negative effects including blindly following a leader, or failing to advance due to a lack of obstacles to overcome together. Instead, Nordic like-mindedness was often stated as a surface-level, positive, given despite its deeply embedded historical roots. As one actant explained jokingly in response to the idea that Nordic colleagues stick together in meetings in Brussels, “[i]t’s the same as when you moved abroad after high school, you hung out with those who were from the Nordics.”¹¹⁰ In contrast, another actant described the need for an abstract sense of Nordic like-mindedness for successful cooperation on return and readmission on the one hand, but also problematized this abstractness if it did not lead to concrete results.¹¹¹ When asked if the goal of prioritizing Nordic cooperation on return and readmission at a political level was felt at an operational level, they explained:

...of course, when it’s high on the political agenda, and it’s mentioned very much by the Ministry...it is indeed then of course trickling down. I don’t know if it’s trickling down to *actual actions*. But I mean, it also has to trickle down as a sense, you know, a *feeling*, that it is important to establish...

Later on in their interview however, they expressed the importance of this *sense* or *feeling* of unity actually leading to concrete outcomes that have an impact, stating, “[o]ne thing is that we have a political focus on [*that*] it’s important that we have a Nordic cooperation. That’s very nice. We all agree on that. But does anything come out of it?”¹¹² Otherwise, the idea that Nordic like-

¹⁰⁴ Interview In13. Note however that this idea was contested in Interview In21.

¹⁰⁵ Interview In23.

¹⁰⁶ Interview In04.

¹⁰⁷ Interview In04.

¹⁰⁸ Interview In10, In23, and In26.

¹⁰⁹ Interview In15.

¹¹⁰ Interview In02.

¹¹¹ Interview In21.

¹¹² Interview In21.

mindedness can lead to Nordic cooperation risks sounding like two interrelated buzzwords where their actual connection to one another is either assumed or taken for granted.

7.1.1 Nordic like-mindedness regarding return policies and practices: the case of Sweden and Finland

In recent years, the Swedish and Finnish Governments have been actively revising their return policies and practices. This change has consequently begun to blur the line drawn in the sand that previously divided the Nordic region into a dichotomy regarding their return policies and practices: with Sweden and Finland on one side of the line, and Denmark and Norway on the other side.¹¹³ Politically, Sweden has been looking towards Denmark (but also Norway), for their whole-of-government approach,¹¹⁴ examining how they have established return centres,¹¹⁵ their established cooperation with third countries, and how they use parts of their aid budget for capacity-building projects related to returns,¹¹⁶ thus covering different aspects of the return continuum.

As one actant explained, in Sweden the 'Danish model' for return and reintegration is often mentioned as a model that Sweden wishes to replicate and apply, whereas Sweden has previously been adamant about distancing itself from Denmark's policies.¹¹⁷ Actants in Finland, however, explained that although the Finnish Government is turning very much towards Denmark for their "newest ideas" and the use of flexible return funds, they are also turning to Sweden (who has been part of the return turn a bit longer and has similar funding streams to Finland, as both are part of the EU), and to Norway (due to their successful third-country cooperation).¹¹⁸

Although actants often reiterated the ways in which the Swedish and Finnish Governments are turning to their Nordic neighbours for inspiration, Anita Vardoy, Policy Director at the Division for Migration and Refugees at the Ministry of Justice and Public Security in Norway, highlighted that there are also aspects of the Swedish system that are worthy of admiration, and beneficial to other Nordic countries as well (an idea rarely mentioned by other actants). Vardoy explained:

¹¹³ This dichotomy has often excluded Iceland, due to Iceland's previous low number of caseloads.

¹¹⁴ Interview In06.

¹¹⁵ Note that the Swedish and Finnish focus (along with interest from Norway and Iceland) on return centres à la the "Danish model" was often mentioned in particular by actants. See for example Interview In04, In09, In12, and In26.

¹¹⁶ Interview In01.

¹¹⁷ Interview In01.

¹¹⁸ Interview In10.

...what we also admire about Sweden, you have lots of ideas now, but you are also very thorough when it comes to looking into how we should do it. So, we have to say, from our side [*i.e. the Norwegian side*], we jump at it more. We don't really look into "*att utreda*" [*investigating*] for months or years, but that is my impression that you do in Sweden. You set up a Commission to do so and so, and you are patient to find out, even though the politicians probably are eager for results, you are patient with the results...You want to do the right thing, which is good, to be thorough and to find out, because there are not many easy straight forward solutions here to see what is working and not. There are many conditions that can make the same thing work in one country and not work in the other country. So to think about all the pros and cons, I think is very important.

According to the actants we interviewed, this ongoing return turn shift in Sweden and Finland has increased the possibilities for Nordic cooperation.¹¹⁹ Bjørn Olaf Pettersen, in charge of liaison officers in the International Section of the National Police Immigration Service in Norway, highlighted that from a Norwegian perspective:

...for some years, Sweden was working in another direction than Norway and Denmark when it came to migration. So it wasn't easy for us to have this kind of operational, strategic cooperation. But lately we have been in close contact with our colleagues from Sweden. There is a new spring coming up, so we are now discussing how we could cooperate when it comes to deploying liaison officers.

According to Pettersen, a Nordic like-mindedness in terms of return policies and practices could lead to "...a possibility to share responsibility" between the Nordic countries in terms of resources. Similar to Pettersen, when asked whether or not it is a welcome change for Norway that Sweden's return policies are now more aligned with Denmark and Norway, Knut Holm, Return Coordinator at the Norwegian Directorate of Immigration (UDI), explained:

I think it's welcomed, because I see...that a strengthened Nordic cooperation on return improves, in general, our position as Norway in cooperation with third countries, but also internally in the EU. So because we have a...joint position, joint interests as Nordic countries, that is something in the long term that will be beneficial for all of us, I believe.

¹¹⁹ Interview In01, In07, In11, and In14.

Hence, according to Holm, an increase in Nordic like-mindedness on return policies and practices leads to a strengthened Nordic unit which can further benefit the individual Nordic countries.¹²⁰ Although Nordicity appears to play a role in the process of translation for these networks, Nordic cooperation is still, of course, also driven by specific national interests, as shown through Stie and Trondal's image of "differentiated integration" (2020, p. 3). If the Nordic countries are more synchronised when it comes to return policies and practices, Norway (a non-EU Member State), for example through Sweden and Finland (two EU Member States) could gain a greater role as an actor within EU networks on these issues without having to fully adhere to the megastructure of the EU. This leads us to the idea of strength in numbers.

7.2 The idea of strength in numbers

The idea of strength in numbers was another common theme describe by actants as the glue that held Nordic networks on return and readmission together, and thereby important for the translation process in which identities and roles are negotiated. One actant stated that one can see a difference when for example, "little Sweden" raises a question of concern regarding return and readmission, compared to if four or five Nordic countries raise the question together.¹²¹ Hence, strength in numbers in this context often entailed the perception that the Nordic countries are quite "small", limited and powerless on their own, but when "joining together," they have the potential to become influential within EU contexts and/or dialogues with third countries, thus strengthening the Nordic brand. These spheres of influence ranged from conveying messages as a unit in EU level discussions,¹²² to approaching Frontex as a united front regarding return flights and escort training,¹²³ and interacting with authorities in third countries as a unit.¹²⁴ One actant expressed this "joining together" of the Nordics in EU discussions, in particular, as having "...more voice when we voice things together, not just as individual countries...", and a result of Nordic like-mindedness.¹²⁵ According to Browning's research, the Nordic brand's existence is reliant on the framing of collective Nordic positions "...built around cohesive policy preferences..." and the "...acceptance that each [*Nordic*] country has authority to speak on behalf of the Nordic collective" (2007, pp. 30-31). Hence, the idea of strength in numbers requires this authority, and reaffirms the idea of the Nordic brand.

¹²⁰ However, it can also lead to many obstacles, as discussed in Chapter 8 of this report.

¹²¹ Interview In02.

¹²² Interview In10 and In18.

¹²³ Interview In17 and In22.

¹²⁴ Interview In27.

¹²⁵ Interview In10.

Another actant explained that Nordic countries are “...stronger together” and hence, Nordic cooperation is currently politically prioritized as this strength benefits each country individually.¹²⁶ But there can be costs to individual countries when applying the strength-in-numbers tactic as a way to foster further cooperation. As another actant, a Migration Affairs Advisor at a Norwegian embassy explained regarding potential cooperation between Nordic countries on the issues of prioritized countries and return/readmission:

Today, I get the feeling that we are sitting at the same side of the table. I think there would be incredible savings, because the return business is costly, and in a lot of cases, you're stronger together. But with some countries, they don't allow you to come in a group, meaning, they see how easy it is to play one up against the other. So they use split and rule, and they do it very well, and we fall into the trap all the time. The small countries, the big countries. And because it's so important for me to get my case through, I'll take the carrot from this country and leave the others outside.

Hence, despite finally sitting on the same side of the table, the tactic of strength in numbers might not always be a beneficial strategy for Nordic countries to use in achieving their own specific national interests. This is especially the case if these national interests entail wanting to increase the number of successfully implemented returns (i.e. what is traditionally referred to in policy as an 'effective' return) to a third country deemed difficult in this area.

7.3 The benefits of information sharing

Sharing relevant information with one another was a core feature of all of the formal and informal intra-Nordic networks on return and readmission mentioned in this report. One of the main goals of each network is to foster an environment or a relationship where information such as best practices can be shared with one another. When successful, it was also described by the actants interviewed for this report as one of the greatest benefits for the Nordic region as a whole when it comes to the area of return and readmission, but also for the individual Nordic countries as well. As one actant explained, “[t]he more we work together, the more information we get, and the more ideas that we get, and we get deeper and deeper, and that's what we hope.”¹²⁷ Depending on the type of network, however, the type of information that needs

¹²⁶ Interview In22.

¹²⁷ Interview In13.

to be shared differs, ranging from best practices regarding problematic countries,¹²⁸ to planning for a Joint Nordic Return Operation,¹²⁹ to sharing details as to whether third-country embassies are treating each of the Nordic countries differently.¹³⁰

Regardless of the type of information that was shared, many actants described their Nordic counterparts as generous in sharing information with one another, thereby providing an opportunity for fruitful cooperation to occur. Mikaela Eriksson at the Swedish Ministry of Justice, and a Swedish representative at the NSHF working group meetings on return, described this climate as follows in her interview when asked about the benefits of *informal* cooperation (in comparison to formal cooperation) between the Nordics on these issues:

...[i]t's like I've said several times now, but we [*i.e. the Nordics*] are very generous with sharing information. Unlike when you sit at a meeting in Brussels, where you sometimes feel like people are actually keeping things to themselves, that's not the way it works with the Nordic countries. Here, you tell it as it is. "We have a great cooperation with Somalia because we've done this, and this, and that. It's cost this amount of money, and that's resulted in four people returning [*to Somalia*], but we think that it has worked well because..." So, we're very generous towards one another.

In the narrative above, an 'effective' return process is not necessarily equated with a large number of implemented returns. It is instead equated with Nordic cooperation where information and knowledge is shared generously between the Nordic countries. When asked where this generosity stems from, Eriksson explained, "I'm not sure, I can only guess. But I think that there's some sort of Nordic identity at least. We feel an affinity with one another, even though we're also very different from one another." This affinity with one another can be understood through the concept of Nordicity, i.e. the idea of a common Nordic identity based on a distinct linguistic and cultural affinity.

¹²⁸ Interview In01.

¹²⁹ Interview In13.

¹³⁰ Interview In13.

7.3.1 Information sharing: the case of Somalia

The case of Somalia was often mentioned by the actants interviewed when discussing the importance and fragility of information sharing between the Nordic countries. As described by Mikko Sivola, Chief Inspector for a Return Unit at the Helsinki Police Department in Finland:

...the Norwegians, they have very good relations with Somalia, and we [*Finland*] had problems with Somalia. We will have, but when...we managed to start, Norway...gave us a lot of information on how they do [*it*]. They gave us an update on how they do [*it*], and how they managed, and...which are the best cases, and so on, and so on. So for sure...I think we have seen, not only with Nordic countries, but when you ask some country, they may give you the contact details to their own liaison officer in Nigeria or whatever. I mean, countries are not hiding their contacts (and best practices) anymore. I think it's more transparent now than it used to be like 15 years ago. Then, everyone wanted to keep it a bit secret, they didn't want to share and were maybe afraid...That's how I sometimes felt it.

Although Sivola describes a more transparent culture of information sharing between countries, regardless of Nordic identity or not, when it comes to the case of Somalia, Nordic network actants often describe turning to primarily Norway, and at times Denmark, for advice on best practices.¹³¹ As one actant explained, Finland has had an excellent dialogue with Norway, for example, regarding best practices.¹³² According to another actant, this working relationship between Denmark/Norway and Somalia dates back to the use of development aid funds in 2016, where Denmark and Norway were the two largest donors for a new headquarters for immigration authorities in Somalia in 2018.¹³³ Denmark and Norway continue to have return and reintegration programmes in Somalia today.¹³⁴

But the reliance on one country (for example, Norway in this case), to share their best practices also highlights the fragility involved for the country doing the sharing. Sharing information with Nordic counterparts could compromise one's own relationship with the third country, thereby eradicating years of work and invested resources, and hence compromising one's own national

¹³¹ Interview In10, In13, In21, and In27.

¹³² Interview In10.

¹³³ Interview In21.

¹³⁴ Interview In24. Note that according to this actant, the Danish Refugee Council (DRC) have a contract with the Norwegian authorities. This means that the Danish authorities are "buying places" on the Norwegian contract.

interests. When asked whether or not other Nordic countries turning to Norway for advice on Somalia is a big issue at the moment for Norway, Bjørn Olaf Pettersen, in charge of liaison officers at the International Section at the National Police Immigration Service in Norway, answered:

[i]t's not a big issue, and it's like I said earlier, of course they [*i.e. other Nordic countries*] will ask us for cooperation, and "how did you manage?" ...But then, we have to do this kind of weighing again. If I let, say Sweden, into that cooperation, we don't have big numbers [*i.e. a large number of returnees to Somalia*] and we're developing slowly, we've done it for many years. If Sweden then decides to come with a charter flight [*to Somalia*], 200 persons, it will be ruined overnight. So we have to go into the cooperation with some kind of strict advice on how to deal with it...But if that is respected, I don't see any problems...We are willing to share under certain conditions. But of course, that's part of the game. If you're going to be in this kind of cooperation, you also have to have something to put into the cooperation. You can't always be the ones sitting and asking for things and never giving something.

Hence, according to Pettersen, the "game" of return and readmission entails a careful weighing up of what information is shared, even to Nordic counterparts, and cannot be a one-sided relationship of taking, but not giving. Information sharing is often the glue holding intra-Nordic networks on return and readmission together, but the type of glue that is used must be carefully chosen. Networks cannot, and are not, solely motivated by the concept of Nordicity, as national interests can be, and are inevitably, at stake.

Another actant explained that an intra-Nordic cooperation regarding Somalia (i.e. Sweden and Finland approaching the Somali authorities together with Danish and Norwegian representatives in order to better their relationship) would potentially be hindered as a result of the variation in caseload numbers in the Nordic countries regarding Somali returnees.¹³⁵ Denmark and Norway, for example, might have a working relationship with Somali authorities regarding return and readmission, but their caseloads are also significantly smaller, than for example, Sweden. Hence, as this actant explained, "...Norway and Denmark are a little bit reluctant because we already have excellent cooperation [*with Somalia*], which we are absolutely not interested in screwing up. I mean, that would be stupid. And also, you know, sometimes we are not the same [*regarding caseloads*]."¹³⁶ The actant continued to describe

¹³⁵ Interview In21.

¹³⁶ Interview In21.

the conundrum of feeling a sense of Nordic unity, yet also being unwilling to compromise a relationship of trust with Somalia that has taken years to build.

Therefore, information sharing between the Nordics regarding Somalia might be one thing, but practical cooperation regarding Somalia introduces an *additional* layer of fragility. This could not only further compromise Norway's (and Denmark's) relationship with Somalia, but also prove to be inconclusive due to the extreme variation in caseload numbers within the individual Nordic countries. Although actants within the Nordic networks on return and readmission often described an abstract feeling of like-mindedness with their Nordic counterparts, the actualities on the ground for the individual Nordic countries reflect a different reality when it comes to Somalia. Sweden and Finland are currently and intensely attempting to catch up to their Danish and Norwegian neighbours with their return policies and practices, hoping to gain insights along the way. As portrayed through our interviews, Danish and Norwegian actants are perhaps more vocal about these differences yet are willing to provide advice to their Swedish and Finnish neighbours, as long as their many years of investing resources and building relationships of trust with Somali authorities is neither lost nor compromised. Thus, the actants were often positive to regional Nordic cooperation on these issues in theory, as long as individual Nordic countries (i.e. Denmark and Norway in the case of Somalia) are able to preserve a level of flexibility in protecting their own national interests.

7.4 The benefits of Nordic cooperation as opposed to EU cooperation

Thus far, we have examined how actants have described Nordic like-mindedness and information sharing as the glue holding intra-Nordic networks on return and readmission together, as well as the narrative that the Nordic countries are stronger together. But according to the actants interviewed in this report, what are the benefits of Nordic cooperation as opposed to EU cooperation? With Denmark, Sweden and Finland as EU Member States, and Norway and Iceland belonging to the Schengen area, is there any added benefit from Nordic cooperation alongside, or on top of, EU cooperation on these issues? Are the Nordic countries, as one actant put it, developing their cooperation on return and readmission in a similar fashion to how they have seen the EU develop their cooperation, i.e. a strategy developed by Ursula von der Leyen and Ylva Johansson, mandating Frontex to establish return liaison officers and cooperation on returns?¹³⁷

¹³⁷ Interview In14.

As researchers, early on in our data-collection period we tried to examine whether there were any tensions or contradictions between the Nordic countries and the EU when it came to forming alliances to cooperate on return and readmission issues. When asked about this, Jörgen Lindström, Migration and Return Ambassador at the Swedish Ministry of Foreign Affairs, explained:

The answer to your question is no. I haven't noticed any contradictions. I think that there is an inherent understanding within the Nordic countries concerned that some are members of the EU and others are not members of the EU, and it is according to those premises that we work...So then, I don't think that there is any contradiction...The Nordic cooperation is so well-established through the decades...we have been so very integrated since the [19]50s, step by step on very many different areas which has led us to have a close, close, cooperation, almost automatically with Nordic colleagues...But no, I don't think that there is a contradiction between [them]. It is based on understanding the different contexts in which you act.

According to Lindström, Nordic affiliation versus EU affiliation in these policy areas is not necessarily viewed as a contradiction; it is instead viewed as solely setting the framework for how one can act. However, the obstacles that arise with these dual affiliations will be unpacked further in Chapter 8.

As previously examined in this report, the idea of Nordic like-mindedness, being fewer in number and, as Lindström described it, having a long history of close cooperation in comparison to the EU,¹³⁸ leads one to inevitably assume that it might be easier for the Nordic countries to reach a consensus on how to cooperate with one another on return and readmission issues than it is for EU Member States to reach a consensus in these policy areas.¹³⁹ Another actant explained that the Nordic countries share quite similar challenges when it comes to return issues and specific third countries in comparison to other EU Member States.¹⁴⁰ Therefore, Nordic cooperation creates spaces in which these challenges can be prioritized, which is not always the case in EU discussions. This also feeds into the narrative of strength in numbers, as Nordic countries are then able to bring up certain issues at an EU level meeting as a unit, thereby “...backing up the same objectives”.¹⁴¹

¹³⁸ Also reiterated in Interview In10.

¹³⁹ Interview In04.

¹⁴⁰ Interview In18; also reiterated in Interview In19.

¹⁴¹ Interview In18.

This Nordic cooperation will never be fully independent of the framework governing the EU countries (Weber, Mohn, Vecchio, & Fili, 2020, p. 79), as some Nordic countries are obviously bound to the new pact on migration for example, due to their EU membership. As Anita Vardoy, Policy Director at the Division for Migration and Refugees at the Ministry of Justice and Public Security in Norway, explained, this pact does not *hinder* Nordic cooperation, but can *postpone* it, so the question remains: “[s]hould we wait for the bigger us, or should we go more together as a smaller us? This is always a dichotomy, I think.” For Nordic countries who are not members of the EU, Nordic cooperation can even come across as less controversial than cooperating with the EU, depending on the political stance taken on the EU by country’s government.¹⁴² Regardless of return policy developments in the EU however, Vardoy predicts that “...we [*i.e. the Nordics*] will always be each other’s first partner to consult on some things.” Actants often circled back to the idea of Nordic like-mindedness/a sense of unity holding the Nordics together after points indicative of challenges were made, thereby cementing the idea that Nordicity does indeed play a role in the translation process for these networks.

7.5 Summary of the chapter

This chapter has outlined the ways in which intra-Nordic networks on return and readmission are shaped and maintained, and the benefits that can arise as a result of this, thereby creating opportunities for successful cooperation. Through our interviews with actants involved in these networks, common themes emerged regarding what actants describe as the benefits of cooperation with their Nordic counterparts on return and readmission. The idea of Nordic like-mindedness was seen by many actants as a prerequisite for cooperation to exist. Although this like-mindedness was at times described in concrete terms (for example, that the Nordic countries share similar problematic countries) and in abstract terms (for example, that the Nordic countries share a bond), what was described by actants was often relatable to the characteristics of Nordicity. Hence, actants from Nordic networks on return and readmission appeared to negotiate and define their identities and roles in relation to the characteristics of Nordicity.

As Sweden and Finland have recently joined the Nordic return turn, looking towards Denmark and Norway for inspiration when it comes to return policies and practices, this move towards Nordic like-mindedness regarding policies and practices was described by actants as a positive foundation for further

¹⁴² Interview In07.

cooperation. The now outdated Swedish saying *lika barn leka bäst* (meaning literally that children who are similar play better together)¹⁴³ seems to be making a comeback in terms of intra-Nordic cooperation on return and readmission. This chapter also examined how actants described the benefits and opportunities that arise when Nordic countries join together and present themselves as a unit with a collective Nordic position. This Nordic collectiveness was described as beneficial within other environments too, such as the EU. Information sharing was also described by actants as the glue holding together most intra-Nordic networks on return and readmission. Choosing what information to share with Nordic neighbours was often described as a delicate balancing act, as sharing information is meant to benefit the Nordic collective as a whole, but can put the national interests of individual Nordic countries at risk. An example of this balancing act is the case of Somalia. The following chapter will go on to examine the obstacles that may arise, potentially hindering intra-Nordic cooperation on issues of return and readmission.

¹⁴³ This saying is generally translated into English as “birds of a feather flock together”, a less problematic saying.

8. The potential obstacles regarding Nordic cooperation on return and readmission

The previous chapter explored what intra-Nordic network actants describe as the benefits of cooperating with their Nordic counterparts on return and readmission issues. This chapter, however, examines the obstacles that could potentially stand in the way of successful intra-Nordic cooperation. Hence, in contrast to the idea of Nordic like-mindedness as reviewed in the previous chapter, this chapter begins with Section 8.1, which looks more closely at the ways in which Denmark and Norway are defining the playing field for Nordic cooperation on return and readmission. Section 8.2 examines the way in which the Nordic national systems differ from one another when it comes to their return and readmission administrative setup, and the problems that can occur when these differences are not properly understood or taken into consideration by other Nordic countries wanting to implement similar ideas, despite having different national systems. In Section 8.3, we look at the uniqueness of Iceland and how, paradoxically, they would benefit greatly from an intra-Nordic cooperation on return and readmission *due to* this uniqueness yet are also often excluded in different ways *because of* this uniqueness. Finally, as a comparison with Section 7.4 in the previous chapter, Section 8.4 in this chapter tackles the obstacles that can arise when Nordic cooperation exists alongside EU cooperation on these issues.

8.1 Who defines the playing field for Nordic cooperation?

As laid out in the previous chapter, for many of our actants within intra-Nordic networks on return and readmission the idea of Nordic like-mindedness plays an important role in the translation process. Actants were found continuously negotiating their network identities in relation to the concept of Nordicity, i.e. a common Nordic identity based on a distinct linguistic and cultural affinity. Yet when it comes to Nordic cooperation on return and readmission, the notion of who can participate, and who defines and provides the playing field, has drastically transformed since the Nordic return turn. According to one actant, until recently Denmark and Norway have not been able to cooperate with

Sweden at a political and operational level on these issues.¹⁴⁴ This newly established cooperation with Sweden, however, is a welcomed change.¹⁴⁵ As one Norwegian actant openly put it, "...we welcome in many ways the new policy in Sweden because...to be frank, we thought you have been a bit naïve..."¹⁴⁶

When asked if Sweden's changing policies and practices in regard to return and readmission have affected the way in which the Nordic countries cooperate, Mikaela Eriksson, at the Swedish Ministry of Justice, and a Swedish representative at the NSHF working group meetings on return explained:

Yes, it might have brought us closer to the Danes, who have been one step ahead of us. And even the Norwegians. They've already done a lot of what our politicians want us to do now. The Danish model is mentioned all the time: "but you can look at how the Danes do it." And in the past, [*regarding*] a lot of what the Danes have done, we have said: "we do not do that."

Eriksson explained that the Swedish Government is looking towards Denmark and Norway when it comes to their extensive whole-of-government approach that incorporates return centres,¹⁴⁷ established contacts with third countries, and the use of parts of their aid budget for capacity-building projects that can benefit returns.

Although also greatly interested in the Danish model and specifically their return centres and flexible return funds, actants involved in intra-Nordics networks on return and readmission in Finland often stressed that Finland could learn from each of the Nordic countries (except for Iceland) when it came to these issues. According to one actant, Sweden is of interest to the Finnish Government as the Swedish Government has been prioritizing these issues for longer. Similar to Finland, Sweden is also bound to the EU system and has a similar legal system and administrative system. When it comes to Norway, their reputation regarding successful established cooperation with third countries is of interest to the Finnish Government.¹⁴⁸ Another actant

¹⁴⁴ Interview In14.

¹⁴⁵ Interview In07 and In11.

¹⁴⁶ Interview In07. The idea that actants in Denmark and Norway have previously viewed Sweden's migration policies and practices as naïve, and thus that they looked askance at Sweden when it came to their reintegration policies and practices, was also stated in Interview In28.

¹⁴⁷ According to Interview In26, all of the Nordic countries (Sweden, Norway, Finland, and Iceland) have visited Denmark in order to learn about their return centres.

¹⁴⁸ Interview In10.

summarized the Finnish Government's interest as divided into two. On the one hand, the Finnish Government is learning from Sweden and Denmark when it comes to the pre-departure phase in terms of return counselling and return centres, and on the other hand, learning from Denmark and Norway when it comes to matters of reintegration and third-country cooperation.¹⁴⁹

Denmark and Norway, however, have had longstanding cooperation with one another when it comes to issues of return and readmission. According to one actant, Denmark and Norway have been in close cooperation when it comes to liaison officers, using funding to strengthen cooperation with third countries, and regarding key policy approaches.¹⁵⁰ Christina Jespersen, Head of the Project Development and Implementation team at the ICMPD's Return and Reintegration Facility (RRF) in Brussels, and previously appointed as Senior Advisor on migration issues within the Ministry of Immigration and Integration in Denmark from 2017 to 2022, explained that this close collaboration can be attributed in part to Denmark drawing inspiration from Norway. Norway had a different way of approaching return and readmission issues in terms of their extensive use of liaison officers and an impressive budget, both found to be inspirational for Denmark. As Jespersen explained:

I think back in the day, Denmark was really influenced by Norway. But these things change over time. Right now, it looks like Denmark is being an inspiration for the other Nordic countries.

Both countries are now considered to be big players in the Nordic return and readmission area by their neighbouring Nordic countries, with Sweden and Finland attempting to catch up. For Nordic cooperation to be successful, many of the actants interviewed described the need to first "be on the same page".¹⁵¹ As one actant in Denmark explained when asked to describe the nature of cooperation between Denmark and other Nordic countries when it comes to these issues, "...I think it's growing even stronger because it seems like Sweden and Finland in particular are getting closer to the approach that we and the Norwegians have."¹⁵² This shift towards a Danish model of return and readmission raises concerns, as noted by Madelaine Seidlitz, lawyer and Senior Legal Advisor responsible for refugee and migration issues at the Swedish section of Amnesty International. Seidlitz cautions that, regardless of which Danish-inspired changes are implemented in practice in other Nordic countries, there is also a noticeable shift in tone and rhetoric surrounding

¹⁴⁹ Interview In12.

¹⁵⁰ Interview In11.

¹⁵¹ See for example: Interview In21.

¹⁵² Interview In22.

these issues. In Sweden, for example, Seidlitz points to a growing discourse that is increasingly sceptical of refugeehood, thus reflecting Denmark's more deterrence-based approach.

With Sweden's and Finland's changing policies and practices regarding return and readmission, the identity of intra-Nordic networks on return and readmission is defined through a process of translation that is centred around the Danish and Norwegian way of 'doing things'. According to this logic, successful Nordic cooperation equates to a standardization of Nordic return policies and practices to the return policies and practices of Denmark and Norway. This defies findings in previous research, which have previously stated that when it comes to questions of migration, "the Nordic countries appear as peripheral and in no way as one *model*" (Brochman & Hagelund, 2011, p. 13). This leads us to the following reflection: To what extent is Nordic cooperation on these issues defined by Denmark and Norway? The two countries clearly play a role in shaping and maintaining intra-Nordic networks on return and readmission, as the Nordic brand on return and readmission is asymmetrically equated with the Danish and Norwegian way of working on these issues. Hence, if Nordic national policies and practices change when national governments change, Nordic cooperation on these issues will find itself in a vulnerable position.

8.2 The uniqueness of Nordic national systems

As shown in the previous section, according to our actants Nordic cooperation is most successful when Nordic countries 'are on the same page'. Inevitably, the uniqueness of the individual Nordic national systems can serve as an obstacle to this cooperation. While the idea that Denmark and Norway are leading the way on return and readmission issues dominated the majority of our interviews, individual Nordic countries were also occasionally praised for their distinctive features. As mentioned in the previous chapter, Sweden was recognized for being thorough in investigating ideas before implementing them and as highlighted by another actant, for the SMA's return counselling dialogues.¹⁵³

When it comes to obstacles regarding Swedish government agencies, Bjørn Olaf Pettersen, in charge of liaison officers at the International Section at the National Police Immigration Service in Norway, explained in his interview:

¹⁵³ Interview In04.

...when it comes to Sweden, and the cooperation between the Police and the immigration services in Sweden, [and] confidentiality laws...I can ask the immigration services in Sweden for information and get it, based on the international cooperation, but my Swedish colleague won't get it. So...we have to adjust our cooperation to that. But I don't see any problem, as long as we are willing to develop this...Norwegian politicians are looking towards Sweden. We have a tradition of looking towards Sweden, and we try to cooperate. I think that will also continue in the future, maybe not on the political front, but on a kind of strategic and operative front.

This division between cooperation at a political versus strategic/operational level is indeed an interesting distinction to make. Although Sweden might be striving towards a similar policy stance on return and readmission as Denmark and Norway, Sweden differs from these two countries regarding the actors involved in the return and readmission process at a strategic/operational level.

As explained in the background chapter of this report, the return process in Sweden involves three main actors: the SMA, the Swedish Police Authority, and the Swedish Prison and Probation Service. Unlike Denmark and the involvement of the Danish Refugee Council (DRC), the involvement of NGOs in the return and readmission process in Sweden is often solely project-based at a local level.¹⁵⁴ Kjell-Terje Torvik, project manager at the SMA, explained the uniqueness of the Swedish system as follows:

[i]n Brussels, they make a fairly clear distinction between voluntary and forced returns, and you avoid mixing the two as we do in Sweden with 'voluntary departures.' In Sweden, the Police and the SMA can, in principle, stand next to each other on the same stage. There is not a sports arena where the Police would stand on the same stage as Fedasil [*Federal Agency for the Reception of Asylum Seekers*] in Belgium. No way. There is no such thing.

Hence, the division of labour between the government agencies involved in the Swedish return and readmission process was described in interviews as confusing for other countries, including Sweden's Nordic neighbours, to understand, and could therefore further complicate intra-Nordic cooperation at an operational level.¹⁵⁵

¹⁵⁴ Interview In04.

¹⁵⁵ See for example Interview In17.

In contrast to Sweden, Denmark's returns are now mainly dealt with by the Danish Return Agency (DRA), minimizing the involvement of multiple government agencies that then need to communicate with one another.¹⁵⁶ As described in the background chapter of this report, the DRA was established by the Danish Government in 2020 (Danish Return Agency, 2021). All matters of return have therefore been moved from the Ministry of Justice (and hence, the Police), to the Ministry of Immigration and Integration, which established the DRA to deal with the operational side of returns. As Morten Laursen, Head of the International Division in the DRA, explained, "what we [*the DRA*] have decided to do strategically from the outset is to try to take a mindset somewhere in between law enforcement and impartial counselling." The DRA, according to Laursen, are "...dealing with all the casework, all the contacts with the embassies, all the local authorities, airline carriers."

Because the DRA is an administrative authority it is nonetheless reliant on police support in cases of forced returns. However, the police do not handle the planning and implementation of the actual return, as for example in Sweden (when it comes to forced returns). As a result, in some cases cooperating countries may struggle to understand the division of responsibilities between the DRA and the police in Denmark, particularly because their own systems often position the police as the primary authority in return matters. As Jørgen Christensen, Chief Advisor at the International Division at the DRA, explains:

[I]nterestingly, we are sometimes faced with a struggle of having other countries understand the division between responsibilities between the Return Agency and the police. Because a lot of countries have a police authority as the main responsible [*authority*]. So they kind of struggle figuring out what is the division here in Denmark and what's the role of the Return Agency versus what is the role of the police.

Christensen stresses, however, that a significant advantage of the DRA is indeed the centralization of skills within a single administrative authority, as this allows for the use of the "whole toolbox" to facilitate the swift enforcement of return decisions. These tools include, for example, the possibility to offer reintegration support to motivate voluntary returns, or withdrawal of "certain allowances" for individuals who do not cooperate concerning their return.

¹⁵⁶ According to Interview In22, since the creation of the DRA, the police in Denmark do not work with returns to the same extent anymore, except for forced returns. Before the creation of the DRA, the police played a more central role in ensuring the departure of migrants who had received an expulsion decision.

The DRA also have a contract for independent/impartial return counselling with the DRC,¹⁵⁷ in which the DRC also provides reintegration counselling.¹⁵⁸ On the one hand according to one actant, Denmark's success on the return and readmission front is credited to this collective approach to returns in which everything is "collected under one roof" and the availability of independent counselling while having flexible return funds in order to support capacity-building projects within third countries.¹⁵⁹ On the other hand, according to Knut Holm, Return Coordinator at the Norwegian Directorate of Immigration (UDI), Norway's success on the return and readmission front is due to a number of unique and interconnected factors including multi-year return strategies, improvement in the cooperation between agencies as part of a whole-of-government approach, giving liaison officers a return mandate and thereby integrating return into Norway's embassies, the alignment of developmental aid with migration, and country-specific return plans.

The uniqueness of the individual Nordic national systems may inevitably serve as an obstacle to intra-Nordic cooperation on return and readmission, as their successes are often attributed to these unique features by actants working in those countries. One actant with a Danish perspective, for example, explained their fear that many of the Nordic countries are copying Danish strategies regarding return centres, but are not providing access to independent return counselling.¹⁶⁰ Bettina Chu, Head of the Return Counselling Unit at the DRC, also recommends NGO involvement in the other Nordic countries when it comes to return and reintegration counselling, and highlights the challenge of NGOs apparently not seeing an independent role for themselves in this policy area. Chu describes the role of the DRC in Denmark as giving people information so that they can make an informed decision. She explains, "...it's very important to have that as a supplement to the role of the authorities. And I think that's something that Sweden and Norway are not seeing the value of."

Chu also highlighted the risk of copying the idea of Danish return centres because of the negative consequences of these centres. These consequences, according to Chu, include the long period that rejected asylum seekers are accommodated there and the isolated geographical location of some of the centres. When it comes to the return centre for single persons – Kærshovedgård – it also includes the overwhelming presence of migrants convicted of serious crimes and the effect that this has on the rest of the centre's inhabitants. Hence, when the identity of intra-Nordic networks on

¹⁵⁷ Interview In23.

¹⁵⁸ Interview In24.

¹⁵⁹ Interview In23.

¹⁶⁰ Interview In23.

return and readmission is defined through a process of translation that is centred around the Danish and Norwegian way of “doing things”, actants in Sweden and Finland may risk cherry-picking strategies and decoupling them from the unique features of Denmark and Norway’s national systems, thus leading to a post-deportation process that risks prioritizing the end goal of an ‘effective’ return, over a ‘humane’ return process. Actants may also risk being naïve about the potential negative consequences of specific return policies and practices due to a potential infatuation with discourses portraying Denmark and Norway as having an ‘effective’ returns process. A worst-case scenario would entail Swedish and Finnish actants picking what they like from Denmark and Norway without ensuring and prioritizing humane conditions when it comes to all aspects of the return continuum: pre-deportation, deportation, and post-deportation.

8.3 Iceland: the odd one out?

As explained in Chapter 2 of this report, Iceland has recently shifted towards more restrictive policies and an intensified focus on returns, mainly due to a significant increase in arrivals of primarily Venezuelan and Ukrainian refugees between 2021 and 2022 (Horwood, 2024). This has led to an increase in resources targeting the area of returns, including a significant organizational change and the employment of return counsellors.¹⁶¹ According to the former Head of the Unit on Matters of Foreigners at the Ministry of Justice in Iceland, Iceland has historically found more common ground with Norway when it comes to issues of migration. They explain that, despite a routine of looking primarily to Norway, Iceland continues to look at all of the individual Nordic countries and their approaches to return and readmission issues. They explain, “[t]here are always similarities, there are always different aspects as well. So you know, it’s very difficult to put a Nordic stamp on it, that ‘this is what the Nordic countries do’.” The same point was also reiterated by Íris Kristinsdóttir, Head of the Asylum Department at the Directorate of Immigration in Iceland, who explained that Icelandic politicians usually turn to Norway first, as Icelandic law is in principle based on Norwegian law. Kristinsdóttir explained that all Nordic countries are consulted for their best practices however, even if this consultation appears to be one-sided. She described the consultation with all Nordic countries as important for Iceland in particular, as “...we are an island, we’re quite far away and we have our own...issues to deal with. So we try to just look at what other people are doing and use that.”

¹⁶¹ Interview In09.

Despite an on-going return turn in their national government, Iceland differentiates itself from the rest of the Nordics in a number of ways. These include its geographical size and location, differences in the nationalities of return cases (with Venezuelans topping the list),¹⁶² and prior to 2021 and 2022, a relatively low number of return cases in comparison with their Nordic neighbours across the sea. According to actants in other Nordic countries, factors such as these have contributed to a lack of Icelandic representation or active presence in intra-Nordic networks on return and readmission. According to one actant, until recently, Iceland had not been as active within the NSHF working group on return due to their previously low number of return cases.¹⁶³ Iceland was described by another actant as not “...so actively participating in...discussions” in the NSHF’s Senior Officials level meetings due to their geographical size.¹⁶⁴

According to a third actant, Iceland was not present at the first meeting of the charter flight working group either.¹⁶⁵ However despite not participating in this first meeting, Iceland would benefit greatly from Joint Nordic Return Operations. According to the former Head of the Unit on Matters of Foreigners at the Ministry of Justice in Iceland, and Sigurgeir Sigmundsson, Head of the Support Office at the National Commissioner of the Icelandic Police, Joint Nordic Return Operations would greatly help Iceland logistically, as there are more flights on a daily basis from Reykjavik to the other Nordic capitals than there are to other Schengen countries, meaning that the travel time can be cut down. According to Sigmundsson, the cooperation between the Nordic police is also smoother than with the rest of Europe, due to a formal Nordic police agreement, thereby making transit authorization smoother as well. Iceland also struggles with obtaining the necessary travel documentation for returnees due to the presence of very few third-country embassies in Iceland. They are therefore reliant on the help of their Nordic/Irish counterparts to contact third country embassies situated in Copenhagen, Oslo, Stockholm, and Dublin, according to Sigmundsson.¹⁶⁶ As one actant explained, however, Iceland’s reliance on Nordic neighbours for help with accessing third-country embassies regarding travel documentation comes with its own challenges due to data protection laws.¹⁶⁷

¹⁶² Interview In09.

¹⁶³ Interview In01.

¹⁶⁴ Interview In18.

¹⁶⁵ Interview In17.

¹⁶⁶ It is worth mentioning here that according to another actant, before the Taliban took over Afghanistan, the Finnish police were able to use the Swedish authorities’ direct contacts with Afghanistan’s embassy in Stockholm, in order to get a “way in,” as there was no embassy in Finland. According to this actant, “...this helped open the way,” as after that, the Finnish police were able to have more frequent contact with the embassy. See Interview In15.

¹⁶⁷ Interview In13.

Hence, intra-Nordic cooperation on return and readmission is of particular importance to a small country such as Iceland. Whether Icelandic representatives were not invited to participate in the first meeting of the charter flight working group or whether they declined to attend is unclear. One issue that was brought up by Icelandic actants who participate in network meetings on intra-Nordic cooperation on return and readmission, however, was the language barrier at these meetings. The concept of Nordicity, as a common Nordic identity is based on a distinct linguistic and cultural affinity. Since Nordicity is very much present within the processes of translation of these networks, meetings are often held in the Nordic languages, meaning that the Danes, Norwegians, and Swedes can understand each other more than perhaps their Nordic neighbours from Finland and Iceland can, due to a clearer linguistic affinity. Íris Kristinsdóttir, Head of the Asylum Department at the Directorate of Immigration in Iceland, explained that this makes it difficult to participate to 100% in Nordic meetings, as it takes a lot of energy to try to understand what others are saying. She explained:

I feel like when you're going to a Nordic meeting and everyone says, "well, we should speak our own language," then I always say, "yes, okay, then I will speak Icelandic." And they say, "oh, I don't understand it." Okay, you don't understand? Then I will speak English to you.

The NSHF working group on return has recently begun to hold their meetings in English as a result of this challenge although previously, according to one actant, the idea of speaking one own's Nordic language at the meetings was meant to be a Nordic "bonding" experience.¹⁶⁸

On the one hand, due to its unique characteristics, Iceland is in great need of intra-Nordic cooperation on return and readmission, but is also at times excluded from this cooperation due to, for example, language and Iceland's reputation of having low numbers of return cases (a reputation that lives on despite the recent increase).¹⁶⁹ Kristinsdóttir believes, however, that the responsibility also lies with, for example, her department (the Asylum Department at the Directorate of Immigration) to "push" themselves into getting more involved in cooperating with other Nordic countries, as thus far the other Nordics have been, according to her, "...inviting and open, and...want to do everything that they can to help..." Hence, Kristinsdóttir believes that Iceland can still benefit from Nordic cooperation despite being the 'odd one out.' This push does not always happen, however, due to time and resources constraints within her department.

¹⁶⁸ Interview In01.

¹⁶⁹ Interview In17.

Although Kristinsdóttir had a positive experience of the other Nordic countries being “inviting and opening” to her department, a majority of the actants interviewed for this report often excluded Iceland when talking about intra-Nordic networks on return and readmission. We have already established that the identity of intra-Nordic networks on return and readmission is defined through a process of translation that is centred around the Danish and Norwegian way of “doing things”, yet to what extent Iceland is included within this concept of Nordicity in relation to return and readmission? In this report, we have previously covered the idea of having to “bring something to the table” when it comes to intra-Nordic cooperation on return and readmission that goes beyond just knowledge and information sharing. This can inevitably present an obstacle for Iceland, a country with unique characteristics that results in an asymmetrical power balance in terms of a cooperation based on bringing something to the table. According to our actants, bringing something to the table includes being able to bring something to the table with third-country authorities as well.¹⁷⁰ A country such as Iceland will inevitably not have the same capacity to post return liaison officers/migration attachés abroad in comparison to their neighbouring countries, such as Denmark and Norway.

8.4 Nordic cooperation versus EU cooperation

As outlined in Chapter 7 of this report, many of the actants interviewed for this report did not view Nordic cooperation as contradictory to EU cooperation when it comes to working on these issues. Instead, the variation in the Nordic countries’ individual affiliations with the EU was often portrayed as solely dictating to what extent the Nordic countries can act within Nordic cooperation. However, this does not mean that Nordic cooperation alongside EU cooperation is without obstacles. Firstly, when it comes to return and readmission issues, there are many different levels that need to be coordinated in order for cooperation to be seamless. As explained by one actant, these political and strategic levels include, but are not limited to, Frontex, the Nordic countries’ police authorities, [*immigration services*], and ministries, the European Commission, and liaison officers.¹⁷¹ Hence, the return and readmission area incorporates many actants, many linkages, and many different chains of association between actants, all of which affect the type of cooperation that can be had. As explained in Chapter 2, although the Nordic countries’ relationships with the EU and their participation might differ, they are all inevitably affected by the broader EU framework on migration.

¹⁷⁰ Interview In21 and In22.

¹⁷¹ Interview In10.

Currently, Nordic cooperation on these issues is inevitably less defined and thereby more informal than EU cooperation on the same issues. When asked if Norway specifies Nordic cooperation in its multi-year return strategy, Knut Holm, Return Coordinator at the Norwegian Directorate of Immigration (UDI) responded:

...no, it's not mentioned specifically in the strategy...It's a good point because this is something that we have been discussing from time to time...how to define Nordic cooperation compared to European cooperation...And [with] European cooperation being a very important part of it [*i.e. the return strategy*] ...I would say that the sub-part of that is improving the Nordic cooperation.

As Anita Vardoy, Policy Director at the Division for Migration and Refugees at the Ministry of Justice and Public Security in Norway, explained, when it comes to the Norwegian Government, "...Nordic cooperation is never controversial when we say [*that*] we want to have that, that goes without saying, So, it's maybe not lifted high up there [*on the agenda*], but I think it's more like self-evident that we should have Nordic cooperation." Here we can see the process of enrolment at play, whereby the identity of Nordicity is accepted by intra-Nordic network actants, to the point where it is not even questioned. The Nordic identity is strengthened in relation to what it is not: an EU identity. In comparison to EU cooperation, not defining Nordic cooperation on return and readmission issues in official governmental strategies can provide more flexibility and informality in how to operate within networks.

As previous research shows, this often appears to be the preferred method for the Nordics, as much of the Nordic administrative collaboration takes place at the civil-servant level through informal networks and direct partnerships (Læg Reid & Rykkja, 2020). If the Nordic countries formalised their cooperation in a similar fashion to the megastructure of the EU (and thus becoming a microstructure affiliated with the EU), the ability of Nordic countries to preserve a level of flexibility in relation to their own national interests could be affected. However, by not defining Nordic cooperation to the same extent as EU cooperation, Nordic cooperation risks being reduced to an unquestioned version of Nordicity, in which the Nordics are expected to work together, without really digging beneath the surface as to why or to what benefit.

Another obstacle to Nordic cooperation versus EU cooperation boils down to different funding streams. As explained by one actant, Denmark's choice to "stand outside" of a European platform when it comes to financing, and Norway's non-EU membership, complicates things if, for example, the Nordic countries want to apply for funding from the European Commission for a joint

Nordic project.¹⁷² This means that Nordic co-funding is a challenge, especially if EU funding is involved.¹⁷³ Previous research has also shown that even prior to certain Nordic countries joining the EU, when it comes to aid, the practical implementation of joint Nordic-funded aid projects has proven difficult, leading to a gradual shift towards alternative approaches (Odén, 2011, p. 19). When it comes to joint Nordic return and readmission projects, contemporary alternative approaches can be found through, for example, the NORAQ platform. The NORAQ platform entails each Nordic country funding its own projects but within a broader Nordic platform¹⁷⁴ rather than attempting to intermingle their funding streams.

8.5 Summary of the chapter

This chapter has outlined the ways in which intra-Nordic networks on return and readmission are shaped and maintained, and the obstacles that can arise as a result of this, thereby potentially hindering successful cooperation. This chapter has shown how the identity of intra-Nordic networks on return and readmission is defined through a process of translation that is centred around the Danish and Norwegian way of “doing things.” Hence, Denmark and Norway play a role in shaping and maintaining the identity of these networks.

Successful Nordic cooperation is often described by actants as when their countries are “on the same page,” (i.e. a standardization of Nordic return policies and practices to those of Denmark and Norway). If national governments change, and their policies on return and readmission change, then intra-Nordic cooperation on these issues inevitably finds itself in a vulnerable position at a political level. Even if the Nordics have a history of successful administrative collaboration on a civil-servant level (Lægread & Rykkja, 2020), changes at a political level regarding return and readmission inevitably affect practices at an operational level. The endeavour to incorporate a Danish and Norwegian model into return and readmission policies and practices is further complicated by the uniqueness of each Nordic national system.

Turning towards a country such as Denmark, for instance, which has a completely different legislative setup for return and readmission than its Nordic neighbouring countries, and attempting to make the same thing work at home, risks de-coupling the return and readmission success of Denmark and Norway from the unique characteristics inherent in their national systems. For

¹⁷² Interview In04.

¹⁷³ Interview In27.

¹⁷⁴ Interview In27.

example, opening up return centres in Sweden and Finland without an established NGO partnership that can provide independent return counselling could risk having undesirable outcomes.

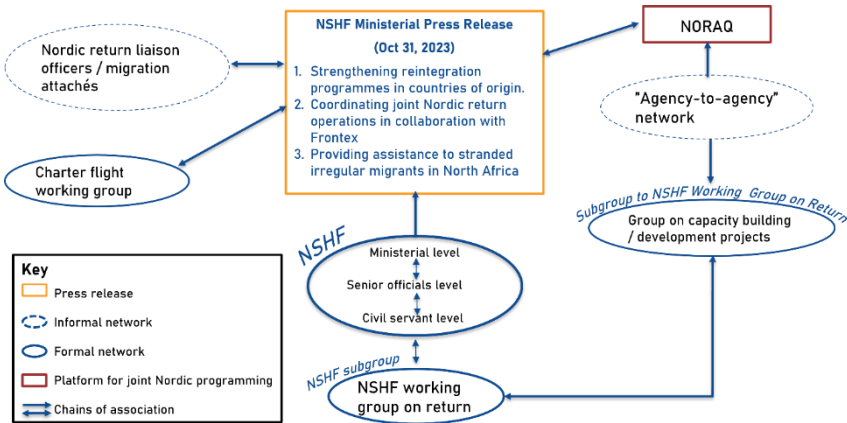
This chapter has also examined to what extent Iceland is included within the concept of Nordicity when it comes to return and readmission issues. In comparison to Denmark, where Denmark's unique features are often portrayed by their Nordic neighbours as something to learn from, Iceland's unique features are often portrayed as an obstacle to intra-Nordic cooperation based on a symmetrical give-and-take relationship. Finally, this chapter also explored the ways in which the Nordicity identities of intra-Nordic networks on return and readmission are further cemented through a process of enrolment in which Nordicity is positioned in relation to something it is not: an EU identity. However, all Nordic countries, whether or not they are affiliated with the EU, are affected by the broader EU framework on migration. As a result of the Nordic countries' different EU affiliations, intra-Nordic cooperation is further complicated by the presence of different funding streams.

9. Conclusions

9.1 The political versus the operational

This report has examined how, and to what extent, five Nordic countries cooperate with one another when it comes to implementing and coordinating the return and readmission of migrants who have received a legally binding decision to return to their country of origin, country of nationality, or country of usual residence. Through an ANT-inspired mapping of formal and informal intra-Nordic networks working on return and readmission (visually represented in Figure 1 below), we were introduced to a variety of advantages and disadvantages regarding the roles that these networks play and how they function at a political and/or operational level.

Figure 1 Key formal and informal networks in Nordic return cooperation



It should be noted, however, that while **Figure 1** depicts the most central networks identified in the report, highlighting their roles and connections in Nordic cooperation on return and readmission, it does not provide a comprehensive picture of *all* Nordic cooperation efforts in this area. Furthermore, although the chains of association between networks are illustrated, the reality is far more fluid and complex. As highlighted throughout this report, actants within these networks often move both across and within networks, blurring the boundaries between formal and informal structures and making the interplay between them even more interwoven than depicted here.

However, by mapping these networks, the figure – although simplified – underscores how operational-level activities feed into broader political directives. These networks include:

- the NSHF working group on return (a formal operational network consisting primarily of civil servants and providing information to the more political levels of the NSHF);
- the charter flight working group (a formal operational network consisting of government agencies working logistically with enforcing returns in relation to the idea of Joint Nordic Return Operations);
- the agency-to-agency network (an ad hoc, semi-formal, information-sharing, operational network consisting of relevant government agencies, which later transformed into a formal operational network functioning as a subgroup of the NSHF working group on return, consisting of civil servants and relevant government agencies working on specific capacity-building/development projects in third countries);
- informal networks of Nordic return liaison officers/migration attachés (which are difficult to map due to their informality).

When it comes to intra-Nordic cooperation on return and readmission at a political level, it is difficult to judge which came first: a policy directive or operational initiatives. As our report shows, the October 2023 Ministerial press release was based on information provided by the more operational levels of the NSHF, hence ideas that had already been put in motion or that the ministries hoped would be put in motion. Whether the press release solely symbolises a united Nordic policy front, or was needed to set in motion some of these ideas (such as the charter flight working group) is unclear.

We know, however, that successful Nordic cooperation is “...largely facilitated by agency-to-agency cooperation” (Stie & Trondal, 2020, p. 2), and occurs predominantly among civil servants at the national level involved in day-to-day activities, and who are thus able to “...maintain considerable independence vis-à-vis their political counterparts” (Schrama, Martinsen, & Mastenbroeck, 2020, p. 68). We also know that the overwhelming incidence of operational networks in comparison to political networks when it comes to intra-Nordic networks working on return and readmission aligns very well with previous research on Nordic cooperation. In this research, Nordic cooperation is often characterized by a “bottom-up dimension” that entails “...informal collaboration among national bureaucrats to coordinate policy positions, seeking inspiration and learning, exchange of contacts, discussing EU regulations, providing help in single cases, and pooling resources and competences...” (Stie & Trondal, 2020, pp. 4-5).

Even within the NSHF working group on return, a formal network that has persisted over time, informal aspects of the group such as an open conversational climate due to the absence of a requirement to record minutes and make them publicly available, and regular communication with fellow working group actants in other forums, were often mentioned as the network's strengths. However, these strengths could just as easily be framed as weaknesses. When it comes to the example provided above, the lack of requirement to record minutes and make them publicly available within the NSHF working group on return brings to light the question of transparency for the taxpayer. This lack of transparency also makes it difficult for Nordic civil society actors to allocate their resources in response to or in alignment with return and readmission policies and practices. As the same NSHF working group actants are often represented within different return and readmission networks, this brings to light the reality of the monopoly on return.

Although a tiny, tight-knit group can play a pivotal role in achieving fruitful cooperation if these personal relationships are fruitful, a closed group with a monopoly on the field, coupled with limited transparency requirements, can risk producing enclaves of like-minded thinking and acting. This lack of transparency was also problematised in our interview with Madelaine Seidlitz, lawyer and Senior Legal Advisor responsible for refugee and migration issues at the Swedish section of Amnesty International. Seidlitz explained that the lack of transparency regarding issues discussed within the NSHF and the working group on return makes it difficult for Nordic civil society to act and react, and to organize around questions regarding Nordic cooperation on return and readmission.¹⁷⁵ According to Seidlitz, "...many years ago...we discussed whether we should invite ourselves [*to the Nordic Council meetings*]. But it's been very difficult. There is no interest from – or I have at least not experienced, any interest from them to have us involved."

It should also be noted that although most of the intra-Nordic networks working on return and readmission were found to be functioning at an operational level, actants at government-agency level often described feeling excluded in NSHF network meetings held by civil-servant actants. Different Nordic countries choose to include government agency level actants within

¹⁷⁵ According to Seidlitz, when it comes to NGO cooperation regarding Nordic return and readmission, Nordic and Baltic NGOs meet with one another one to two times a year through a network group called Nordic Consultation on Refugees and Exile (NOCRE). NOCRE is a branch of the European Council on Refugees Exiles (ECRE), an alliance of European NGOs. The purpose of NOCRE is to exchange information and experiences with one another, yet they do not formally work with return and readmission beyond this exchange. According to Seidlitz, this is partly due to the lack of transparency in how the Nordics are working on these issues, thus leaving NGOs "without tools in their hands."

civil-servant network meetings to varying degrees. Of the government agency level actants interviewed for this report, there appeared to be a wish to continue intra-Nordic logistical and strategical networking at a government agency level, but also to be included to a greater degree as part of a whole-of-government approach, thereby minimizing the gaps between different levels.

9.2 The goal of a ‘whole-of-Nordics’ approach

This report has found that Nordicity plays a role in the process of translation for intra-Nordic networks cooperating on return and readmission, as actants appear to negotiate and define their identities in relation to the characteristics of this concept. This is best portrayed by the idea of Nordic **like-mindedness** – a characteristic that many actants described as often already in place and a prerequisite for successful intra-Nordic cooperation. This like-mindedness was described in terms of the Nordics working in a similar way to one another based on, for example, shared cultural heritage values, a common history of cooperation, as well as similar administrative and legal structures. It was also often described in quite abstract terms by actants however, such as the Nordics “sharing a bond.”

While Nordic like-mindedness indeed appears to facilitate collaboration, previous research as well as our own findings indicate that Nordic cooperation is more often driven by pragmatism than by a deep normative consensus. Arguably, the absence of an explicitly stated, shared **normative framework** risks leaving this cooperation vulnerable to divergence if national policies and practices shift. A shared normative framework that formalizes the principles and values underpinning Nordic cooperation could provide a foundation capable of transcending shifting political contexts and ensuring long-term alignment. Beyond the pragmatic advantages of regional cooperation, such a framework could also help articulate the added value of a whole-of-Nordics approach, offering clarity on its necessity and benefits, particularly when communicating with civil society and taxpayers in the Nordic countries.

At the same time, the interplay between Nordicity and pragmatism is complicated by the role of national interests in shaping the cooperation. This report found that while Nordicity plays a role in the process of translation for these networks, Nordic cooperation is also influenced by specific national priorities, aligning with Stie and Trondal’s image of Nordic cooperation as differentiated integration (2020, p. 3). These national interests currently affect the level of cooperation that takes place at a Nordic regional level.

The case of Iceland is a prime example of Nordic regional cooperation and its clashes at times with Nordic national interests. Iceland is often included in intra-Nordic networks on return and readmission based on the idea of Nordicity (provided that English is accepted as the spoken language during these meetings). However, Iceland is often excluded if the context entails bringing something to the table for the other Nordic countries. In situations where Iceland is excluded for its perceived inability to bring something to the table, Nordic national interests are prioritized over the idea of the collective Nordic 'us.' Thus, in cases such as Iceland, Nordic cooperation rests on give-and-take cooperation that is more inclined to benefit the national interests of the Nordic country that can give more.

This tension between Nordic cooperation for the sake of Nordicity versus Nordic cooperation as a pathway to benefit the national interests of individual Nordic countries is indeed interesting. On the one hand, if Nordic countries cooperate with one another solely based on the idea of a common Nordic identity and the preservation of the Nordic brand, we never really get below the surface of why this is important when it comes to issues of return and readmission. If Nordic cooperation on return and readmission is centred around Nordic like-mindedness, then what happens to this cooperation if Nordic national policies and practices once again begin to differ from one another due to changes in national governments? On the other hand, if we were to observe the opposite — an increasingly formalized structure for cooperation on these issues at a Nordic regional level as inspired by, for example, the megastructure of the EU — then this structure could interfere with the desire for individual Nordic countries to preserve a level of flexibility when it comes to implementing their own national policies and practices. Because signing up to a formal regional cooperation framework could interfere with this flexibility, this could thus explain instead why Nordic cooperation on these issues largely remains informal today. We know, for instance, that the absence of a formal Nordic mechanism for coordinating responses to the 2015 refugee crisis and the Ukrainian refugee crisis led the Nordic countries, in those instances, to prioritize national sovereignty over Nordic regional collaboration.

As a result of this tension, we believe that actants working on intra-Nordic cooperation on return and readmission should go beyond the ways in which they cooperate, and specify what the added benefit of what we have called a 'whole-of-Nordics' approach actually is. As confirmed in previous research on Nordic cooperation, intra-Nordic cooperation at an operational level (i.e. agency-to-agency level) is often found to be successful. In this report, Nordic cooperation centred around logistical planning and Nordic capacity-building

project platforms (in order to avoid project overlaps) were named by actants as successful outcomes of intra-Nordic cooperation. In these contexts, success is defined by information sharing and logistical coordination rather than 'effective' returns.

Although we can identify benefits with intra-Nordic cooperation at an operational level, there appears to be no common goal for Nordic cooperation on these issues at a political level. The October 2023 Ministerial press release states that the five Nordic countries have "...agreed on three joint initiatives with a strong commitment to strengthen and expand Nordic cooperation in the area of return" (Government of Iceland, Ministry of Justice; Ministry of Immigration and Integration, Denmark; Ministry of the Interior, Finland; Royal Norwegian Ministry of Justice and Public Security; Government Offices of Sweden, Ministry of Justice, 2023). The reason *why* there should be a strong commitment to strengthen and expand Nordic cooperation in the area of return is, however, not specified. If a whole-of-Nordics approach is to be adopted politically, a common goal should be defined.

When it comes to issues of return and readmission, discourses surrounding increased intra-Nordic political cooperation have intensified in alignment with an increasing standardization of return and readmission policies and practices at a regional level. Hence, intra-Nordic political cooperation regarding return and readmission is quite new, and also quite fragile. To avoid this cooperation being solely defined by a (potentially transient) state of goal convergence – such as Sweden and Finland increasingly aligning their return and readmission policies with a Danish or Norwegian model, including the adoption of greater deterrence measures – a common goal for intra-Nordic cooperation at the political level must be formulated to endure regardless of which political parties are in power nationally. This would not only assure the longevity of Nordic cooperation at a political level (if this were the goal), but would also offer an explanation to Nordic civil society and taxpayers as to why a whole-of-Nordics approach is prioritized when it comes to the allocation of national resources.

9.3 A whole-of-Nordics approach in the future

How far can a whole-of-Nordics approach be taken in the future and what would the potential consequences be? Within this report, we have touched upon what individual Nordic countries have contributed to intra-Nordic third country cooperation. For example, when it comes to bilateral relations, Denmark and Norway have been strategic players in terms of information sharing with their Nordic neighbours. When it comes to Joint Nordic Return Operations, Sweden appears to be needed logistically by other Nordic

countries due to Sweden's high number of return cases requiring charter flights (i.e. Sweden's previously perceived weakness in terms of high caseloads is now a strength for its Nordic neighbours). Hence, a mapping of what individual Nordic countries can contribute to a whole-of-Nordics approach is an area in need of further research if a whole-of-Nordics approach is deemed desirable in the future and if bringing something to the table is a feature of this approach.

Through our interviews with actants involved in intra-Nordic networks on return and readmission, we were given some insight into where Nordic cooperation on these issues might be heading in the future. It should come as no surprise that intra-Nordic capacity-building projects appear to be on the agenda, especially considering the transformation of the agency-to-agency network into a NSHF working group on return, a subgroup mainly focusing on capacity-building/development projects and the newly discovered possibility of how to successfully coordinate different funding streams (as in the case of NORAQ). According to the actants, joint intra-Nordic capacity-building projects are expected to increase in number in the future.¹⁷⁶ In the words of one actant:¹⁷⁷

...[i]f you look at the countries we work with, long-term they need to address and have ownership of the return and reintegration of their own citizens. How do we do that? Should we...only be reintegration partners supporting organizations to provide support, or should we build the capacity of the government itself to be able to receive and reintegrate their own citizens? The last part is clearly an ambition we have long-term and then to be able to do that, we need to involve more development partners. That is something we will see more and more of the next years, more so in the Nordic countries.

Hence, according to this actant, joint intra-Nordic capacity-building projects would be part of a larger goal of creating a more sustainable (in terms of longevity) return and readmission process.¹⁷⁸

Working jointly in and with third countries would also help to eradicate a common problem today: that countries are running parallel projects without knowing it, thereby contributing to a potentially wasteful allocation of

¹⁷⁶ Interview In01, In11, In16 and In28.

¹⁷⁷ Interview In11.

¹⁷⁸ A similar point was made in Interview In28.

resources in the third country.¹⁷⁹ Working in a more coordinated way would also assist third-country authorities in being able to define what coordinated projects are indeed needed and wanted. If the NORAQ platform continues to be a success in terms of intra-Nordic cooperation, then this playbook can be copied in the future (yet taking into consideration local contexts). Other, more abstract, ideas for the future of intra-Nordic cooperation have been discussed, according to our actants. These ideas include shared Nordic return liaison officers¹⁸⁰ (which we have decided to call NORLOs) and shared Nordic detention centres in relation to Joint Nordic Return Operations.¹⁸¹ This leads us to wonder if, in the future, we could even expect to see joint Nordic readmission agreements.

Regardless of what the future holds regarding a potential whole-of-Nordics approach, as outlined in Chapter 2 of this report, when faced with extraordinary migration crises such as the 2015 refugee crisis and the Ukrainian refugee crisis, Nordic national sovereignty has been shown to be prioritized over a coordinated Nordic regional response. In times of migration crises, Nordic cooperation has occurred solely when it aligns with national interests. As the Nordic countries are increasingly prioritizing national migration strategies of deterrence, the question remains if third-country cooperation, such as through capacity-building and development projects, will be the chosen Nordic response for cooperation in the future. This strategy allows Nordic countries to maintain national sovereignty over their internal return policies and practices, as coordination efforts are instead project-based and outside of the Nordic region.

9.4 Terminology

This also leads us to wonder to what extent these ideas, if implemented, would promote a return process that is considered to be effective, sustainable and humane. Despite their normative nature, *effective*, *sustainable* and *humane* are three terms that, despite not being formally defined, dominate EU strategy documents regarding return and readmission, such as the EU New Pact on Migration and Asylum, as well as the EU Return Directive. Thus, the question remains whether or not these terms currently have, or will have, equivalent importance in a return and readmission process coordinated at a Nordic regional level. Surprisingly, despite their consistent presence in EU policy contexts, the terms in themselves were rarely mentioned by actants working

¹⁷⁹ Interview In16.

¹⁸⁰ This idea would be based on the Nordic police liaison officers model. See Interview In01, In02, In07, In14 and In19.

¹⁸¹ Interview In01 and In09.

with Nordic cooperation on return and readmission policies and practices. They were, however, at times touched on subjectively and discursively. Their slight presence but overwhelming absence offers us clues as to how Nordic cooperation on these issues might promote return processes that are indeed considered effective, sustainable and humane *from the perspectives of the actants interviewed*.

As explained in the introduction to this report, in the context of policy the term *effective* returns often refers to , the number of successfully implemented returns, i.e. "...the ratio of the number of actual returns to the total number of persons required to leave" (Biehler, Koch, & Meier, 2021, p. 11). In alignment with the political discourses at both the EU level and in relation to the return-policies and practices in the Nordics, an increase in the number of effective returns is often and increasingly stated as a policy goal. Although this goal might be the driving force behind an increase in Nordic cooperation on return and readmission on the political front, effective returns according to this definition were rarely mentioned as the end goal of cooperation at an operational level. What was instead described discursively by these actants was an effective return *process*, which was often equated with successful cooperation with relevant Nordic counterparts, and between the operational and political levels. This successful cooperation entailed meaningful relationships based on knowledge and information sharing. An effective return process was also overwhelmingly defined discursively in relation to cost-effectiveness. Intra-Nordic cooperation was deemed beneficial by many actants, as pooling resources would lead to saving resources. This cost-effectiveness was portrayed at times as an obligation to Nordic country taxpayers, more so than transparency was.

Sustainable returns, on the other hand, were rarely mentioned by the actants, despite an increased focus on Nordic cooperation in the post-deportation phase through capacity-building and/or development projects in third countries. Successful cooperation was often equated with, for example, the NORAQ platform, which uses the term 'sustainable' in the platform's concept note on the MRC in Erbil, as well as the ICMPD press release (ICMPD, 2024). However neither of these unpacks what is meant by this term. Whether or not actants define a sustainable return as a reintegration process which, according to the IOM, ensures that "...returnees are economically self-sufficient, socially accepted and enjoy psychological well-being" (Newland, 2017, p. 5), or whether they define this term differently, remains unsaid. However, surprisingly a sustainable reintegration process was not explicitly coupled to the term 'humane' return.

Equally surprising was the finding that striving for a *humane* return and readmission process was not often mentioned by the actants. As explained in the first chapter of this report, it is unclear what exactly it means to undertake a humane return policy, as academics often debate whether or not the act of deportation in itself can ever be considered a humane act. When the term humane was touched on discursively by the actants, it was predominantly in relation to charter flight escorts. When speaking of Joint Nordic Return Operations, for example, intra-Nordic cooperation on joint charter flights that could mean shorter travelling time and fewer transfers for escorts and returnees was described discursively as humane for escorts, but never in relation to returnees. If shorter travelling time in the future for escorts and returnees were to be made possible by being able to use another Nordic country's detention centre (or joint Nordic detention centres) – hence decreasing travelling time but increasing the number of places where a returnee is detained, then we need to revisit what is meant by a humane return process in this context, and for *who*.

With regard to the term humane in relation to return and readmission processes, one actant reflected upon how the term was included in our research project description:

...[Y]ou don't need that word 'humane.' That is obvious from our side. That's a nonsense word to put into your project description because what we do from Norway, Sweden, Finland or Denmark is humane. You don't need to say that. Some countries of origin just say this to block returns. They are questioning whether, when you return someone from Sweden, they are getting due process? Of course returnees are getting a humane due process. But they question it. Are we really being humane when these people are returned? You don't need to write it. They just use it against us, but we cannot ask them the same question, because we know, many countries often do not follow due process when they return people. But part of the humour of all of this is how it is being used...From our side, we should worry more about the other two words: sustainable and effective. That's our job.

A similar explanation regarding the potential 'weaponization' of the word humane by third-country authorities was also given by another actant in their interview.¹⁸² If reflections such as these are shared by other actants, then this could offer an explanation as to why the actants often neglected to mention a 'humane' return and readmission process in their interviews. The actants might view the need for a humane return and readmission process as a given, i.e. a characteristic already embedded in the Nordic brand.

What we can say, however, is that through our interviews, a humane return and readmission process was not described in relation to Nordic identity, except in the quote mentioned above. Hence, it is not stated as an organizing logic for intra-Nordic cooperation on return and readmission. This is either because it is seen by actants as so deeply embedded in the Nordic identity and therefore does not need to be mentioned, or we are currently witnessing a change in what the Nordic brand proudly stands for. Another explanation could be related to the political sensitivity surrounding the term. As described earlier, what does it mean to undertake a humane return policy? As Nordic return policies and practices are increasingly opting for deterrence strategies, can the two terms humane and deterrence co-exist?

Thus, the question remains whether the terms *effective*, *sustainable* and *humane* will dominate Nordic return and readmission policy documents in the future. Although discursively touched on, they were largely absent from the discussions with our actants. It is unclear whether this omission was a deliberate and cautious decision by the actants, intended to respect the value-laden and normative nature of these terms, and to avoid reproducing them as mere political buzzwords. Alternatively, it is arguable whether these terms were perceived as so integral to the Nordic return and readmission process that their inclusion was deemed unnecessary, or whether their absence reflects a lack of prioritization within a Nordic framework. Only time will reveal the answer.

¹⁸² Interview In25.

10. Policy Recommendations

- If intra-Nordic cooperation on return and readmission policies and practices continues to be prioritized in the future, we suggest a **common goal** to be formulated at a **political level** that outlines the necessities and advantages of a 'whole-of-Nordics' approach. This goal should be based on an explicitly stated, shared **normative framework** that defines the guiding principles, values and standards underpinning Nordic cooperation on return and readmission. Such a framework would ensure alignment and consistency across countries, reinforcing trust and mutual accountability. This would not only ensure longevity for Nordic cooperation at a political level that would persist regardless of what political parties are in power nationally, but would also offer clarity and transparency as to why Nordic cooperation is prudent when it comes to the allocation of national resources. The rationale behind Nordic cooperation on return and readmission and shared goals should also be included in individual Nordic countries' return and readmission strategies.
- We recommend that if terms such as **effective, sustainable, and humane** are used with regard to a common goal at a political level for intra-Nordic cooperation or within national return strategies, then they should be specifically **defined and operationalized**. Not only would this ensure a common, normative understanding and transparency concerning how these terms are used within these specific contexts, it would also minimize the risk of terms such as 'Nordic cooperation' and 'effective,' 'sustainable,' and 'humane' return policies and practices being used merely as political buzzwords. What an effective, sustainable, and humane return and readmission *process* entails at an operational level would also need to be unpacked and defined within operational networks. A shared understanding and operationalization of these terms would provide a foundation for evaluating the success of cooperative efforts.
- We recommend that networks consisting of primarily **civil servants** should review the ways in which and when they can consistently **include relevant authorities** and, when relevant, **civil society organisations** at their meetings. Network meetings should be inclusive by having the **working language** as first and foremost English.

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- We also recommend that if intra-Nordic cooperation on return and readmission is to be prioritized in the future, an **inventory** of where **operational cooperation** is needed should be made. This includes ideas such as how to facilitate accessing embassies in neighbouring Nordic countries and a shared RLO registry that is continuously updated with information on when and where Nordic RLOs are stationed abroad.
 - At the moment, civil society organisations such as **NGOs** are not included in the current intra-Nordic networks on return and readmission. We recommend that networks on return and readmission review when and where relevant civil society organisations can be **included** at network meetings, thereby making the process more transparent. Relevant Nordic NGOs should also be invited to fulfil the role of independent observation committee for Joint Nordic Return Operations.

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This report is the second in a series of three studies within the project “Return as International Migration Policy: Coordination Within and Across National Borders,” funded by the Asylum, Migration and Integration Fund (AMIF).

The report provides an in-depth analysis of the formal and informal networks that shape Nordic cooperation on return and readmission. Through interviews with key stakeholders and a mapping of cooperation structures, the study examines how political ambitions are translated into practice and how Nordic cooperation can develop in the future.

The report identifies factors that facilitate cooperation - such as shared administrative structures and a common Nordic identity - while also highlighting challenges related to transparency, accountability and the balance between national and collective interests. With concrete policy recommendations and a critical examination of concepts such as ‘effective’, ‘sustainable’ and ‘humane’, this study offers valuable insights for policy-makers, practitioners and researchers in the field of migration policy.

The report was authored by Anna Hammarstedt, PhD in International Relations and Research Coordinator at Delmi, and Iris Luthman, MSc in Political Science and Research Coordinator at Delmi.

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