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Nordic countries and the EU's external dimension of migration

Aligning on externalisation, differing on funding

Saila Heinikoski

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Summary

- The Nordic EU member states – Denmark, Finland and Sweden – have not traditionally formed close alliances in the field of EU migration policy due to Denmark's opt-out from EU Justice and Home Affairs and their historically divergent national migration priorities.
- In recent years, the Nordic countries have converged in their migration policy objectives at both national and EU levels, with governments pursuing similar policies.
- Denmark has been active in promoting 'innovative' migration solutions at the EU level. During Denmark's EU Council Presidency in 2025, the EU made significant progress on the legislative frameworks needed for return hubs and other schemes intended to transfer migrants outside the EU.
- To some extent, the Nordic countries have all promoted so-called externalisation schemes, but no uniform Nordic approach to EU migration policy can be discerned.
- Closer Nordic EU coordination could increase the influence of the Nordic bloc, but may be hampered by risks related to changing political priorities.

Author



Saira Heinikoski

Senior Research Fellow
The European Union and Strategic Competition
Finnish Institute of International Affairs

Introduction

During the EU's current legislative term, the focus of migration policy has been on the EU's relations with third countries relevant to EU migration policy, also known as the external dimension of migration. The Nordic EU member states – Denmark, Finland and Sweden – have had different migration priorities and have not traditionally allied closely in this field, until recently.¹ The countries have also differed in their national migration debates. Finland has been the only Nordic EU member state to face instrumentalised migration, which has also become a key aspect of Finland's influence within the EU. In contrast, Denmark's current government abandoned its predecessor's UK-style asylum transfer plan in 2023 and began gathering like-minded member states to promote the externalisation of asylum at the EU level, namely the scheme to transfer asylum-seekers outside the Union, marketed as an 'innovative' migration policy.

Comparing the Nordic countries is intriguing in terms of their EU policy, as they have not traditionally been each other's main peers in EU affairs. The Nordic countries have also had their own controversies in the context of migration, and although Nordic cooperation was close long before the countries joined the European Union, they have never coordinated their EU policies, despite close

administrative cooperation on other issues.² In recent years, however, Nordic cooperation seems to have intensified in several areas alongside Finnish and Swedish NATO accession, including in external migration policy, where joint influencing at the EU level can also be observed.

This Briefing Paper examines the external dimension of migration, in particular how 'innovative' solutions such as the externalisation of asylum and return policy have been promoted by Denmark, and how the other Nordic EU countries are involved in this endeavour. The following sections discuss the roles of each Nordic EU country, examine their mutual cooperation, and conclude by assessing the role of the Nordics in the EU's external migration policy.

Denmark: National Rwanda plan abandoned in favour of an EU approach

Since the turn of the millennium at least, Denmark has pursued a much stricter migration policy than its Nordic neighbours, which may have reduced incentives for Nordic cooperation on migration issues. Denmark even had its own UK-style Rwanda plan, dating back to 2018, when the Danish Social Democrats outlined their proposal to transfer all asylum-seekers outside Denmark for the processing

1 See e.g., Finnish Ministry of the Interior (2026) Nordic ministers responsible for migration to discuss cooperation on returns. 18 February 2026. https://intermin.fi/-/pohjoismaiden-maahanmuutosta-vastaavat-ministerit-keskustelevat-palautuksiin-liittyvasta-yhteistyosta?language=en_us.

2 Tervonen, Miika (2015) "The Nordic Passport Union and Its Discontents: Unintended Consequences of Free Movement". In *Nordic Cooperation: A European Region in Transition*, edited by Johan Strang. New York: Routledge; Stegmann McCallion, Malin and Alex Brianson (2018) *Nordic States and European Integration: Awkward Partners in the North?* London: Palgrave Macmillan; Etzold, Tobias (2020) "The Nordic Council of Ministers: Aspirations for More Political Relevance". *Politics and Governance* 8(11), 11–20; Lægveid, Per and Lise H. Rykkja (2020) "Nordic Administrative Collaboration: Scope, Predictors and Effects on Policy Design and Administrative Reform Measures". *Politics and Governance* 8(21), 21–32.

of their asylum applications. For this purpose, Denmark amended its Aliens Act in 2021 to pave the way for the 2022 agreement concluded with Rwanda on the transfer scheme.

These plans were made possible by the Danish opt-out from EU Justice and Home Affairs, but there were doubts about the compatibility of the scheme with Denmark's Dublin responsibilities under EU law, as well as fierce criticism from civil society.³ The project also received criticism from the European Commission, including from the Home Affairs Commissioner at the time, Swedish national Ylva Johansson, who stated that "a system aiming for external processes outside the EU instead of protecting the right to apply for asylum in the EU would send a strong and wrong signal to the outer world".⁴ It did not take long for the Commission to reverse its stance, however.

Ultimately, the current Danish government that took office in 2022 abandoned the national plan and instead stated in its government programme that "it is the government's goal that a reception centre outside Europe is established by the EU or in cooperation with a number of other countries, and that there is established a safe place that lives up to Denmark's international obligations".⁵ According to the Danish Migration Minister at the time, the decision to abandon the national plan was linked to the formation of the new government. It was also driven by the EU's stronger negotiating position and capacity, as well as growing interest in the scheme at the EU level, where a common solution was allegedly needed. According to the Danish minister, "one risks an "Italianisation" of Europe's political systems, where each election brings a new far-right party that is even more extreme than the ones that came before".⁶ The Danish Social Democrats thus

considered the measure to be protecting Europe from far-right parties by adopting their political priority of a strict migration policy. The power-holding centre-right parties in Sweden and Finland have apparently pursued the same, as will be discussed below.

Denmark subsequently stepped up its promotion of an EU-level approach. This culminated in a letter to the Commission dated 15 May 2024, signed by 17 member states, including Finland, as well as two further letters on instrumentalisation and return policy, which Denmark, Finland and Sweden all signed.⁷ After the new Commission put forward legislative proposals in line with these demands in spring 2025, Denmark happened to hold a pole position with its Council Presidency in the second half of the year.

Denmark was indeed successful in chairing the negotiations: inter-institutional agreements on the Regulation on Safe Third Countries and the Regulation on the Common List of Safe Countries of Origin were reached in trilogue negotiations in December 2025, and a General Approach on the Return Regulation was achieved in the Council. In addition, a provisional agreement was reached in trilogues on the Generalised Scheme of Preferences (GSP) Regulation to conditionalise trade preferences on the readmission of own nationals, a system that had been abandoned in political negotiations two years earlier. These regulations contribute to the Danish government's objective of linking migration policy with external relations, as well as transferring asylum-seekers and returnees outside the EU by providing legal frameworks for such policies. A policy once labelled as "sending the wrong signal" at the EU level started to seem attractive to the Nordic neighbours as well.

3 Tan, Nikolas Feith (2022) "Visions of the realistic? Denmark's legal basis for extraterritorial asylum". *Nordic Journal of International Law*, 91(1), 172–181. <https://doi.org/10.1163/15718107-91010008>.

4 Nielsen, Nikolaj (2021) "EU commission takes stand against Danish asylum law". *EUObserver*, 21 June. <https://euobserver.com/news/ara1108d15>.

5 Statsministeriet (2022) *Regeringsgrundlag 2022: Ansvar for Danmark*. <https://stm.dk/statsministeriet/publikationer/regeringsgrundlag-2022/>.

6 Holstein, Erik (2023) "En ren dansk Rwanda-model er sat på pause". *Altinget*, 25 January. <https://www.alinget.dk/artikel/kaare-dybvad-vi-indleder-jo-ikke-forhandlinger-lige-nu-om-at-lave-et-dansk-modtagecenter-i-rwanda>.

7 Joint Letter from the undersigned Ministers on new solutions to address irregular migration to Europe. 15 May 2024; Joint initiative on an EU-level approach to effectively address instrumentalisation of migration. 7 June 2024; Objectives for a New Legislative Proposal for More Effective Returns Non-Paper by AT and NL.



Sweden's Migration Minister Johan Forssell at a press conference in February 2026 where the Tidö parties presented stricter rules on deportation following criminal offences.

Source: Lars Schröder, TT / Lehtikuva

Sweden: From humanitarian actor to promoter of return hubs

Sweden seems to have made a U-turn in its migration policy over the past ten years, tightening national policies while simultaneously paying more attention to migration as part of development policy. At the EU level, Sweden has been somewhat more cautious than Finland in advancing innovative ideas – for example, by not signing the first ‘innovative’ letter – but it has taken a more comprehensive approach to migration in general. At the same time, all three Nordic EU member states have started to adopt more similar policies, placing them in the same like-minded groups. However, as both Sweden and Finland are bound by the Migration and Asylum Pact⁸ to be implemented in summer 2026, they also have more

interest in the discussion on EU internal migration management.

Sweden used to be known for its generous migration policy, but the situation changed after the so-called asylum crisis of 2015–2016. The country started to tighten its migration policies, culminating in the Tidö Agreement in 2022, when the centre-right government parties secured the support of the Sweden Democrats for their political agreement aiming to make asylum policy significantly stricter. The agreement described the change as a “paradigm shift” in which “Sweden shall not in any way be more generous in asylum affairs than what follows from commitments under EU law or other legally binding international agreements”.⁹

8 The Migration and Asylum Pact is a major reform of the EU’s asylum system, including a mandatory border procedure for certain groups and mandatory solidarity between member states in the form of relocations of asylum-seekers or financial support.

9 Political agreement between the Swedish government and the Sweden Democrats: Tidöavtalet – Överenskommelse för Sverige. 14 October 2022. <https://www.liberalerna.se/wp-content/uploads/tidoavtalet-overenskommelse-for-sverige-slutlig.pdf>.

Sweden thus moved closer to the Danish policy. Instead of promoting general EU externalisation schemes, however, Sweden has specifically emphasised the need for so-called return hubs outside the EU, which the Swedish Migration Minister already called for in early 2024.¹⁰ Although Sweden has been part of the ‘innovative’ group’s discussions, it seems that the country has put more effort into tightening its national policies to the level required by EU law, a race to the bottom initiated by Denmark.

Not only has Sweden imitated Denmark’s national migration policies, but it has also adopted a more comprehensive approach to migration as part of its foreign policy. A testament to this is the Strategy for Sweden’s Global Development Cooperation within Migration, Return and Voluntary Return 2024–2028.¹¹ This strategy was coupled with significant funding of three billion Swedish kronor (approximately EUR 280 million) for the period. The government has made it possible to make development aid conditional, for example on the readmission of a country’s own nationals. The stated aim is to create strong partnerships and to advance Sweden’s return- and migration-related objectives.

“As the EU has recently placed greater emphasis on the external dimension of migration in its policies, countries with strong partnerships and available funding are better positioned to influence discussions.”

Although the effects of the strategy and related funding are not yet evident, the new approach could establish Sweden as a more powerful player at the EU negotiating table. As the EU has recently placed greater emphasis on the external dimension of migration in its policies, countries with strong

partnerships and available funding are better positioned to influence discussions. Even outside formal EU negotiations, such funding provides Sweden with an opportunity to initiate joint projects with other EU member states and thus achieve more with the same resources. Finland, in turn, has adopted a different approach.

Finland: Addressing instrumentalisation of migration as a national priority

Upon taking office in 2023, the Finnish government, led by the centre-right Coalition Party and including the right-wing populist Finns Party, promised to implement multiple migration policy reforms closely resembling the Swedish Tidö Agreement. Inspiration was also sought from Denmark, with the government programme even outlining that “The Government will bring Finland’s key asylum policy statutes up to the general level of Nordic countries”. At the time, Sweden was starting to implement government reforms that would make its migration policy more aligned with Denmark’s, and it is apparently this level that is referred to in the Finnish programme.

The government also presented clear goals for influencing EU migration policy. In light of the instrumentalisation of migration at the Finnish and Norwegian borders with Russia in 2015–2016, the government wanted an EU-level mechanism to suspend the reception of asylum applications in such cases. In early 2024, the government published its EU-level priorities, which also stated that “Finland will constructively promote EU-level measures that enhance opportunities to implement the asylum process and provide international protection in safe third countries”.

After only a few months in office, the government was confronted with a new instrumentalisation campaign in autumn 2023, and the entire eastern border of Finland has been closed ever since. In addition, the government prepared a bill to allow the immediate return of asylum-seekers to Russia, acknowledging that this would conflict with Finland’s obligations under international and EU law. As the border has remained closed, the temporary act adopted in summer 2024 and renewed in 2025 has never been tested. Still, in December 2024, the newly appointed European Commission issued a

10 von Arndt, Katarina (2024) “Migrationsministern vill kunna utvisa till ‘hubbar’ utanför EU”. Sveriges Radio, 10 February. <https://www.sverigesradio.se/artikel/migrationsministern-vill-utvisa-till-uppsamlingscenter-utanfor-eu>.

11 Regeringskansliet (2024) Strategi för Sveriges globala utvecklingssamarbete inom migration, återvändande och frivillig återvandring 2024–2028. 24 October. <https://www.regeringen.se/strategier-for-internationellt-bistand/2024/10/strategi-for-sveriges-globala-utvecklingssamarbete-inom-migration-atervandande-och-frivillig-atervandring-20242028>.

communication (COM/2024/570 final) outlining that it may be necessary to suspend the reception of asylum applications in a situation involving the “weaponisation” of migration. Although not a legally binding document, it provided important political support for Finland and other countries pursuing similar measures in addressing the instrumentalisation of migration.

Even though instrumentalisation has not affected Denmark and Sweden directly, both countries have provided political support for Finland and signed a letter addressed to the Commission calling for EU measures in instrumentalisation cases in summer 2024. Finland, in turn, has joined its Nordic neighbours in pursuing ‘innovative’ solutions, thereby bringing the three countries closer to each other in the field of EU migration policy. However, one issue in which Finland is less influential than its Nordic neighbours is the external dimension of migration, as the country has reduced its development policy budget, unlike Sweden and Denmark. While Sweden even introduced a new programme for aligning its development and migration policy targets referred to above, Denmark has also continuously increased its development cooperation budget, reaching more than DKK 23 billion (approximately EUR 3 billion) in 2026, and has for years linked foreign and development policy with migration policy objectives.

Sweden and Denmark both meet the 0.7% development aid target. Denmark’s latest development cooperation strategy notes that the country is the third largest development donor after Germany and France, measured as a share of GNI.¹² Combined with their other migration-related external funding, this allows Denmark and Sweden to participate in the EU’s external migration dimension through their own projects and also to conduct joint projects. By providing financial support for projects linked to EU initiatives, they also gain more influence and weight at the negotiating table.

For years, Denmark’s national external migration policy has pursued a whole-of-government approach, combining migration and foreign policy. Sweden seems to be adopting a similar approach. The Finnish government has also linked

development and migration policies, primarily by freezing existing support if readmission cooperation is not functioning. One could, of course, question whether development policy should be instrumentalised for migration objectives in the first place, or whether separate migration-related funding should be earmarked to complement traditional development cooperation.

Roles of the Nordic countries in EU migration policy

The Nordic countries will have slightly different roles once the EU Pact on Migration and Asylum enters into force on 12 June 2026. As Denmark has opted out of the Justice and Home Affairs area but has separately joined the Schengen area, it will mainly be bound by the Schengen-related provisions and those concerning the determination of the responsible country, formerly known as the Dublin provisions.

Finland and Sweden, in turn, will be fully bound by the Pact, yet they will be in different positions, at least in 2026, when it comes to the so-called solidarity pool. Although both countries will have to provide solidarity to member states under migratory pressure, Finland is categorised as a country “at risk of migratory pressure” due to the risk of continued instrumentalisation of migration at its border with Russia. This means that Finland will have priority access to the so-called migration support toolbox; in other words, it can receive support more quickly from the Commission and other member states if it faces migratory pressure. Instead of committing to the relocation of asylum-seekers from other EU member states, both Finland and Sweden have pledged to cover their 2026 solidarity contribution financially, with EUR 5.94 million from Finland and EUR 11.68 million from Sweden directed to the solidarity pool. Denmark will not be bound by the solidarity mechanism.

Despite Sweden and Finland moving closer to Denmark in terms of their national measures and involvement in promoting ‘innovative’ solutions, Denmark appears to be taking matters further. For example, it was reported in January 2026 that Denmark is part of a working group preparing a roadmap for return hubs to be established outside the EU. The Swedish Minister for Migration and Asylum Policy also expressed interest in the group,

¹² Ministry of Foreign Affairs of Denmark (2025) “A changing world: partnerships in development. Denmark’s Strategy for Development Cooperation”. <https://um.dk/en/danida/strategies-and-priorities>.

but the group's actual role and composition remain unclear.¹³ Finland has not commented on the matter publicly.

Despite the fact that all three countries have similar ambitions in EU migration policy, they do not seem to proceed in tandem but instead decide individually which initiatives to join. For Denmark, it is politically unproblematic to be part of the most active group of member states, given the country's own 'zero refugee' policy pursued by the ruling Social Democrats since 2019. Sweden and Finland, however, appear to quietly settle for driving in Denmark's slipstream without too much controversy. The fact that several major EU countries are advancing certain measures makes them easier to accept nationally, as these countries are merely following the European mainstream.

“It cannot be claimed that the countries form a Nordic bloc within the Union, but they do seem to support each other in migration-related matters of particular importance to them.”

It cannot therefore be claimed that the countries form a Nordic bloc within the Union, but they do seem to support each other in migration-related matters of particular importance to them, such as the instrumentalisation case concerning Finland. Finland and Sweden appear closer to each other in their policies, whereas Denmark has more far-reaching objectives. Together with Italy, Denmark even initiated a controversial letter concerning the European Court of Human Rights and its allegedly overextended interpretation of the European Convention on Human Rights,¹⁴ while Finland and Sweden were not involved. In a similar vein, when the Finnish Prime Minister hosted an informal meeting in Finnish Lapland in December 2024 that also addressed migration, Denmark did not participate, whereas the

Swedish Prime Minister did. The composition of the meeting – two prime ministers from Mediterranean countries (Italy and Greece) and two from Northern Europe (Finland and Sweden) – may also have played a role. It nevertheless appears that, when it comes to migration, Stockholm is Helsinki's primary contact.

Conclusions: Added value in closer EU coordination?

The Nordic countries could potentially benefit from closer coordination on migration within EU policy-making. They could support each other on issues of shared importance and achieve greater value for money in their external migration projects. Many countries of origin are important to the Nordics but not to most EU member states; collective efforts at the Nordic level could therefore be easier and more effective to organise and could even be brought to the EU negotiating table.

On the other hand, Denmark, Sweden and Finland may have different reputations in different countries, shaped, for example, by previous bilateral cooperation or even foreign policy crises, such as those related to Quran desecrations in Denmark and Sweden. The countries may not wish to jeopardise their functioning bilateral cooperation by aligning too closely with partners that have a more negative reputation in a given country. In the external dimension of migration, migration policy becomes entangled with other areas of foreign policy, and even in the absence of acute diplomatic crises, the risk that one country's reputational damage could affect the others may constrain closer cooperation.

Furthermore, politicians may be wary of the national political implications of close cooperation. In both Finland and Denmark, the media and certain politicians have often portrayed Swedish migration policy as a path that the neighbours did not wish to follow, especially with regard to incidents of gang violence. In all three countries, current politics also revolve around balancing against far-right forces: in Denmark, the government pursues migration objectives traditionally associated with the far right; the Swedish government relies on support from the Sweden Democrats; and the Finns Party participates in the Finnish governing coalition.

In the end, the external dimension of migration often deals with sensitive issues, such as the

13 Agence Europe (2026) "Five EU Member States set up 'working group' to speed up procedure on 'return hubs'". 23 January. <https://agenceurope.eu/en/bulletin/article/13792/16>.

14 Frederiksen, Mette; Giorgia Meloni et al. (2025), Open letter, 22 May. https://www.governo.it/sites/governo.it/files/Lettera_aperta_22052025.pdf.

readmission of a country's own nationals, which requires caution in the conduct of relations. For the EU, the optimal solution would be for all member states to pursue a uniform approach towards key migration countries, but national priorities and contrasting views on the appropriate course of action may hinder its effectiveness. This allows third countries to pit member states against each other, for example by seeking more favourable treatment from one country and then exploiting it in their dealings with another.

If the EU's external dimension is not yet functioning optimally, the Nordic countries could seek to enhance their collective leverage through joint action. However, in addition to the diplomatic risks outlined above, there is also the political risk that policies may change in one country, bringing cooperation to a close due to contrasting political priorities. External action is, however, a field in which continuity is generally valued, and such continuity could perhaps be achieved through closer Nordic cooperation and a jointly agreed approach. That could also reduce the risk of one country's external action appearing volatile, such as one government increasing funding and another withdrawing it.

A joint approach cannot be established overnight. However, with more joint projects and closer coordination between the countries, Nordic rapprochement could evolve organically. This would require greater political will and increased cooperation between civil servants in each country, ideally involving several ministries. After all, the external dimension of migration falls within the purview of the ministries responsible for migration and foreign affairs. But if coordination is not functioning optimally even within each country, coordination with other countries would add yet another layer of complexity to the discussion.

It is also worth asking whether the Nordic countries really need another layer of cooperation in addition to EU-level cooperation and the group of 'innovative' countries, which already includes around 20 member states and the Commission. Ultimately, considerations such as resources, priorities, as well as reputational and political risks may indeed outweigh the potential added value of more coordinated Nordic EU migration policies. ◆

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FIIA
FINNISH
INSTITUTE OF
INTERNATIONAL
AFFAIRS

Arkadiankatu 23 b
POB 425 / 00101 Helsinki
Telephone +358 (0)9 432 7799
www.fii.fi

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