

Discourses on differentiated integration in Finland – Controversy over the Prüm Convention, credit-claiming for PESCO¹

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Abstract

This article discusses discourses on differentiated integration (DI) in Finland both from the quantitative and qualitative perspectives. It illustrates how salient DI has been in Finland between 2004 and 2019 and how government and opposition parties have approached DI, with special focus on the Prüm Convention and Permanent Structured Cooperation (PESCO) in defence. It also examines approaches towards polity differentiation, i.e., the idea of multi-speed or multi-end Europe, as well as discourses on DI mechanisms, namely enhanced cooperation and opt-outs. The article concludes that the Finnish approach towards DI is pragmatic and generally positive, as the country has joined almost all instances of enhanced cooperation, unlike its Nordic neighbours Denmark and Sweden. This may be due to the lack of politicisation of DI in Finland, which has also allowed the country to join those instances.

Keywords: differentiated integration, European Union, Finland, Permanent Structured Cooperation, Prüm Convention

Introduction

Not much is known about how European Union (EU) Member State governments view differentiated integration, and this article aims to fill this gap for one EU Member State: Finland. It investigates the salience of differentiated integration (DI) in Finnish government discourses between 2004 and 2019. It also probes into the position of Finnish governments on the issue of DI in selected peak-salience years (2006–2008, 2012–2014, 2017–2020). The assumption is that the more a government talks about DI, the more relevant it is. While key word counts in government programmes and PM speeches show the salience of DI at specific moments in time, an analysis of parliamentary debates allows us to identify trends over time and situational peaks.

Finland does not have any opt-outs from EU policies, but it participates in most instances of enhanced cooperation. In general, Finnish politicians have emphasised that the optimal solution would be to have all EU Member States on board – but differentiated integration can be an option in order to move forward in certain fields.

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Finland has wanted to remain in core Europe and participate in all significant integration projects. Since 2004, participation in the Prüm Convention and Permanent Structured Cooperation (PESCO) seem to be the only DI instances that some politicians have opposed. These two instances of policy differentiation are also discussed specifically in this article, since those were the ones that spurred some political controversy. Usually, Finland is involved in new EU policy initiatives as a matter of course. In the case of PESCO, the Finnish government even took some credit for the launch of cooperation. This is remarkable for a non-NATO country which was initially wary of some aspects of the EU's Common Security and Defence Policy (see e.g. Devine 2011; Duke 2018).

In the Finnish case it is also interesting that its Nordic neighbours, Sweden and Denmark, have been much more reluctant to join all EU policies. Neither Sweden nor Denmark is part of the eurozone, Denmark has opt-outs from key integration fields and has not joined PESCO or the Prüm Convention, of which Sweden only became a member in 2013. Finland therefore stands out as the Nordic country that is most interested in participating in voluntary EU policy frameworks. The sections that follow delve deeper into the Finnish approach on differentiated integration and potential explanations for this. The questions the article seeks to answer include to what extent and how have Finnish politicians discussed differentiated integration, and what are the potential explanatory factors behind the positive approach?

Theory and methods

The results are based on an analysis of various government documents with the framework outlined in the introduction to this special issue (Telle, Brunazzo & Doidge 2021). The material analysed includes government programmes, Prime Ministerial speeches, Prime Ministerial European Council statements² and parliamentary debates. They were analysed in this order. The salience of DI models, DI mechanisms and DI instances was assessed by counting key words in the above-mentioned documents. In some cases, key words were counted from 1994 onwards (Finland joined the European Union in 1995). The material included in the analysis is presented in Table 1.

Table 1 *Overview of the documents analysed*

Category of document	Time period	Details
1 Government programmes	2004-2020	2007, 2010, 2011, 2014, 2015, 2019 x 2 (same programme with a different PM)
2 First speeches and parliamentary debate	2004-2020	The first speech after the election of each PM in parliament and the subsequent debates (years same as above).
3 European Council presidency speeches and parliamentary debates a. in Finnish Parliament	2004-2020	21.6.2006 (Finnish Parliament) 5.7.2006 (European Parliament) 26.6.2019 (Finnish Parliament) 17.7.2019 (European Parliament)

² The latest statement related to DI was made on 22 November 2017 on current EU matters, including PESCO (Finnish Parliament, 2017). Another statement was made in May 2017 about the Commission's Future of Europe scenarios, and this was the parliamentary debate with the strongest focus on DI over the period covered. It seems that the Prime Minister provides such statements only on very important topics. The statements focused on Ukraine in 2014, on economic matters discussed at a summit in 2011, on the European stability package in 2010, on the results of the inter-governmental conference (Lisbon) in 2007, on current EU matters after a summit in Lahti in 2006, on the Northern Dimension in 2005 and on the summit agreeing on the Constitutional Treaty in 2004.

b. in European Parliament

4	Future of Europe speeches and parliamentary debates a. in European Parliament b. for citizen consultations	2017-2020	- PM speech in the European Parliament on the 'Future of Europe' on 31 Jan 2019 - PM speech on the citizen consultation on the 'Future of Europe' on 31 Aug 2018
5	Prime Minister European Council Statements	2004-2020	All post-Council statements by PMs in the Finnish Parliament: 2004, 2005, 2006, 2007, 2010, 2011, 2014, 2017 x 2
6	Parliamentary debates	2006-2008 2012-2014 2017-2020	Documents with one of the following key words: multi-speed Europe, coalition of the willing, core Europe, à la carte, enhanced cooperation, opt-out
7	Government EU Policy Reports and EU Influence Strategies	2004-2020	EU Policy Reports 2009 and 2013, EU Influence Strategies 2016, 2017 and 2018

Since Finland has two official languages, all the key words were searched in the repository of the Finnish Parliament with both Finnish and Swedish equivalents. The keywords were searched with the stem of the word, as both languages may have small variations at the end of the word depending on the conjugation of the word. The main problem encountered in the search was that the Finnish and Swedish equivalents are rarely used in political debates, perhaps due to their technicality. Sometimes, only one part of the key word was used in the search, such as 'differentiated,' which might have been used in connection with a word other than 'integration.' For some key phrases, both the acronym and the longer version were searched.

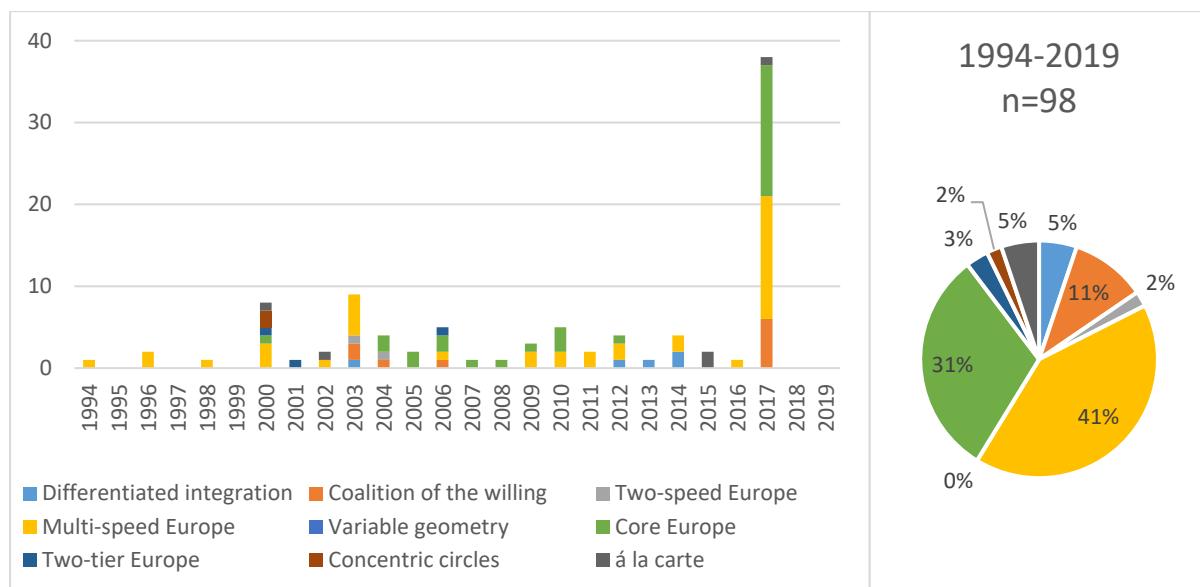
The results regarding the number of key words in government documents and parliamentary debates were verified through a close reading and holistic grading of the respective government programmes and speeches.³ The following sections summarise the results of the analysis.

Polity differentiation: Multi-speed Europe and multi-end Europe

The use of conceptual key words in parliamentary debates is visible in Figure 1. We can observe that conceptual key words related to DI models have been practically non-existent in parliamentary debates. The low salience of DI is also reflected in the fact that the concepts do not have established translations and are not part of everyday political debate, even though politicians might *de facto* discuss differentiated integration. The figure below illustrates that salience has been low throughout the period from 1994 onwards. Finland has usually considered it important to join instances of enhanced cooperation, even though the country has emphasised that unity is always the preferred option, and such instances must remain open to all willing Member States in all stages of their development.

³ Each document (n=28) was carefully read and scored between 0 (no reference to DI) and 2 (direct reference to DI). In addition, the position of the documents was evaluated as either 0 (negative), 1 (neutral) or 2 (positive).

Figure 1 The salience of conceptual key words in parliamentary debates



Over the entire period, ‘multi-speed Europe’ and ‘core Europe’ were the most frequently recurring key phrases, covering more than two thirds of all the conceptual key words. A breakdown of the keywords used in peak-salience years (2000, 2003, 2017) illustrates that there was variation. In 2017, most DI references referred to ‘core Europe’ and ‘multi-speed Europe’. However, in 2000 and 2003 not many references to ‘core Europe’ were made while most key words referred to ‘multi-speed Europe’. Interestingly, ‘differentiated integration’ as such was not mentioned in the 2017 or 2000 debates, but in 2003 there was one reference.

We can see that 2017 was the absolute peak year, with multi-speed Europe coming up in several debates. However, most references were made in a single debate held on 31 May 2017 after the Prime Minister’s announcement on EU policy as a result of the Commission’s *White Paper on the Future of Europe*. Still, the fact that multi-speed Europe was referred to only fourteen times during the peak year suggests that concepts related to DI are very rarely discussed in the Finnish Parliament.

The use of DI key words was not very frequent in post-Council statements by Prime Ministers either. Core (*ydin*) Europe was only used in 2010 and multi-speed (*eritahtinen*) Europe appeared in both the statements made in 2017. Overall, differentiated integration does not seem to be a key issue as such. Finland has been eager to join almost all instances of enhanced cooperation and DI has not caused significant debate.

While the salience of polity differentiation was low, the quantitative analysis regarding DI models shows that Finnish politicians have a rather positive or neutral approach to multi-speed Europe and coalitions of the willing, in which Finland has usually participated (Figures 2 and 3 below). The government is slightly more positive than the opposition, with the opposition mainly making neutral statements with regard to multi-speed Europe. When it comes to multi-end Europe, the situation is more divided, since there is a slightly higher number of negative statements than positive ones. In 2017, the negative statements by the opposition usually dealt with PESCO, which the opposition did not believe would take Finland into the core of Europe. Positive statements usually outlined that Finland wants to enter the core of Europe, but

negative statements considered that there is a core Europe making decisions which Finland has little chance of influencing. Being in the core appeared positive and remaining outside was negative.

Figure 2 Position on multi-speed Europe (multi-speed + coalition of the willing)

(n = 27)	Negative	Neutral	Positive
Government	3	3	6
Opposition	3	9	3
2006-2008	2	0	0
2012-2014	2	2	0
2017-2020	2	10	9

Figure 3 Position on multi-end Europe (core Europe + à la carte)

(n = 22)	Negative	Neutral	Positive
Government	3	2	2
Opposition	6	3	6
2006-2008	1	1	2
2012-2014	1	0	0

A few examples of these instances are illustrated here. For example, on 2 May 2012, there was a debate on how the Lisbon Treaty had impacted the Common Foreign and Security Policy. The parliament's Committee for Foreign Affairs had a critical view of the EU's external action in its report issued to the parliament. MP Miapetra Kumpula-Natri, chair of the Grand Committee dealing with EU affairs, considered that the Union was operating normally, although the financial crisis dominated the media. She also deemed it important to have a clear position on a multi-speed Europe:

“But these decisions on the measures that are proposed are also important to take into account in their entirety because there will be **multi-speed development** in different sectors, and what is Finland’s position in this new kind of Europe?” (MP Miapetra Kumpula-Natri (SDP), 2 May 2012).

On 28 April 2017, two Social Democratic MPs took up DI in a debate on a government proposal on the European Small Claims procedure and the European Order for Payment procedure. They called for a general debate on the Future of Europe already before the scheduled debate on 31 May, in the light of the five scenarios of the Commission White Paper. They wanted to know if Finland wanted to be in the core of Europe and if there could be multi-speed integration:

“In addition, what I have thought of a lot is this comprehensive debate, whether we enter all the **cores** and how deeply and in which fields and whether there can be **multi-speed development** and so on” (MP Pia Viitanen (SDP), 28.4.2017).

On 31 May 2017, the Prime Minister stated that, “If necessary, **multi-speed advancement in the Union** is also possible.” (Prime Minister Juha Sipilä (Centre), 31.5.2017). Whereas the government spoke mainly through the Prime Minister (the debate was based on an announcement by the Prime Minister), various opposition MPs

took the opportunity to present their views on differentiated integration in their group presentations. They insisted on Finnish influence and were worried that some countries would steer integration too heavily. For example, a Social Democratic MP reminded that “if integration shifts towards **multi-speed Europe**, Finland will have to aim to have **influence at all the tables**” (MP Jutta Urpilainen (SDP), 31.5.2017).

Finally, in a debate on current EU issues announced by the Prime Minister on 22 November 2017, a few opposition politicians took the opportunity to criticise the unclear approach to DI and the lack of leadership in Finnish EU policy:

“You, Prime Minister, simultaneously talked about unity and gave your support for **multi-speed development**” (MP Tytti Tuppurainen (SDP), 22.11.2017).

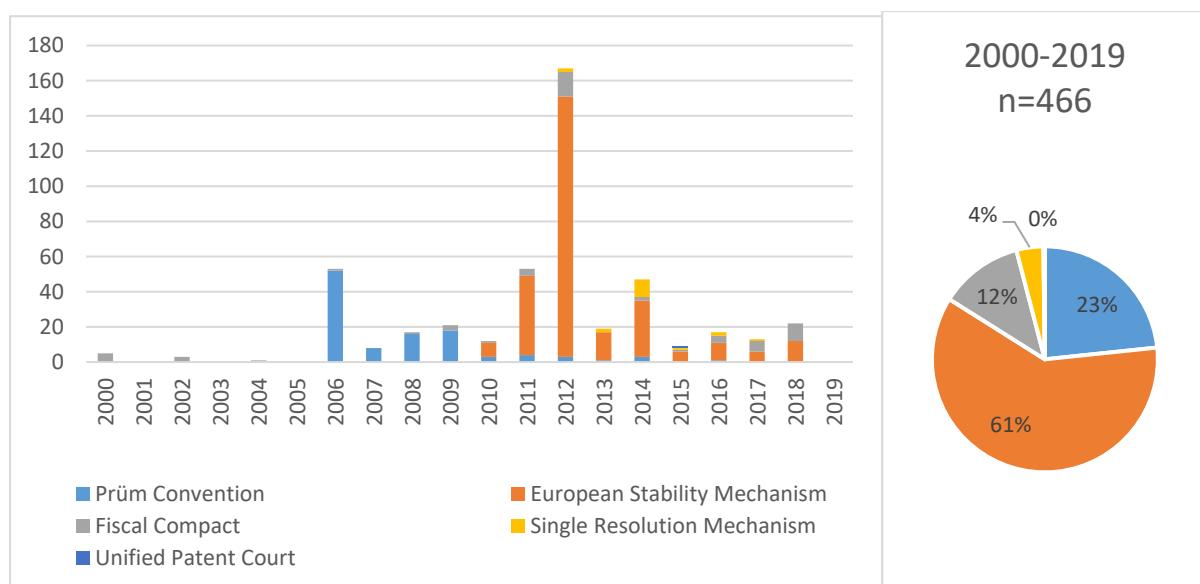
Overall, both government and opposition politicians approached both multi-speed Europe and multi-end Europe positively, even though the latter word was not explicitly used. Instead, some politicians emphasised that it is important that Finland enters all cores of Europe. In the next section, two examples of policy differentiation are discussed: the Prüm Convention and Permanent Structured Cooperation (PESCO) in defence.

Policy differentiation: Prüm Convention and PESCO

The Prüm Convention and PESCO are the two differentiated EU policies that were discussed the most in the analysed material. As mentioned above, Finland joined both policies and took even partial credit for the launch of PESCO. The Prüm Convention is a so-called *inter se* agreement, which EU Member States concluded outside the framework of the European Union. PESCO, in turn, is an instance of enhanced cooperation made possible by the Lisbon Treaty among willing Member States within the framework of the European Union (see also Telle, Brunazzo & Doidge 2021).

Figure 4 shows that debates about differentiated *inter se* agreements peaked in 2012, when there was a total of 148 references to the European Stability Mechanism (ESM) in Finnish parliamentary debates. This is due to the financial crisis and the establishment of the ESM in late 2012. However, the ESM was not discussed within the context of differentiated integration, while the Prüm Convention is a more interesting case for the purposes of this article focusing on DI. The Prüm Convention, indeed, aroused quite an active debate during its peak year 2006, when the Finnish government issued its proposal to join the Convention. The Prüm Convention also came up relatively often in the years immediately following the Finnish accession to the Convention in 2007, but no references were made after 2016.

The Prüm Convention peak was also visible in the 2006 presidency speech in the Finnish Parliament, which mentioned the Prüm Convention eight times, as the government parties and even the largest opposition party expressed support for participating in the Convention, which Finland had yet to join. The government issued a proposal to join the Prüm Convention in March 2006, with the opposition Greens and the Left Alliance criticising the proposal (and eventually voting against it in February 2007). Only seven EU Member States were involved in establishing the Prüm Convention, and these two opposition parties criticised Finland for joining an already agreed arrangement among a few countries outside the EU structures.

Figure 4 *The salience of instances of inter se agreements in parliamentary debates*

There was a debate on 8 November 2006 on the government proposal on the approval of the Prüm Convention. Justice Minister Leena Luhtanen (Social Democratic Party) stated that the Prüm Convention had not been prepared in accordance with the Treaty provisions on enhanced cooperation but intergovernmentally, which was contrary to the general objectives of Finnish EU policy. However, she considered that this derogation from the Finnish line of promoting EU-level preparation was justified due to the benefits received from participation:

“A few words on the relation of the Prüm Convention to the general objectives in Finnish EU policy. We declared in our statement [by the Ministry of Justice] that the Prüm Convention has not been prepared in accordance with the provisions in the EU Treaties concerning **enhanced cooperation but intergovernmentally**, and this is where this preparation diverts from the general principles of Finnish EU policy. Because of this, the Ministerial Committee on EU Affairs, among others, has discussed and processed this issue several times, but has considered that the benefit received from joining the Convention in terms of promoting international cooperation by law enforcement authorities is greater than the possible damage caused by activities that are contrary to the principle assumed in Finnish EU policy” (Justice Minister Leena Luhtanen (SDP), 8.11.2006).

In the same debate, the Minister of the Interior from the same party also defended Finnish participation and considered that participating in the Prüm Convention took Finland into the core of internal security in the EU: “Finland reacting so fast has brought us among the **core and leading countries** in internal security” (Interior Minister Kari Rajamäki (SDP), 8.11.2006).

As has already been mentioned, the Left Alliance and the Greens voted against Finland’s participation in the Prüm Convention, but this was rarely done with reference to DI. However, a Left MP did raise during the debate that joining the Prüm Convention may harm European communalities:

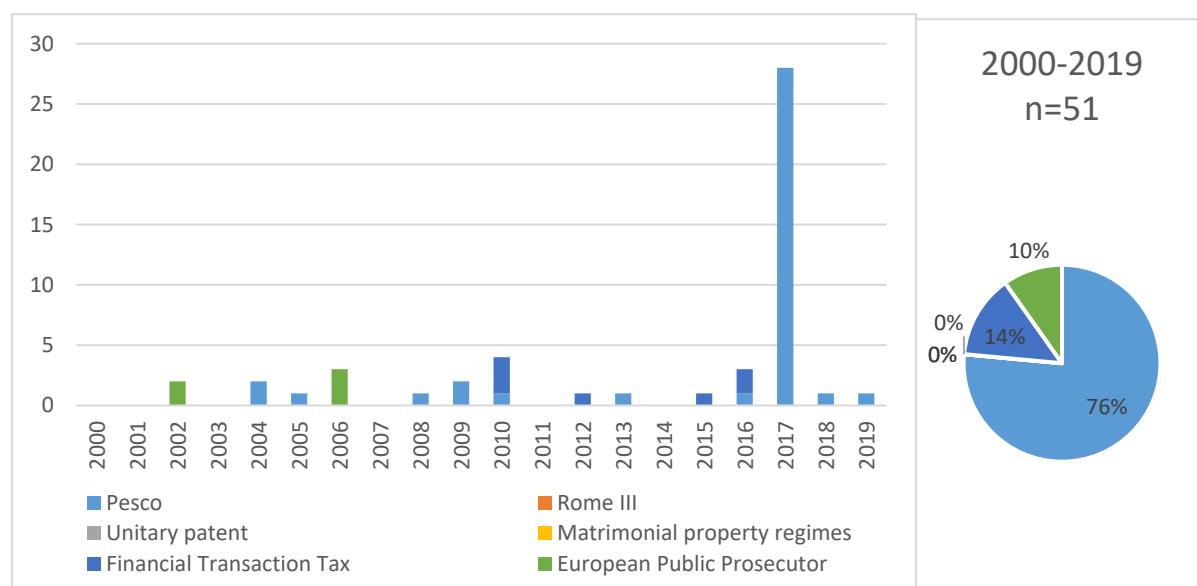
"If one develops more models resembling the Prüm Convention, when one makes intergovernmental agreements, I claim that this contributes to whittling away at the European Union. It can be that on some issues certain countries can launch **enhanced cooperation**, if not everyone is **willing**, but it must not be the main rule. The main rule should be strengthening communalism" (MP Outi Ojala (Left), 21.6.2006).

When looking at instances of enhanced cooperation, in turn, the pattern becomes very clear (Figure 5). On the one hand, instances of enhanced cooperation show very low salience. On the other hand, more than three quarters of the references are related to PESCO, a project for which Finnish politicians took partial credit and almost all parties fully supported. PESCO was established in December 2017, which was also the peak year for references to it (28 of 39 references).

PESCO was referred to in three consecutive sentences in the 2019 government programmes and was cited as "a key project for the defence dimension of the EU." The programme declared that "Finland will contribute actively to the development of defence cooperation within the EU." This was in line with the previous government's position on PESCO and European defence cooperation.

Although launched only in 2017, PESCO had already been raised in Finnish parliamentary debates in 2012, when the approach was positive. However, the debate became more vivid in 2016, when the EU Council and European Council endorsed the launch of PESCO (Council of the European Union, 2016; European Council, 2017). In the debate on the White Paper on Defence Policy in March 2017, an MP from the Greens deemed it positive that Finland was involved in the European core: "I was also pleased to hear the Prime Minister tell how strongly Finland has committed to developing a **common defence policy of the EU**. It is important that we are strongly involved in all these **cores**" (MP Johanna Karimäki (Greens), 8.3.2017).

Figure 5 *The salience of instances of enhanced cooperation in parliamentary debates*



What was similar in the Prüm and PESCO cases is that joining both instances were opposed by the Left Alliance in the Finnish Parliament. The Green Party also objected to Finland joining the Prüm Convention but has been positive towards PESCO. The

incumbent government, which includes both parties, affirms a positive stance on PESCO in its government programme.

The parliamentary debate on PESCO was held on 22 November 2017 in conjunction with the Prime Minister's announcement on current EU issues. The Prime Minister again outlined the Finnish position on DI, which he claimed had become the EU's common line:

"We permit multi-speed development when certain preconditions are fulfilled. **Finland is currently involved in all the models of multi-speed development.** Decisions on participation are always made case-specifically, starting from the common interest of both Finland and the Union" (Prime Minister Juha Sipilä (Centre), 22.11.2017).

In the same parliamentary debate, the Prime Minister also stated that Finland had been among the first countries to announce its participation in PESCO, had contributed to the preparation with seven other countries, and had managed to pass the initiative on mentioning the mutual assistance clause in the PESCO notification. Indeed, PESCO was one of the instances of enhanced cooperation that Finland actively promoted together with France (France & Finland, 2016). One of the recitals of the PESCO notification reads as "Recalling the obligation under Article 42(7) TEU of mutual aid and assistance", which links PESCO with the obligation to provide military aid, at least in the view of the leading Finnish politicians of the time. This was considered positive as Finland is not a NATO member, and PESCO appeared to provide the country with some sort of security guarantee. However, at least the European Parliament has considered PESCO to also enhance EU–NATO cooperation (European Parliament, 2018), which may undermine the pursuit for European autonomy in defence.

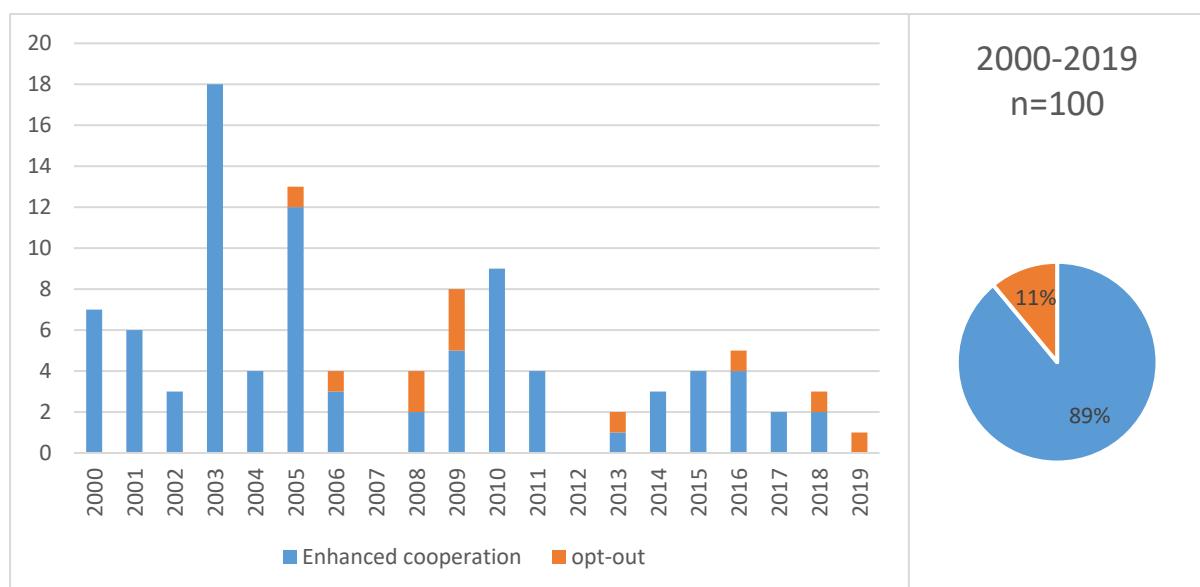
Defence is often considered one of the so-called "core state powers" (Genschel & Jachtenfuchs, 2018), and it is interesting that militarily non-allied Finland has pursued integration in this field. One reason may be the positive approach of Finnish citizens: more than 50 % of Finns have been found to support deeper defence cooperation within the EU (Härkönen, 2019). A much more heated debate on PESCO was held in the similarly militarily non-allied Sweden (see e.g. Heinikoski 2020), whilst Denmark decided not to join PESCO. It appears that the defence aspect of European integration is a more sensitive issue in the Nordic neighbours of Finland, whilst Finnish politicians whole-heartedly support deeper defence cooperation. The next section, in turn, discusses how enhanced cooperation in general appeared in the Finnish material.

Mechanisms of differentiation: opt-outs and enhanced cooperation

'Enhanced cooperation' or 'opt-out' were mentioned only 100 times in parliamentary debates during the period 2000 to 2019. The breakdown into these two DI mechanisms clearly shows that the vast majority of references dealt with enhanced cooperation; there were only 11 references to opt-outs in Finnish parliamentary debates. Again, we need to remember that there is no established translation in Finnish for opt-out, which is why the English term 'opt-out' was used in the search. Other formulations of the concept of opt-out in Finnish are too complex to yield any results in the search in parliamentary debates. Opt-outs were mainly mentioned with reference to the Irish

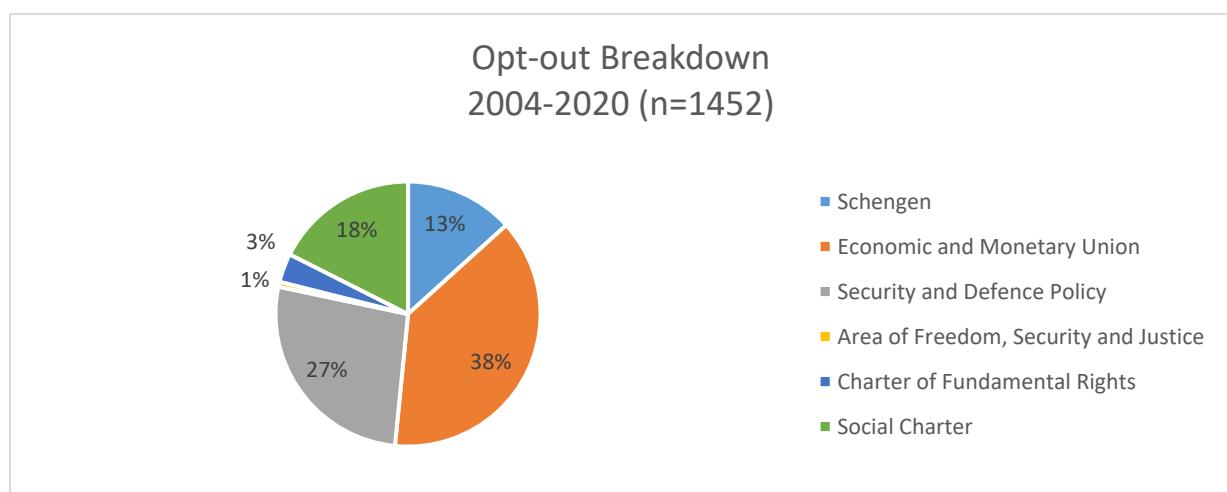
and British decisions to remain outside of certain EU policies. Enhanced cooperation was not much discussed either, but there were some references.⁴ In particular, there was a peak in the debate on enhanced cooperation in 2003 (see Figure 6). This was related to the Convention on the Future of Europe, which prepared the proposed EU Constitution that entailed enhanced cooperation within the field of defence.

Figure 6 *The salience of DI mechanisms in parliamentary debates*



Regarding the EU policy fields for which some EU Member States have opt-outs, we can observe in Figure 7 that these policy fields have been fairly often discussed over the 16-year period. However, since Finland has not opted out from any policy field, the discussions regarding these instances did not relate to opt-outs (and even less so to the possibility of Finland opting out). Because only 11 references to opt-outs were made during the period, the opt-outs by the United Kingdom (UK) and Ireland were also rarely referred to.

Figure 7 *Salience of opt-out policy fields*



⁴ While enhanced cooperation is a specific term in EU jargon, the Finnish and Swedish translations “tiiviimpi yhteistyö/förståtup samarbete” are used in many other contexts and do not always refer to enhanced cooperation in the EU, but instead to closer cooperation between any actors. Therefore, it was necessary to make sure that the references were made to the EU context.

Opt-outs and enhanced cooperation were also rarely discussed in government documents. In the first speech by the PM in the European Parliament during the Finnish Council presidency in 2006, there was one reference to opt-outs. The 2006 presidency speech in the Finnish Parliament, in turn, outlined that enhanced cooperation between certain groups of countries may be possible and necessary, but emphasised that the Union should remain as united as possible and that the Member States should be equal.

In terms of mechanisms of differentiation, the 2013 government report on EU policy was perhaps the most interesting one, as it included a separate 2-page section entitled “United Union,” which dealt with DI. It described three forms of DI with examples: 1) sector-specific cooperation with a smaller group of Member States (euro and Schengen), 2) opt-out models (Justice and Home Affairs) and 3) enhanced cooperation and Permanent Structured Cooperation (Matrimony, the Patent and the Financial Transaction Tax). However, the approach to DI seems to have been consistent: unity is preferred, but DI arrangements open to all Member States may be used if necessary.

Figures 8 and 9 show that enhanced cooperation was considered more positively by the government, which also referred to opt-outs in a neutral or positive manner. Some opposition politicians considered opt-outs negative in advancing legislative processes. Both mechanisms aroused little debate during the periods analysed. In 2006–2008, enhanced cooperation was discussed with regard to the Prüm Convention, and since 2017 there has been some debate on PESCO and the Future of Europe.

Figure 8 Position on enhanced co-operation

(n = 13)	Negative	Neutral	Positive
Government (n=8)	1	2	5
Opposition (n = 5)	4	1	0
2006-2008	2	2	1
2012-2014	2	0	2
2017-2020	1	1	2

Figure 9 Position on "opt-outs"

(n = 6)	Negative	Neutral	Positive
Government (n = 3)	0	1	2
Opposition (n = 3)	2	1	0
2006-2008	0	2	0
2012-2014	0	0	1
2017-2020	2	0	1

Finland held the Council presidency during the second half of 2006, and Prime Minister Matti Vanhanen (Centre) sometimes made principled statements on DI. For example, in the debate on 21 June 2006 on the upcoming Council presidency, Vanhanen defined the line that characterised the Finnish approach to DI throughout the period: DI is possible, but all Member States must remain equal. There was also some debate over an interview with former Commission President Jacques Delors in the Finnish Journal of Foreign Affairs (*Ulkopolitiikka*), which the Finnish Prime Minister and many MPs referred to. Delors had stated that the enlarged Union should differentiate more, but the Finnish Prime Minister thought that all Member States

were interested in all fields, “and that is how it should be.” PM Vanhanen recalled that all Member States had joined the Rapid Reaction Force (EU Battlegroups), but in fact Malta and Denmark remained outside. We can observe that the Prime Minister had a slightly negative approach to enhanced cooperation as he wanted all Member States to be involved:

“Enhanced cooperation among certain groups of countries is of course possible, and it may sometimes even be necessary. [...] Perhaps the core message in the article on former Commission President Delors related to the assessment that the Union should differentiate in the future. With this **enhanced cooperation**, it is possible, but I have not heard a single proposal on the fields where this could take place, and I have not heard that there could be fields in which not everyone was interested” (Prime Minister Matti Vanhanen (Centre), 21.6.2006).

On 10 April 2008, Prime Minister Vanhanen presented the government proposal on the ratification of the Lisbon Treaty. He did not take a stance on DI, but simply mentioned that the Treaty included provisions on enhanced cooperation: “Compared to the Constitutional Treaty, the **Lisbon Treaty** includes strengthened provisions on the emergency brake concerning Justice and Home Affairs and **on enhanced cooperation**, but these specifications do not change the basic solutions” (Prime Minister Matti Vanhanen (Centre), 10.4.2008).

Opt-outs were not discussed much in the documents, but two exceptions included the effect of the opt-outs on the Lisbon Treaty as well as the Working Time Directive. A question by MP Krista Kiuru was presented to Migration and Europe Minister Thors on the Irish and British opt-outs in the Lisbon Treaty. MP Kiuru did not take a stance on DI but wanted to know what the effects of the Lisbon Treaty were, including Ireland’s and the UK’s opt-outs (MP Krista Kiuru (SDP), 19.4.2008).

Migration and Europe Minister Astrid Thors answered the MP’s question on Ireland and the UK’s opt-outs, emphasising that they did not jeopardise what was agreed in common: “You [MP Kiuru] also presented a very difficult question on the impact of **Ireland and the UK’s opt-outs**. They can have an impact in the sense that they **postpone** the time when these issues that are part of Justice and Home Affairs come under the supervision of the Courts of Justice of the European Communities” (Migration and Europe Minister Astrid Thors (SFP), 10.4.2008).

Interestingly, there was also one event in which a member of a government party proposed that Finland should have an opt-out related to the implementation of the Working Time Directive. An MP from the Blue Reform party regarded it as essential for healthcare in a debate on 3 October 2018 on the government proposal for the Working Time Act:

“In order to be able to ensure certain special health care services in the future, Finland should also permit the use of a so-called limited **opt-out**. It means that one could deviate from the maximum working times in the **Working Time Directive** with an agreement between the employer and employee with the preconditions mentioned in the directive” (MP Lea Mäkipää (Blue Reform), 3.10.2018).

Another case in which opt-outs were discussed with regard to the Working Time Directive was in March 2019, this time from a negative perspective from the opposition's side, claiming opt-outs make it difficult to pass legislation:

"I must say that while it was in the European Parliament this Working Time Directive was in a sort of permanent stalemate. This means that one stated in different ways that it did not move forward because Member States had so many so-called **opt-outs which related to this Working Time Directive**. For example, **the UK systematically opted out** from the entire Union, but already at the time it stated on these working time provisions that they do not apply to it" (MP Sari Essayah (Christian Democrats), 7.3.2019).

As we have seen, DI is not much discussed in Finland, but there are some interesting references to polity differentiation, policy differentiation and mechanism of differentiation. Summary of results, potential explanatory factors and future research is discussed in the final section below.

Discussion and conclusion

Overall, DI was not a very salient topic in Finland, but all the governments usually at some point brought up the Finnish stance of supporting uniform integration, where DI may be used if necessary and if it is open to all the Member States. It was usually the Prime Minister who discussed DI on the government's side, and the opposition included certain active politicians who wanted to express their stance on a specific DI instance. Opposition politicians generally called for a clear Finnish stance on the future of Europe and DI. At the same time, they expressed certain doubts about whether Finland was in the core of Europe and able to influence the development of the EU. There were fears that if DI became more common it would mean that large Member States would have even more power, whereas Finland could lose influence in these fields. Furthermore, opposition politicians called for open debates about the future of the EU. The Finns Party warned of a more federalist EU and the Christian Democrats were concerned about Finland's dwindling powers in the EU. At the other end of the spectrum, the Social Democrats and the Greens pursued more active EU debates and advocated more active participation.

DI debates usually dealt with specific DI instances, and the only more principled debate on DI was held on 31 May 2017, following the Prime Minister's announcement on EU policy reflecting the Commission's White Paper on the Future of Europe published that spring. It seems that the Finnish approach was very pragmatic and reflects the overall EU policy of Finland, which has traditionally not been very politicised. We could observe some attempts at politicisation of certain DI instances from opposition parties such as the Finns and Christian Democrats, but generally DI as such did not arouse much debate. This pragmatic and positive approach towards DI is also visible in the Finnish policy: Finland has joined most instances even more eagerly than its Nordic neighbours. These are of course tendencies that mutually strengthen each other: non-politicisation allows Finland to join enhanced cooperation and being involved in DI reinforces the positive and pragmatic approach. Both examples of DI discussed in this article, namely the Prüm Convention and PESCO, relate to the field of security, which probably explains the more eager approach of Finland compared to Denmark and Sweden: a non-NATO country with a history of war with its Eastern neighbour obviously plays a role.

While the domestic factors potentially explain the lack of salience of DI, the peak years can be explained by European politics, as DI was discussed mostly when specific DI instances, such as the Prüm Convention or PESCO, were being prepared. Furthermore, the Commission's "White paper on the future of Europe: Five scenarios" spurred some debate also in the Finnish Parliament.

The non-politicisation may also explain the positive Finnish position towards DI, since it is not approached from an identity-related perspective, but DI is considered functional whenever not all parties want to join certain instances. The issue is mostly looked at from the Finnish perspective, as Finland is considered to gain by participating in "all cores". Even though some parties opposed certain instances of DI, there seems to exist a reasonable consensus that Finland should attempt to be in the core of Europe rather than being marginalised. Finland is a fairly recent Member State located on the Northern periphery, and EU membership is considered vital for the country's economic and security interests, which also makes the country more positive towards the Prüm Convention and PESCO.

In the future, it will be interesting to analyse whether DI becomes more politicised, as other EU debates have done in Finland. It would also be fruitful to compare the differences in the approaches of Nordic EU countries, namely Denmark, which joined the Union in 1973, and Finland and Sweden, which both joined the EU in 1995. All three countries have adopted different policies towards DI; Denmark has opt-out/opt-in options, e.g. in Justice and Home Affairs, Sweden has been more reserved towards joining DI instances and Finland has joined almost all instances. As illustrated in this article, one relevant aspect may be the level of politicisation of EU affairs.

References

- Council of the European Union. (2016). *Implementation Plan on Security and Defence*. 2016. <https://data.consilium.europa.eu/doc/document/ST-14392-2016-INIT/en/pdf>.
- Devine, K. (2011). Neutrality and the development of the European Union's common security and defence policy: Compatible or competing? *Cooperation and Conflict*, 46(3), 334–369.
- Duke, S. (2018). The Enigmatic Role of Defence in the EU: From EDC to EDU? *European Foreign Affairs Review*, 23(1), 63–80.
- European Council. (2017). *European Council meeting (22 and 23 June 2017) – Conclusions*. <https://www.consilium.europa.eu/media/23985/22-23-euco-final-conclusions.pdf>.
- European Parliament. (2018). *European Parliament resolution of 13 June 2018 on EU-NATO relations (2017/2276(INI))*. <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:52018IP0257&from=EN>.
- Finnish Parliament. (2017). *Keskiviikko 22.11.2017 klo 13.59–18.20 7. Pääministerin ilmoitus ajankohtaisista EU-asioista*. https://www.eduskunta.fi/FI/vaski/PoytakirjaAsiakohta/Documents/PTK_122+2017+7.pdf.
- France & Finland. (2016). *Declaration on strengthening the EU's Common Security and Defence Policy*.
- Genschel, P., & Jachtenfuchs, M. (2018). From Market Integration to Core State Powers: The Eurozone Crisis, the Refugee Crisis and Integration Theory. *Journal of Common Market Studies*

Studies, 56(1), 178–196.

Härkönen, H. (2019). Kysely: Puolet suomalaisista toivoo EU:lle tiiviimpää puolustusyhteistyötä – Natoa kannattaa neljännes. *Maaseudun Tulevaisuus*.

Heinikoski, Saila (2020). Framing of the new CSDP in militarily non-aligned Finland and Sweden. Promotion of national interests or a step towards a European security community? *L'Europe en formation* 389, 161–176.

Telle, S., Brunazzo, M. & Doidge, M. (2021). Introduction. The Member States and Differentiated Integration in the European Union. *Australian & New Zealand Journal of European Studies*, 13(3).