

## CANADA AS AN INSPIRATIONAL MODEL: *Reforming Scandinavian Immigration and Integration Policies*

### Abstract

The Scandinavian countries have often been portrayed as models for the development of policies for other states. However, in the area of immigration and integration policies, Denmark, Norway, and Sweden have themselves been searching for new policy solutions abroad. Canada is internationally recognised in the areas of immigration control and immigrant integration, and this article focuses on the role the Canadian immigration and integration policy model played in the Scandinavian reform process during the 2000-2012 period. The overall conclusion is that the Canadian model significantly shaped the reform debate and process in the three Scandinavian countries. However, the Canadian model was not copied or emulated to a great extent. Instead, it served as intellectual stimulus and a model for inspiration. In particular, the Canadian model served as an inspiration for the rediscovery of labour immigration in Scandinavia during the 2000s.

### Keywords

Scandinavia • immigration and integration • Canadian model • policy transfer • inspiration

Received 12 July 2013; Accepted 10 July 2014

## 1 Introduction

The Scandinavian countries – Denmark, Norway, and Sweden – have often been portrayed as models for the development of policies for other states (Einhorn & Logue 1989). The so-called Scandinavian model is rooted in a particular version of the mixed economy, which reflects a strong commitment to the welfare state. The international fascination with the model emanates from a broadly shared impression that the Scandinavian states have successfully managed to combine private capitalism and the quest for economic growth on the one hand and state intervention and the promotion of social equity on the other. The strong tradition of political pragmatism and societal compromises together with the ensuing widespread domestic support for this model has further added to its attractiveness internationally (Elder, Thomas & Arter 1988). However, questions have increasingly been raised regarding the future of the Scandinavian model. The concerns are often associated with the challenges posed by increased immigration.

The Scandinavian countries share a common history of migration, and they can all be described as latecomers in terms of immigration. While Sweden began receiving significant numbers of immigrants during the 1950s, Denmark and Norway did not become net receivers of migrants until the late 1960s. However, the immigrant population has increased steadily in all three countries, and the public debate on immigration and integration policy reforms has intensified in Scandinavia in recent decades. The future of the welfare state has

Trygve Ugland\*

Department of Politics and International Studies, Bishop's University, Canada

been a central theme in this debate (Brochmann & Hagelund 2011, 2012).

The notion that there is a potential trade-off between a more open and accommodating approach to immigration and the maintenance of a robust welfare state has become increasingly shared in many European countries. The universalistic and generous Scandinavian welfare model has been regarded as particularly vulnerable: “immigration to a country that espouses the principle of equal treatment and has an extensive welfare state challenges the population’s generosity in the first instance, and *may* in the longer term affect the sustainability of the system itself if the bulk of the newcomers are unable to support themselves” (Brochmann 2003: 6). There has been a growing impression that efforts to integrate immigrants have not succeeded in Scandinavia. Data have, for instance, demonstrated that the Scandinavian countries scored poorly compared with most other countries with respect to integrating immigrants into the labour market (OECD 2012a).

Although there is little evidence to support the contention that increasing ethnic diversity *as such* has adverse effects on established welfare states (Banting & Kymlicka 2006), a growing chorus of commentators have argued that ethnic/racial diversity makes it more difficult to sustain redistributive policies. In the Scandinavian context, it has been highlighted that social homogeneity in terms of ethnicity, language, and religion was the source of the values of solidarity,

\* E-mail: tugland@ubishops.ca

reciprocity, and social equity that supported the Scandinavian welfare model (Brochmann 2003). Therefore, the Scandinavian countries are facing new challenges: “A form of belonging is needed within which one can live out one’s diversity – some sort of ‘we’ – even though considerably altered. In this respect, no happy moment has arrived in any of the Nordic countries...” (Brochmann & Hagelund 2012: 18).

The public debate on immigration and integration policy reforms has intensified in Denmark, Norway, and Sweden. In this reform process, the Scandinavian countries have searched for inspiration and new policy solutions abroad. Although many countries and models have been devoted attention, this article focuses on the role the Canadian immigration and integration policy model played in the Scandinavian reform process in the period from 2000 to 2012, which has been referred to as a “reassessment phase” in the history of Scandinavian immigration and integration policies (Brochmann & Hagelund 2012).

The challenges posed by increasing immigration and ethno-cultural diversity are a major concern for governments across the world, and a variety of apparent immigration and integration policy solutions exist internationally. Canada has one of the highest levels of foreign-born populations in the world, and currently admits more immigrants annually relative to the size of its population than most countries. Moreover, Canada has a strong international reputation – buttressed by comparative studies on immigrant integration – as a country that has successfully managed to benefit from increased ethno-cultural diversity. In fact, Canada has been described as a “statistical outlier” in that it has managed to combine high levels of diversity with peace, democracy, economic prosperity, and individual freedom (Laczko 1994; Kymlicka 2007a). Further, Canada has also managed to reconcile important welfare state objectives and principles with increased immigration, and public attitudes reveal little tension between ethnic diversity and support for social programmes (Banting 2010).

The Canadian approach to immigration control and immigrant integration has been referred to under different labels, including “the Canadian model of pluralism” (Kymlicka 2004), “the Canadian model of diversity” (Kymlicka 2007a), “the Canadian model of multiculturalism” (Kymlicka 2007b), “the Canadian model of immigration and welfare” (Koning & Banting 2011), “the Canadian immigration model” (Schmidtke 2003), and “the Canadian integration model” (Triadafilopoulos 2006), to mention a few. Here, the concept of the *Canadian immigration and integration policy model* is employed to cover both the Canadian policies governing the control of the influx of immigrants (immigration policy) and the policies governing how immigrants are treated once they have entered the country (integration policy).

The Canadian model can be summarised through two main characteristics. First, and with respect to immigration control, Canada has adopted a selective approach, which actively aims to attract economic immigrants. Currently, this group, including spouses and dependents, constitutes nearly two-thirds of the migrants coming to Canada each year. The family stream comprises approximately 25 percent, while refugees and others admitted for humanitarian reasons represent somewhere between 10 and 15 percent of immigrants coming to Canada each year (OECD 2012b). The “points” and “sponsorship” systems are central components of the Canadian model. While economic immigrants are selected through a points-system that grants priority to those most likely able to enter the Canadian labour force by virtue of their age, education, work experience, and language skills, family immigrants who wish to enter Canada to be reunited with their families require sponsors who will

commit to supporting them economically for a significant period of time. Further, Canada also makes use of private sponsorships in order to provide financial and emotional support for arriving refugees.

Second, Canada’s multiculturalist citizenship represents a key element in the approach to immigrant integration, where multiculturalism refers to a policy of recognising diversity within public institutions and celebrating it as an important dimension of collective life and collective identity (Kymlicka 2007c). Canada was the first country to adopt an official public policy of recognising and accommodating ethno-cultural diversity through a parliamentary statement in 1971. This policy was subsequently enshrined in law in the Canadian Multiculturalism Act of 1988 and given constitutional recognition in section 27 of the Constitution. Canada followed up on this constitutional commitment with the world’s strongest multicultural policies (Banting & Kymlicka 2006). Programmes supported under Canada’s multiculturalism policy include, to mention a few, the allowance of dual citizenship; public funding for ethnic group organisations and activities such as ethnic festivals; and exemptions from dress codes in certain areas. The Canadian multiculturalist approach is built on a conception of integration in which it is expected that immigrants will visibly and proudly express their ethnic identity and that accepts an obligation on the part of public institutions to accommodate these ethnic identities (Kymlicka 2007a). In addition to measures directly earmarked for the immigrant population, indirect integration policy measures exist in the form of general welfare policies. Immigrants have, with few exceptions, immediate and undifferentiated access to social benefits and are not confronted with long residency requirements (Banting 2010).

A central feature of the Canadian model is the tight link between the approach to immigration control and immigrant integration. While the comprehensive programmes that immigrants can rely on in Canada are likely to have an independent effect on immigrant integration, the selective immigration strategy is also aimed at maximising integration and minimising immigrants’ reliance on state support.

The Canadian government has actively promoted the Canadian model abroad (Abu-Laban & Gabriel 2002; Kymlicka 2004). For instance, the government has funded academic research, conferences, and policy workshops that explore the international relevance of Canadian policies. Despite these efforts, very little systematic attention has been devoted to investigating whether and how other countries have used this model to address the challenges posed by increased immigration and ethnic diversity. While some policy advocates seem to promote the Canadian model to foreign audiences without questioning its exportability or international relevance, others, however, regard the Canadian model as a product of unique and favourable domestic circumstances, which makes it ill-suited for other countries lacking these underlying conditions. Kymlicka (2007a), for instance, suggests that both the precise timing of the introduction of multiculturalism and Canada’s unique geography limit the exportability of the Canadian model to other political systems. Nevertheless, based on the literature on policy transfer (Dolowitz & Marsh 2000), a basic premise here is that policy-makers *can* learn from their observations of policies and programmes in foreign systems.<sup>1</sup>

## 2 Policy Transfer and Learning from Abroad

States are constantly exposed to alternative solutions to public problems. Occasionally, the process is demand driven in the sense

that domestic reformers actively search for inspiration abroad. In other instances, the process is more supply driven. This is the case when national public sector reformers are more or less passive – even reluctant – receivers of alternative solutions promoted by other states or international organisations. The attention devoted to the Canadian immigration and integration policy model in Scandinavia is a product of both demand and supply driven mechanisms, i.e., the Scandinavian countries have actively searched for inspiration abroad, but the Canadian government has also promoted its model internationally.

This article analyses the degree of policy transfer that has occurred from Canada to Denmark, Norway, and Sweden in the area of immigration control and immigrant integration, where policy transfer is understood as a process “by which knowledge of policies, administrative arrangements, institutions, and ideas in one political setting (past or present) is used in the development of policies, administrative arrangements, institutions, and ideas in another political system” (Dolowitz & Marsh 2000: 5). Policy transfer is not an all-or-nothing process, and Dolowitz & Marsh (2000) identify four different gradations of policy transfer: copying (direct and complete transfer of a policy or programme from another jurisdiction); emulation (transfer of the basic ideas behind a policy or programme in another jurisdiction with adjustments for different circumstances); combinations (transfer of policies and programmes from several different jurisdictions); and inspiration (policy in one jurisdiction is used as an intellectual stimulus and may inspire a policy change, but the final outcomes do not actually draw upon the original) (see also Rose 1991).<sup>2</sup>

Non-transfer is also an option, as decision-makers deem foreign solutions to be either undesirable politically or technically impractical in the domestic context. This may also be an option when studying the role of the Canadian immigration and integration policy model in the Scandinavian countries. For instance, despite its overall reputation, Canadian policies have sometimes received international criticism from a perspective of global social justice for the way the Canadian government attracts and selects highly educated and skilled workers from poorer countries. Also, Canada’s Temporary Foreign Workers Program has recently been criticised on a number of grounds (Lenard & Straehle 2012).

This article will also identify *how* the transfer occurred and *who* the key actors were in this process, since both of these factors are hypothesised to affect the degree of transfer. There are indeed several ways in which policy transfer and learning from abroad can occur. For instance, a reforming country may actively attempt to collect information from other countries on policy experiences, for example, through travel and systematic analysis (Lisheng, Christensen & Painter 2010). In other cases, reformers may be exposed to reform ideas in a more informal and less organised manner (Olsen & Peters 1996). Similarly, elected officials and civil servants may act differently and be associated with different degrees of policy transfer from abroad. For instance, it has been assumed that politicians tend to look for “quick fix” solutions and promote copying to a greater extent than civil servants do (Dolowitz & Marsh 2000).

The relationships among the degrees, methods, and actors involved in policy transfer and learning processes have so far received little attention in the policy transfer literature (Benson & Jordan 2011). The empirical discussions in this article will address these relationships in three different cases, which will increase our understanding of why one type of policy transfer occurs and not another.

When it comes to policy transfer, some countries have generally been regarded as borrowers of policies from other countries, while

others have been classified as lenders. While the latter categorisation often has been assigned to the Scandinavian countries (Einhorn & Logue 1989), Canada has generally been described as a borrower in the public policy literature (Bennett 1991). United States has been a particularly important influence on Canada (see for instance Hoberg 1991). Although much prior research has argued that the respective roles as borrower and lender seldom change (Rose 1993), this article investigates to what extent a traditional policy borrower (Canada) acted as a model for countries often classified as policy lenders (the Scandinavian countries).

### 3 The Canadian Immigration and Integration Policy Model in Scandinavian Politics

Although Sweden experienced its first waves of immigration earlier than Denmark and Norway, the experiences and challenges facing the Scandinavian countries in this area of public policy are similar. During the 2000–2012 period, both the policies governing the control of the influx of immigrants and those governing how immigrants are treated once they have entered the country were reassessed in all three countries.

#### 3.1 Denmark

The topic of immigration was the central issue in the campaign leading up to the local and national elections in November 2001, and the Liberal/Conservative coalition government that took office after the elections immediately set out to reform Danish immigration and integration policies. By examining the reforms introduced by the new government between 2001 and 2003, it is clear that a more selective immigration policy was adopted (Olwig & Paerregaard 2011; Jønsson & Petersen 2012). While the rules with respect to economic immigration were liberalised, the regulations on family immigration became more restrictive. For instance, although family reunification is still possible, the *legal* claim to it was revoked. The introduction of the controversial 24-year rule, which states that a foreign spouse can only be admitted if both spouses are at least 24 years of age, is further evidence of this trend. Family reunification has been further restricted by new regulations concerning national attachment. The new rules state that family reunification will only be granted if the married couple has a national attachment to Denmark that is considered to be *greater* than that to any other country. It has also become more difficult to obtain refugee status in Denmark. Most important, the removal of the “de facto” concept meant that some categories of refugees were re-classified as immigrants, which in practice implied that they could more easily be deported.

The increased focus on economic immigration can be identified in practice: while the total number of immigrants to Denmark has grown since 2001, the number of both refugees and family immigrants admitted to the country has fallen drastically. The increased immigration is due to significantly higher numbers of economic immigrants and persons admitted to pursue education. In 2010, labour immigrants comprised the largest group of immigrants entering Denmark (OECD 2012b).

In terms of immigrant integration, Danish reforms during this reassessment phase reflect a more assimilationist, as opposed to multiculturalist, approach. The tendency has been that “the national’ or ‘the Danish’ has been given a far more central position” (Brochmann & Hagelund 2012: 257). This trend began with the 1998

Integration Act, and it was further reinforced after the 2001 election. For instance, compulsory integration programmes for refugees and family immigrants and a special integration benefit that was considerably lower than social assistance rates were introduced. Moreover, Denmark has maintained a system of exclusive as opposed to dual citizenship. In fact, a series of measures that make it more difficult to become a permanent resident and Danish citizen have been introduced (Jønsson & Petersen 2012).

Denmark has also introduced reforms over the past decade making the welfare state less inclusive for immigrants. For instance, Denmark implemented a system where the level of social assistance benefits a person will receive is dependent on the time the applicant has spent on Danish territory (Andersen, Larsen & Møller 2009). Although not formally directed towards immigrants, the reduced “Start Help” benefit, the “apron circular” policy that was intended to increase work incentives in instances where both husband and wife were outside the labour market, and the 300/450-hour rule that required occupational employment for a predetermined number of hours to be eligible to receive cash benefits all seem to affect immigrants to a greater extent than the majority population (Jønsson & Petersen 2012).

Canada clearly served as a source of inspiration in the process that led to the adoption of the 1998 Integration Act. For instance, two former Social Democratic Ministers of Interior – Birte Weiss and Karen Jespersen – embarked on study trips to Canada (Interview 13, Copenhagen, 7 May 2013). Upon her return from Canada in 1997, Weiss declared that there were important lessons to be learned for Denmark: “It was striking that in Canada the main thing is that people should be self-helped. It is the main theme in their integration efforts. People should have a job so they can contribute to society. It is all about people becoming contributors to Canadian society as swiftly as possible and not receivers” (translation) (Mylénberg 1997). However, a high-ranking civil servant who also participated in the study-trip warned against using the Canadian system in Denmark due to the significant differences between the two countries with respect to immigration histories and traditions (Interview 14, Copenhagen, 7 May 2013).

The Canadian model seemed to disappear from the political agenda in the immediate aftermath of the 2001 election. The reforms initiated by the new government between 2001 and 2003 represented a clear break with the past and seemed motivated by a purely “national agenda”. In particular, the growing popularity of the populist and anti-immigrant Danish People’s Party seem to push the established parties in a more restrictive direction. The Canadian model – or other foreign models, for that matter – did not play a central role in the rapid legislative process initiated in 2001. In fact, the Danish government considered itself to be more of an international innovator in the area of immigration and integration policy reform. Explaining the new policies on family integration introduced in 2002, the Minister of Integration, Bertel Haarder, clearly illustrates this attitude: “I am certain that many countries will follow our example in the years to come. Denmark can be considered a pioneer in this area” (translation) (Information 2002).

However, other actors continued to make references to the Canadian immigration and integration policy model in the aftermath of the swiftly introduced reforms. Both the Think Tank on Integration (Tænketanken om Udfordringer for Integrationsindsatsen i Danmark) and the Welfare Commission (Velfærdskommissionen), which were appointed in 2000 and 2003, respectively, emphasised the importance of analyzing international experiences in immigration and integration policy. Canada received substantial attention from both expert

commissions (Interview 11, Copenhagen, 6 May 2013; Interview 13, Copenhagen, 7 May 2013). For instance, the Think Tank highlighted the Canadian tradition of strong voluntary and popular involvement in integration efforts as a complement to public initiatives: “Although we in Denmark cannot nor wish to transfer the entire Canadian integration model to the Danish welfare state; Denmark can learn from Canada. Denmark can, among other things, draw inspiration from the Canadian tradition of a strong voluntary and popular involvement in the efforts to integrate immigrants” (translation) (Tænketanken om Udfordringer for Integrationsindsatsen i Danmark, 2004: 122).

Both the Think Tank and the Welfare Commission also devoted considerable attention to the Canadian approach to economic immigration. In its final report, the Welfare Commission proposed the introduction of a points-system for labour immigration inspired by the Canadian system (Velfærdskommissionen 2005). The proposal of the Welfare Commission can be recognized in the new point-based system that was introduced in Denmark in 2010. However, in contrast to the Canadian case, the Danish government decided to extend the points-system to the area of family reunifications.

Canadian integration policies and multicultural thinking, where cultural diversity is to be valued and group identities are given more or less formal recognition, has not received much support in Denmark over the past decade. Indeed, Denmark and Canada are often portrayed as polar opposites regarding the adoption of multicultural policies (Banting & Kymlicka 2006). Although Canada also requires immigrants to pass a citizenship test to be naturalised, the Danish test – which focuses on questions concerning national history, achievements, and heroes – has been described as having a clear “ethnic” orientation, compared with the more “civic” profile of the Canadian test, which predominantly consists of questions regarding political institutions, rights and responsibilities, and political values. In fact, Canada and Denmark are placed at opposite ends of the spectrum with respect to naturalisation practices among a group of twenty-six countries (Koning 2011).

Although the Canadian immigration and integration model has been devoted attention in Denmark during the past decade, Canadian and Danish policies and practices differ to a large extent. While Canada combines a selective immigration approach that actively aims to attract economic immigrants with an open, multiculturalist policy of recognising and accommodating ethno-cultural diversity, Denmark has increasingly adopted a more selective immigration strategy combined with an assimilationist approach to immigrant integration into Danish society.

### 3.2 Norway

While sweeping reforms have been introduced in Denmark, Norway has to a large extent been reassessing and actively searching for new solutions without committing to the same level of comprehensive reforms. However, the Canadian model has played a central role in the debates on immigration and integration policy reforms in this country as well.

The Immigration Law Committee (*Utlendinglovsutvalget*), which was established in 2001, was mandated to prepare a proposal for a new Immigration Act (NOU 2004: 20). During the committee hearings, the Norwegian Parliament instructed the government to study the possibility of adopting a new sponsorship system for family reunifications in the case of spouses: “...based on the Canadian model, a three year sponsorship system should be evaluated for those who bring their spouse to Norway from another country”

(translation) (Innst. 2005). Additionally, a minority group of members in the Parliament proposed that: “as in Canada, persons who marry a permanent resident and have been granted family reunification should be granted permanent residency immediately” (translation) (Innst. 2005: 15).

Based on these requests, the government asked for an opinion from the Norwegian Directorate of Immigration (UDI), which is the central agency in the immigration administration in Norway. According to UDI, “the proposal refers to the Canadian model for family immigration. This model can, however, not be evaluated independently of general immigration policies adopted in Canada. With an extensive use of ‘sponsorship’, Canadian authorities have based their laws and policies on a completely different philosophy than Norwegian authorities” (translation) (Ot.prp. 2007: 65). The UDI is, thus, warning against applying a fragment of an external policy model to Norwegian realities: “Using the Canadian model as a reference requires more comprehensive studies of Canadian immigration policies and the Canadian welfare system” (translation) (UDI 2005).

The Canadian model would ultimately become subject to more systematic attention from the Welfare and Migration Committee (*Velferds- og migrasjonsutvalget*), which was established in 2009 (NOU 2011: 7). The mandate of this committee was to describe and assess the elements of the Norwegian welfare model that influence and are influenced by increasing migration. In addition to the numerous references to Canada in the report, the committee commissioned the Canadian academic and immigration expert Keith Banting to write a report on the Canadian model to be incorporated into the final report (Koning & Banting 2011). Apparently, the committee wanted to directly rely on the Canadian expertise rather than solely on systematic analyses of the Canadian model viewed from afar (Interview 6, Oslo, 13 December 2010). The Inclusion Committee (Inkluderingsutvalget), which was established in 2010 in order to discuss challenges and propose solutions for a multicultural Norway, also devoted systematic attention to the Canadian model (NOU 2011: 14).

In addition to the three temporary expert commissions, the Canadian model also received direct attention at the political level in Norway during this reassessment phase. For instance, a study trip to Canada formed an important background for the White Paper on diversity that was presented in 2004 (St.meld. 2004). The delegation, which included the responsible minister from the Norwegian government, Erna Solberg, spent nearly a week in Canada in July 2003 (Interview 9, Oslo, 11 October 2012). The positive stance on the Canadian model is easily recognised in the White Paper:

“Canada has a fundamentally positive attitude towards immigration that the government feels Norway can learn from.... The government is of the opinion that Canada can give Norway important inspiration through the manner in which a positive and inclusive attitude towards immigration is combined with clear demands and expectations (translation) (St.meld. 2004: 27).”

The White Paper on diversity must be considered in relation to the Introductory Act, which became effective in 2004 (Ot.prp. 2002). This was the first law in the area of immigrant integration in Norway. Although important in terms of formalising individual rights and obligations of the various categories of immigrants, many practical questions related to immigrant integration were not addressed in this act. The question of citizenship, for instance, was addressed in a separate citizenship bill that was approved in 2005 (Ot.prp. 2005). This law was based on the work of an expert inquiry commission

that delivered its report in 2000 (NOU 2000: 32). The majority of the members of this expert commission recommended to open for dual citizenship and argued against introducing stricter rules for naturalisation, for instance in the form of language requirements. However, the Citizenship Act, which was adopted in 2006, rejected dual citizenship as an option and called for language requirements and a citizenship ceremony with an oath of allegiance.

The introduction of language requirements, but especially the citizenship ceremony, was clearly inspired by Canadian realities. A key informant at the Ministry of Local Government and Local Affairs claimed that there is a very strong link between the minister’s study trip to Canada, where she attended a citizenship ceremony, and the introduction of citizenship ceremonies in Norway (Interview 9, Oslo, 11 October 2012). However, the decision not to accept dual citizenship deviates from the Canadian approach to multiculturalism. As Brochmann and Hagelund (2012) note, both the White Paper on diversity and the Citizenship Act signal an ambivalence between efforts to strengthen the interests of the nation state and the community while also supporting the idea of individuals being more important than cultures regarding the rights of newcomers. This ambivalence is clearly illustrated by the citizenship ceremony being voluntary rather than compulsory, like in Canada.

Although family immigration still constitutes the largest group of immigrants entering Norway (OECD 2012b), the issue of labour immigration has received increased attention over the past decade. Although regulated by the Immigration Act, the issue became subject to special attention by the Norwegian government in a White Paper in 2008 (St.meld. 2008). The Canadian model receives special attention in the report itself, but Canada also played an important role in the preparatory work. In January 2007, the Minister for Labor and Social Affairs, Bjarne Håkon Hanssen, led a delegation to Canada to learn about the Canadian system for labour immigration (Interview 8, Oslo, 9 October 2012). Although changes have been made over the years, the Canadian model is still used as a reference in discussions on labour immigration, as illustrated in the parliamentary debates over the most recent White Paper on a comprehensive integration policy (St.meld. 2012).

Although Norwegian immigration and integration policies have not been comprehensively reformed, the Canadian model has been subject to systematic attention in Norway over the past decade. First, Canada has been employed as an example of a “traditional immigrant country” in contrast to a non-traditional immigration nation, such as Norway. The Immigration Law Committee, for instance, systematically referred to Canada in these terms. Second, Canada’s combination of an open and accommodating approach to immigration and increasing ethnic diversity with a comprehensive welfare state system has also been used to justify the attention devoted to the Canadian model. A representative from the Welfare and Migration Committee highlighted this aspect and referred to Canada as an “interesting contrast case” to Norway because the Canadian and Norwegian immigration policies differ substantially while the two countries share a commitment to the welfare state (Interview 6, Oslo, 13 December 2010). Third, the Inclusion Committee is very explicit in their justification: “Canada was selected because it was the first country in the world that in 1971 adopted an official multiculturalism policy” (translation) (NOU 2011:14: 49). Fourth, the Canadian model is often used as a reference because it is a well-known and admired international model. According to several respondents, Canada is generally perceived as an international success in the area of immigration and integration policies (Interview 8, Oslo, 9 October 2012; Interview 10, Oslo, 12 October 2012).

### 3.3 Sweden

As in Denmark and Norway, immigration control and immigrant integration have been subject to substantial attention in Sweden since the early 2000s. The issue of labour immigration, which had been a non-issue for several decades, rose to the top of the political agenda during the 2002 election campaign, when the centre-right parties argued in favour of opening the country to labour immigration from countries outside the EU. The bill that was finally adopted in 2008 represented a clear liberalisation of existing policies (Proposition 2008). According to the new legislation, a temporary work permit could be granted to foreigners who had been offered a job that would enable the person to support himself or herself. Further, a person who has held a residence permit during the past five years because of employment for a total of four years could then be granted a permanent residency permit. It was also decided that asylum seekers whose applications had been rejected could apply for a residency permit as a labour immigrant under the condition that the person had already been employed for at least six months and could show that the job would last for an additional year.

Moreover, Sweden's longstanding international reputation as a country with a generous and humanitarian refugee policy was reconfirmed during this period (Borevi 2012). The same generosity and openness can be recognised in the Swedish policies for family reunification, where no financial support for relatives moving to the country is required. This openness resulted in family immigrants becoming by far the largest group of immigrants to Sweden in recent decades (OECD 2012b). However, in 2010, the centre-right government introduced a modest financial support requirement (Proposition 2010). According to the new rules, a person living in Sweden must be able to document a regular income that is adequate for self-support, as well as adequate accommodation for both sponsor and immigrant. Thus, the rule does not require that the sponsor in Sweden be able to financially support the relative, only support himself or herself. The new regulation was introduced to promote immigrant integration in the sense that persons who are successful in finding jobs and residences can be "rewarded" by being allowed to have their family come to Sweden" (Borevi 2012: 75).

Although subject to several amendments and changes over the years, the Swedish Parliament's adoption of an official multicultural policy in 1975 can still be recognised in the country's approach to immigrant integration. For instance, the comparatively short time required for residents to obtain citizenship (five years) has remained unchanged. Despite Sweden's increased emphasis on individual immigrants' obligations over the past decade, the country has also rejected the introduction of formal language requirements and tests of knowledge as conditions for naturalisation. Further, the 2001 decision to allow dual citizenship is consistent with a multicultural approach to immigrant integration, where citizenship is regarded as a tool of integration and not a reward for successful integration.

The Canadian approach to multiculturalism has been said to provide "transnational inspiration" for the development of the Swedish policy of multiculturalism during the 1970s (Wickström 2013). However, the Canadian immigration and integration policy model has also received substantial attention in Sweden during the recent reassessment phase. Emilsson (2011), for instance, documents how politicians and media outlets from various ideological strands consistently have referred to Canada as a potential model for Sweden during the 2000s. A more systematic contribution to the public debate was recently provided by a Swedish research institute that invited a group of Canadian and Swedish researchers to present

the Canadian model to a Swedish audience in the publication, *Kanadamodellen* (Hojem & Ådahl 2011).

The Canadian immigration and integration policy model has also received systematic attention at the political and administrative level in Sweden. The Family Immigration Committee (Anhörigkommittén), which argued for the introduction of a financial support requirement, makes numerous references to Canada (SOU 2002:13). As a background for its deliberations, the committee relied on information provided by the immigration authorities in a number of countries. As the only country receiving this form of special attention, the committee secretariat visited the Canadian embassy in Stockholm to learn more about the Canadian family integration system (SOU 2002:13: 52).

Systematic attention to the Canadian immigration and integration policy model can also be identified in the debate on labour immigration. The Labor Immigration Committee (Kommittén för arbetskraftinvandring), which began its work in 2004, refers extensively to Canada (SOU 2005:50; 2006:87). In particular, the 2005 report contains several interesting quotes about Canadian immigration policies from a Swedish perspective: "In Canada, the view on immigration is fundamentally positive. It is generally accepted that immigration is necessary to ensure continued economic development" (translation) (SOU 2005:50: 88). Further, the committee argues that there is a positive relationship between labour immigration and refugees in Canada: "Labor immigration makes asylum seekers more accepted, among the general public and among employers" (translation) (SOU 2005:50: 90).

In terms of immigrant integration, the Swedish government appointed a parliamentary committee in 1997 to consider the need for amending citizenship legislation. The Citizenship Committee (1997 års medborgarskapskommitté) delivered its final report with detailed recommendations in 1999 (SOU 1999:34). The Canadian case received significant attention by the committee in the deliberations on dual citizenship and language requirements for citizenship. Ultimately, a majority of the committee recommended changing the existing law, which dated back to the 1950s, and accepting dual citizenship. However, the committee opposed the introduction of language requirements for citizenship, thus departing from Canadian practices on this point. Overall, the emphasis in Sweden has, to a larger extent than in Canada, been on providing incentives for immigrant integration rather than obligations.

In addition to the attention devoted to Canada by these committees, a number of study trips have been organised for Swedish politicians and civil servants to study the Canadian model (Interview 15, Stockholm, 19 August 2013). A representative from the Swedish embassy in Ottawa estimated that approximately 100 members of the Swedish Parliament visited Canada during a three-year period in order to learn more about the Canadian immigration and integration policy model (Interview 19, Ottawa, 15 April 2014). Also, the responsible ministers in the Canadian and Swedish governments have formally met several times in bilateral exchanges during the past few years (Interview 15, Stockholm 19 August 2013). A number of study trips have also been organised for Swedish civil servants. In June 2004, representatives from the Swedish Integration Board visited Canada where they met with a large number of civil servants representing different sectors and levels of government, NGO representatives, and policy practitioners, as well as academics and immigration and integration policy experts (Interview 19, Ottawa, 15 April 2014).

Over the past decade, Sweden has maintained an open, multiculturalist policy of recognising and accommodating ethno-cultural diversity. Moreover, the country has become increasingly

Table 1. Policy Transfer of the Canadian Immigration and Integration Policy Model to the Scandinavian countries

Degree of Transfer	Denmark	Norway	Sweden
Inspiration	immigration and immigrants as a resource (the Canadian positive view of immigration contributed to a rediscovery of labour immigration in all three Scandinavian countries)		
Emulation	"points-system" for labour immigration	citizenship ceremonies	dual citizenship
Copying	n/a	n/a	n/a
Non-transfer	attention to specific policies and programmes in all three countries (the Canadian model was not approached as a complete package of reforms, and several policies and programmes were not transferred as they were deemed to be either undesirable politically or technically impractical in the Scandinavian context)		

open to labour immigration. The Canadian immigration and integration policy model has received much attention in this process, and despite important differences, the Swedish approach to both immigration control and immigrant integration is the most similar to the Canadian model of the three Scandinavian countries.

#### 4 Canada as Inspirational, but not always Practical or Desirable Model for Scandinavia

The Danish, Norwegian, and Swedish approaches to immigration control and immigrant integration have undergone comprehensive reassessments over the past decade. Policy transfer is seldom the sole explanation of policy developments (Dolowitz & Marsh 2000), but this article focuses on the role of the Canadian immigration and integration policy model in this process. The main findings, illustrated in Table 1, can be summarised through three points.

First, the Canadian model has received significant attention from Denmark, Norway, and Sweden in the reassessments of their immigration and integration policies between 2000 and 2012. Knowledge of Canadian policies and ideas has been used in the development of policies in the three Scandinavian countries, which suggests that policy transfer has occurred. This article therefore confirms that, despite its unique history and geography, Canada and Canadian policies on immigration control and immigrant integration are of significant international relevance. However, the Canadian model was not transferred as a complete package of reforms. Instead, the Scandinavian countries selected specific policy elements for attention. Above all, the Canadian approach to economic or labour immigration has been a central reference point in the general move towards a rediscovery of labour immigration, a trend that has occurred in all three Scandinavian countries.

Second, the policy transfer has primarily taken the form of inspiration, where the Canadian immigration and integration policy model has been used as intellectual stimulus for new policies and programmes in Scandinavia. For instance, the increased focus on labour immigration prompted different responses in the three countries that all differ from the original Canadian programmes and policies. However, processes of more active emulation of Canadian policies and programmes were also identified. For example, Norway's adoption of citizenship ceremonies and the Danish points-system were clearly transferred from Canada. The Canadian model also played a role in the process that led to the acceptance of dual citizenship in Sweden. Yet, Canadian policies and programmes in these areas were all modified and adjusted

to domestic circumstances. The meeting between the Canadian model and the political-administrative histories, cultures, traditions and styles of governance in the Scandinavian countries also led to non-transfer in many areas due to perceived ideological and cultural incompatibilities. Direct and complete transfer in terms of copying Canadian policies was not identified in the reform process.

Third, elected officials in Scandinavia were the primary actors in the process of seeking inspiration and learning from abroad. Several respondents confirmed that the Canadian model attracted particular attention from politicians in Denmark, Norway, and Sweden because it was widely recognised as a successful solution. However, expert commissions played a crucial role in the reassessment of Danish, Norwegian, and Swedish immigration and integration policies, although this was the case to a greater extent in Norway and Sweden than in Denmark. This article illustrated how data – systematically collected and analysed by expert commissions – constituted the starting point for an open and deliberative debate on policy reforms. References to the Canadian model were supported by methodical discussions of the model's advantages and disadvantages and its applicability to the Scandinavian context. In line with this approach, bureaucrats and civil servants also seemed to warn politicians against attempts at direct and complete transfer of Canadian policies and programmes in the form of copying. The way in which the Canadian immigration and integration policy model has been used therefore re-confirms the well-established view of the Scandinavian countries as rationalistic and pragmatic with respect to policy-making (Anton 1969).

#### 5 Conclusions

The overall conclusion is that the Canadian immigration and integration policy model is an internationally recognised model that has significantly shaped the reform debate and process in the three Scandinavian countries during the past decade. However, the Canadian model was not copied or emulated to a great extent. Instead, it served as intellectual stimulus and a model for inspiration. In particular, it served as inspiration for the rediscovery of labour immigration in Scandinavia during the 2000s. This illustrates that the Canadian model that has been seen as a product of unique and favourable domestic circumstances can still be relevant in countries lacking these underlying conditions. Moreover, the article demonstrates a change in roles, where Canada – often described as a policy borrower – acted as an inspirational model for the Scandinavian countries, which commonly are classified as policy lenders.

The Canadian immigration and integration policy model is not static nor is its international reputation. Although the key ingredients of the Canadian model have been preserved and supported by the Conservative government that came into power in 2006 (Marwah, Triadafilopoulos & White 2013), new rules have been passed that make it harder for naturalised citizens to pass Canadian nationality on to their children while residing outside of Canada. Changes to refugee policy have also been introduced to crack down on the so-called “false” claimants. Although this study found that the Canadian model still serves as an inspirational model in Scandinavia, future research should pay close attention to how changes and shifts in domestic policy priorities impact its international reputation in Scandinavia and elsewhere.

**Trygve Ugland** is Professor of Politics and International Studies at Bishop’s University, Canada. His research and teaching interests lie in the fields of Comparative Politics and Comparative Public Policy, with a focus on European and Scandinavian Politics. His work has appeared, for example, in the *Journal of Common Market*

*Studies*, *Journal of Public Policy*, *Scandinavian Political Studies*, and *International Journal of Canadian Studies*. His latest book tells the story of how Jean Monnet’s encounters with Canada and Canadians between 1907 and 1914 played a vital role in his project of uniting Europe: Ugland, T. (2011): *Jean Monnet and Canada: Early Travels and the Idea of European Unity*. Toronto: University of Toronto Press.

## Notes

- 1 The empirical basis for this article comprises an extensive review of existing studies of immigration and integration policy reform processes, systematic analyses of public documents, and 24 semi-structured interviews with civil servants and policy experts in the three Scandinavian countries and Canada.
- 2 The “combinations” option will not be included in this analysis, which focuses on the degree of transfer from the Canadian model.

## References

- Abu-Laban, Y & Gabriel, C 2002, *Selling diversity: Immigration, multiculturalism, employment equity, and globalization*, Broadview Press, Peterborough, Ont.
- Andersen, J, Larsen, JE & Møller, IH 2009, ‘The exclusion and marginalisation of immigrants in the Danish welfare society’, *International Journal of Sociology and Social Policy*, vol. 29, no. 5/6, pp. 274–286. DOI: 10.1108/01443330910965804.
- Anton, TJ 1969, ‘Policy-making and political culture in Sweden’, *Scandinavian Political Studies*, no. 4, pp. 88–102. DOI: 10.1111/j.1467-9477.1969.tb00521.x.
- Banting K, 2010, ‘Is there a progressive’s dilemma in Canada? Immigration, multiculturalism and the welfare state’, *Canadian Journal of Political Science*, vol. 43, no. 4, pp. 797–820. DOI: 10.1017/S0008423910000983.
- Banting, K & Kymlicka, W 2006, *Multiculturalism and the welfare state*, Oxford University Press, Oxford.
- Bennett, CJ 1991, ‘How states utilize foreign evidence’, *Journal of Public Policy*, vol. 11, no. 1, pp. 31-54. Doi:10.1017/S0143814X0000492X
- Benson, D & Jordan, A 2011, ‘What have we learned from policy transfer research? Dolowitz and Marsh revisited’, *Political Studies Review*, vol. 9, no. 3, pp. 366–378. DOI: 10.1111/j.1478-9302.2011.00240.x.
- Borevi, K 2012, ‘Sweden: The flagship of multiculturalism’, in *Immigration policy and the Scandinavian welfare state 1945–2010*, eds G Brochmann & A Hagelund, Palgrave Macmillan, Basingstoke, pp. 25–96.
- Brochmann, G 2003, ‘Citizens of multicultural states’, in *The multicultural challenge*, ed G Brochmann, Elsevier, Oxford, pp. 1–11.
- Brochmann, G & Hagelund, A 2011, ‘Migrants in the Scandinavian welfare state’, *Nordic Journal of Migration Research*, vol. 1, no. 1, pp. 13–24. DOI: 10.2478/v10202-011-0003-3.
- Brochmann, G & Hagelund, A 2012, *Immigration policy and the Scandinavian welfare state 1945-2010*, Palgrave Macmillan, Basingstoke.
- Dolowitz, D & Marsh, D 2000, ‘Learning from abroad: the role of policy transfer in contemporary policy-making’, *Governance*, vol. 13, no. 1, pp. 5–23. DOI: 10.1111/0952-1895.00121.
- Einhorn, ES & Logue, J 1989, *Modern welfare states: politics and policies in social democratic Scandinavia*, Praeger, New York.
- Elder, N, Thomas, AH & Arter, D 1988, *The consensual democracies? The government and politics of the Scandinavian states*, Blackwell, Oxford.
- Emilsson, H 2011, *Vad kan vi lära av Kanadas migrations- och integrationspolitik?* Available from: <http://integrationsbloggen.blogspot.ca/2011/03/den-kanadensiska-modellen-oversatt-till.html> [Last accessed 10.05.2013].
- Hoberg, G 1991, ‘Sleeping with an elephant: the American influence on Canadian environmental regulation’, *Journal of Public Policy*, vol. 11, no. 1, pp. 107-131. DOI: 10.2307/4007340.
- Hojem, P & Ådahl, M 2011, *Kanadamodellen*, FORES, Stockholm. Information 2002, ‘Et foregangsland’, 26. januar. Available from: <http://www.information.dk/65291>. [Last accessed 28.02.2013].
- Innst. 2005, nr. 185 (2004-2005): *Innstilling fra kommunalkomiteen om mangfold gjennom inkludering og deltakelse*, Stortinget, Oslo.
- Jønsson, HV & Petersen, K 2012, ‘Denmark: a national welfare state meets the world’, in *Immigration policy and the Scandinavian welfare state 1945 - 2010*, eds G Brochmann & A Hagelund, Palgrave Macmillan, Basingstoke, pp. 97–148.
- Koning, EA 2011, ‘Ethnic and civic dealings with newcomers: naturalization policies and practices in twenty-six immigration countries’, *Ethnic and Racial Studies*, vol. 34, no. 11, pp. 1974–1994. DOI: 10.1080/01419870.2011.556747.
- Koning, EA & Banting, K 2011, ‘The Canadian model of immigration and welfare’, in *NOU, 2011:7 - Velferd og migrasjon: den norske modellens framtid*, pp. 354–371.
- Kymlicka, W 2004, ‘Marketing Canadian pluralism in the international arena’, *International Journal*, vol. 59, no. 4, pp. 829–852.
- Kymlicka, W 2007a, ‘The Canadian model of multiculturalism in a comparative perspective’, in *Multiculturalism and the Canadian constitution*, ed S Tierney, UBC Press, Vancouver, pp. 61–90.
- Kymlicka, W 2007b. *Multicultural odysseys*, Oxford University Press, Oxford.
- Kymlicka, W 2007c. ‘Disentangling the debate’, in *Uneasy partners:*

- multiculturalism and rights in Canada*, ed J Stein, Wilfrid Laurier University Press, Waterloo, Ont., pp. 137–156.
- Laczko, LS 1994, 'Canada's pluralism in comparative perspective', *Ethnic and Racial Studies*, vol. 17, no. 1, pp. 20–41. DOI:10.1080/01419870.1994.9993811.
- Lenard, PT & Straehle, C 2012, *Legislated inequality: temporary labour migration in Canada*, McGill-Queen's University Press, Montreal.
- Lisheng, D, Christensen, T & Painter, M 2010, 'A case study of China's administrative reform', *The American Review of Public Administration*, vol. 40, no. 2, pp. 170–188. DOI: 10.1177/0275074009334075.
- Marwah, I, Triadafilopoulos, T, & White S 2013, 'Immigration, citizenship and Canada's new Conservative Party', in *Conservatism in Canada*, ed. DM Rayside and JH Farney, University of Toronto Press, Toronto, pp. 95–119.
- Mylenberg, T 1997, 'Weiss: Arbejde er den bedste integration', *Berlingske*, p. 5.
- NOU 2000:32, *Lov om erverv og tap av norsk statsborgerskap (Statsborgerloven)*, Statens Forvaltningstjeneste, Oslo.
- NOU 2004:20, *Ny Utlendingslov*, Statens forvaltningstjeneste, Oslo.
- NOU 2011:7, *Velferd og migrasjon: den norske modellens framtid*, Statens Forvaltningstjeneste, Oslo.
- NOU 2011:14, *Bedre integrering: mål, strategier, tiltak*, Statens Forvaltningstjeneste, Oslo.
- OECD 2012a, *International migration outlook*. Available from: <<http://www.oecd.org/migration/internationalmigrationpoliciesanddata/internationalmigrationoutlook2012.htm>>. [Last accessed 10.1.2013].
- OECD 2012b, 'Key information on migration policy and migration statistics by country'. Available from: <<http://www.oecd.org/migration/mig/internationalmigrationoutlook2012countrynotes.htm>>. [Last accessed 5.4.2013].
- Olsen, JP & Peters, BG 1996, *Lessons from experience*, Scandinavian University Press, Oslo.
- Olwig, KF & Paerregaard, K 2011, *The question of integration: immigration, exclusion and the Danish welfare state*, Cambridge Scholars Publishing, Cambridge.
- Ot.prp. 2002, nr. 28 (2002-2003): *Om lov om introduksjonsordning for nyankomne innvandrere (introduksjonsloven)*, Kommunal- og regionaldepartementet, Oslo.
- Ot.prp. 2005, nr. 41 (2004-2005): *Om lov om norsk statsborgerskap (statsborgerloven)*, Kommunal- og regionaldepartementet, Oslo.
- Ot.prp. 2007, nr. 75 (2006-2007) *Om lov om utlendingers adgang til riket og deres opphold her (utlendingsloven)*, Arbeids- og inkluderingsdepartementet, Oslo.
- Proposition 2008, 2007/08:147: *Nya regler för arbetskraftsinvandring*, Riksdagen, Stockholm.
- Proposition 2010, 2009/10:77: *Försörjningskrav vid anhöriginvandring*, Riksdagen, Stockholm.
- Rose, R 1991, 'What is lesson-drawing?', *Journal of Public Policy*, vol. 11, no. 01, pp. 3–30. DOI: 10.1017/S0143814X00004918.
- Rose, R 1993, *Lesson-drawing in public policy*. Chatham House Publishers, Chatham.
- Schmidtke, O 2003, 'Das kanadische Einwanderungsmodell: wohlverstandenes Eigeninteresse und multikulturelles Ethos', in *Migration im Spannungsfeld von Globalisierung und nationalstaat*, eds D Thränhardt & U Hunger, Westdeutscher Verlag, Wiesbaden, pp. 205–226.
- SOU 1999:34, *Svenskt medborgarskap*, Regeringskansliet, Stockholm.
- SOU 2002:13, *Vår anhöriginvandring*, Regeringskansliet, Stockholm.
- SOU 2005:50, *Arbetskraftsinvandring till Sverige - befolkningsutveckling, arbetsmarknad i förändring, internationell utblick*, Regeringskansliet, Stockholm.
- SOU 2006:87, *Arbetskraftsinvandring till Sverige - förslag och konsekvenser*, Regeringskansliet, Stockholm.
- St.meld. 2004, Nr. 49 (2003-2004): *Mangfold gjennom inkludering og deltakelse: ansvar og frihet*, Kommunal- og regionaldepartementet, Oslo.
- St.meld. 2008, Nr. 18 (2007-2008): *Arbeidsinnvandring*, Arbeids- og inkluderingsdepartementet, Oslo.
- St.meld. 2012, Nr. 6 (2012–2013): *En helhetlig integreringspolitikk: mangfold og fellesskap*, Barne-, likestillings- og inkluderingsdepartementet, Oslo.
- Tænketanken om Udfordringer for Integrationsindsatsen i Danmark, 2004, *Udlændinge- og integrationspolitikken i Danmark og udvalgte lande*. Ministeriet for Flygtninge, indvandrere og integration, København.
- Triadafilopoulos, T 2006, 'A model for Europe? an appraisal of Canadian integration policies', in *Politische Steuerung von Integrationsprozessen*, eds K Schönwälder, S Baringhorst, & U. Hunger, Verlag für Sozialwissenschaften, Wiesbaden, pp. 79–94.
- UDI 2005, *Anmodningsvedtak fra Stortinget om forsørgeransvar for herboende referanse ved familieinnvandring for ektefeller*.
- Velfærdskommissionen 2005, *Fremtidens velfærd - vores valg*, Velfærdskommissionen, København.
- Wickström, M 2013, 'The difference white ethnics made: the multiculturalist turn of Sweden in comparison to the cases of Canada and Denmark', in *Migrations and welfare states*, eds HV Jønsson, E Onasch, S Pellander and M Wickström, NordWel, Helsinki, pp. 25–58.