

The Pillars of Counter-Terrorism

A comparative study on member state compliance towards the European
Union's counter-terrorism strategy

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Abstract

The aim of this thesis is to investigate to what extent member states within the European Union have shown compliance with regards to the implementation of the EU's counter-terrorism strategy from 2005. Grounded in a framework of social constructivism that emphasizes normative structures significant to strategy formation, the analysis concentrates on the impact national strategic cultures have on member state compliance. Using the four key pillars of the EU's counter-terrorism strategy – Prevent, Protect, Pursue and Respond – as a point of departure, the national counter-terrorism policies of Germany, Sweden and the United Kingdom are analysed in a small comparative case study. Although some significant differences exist between the three countries counter-terrorism policies, the results show a relatively high level of compliance with regards to the implementation of the European counter-terrorism strategy. This seems to suggest that at least in the field of counter-terrorism, security priorities have started to align within the EU, signifying an important step towards the establishment of a common European strategic culture.

Key words: counter-terrorism, compliance, national strategic culture, European Union, international terrorism

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Abbreviations

9/11	World Trade Center Attack on 11 September 2001
BBK	Federal Office for Civil Protection and Disaster Assistance
BKA	Federal Criminal Police Office
CBRN	Chemical, Biological, Radiological and Nuclear
CPM	Civil Protection Mechanism
DIK	German Islam Conference
EC	European Commission
ESDP	European Security and Defense Policy
EU	European Union
FCO	Foreign and Commonwealth Office
ILS	International Liaison Section
IRA	Irish Republican Army
MAPPA	Multi Agency Public Protection Arrangements
NATO	North Atlantic Treaty Organisation
PIRA	Provisional Irish Republican Army
RAF	Red Army Faction
SIS	Schengen Information System
SÄPO	Swedish Security Police
UK	United Kingdom
VIS	Visa Information System
WWII	The Second World War

1 Introduction

During the past sixty years, the European Union's importance as a political and economic actor within international relations has continuously expanded through the deepening of commitments between member states in an increasing number of policy areas. The completion of the internal market within the EU has been a central achievement in the integration of European politics as it cemented the four freedoms of movement pertaining to individuals, goods, services and capital within the EU (European Commission 2011). Although the four freedoms of movement were put in place to support social and economic policy integration, the liberalization of border control has also served to strengthen the interdependency of member states in other policy areas. Security policing is one such area which has increasingly been affected by the single market integration. Following in the footsteps of the wave of globalization flooding the world today, threats to security are today often of a global nature, working across national borders in terms of money flows, communication and organization. Acknowledged as one of the most serious globalized threats to security in European countries, international terrorism is organized in de-centralized entities that maintain presence in multiple countries. Taking advantage of open borders, many member states have made contact with international terrorism both in terms of being a target for terrorist attacks as well as in terms of being platforms for the organization of finances, recruitment and planning of terrorist networks (Wright 2006:283). Additionally, terrorist attacks in European countries during the past few years have demonstrated the transnational impact in terms of victims as well as in terms of financial- and security repercussions. Internal and external security challenges can therefore be considered to be more inter-connected than ever before (Hix 2005:397).

However, the Westphalian order still constitutes the framework for international relations. One strong feature of this order, positioned at the center of a state's *raison d'être*, is the state's responsibility to ensure the safety of its citizens. Maintaining security for its population can therefore be regarded as a defining feature of a state's identity and sovereignty and positions security as a central factor in a state's relations to other international actors (Hix 2005:398). Given the close connection to the issues of identity and sovereignty, security policing still constitutes a delicate and complicated area of cooperation within the EU and accordingly, national security interests of individual member states still take precedence over any collective interest that may exist within the Union (Lisbon Treaty 2009:Article 42.7). A state's history of factors such as war and peace and oversea relations have shaped deeply rooted narratives about a state's identity, its perspective on security and its position in the international community. Together, this makes up a state's national strategic culture, which

continuously influences strategic choices made with regard to issues of security (Howorth 2007:178). Consequently, although member states within the EU are faced with similar security challenges, perspectives on threats to security and the application of security measures may still vary according to different national strategic cultures. However, governments have realized that addressing issues such as international terrorism increasingly require multilateral cooperation. The interdependency between member states of the EU in terms of security may therefore serve as an incentive for states to further integrate their perspectives and continue to deepen the commitment between member states.

1.1 Research problem

The terrorist attack on World Trade Center in 2001 (from now on 9/11), the train bombings in Madrid 2004 and the London subway bombing in 2005 illustrated the need for multilateral organization with regard to counter-terrorism. Since then a counter-terrorism framework within the European Union progressively developed, which ultimately resulted in an official strategy presented in December 2005 (Hassan 2010). The strategy is composed of four key pillars – Prevent, Protect, Pursue and Respond – and include a wide range of measures and initiatives that the member states are expected to institutionalize in their own policy frameworks (European Council 2005).

Earlier studies have shown that in many cases, some shortfalls exist in the implementation process of member states with regards to directives from the EU (Zhelyazkova & Torenvlied 2011; Gelderman et al 2010; Haverland & Romeijn 2007; Lampinen & Uusikylä 2006; Falkner et al 2005). Compliance deficits have also been a matter of concern for EU counter-terrorism efforts before 2005, as it has been revealed that member states did not always implement concerted EU agreements. For example, Europol has not received its expected role and authority as the institution for information-sharing across the Union. Contrary to the agreement from 2003, Europol did not get access to intelligence sources to the extent originally intended, as national police forces and national security and intelligence services did not trust Europol enough to share all their information (Keohane 2005:20). Consequently, cooperation between law enforcement and the forming of European foreign and defense policies have until recently been relatively poor.

The precedence of national security interests of member states over collective security policies within the EU means that the greatest responsibility to implement the European counter-terrorism strategy lies with the member states themselves. A potential obstacle for member states to unite under a common strategy is therefore the possibility of incompatible security interests among the members. Worst case scenario could be that diverging security interest compels member states to pursue their own objectives and strategies, leaving the EU largely incapacitated to organize a multilateral strategy to fight these security challenges. Six years after the formulation of the EU's counter-terrorism strategy,

it is therefore interesting to explore to what degree member states with differing national strategic cultures have implemented the four key pillars into their own national counter-terrorism policies. The research questions for this study are thus;

- *To what extent have member states been compliant with regard to the European Union's counter-terrorism strategy in their implementation of the four pillars?*
- *How has a state's national strategic culture affected its implementation of the European Union's counter-terrorism strategy?*

1.2 Scope of the study

This study conducts an analysis of national counter-terrorism policies of Germany, Sweden and the United Kingdom in order to see how the European Union's counter-terrorism strategy has been implemented in their national counter-terrorism policies. Based on issues of past historical events, internal socio-economic conditions and relations with neighboring countries, these three states all have different national strategic cultures that serve to influence strategy formation. Thus, it is possible that compliance regarding the implementation of the European counter-terrorism strategy may have manifested differently across the three different member states.

The analysis is limited to national policies specifically targeting international terrorism and does not include policies aimed to counter domestic terrorism in the three countries that are part of the study. Domestic terrorism is primarily associated with groups with separatist motivations and has therefore generally been handled unilaterally by national governments (TTSRL (3) 2008:88). As this form of terrorism is largely contained within a state's borders it has not become an issue of policy-making for the EU. Measures targeting domestic terrorism are therefore not part of the EU's counter-terrorism strategy and accordingly not part of this study.

As the formation of national security policy is the main focus in this study, the research primarily revolves around the state as the central actor in this process. Certainly, non-governmental groups, issue networks, policy communities and interest groups play an important role in policy-making both at the national and supranational level in their interaction with the state as well as within and across societal levels (Hantrais 2009:52). Thus, by excluding civil society actors from the study, the policy making process is to some extent simplified in the study. However the state remains the most significant actor in the formation of security policy and thereby constitutes a central point of contact with the EU. It is therefore contended that a state-centered approach is not likely to compromise the results of this study.

1.3 Structure of study

The study begins with an overview of the theoretical field on member state compliance within the European Union in order to facilitate an empirical analysis of the national counter-terrorism policies of Germany, Sweden and the United Kingdom. A chapter on methodology follows, where the method of small case study analysis is presented and discussed with relevance to its application in the study. The fourth chapter provides an overview of the national strategic cultures of the three countries in this study, which is followed by a presentation of the evolution of counter-terrorism within the EU. The results from the data collection process are thereafter presented in the sixth chapter, with a forthcoming analysis grounded in theories on compliance and national strategic cultures that were earlier presented in the theoretical chapter. Lastly, the study is summarized in a few concluding remarks concerning the study's results and suggestions for future research.

2 Theoretical Framework

This theoretical chapter intends to facilitate an empirical analysis of the member states' response to the counter-terrorism strategy presented by the European Union in December 2005, using a framework grounded in theories of compliance and national strategic cultures. Previously, studies of member state compliance have largely focused on legislation with a particular emphasis on social policies regarding the internal market. The integration of the internal market within the EU is conditioned on obligations for member states to fulfill the regulations set up by the European Commission (EC) under threat of pending sanctions from the European Court of Justice (Falkner et al 2004; Haverland & Romeijn 2007; Lampinen & Uusikylä 2006; Tallberg 1999; Thomson 2007; Zhelyazkova & Torenvlied 2011). However, compliance of member states regarding policies that concern the European counter-terrorism strategy remains under-researched. As national security is still a delicate issue with close connection to aspects of a state's identity, sovereignty and interests (Hix 2005:398), obligations between member states regarding security and defense policies have thus far been limited to expressions of solidarity. For this reason, the EU only possesses limited power to enforce policies concerning issues of security and defense. This study is therefore concerned with the normative aspects of member state compliance regarding the EU's counter-terrorism strategy. The normative dimension of compliance is elaborated on below through theories of national strategic cultures, which enable a contextual understanding of the formation of the strategic security actions of states.

2.1 The theoretical field of compliance

The existing literature in the field of compliance within the European Union primarily places its epistemological roots within the positivistic school of thought, where knowledge is considered to rest on objective, verifiable observations conducted through theory testing in order to explain and eventually predict the phenomenon under study. The concept of compliance is commonly defined as the degree to which national implementation measures are consistent with European policy requirements (Zhelyazkova & Torenvlied 2010:690). Previous studies have predominantly addressed issues such as the capacity of institutions and administrations, level of fit between new policies and the established institutional arrangements, economic benefits, legal consequences of non-compliance, types of political systems and degrees of social stability. These studies build on earlier work primarily grounded in theories of neofunctionalism

and intergovernmentalism, both of which have dominated the field and been of great influence in the further theorizing of the integration of Europe.

Ernst Haas in his book *The Uniting of Europe* (1958), which has been identified as one of founding works of the theoretical school of neofunctionalism, imagined political integration as a development of interactions between state-societal- and supranational actors. Through this interaction process, supranational institutions, like the European Commission, gained considerable autonomy from national governments and has served to encourage the development of European policies. As coordinated policies of one area were predicted to demonstrate the need to coordinate policies in other interrelated areas, integration is expected to increase through the process of spill-over. As a result of this process, citizens of the member states are expected to progressively look to Europe for fulfilling their needs and it is through the fulfillment of these needs that the economic and social integration will likely spill over into further political integration (Schmitter 2004:46). The study by Sandholtz and Zysman (1989), which further develops Haas theoretical model, could be a testimony to this development. They argue that through completing the integration of the internal market, the EC managed to exercise a successful political leadership in spite of what Sandholtz and Zysman recognized as insufficient responses by the member states to the structural changes in the world economy at that time.

In contrast, intergovernmentalism, contend that member governments still control the integration process and that supranational institutions of the EU lack real autonomy and instead function as tools to assist intergovernmental bargaining (Tallberg 1999:6). This theoretical model is grounded in the realist tradition where conceptions of power, anarchy and conflict steer the behavior of states. Consequently, national governments remain as key actors in the regional integration process. According to intergovernmentalism, the only function of supranational institutions is to assist in the establishment of superior collective policies where transaction costs are reduced and information is provided in order to reduce uncertainty among states in the bargaining process (Schimmelfennig 2004:79). In an article, written by Andrew Moravcsik (1991) in a response to the above mentioned study by Sandholtz and Zysman, he argues that the influence of the EC over the negotiations of the completion of the internal market cannot be confirmed. Moravcsik claims that supranational institutions did not at all affect the outcome of the negotiations and instead emphasizes the interstate bargains that were met between national governments.

However, neither of the theories of neofunctionalism and intergovernmentalism leaves much room for variation and it is unlikely that one can explain patterns of compliance in all 27 member states using either of these theories. The extent to which member states in the EU comply with European directives differs from case to case and the reasons for this is likely not as clear-cut as neofunctionalism or intergovernmentalism would suggest. Supranational institutions do have power to exercise independent influence in securing the realization of adopted policies, yet member states do not stand powerless and watch but have the capacity to limit or block aspects of supranational influence (Tallberg 1999:267). In fact, a number of studies conducted argue that

compliance regarding social policies is rather limited and vary across different cases (Zhelyazkova & Torenvlied 2011; Gelderman et al 2010; Haverland & Romeijn 2007; Lampinen & Uusikylä 2006; Falkner et al 2005). As a result, research has been primarily focused on explaining non-compliance and has generated a plethora of various theories in the process. The majority of these are grounded in explanations focusing either on institutional settings or enforcement strategies within a framework based on a rational choice model where costs are always weighed against expected benefits.

2.1.1 Theories with a focus on institutions

Theories with a focus focus on the formation of national, political institutions and their capacity to manage and implement directives from the European Commission. According to this approach, compliance is dependent upon the ability of domestic actors to effectively introduce policy change. Falkner et al (2005:453) argue that the complexity of directives may facilitate misinterpretations and be a factor in inaccurate or delayed compliance. Administrative shortcomings can be viewed as an obstacle to full compliance, especially in small countries like Luxembourg where the administration is hard-stretched due to lack of resources to accommodate both national and European issues in an effective manner (Ibid:459). Other studies have indicated that administrative deficiencies may also be a significant factor regarding non-compliance in southern member states, like Spain and Greece (Thomson 2007; Haverland & Romeijn 2007).

The goodness of fit between new European legislation and current national arrangements has also been a well-discussed topic for motives of compliance within the institutional approach. Since “public policies usually change only incrementally, if at all [...] European directives that require far-reaching adjustments to national practices are less likely to be complied with than directives that are more congruent with existing national arrangements” (Thomson 2007:994). Depending on the character of the directive, a policy proposal incurs different costs depending on the member state. This type of explanation for non-compliance is recurrent throughout the literature and many studies do find a relationship between non-compliance and directives that challenge existing national policies. Among these are Zhelyazkova’s and Torenvlied’s study (2011:704) and Thomson’s study (2007:1004) where the former looked at the transposition of the Framework Equality Directive and the latter studied national responses to six labor market directives. Both studies concluded that compliance is more likely when provisions only require marginal changes to existing policies.

Related to this topic is also the theory of discretion, which maintains that, the higher degree of discretionary power within a directive, the more likely are member states to comply in the implementation process. Owing to the multitude of actors and diversity of opinions and wishes involved in the policy-making process, EU directives are often loosely phrased to be able to accommodate these

differences. Creating solutions that are clear-cut for 27 different national settings is of course extremely difficult so European policies are often open to different interpretations, so called discretion (Falkner et al 2005:463). Thus a wider range of policy options becomes acceptable in the implementation of a decision with a high degree of discretion and is expected to result in an increased likelihood of compliance (Zhelyazkova & Torenvlied 2011; Thomson 2007; Falkner et al 2005).

2.1.2 Theories with a focus on enforcement mechanisms

A second category of theories are the preference-driven explanations which are common within the enforcement literature. This approach considers compliance as a matter of choice where states choose one strategy over another in accordance with the expected costs from the likelihood of detection and the plausibility of sanctions (Luetgert & Dannwolf 2009:313). Tallberg argues that in a situation of collaboration, “states have an incentive to renege on their commitments, since they gain more from an agreement if they reap all the benefits without putting in their own fair share” (Tallberg 2003:612). In order for a collaboration to succeed, introducing measures, such as monitoring to increase transparency and sanctions to increase costs of non-compliance, are needed. Advocates of this approach have largely focused on the behavior of the European Commission, since comprehensive monitoring efforts and the use of formal sanctions are anticipated to motivate states to comply with supranational policy making. Studies have shown that it is primarily through the infringement proceeding that member states are forced to comply with directives and correct mistakes made during the transposition process, resulting in a higher degree of compliance (Tallberg 2003; Zhelyazkova & Torenvlied 2011).

However, Gelderman, Ghijsen and Schoonen (2010) argue that compliance appears to be motivated by economic gains rather than the threat of legal sanctions. They found that organizational pressure held significant importance with regard to the compliant behavior of states, since the management of public agencies, which ultimately are the executors of EU policy, can highly influence the motivation to follow regulations. Poor leadership, insufficient coordination and inflexible procedures are factors that seem to undermine compliance. The expected gains of compliance and organizational pressure did have a positive impact in their study, which seems to suggest that it would be more effective to provide incentives of economic benefits rather than legal sanctions in order to make states implement EU directives.

2.1.3 Turning towards new ground

Despite their differences in outlook and focus, these two different categories of compliance-theory do have one thing in common; both approaches are grounded in positivistic methodologies, where models of rational theory, commonly found

in the theoretical school of realism (Morgenthau 1985), serve as a uniting starting point. While enforcement-theorists proclaim that compliance is dependent on the rational choices made by states in a cost- and benefit analysis, the advocates of the theories with a institutional focus stress the rationale of institutional settings which are considered to frame the compliance of states. This is then examined through the study of easily observable variables that can be theorized through a set of hypotheses. As you may have noticed, several scholars in the presentation above move across the theoretical approaches and often use several of the theories to test probability of compliance within the same study. The results of these theory-testing studies differ depending on the directive and the selected cases for comparison and will accordingly provide new material that continues to modify existing theories. However, studies within this field are trudging habitually through the same practices, relying on previous findings and research designs with the result that the door is held closed for new and different interpretations. Innovative findings with the ability to evolve this field will most likely be scarce without the ambition to use other methodological perspectives that could provide more insight into the field. Looking at issues concerning security and defense within the Union, where the European Union lack firm authority capabilities, would invite scholars to look at other dimensions of compliance rather than limiting the concept to the legal level as has been done in previous studies. Using only theories of enforcement or institutional arrangement as explanatory variables is insufficient concerning the adoption of a European counter-terrorism strategy where compliance is equally dependent upon the converging of member states' security interests. Incorporating variables such as culture, norms and identity, which up until now have been missing from compliance research, would therefore be productive as they may offer a contextual understanding of the security behavior of states. Such variables would also serve to explain events that a rational model have difficulty of doing, for example those occurrences of 'irrational' behavior, which is never absent from social action but fits very uncomfortably within rational theories. Turning the eye towards new theoretical ground may therefore serve to give the field a new start.

2.2 Introducing national strategic cultures

The concept of 'security community' in relation to the European Union gained prominence after the terrorist attacks on World Trade Center on 11 September 2001, where the attacks indirectly served to justify a European ambition to become a regional security actor. The attacks confirmed the need for an authoritative actor who could face the threats of terrorism which was thought to be directed towards Europe as well (Hassan 2010:451f.). Strategies and policies to tackle this threat have been progressively developed since then, but already in 2004 two major shortfalls were identified with these efforts; several member states were not implementing the agreements and there was poor coordination of law enforcement agencies and foreign and defense policies. According to Simon

Hix, the limited capabilities of the EU to enforce agreements risk to make the EU incapacitated when the interests of member states diverge and they instead choose to pursue their own individual interests without regard for the security interests of the EU (2005:398). Without the option to turn the counter-terrorism strategy into European legislation, the hope is that the security interests of member states eventually will converge, which then would serve to facilitate cooperation between states on security issues. However, all member states are still inclined to some extent to see matters of war, peace and security through a national lens;

Long and often bloody histories, the accidents of geography, national mythologies, as well as oversea experiences have woven deeply rooted cultural narratives of national situation, security and rank. Many elements contribute to these narratives: internal cultural cohesion; interactions with neighbors; defeat and occupation; threat perception; past martial or imperial ambitions and traditions; impermeability and durability of national borders. The result is a cocktail that theoreticians and political scientists have called 'strategic culture' (Howorth 2007:178).

The strategic culture of a nation-state thus rests on deeply embedded beliefs, norms and ideas which in turn influence how states design their security policies. The language used here is reminiscent of the influence of social constructivism, where it is argued that normative and ideational structures are equally as important as material structures when explaining the behavior of social and political actors. It is through the normative and ideational structures that identities are formed, which is significant as identities serve to inform interests of actors, which in turn informs their actions (Reus-Smit 2005). Political actors draw on previous experience, beliefs and ideas about how the world is constructed and about appropriate behavior to act within it. As such they are embedded in their social and cultural context and their behavior will always mirror it (Meyer 2005:527). In international politics this serves to inform how norms and ideas impact on the perceptions of security issues within the EU and it speaks of how member states' perception of the terrorism threat affect their security interests, which in turn determines the design of counter-terrorism policies. If the threat of terrorism pervades the national consciousness over a longer period of time, the norms regarding strategic behavior are likely to adapt in order to develop a protective shield towards these fears. The stronger the fears, the more durable and protective are the norms going to be and may result in measures such as stronger commitment to border defense or stronger cooperation in security alliances (Meyer 2005:533). Thus, an effective European counter-terrorism strategy needs to be founded upon a similar set of norms and ideas concerning the means and ends of the strategy so that a common ground for action can be installed.

Whether such a convergence of norms and common security interests within the EU is actually occurring is still an issue of debate within the academic community. On one side of the debate are scholars who argue that there is still some disagreement between member states over important issues concerning threat perception and the applicability of military force. For example, a survey

from 2003 showed that threat perceptions regarding international terrorism greatly varied between member states, where 76 % of the population in Spain and the United Kingdom were afraid of an attack, while only 6 % of the Finns had any fears related to the terrorist threat (Meyer 2005:535). Longhurst and Zaborowski (2005) maintain that it was also different national strategic cultures that caused a divide between European countries with regards to the war in Iraq 2003. This resulted in stark divergences in national security policy, which they argued undermined the EU's role as a security actor. According to this line of argument, because of diverging views, the EU will likely fail to take effective action in a threatening situation or crisis.

On the opposite side of the debate are those that emphasize the important steps been taken toward a common European strategic culture through the development of supranational institutions and their subsequent policies and capabilities. According to Jolyon Howorth (2002), the fact that there is agreement on the view that the EU can and also should evolve into a legitimate security actor with military capacities at its disposal, indicate that the EU has taken a concise step towards homogenizing its member states' security strategies. Once the member states have come to an agreement that the EU ought to pursue common objectives, they have started to participate in a process where compromises are necessary in order to come to terms with how these objectives will be achieved (Hix 2005:400). This may ultimately force some states to reshape their own initial interests and ambitions as their interaction with other state actors may make them aware of other dominant norms and beliefs within the group and may accordingly change their own perception of security to better reflect the prevailing world view (Meyer 2005:536).

3 Methodology

The intention of this study is to assess the impact of a state's national strategic culture on member state compliance regarding the European Union's counter-terrorism strategy. The research method chosen for this purpose is the small comparative case study analysis and in order to achieve high experimental variation between the cases, the primary selection criterion was based on the different national strategic cultures in the European Union, which resulted in the selection of Germany, Sweden and the United Kingdom –(Seawright 2008:300). Due to the context specific concept of culture, the small comparative case study method is especially benefitting as it provides the possibility to systematically compare cases as well as to study each case as one unique setting (Hantrais 2009:3).

3.1 The small comparative case study

Small comparative case study analysis provides the opportunity to do a “detailed examination of an aspect of a historical episode to develop or test historical explanations that may be generalizable to other events” (George & Bennett 2005:5). A “historical episode” in this quotation is understood as the phenomenon chosen for analytical inquiry. In context of this study, the historical episode constitutes European policy making, while the focus on compliance of member states represents an aspect of the historical episode. Further, George and Bennett (2005:17f) define a case as “an instance of a class of events”. The class of events signifies the phenomenon of scientific interest, which translates into the national implementation of the European counter-terrorism strategy. In order to identify divergence and similarities within this phenomenon, a number of instances (chosen cases) are selected from the class of events.

Compared to a large quantitative case study, which often incorporates a large number of cases into its research design in order to be able to make generalizations about causal relationships, the small case study is fruitful when looking at context specific concepts (Coppedge 1999). This makes it possible to study each case as one unique setting, which is especially benefitting, due to the potential effect of national strategic cultures on the pattern of member state compliance. In other words, the small case study provides the possibility to systematically look at the characteristics of each state's counter-terrorism policy while at the same time take the contextual factors of each country into account, which serves to inform strategic decisions (Hantrais 2009:3). In this sense, the small comparative case study will provide a more comprehensive and detailed

picture of compliance patterns across the European Union than would otherwise be possible in a large quantitative case study.

3.1.1 Critique

As with all research methodologies, there are some disadvantages when applying the small comparative case study analysis in research. One such disadvantage regards potential selection bias when the researcher deliberately chooses his/her cases instead of using a randomized selection procedure (George & Bennett 2005:22). In studies, such as this one, where the population universe is relatively small and where a theoretical framework is being conceptually elaborated, the research design will be stronger if preliminary knowledge about different cases guide the selection process. In fact, as the population in this study only is confined to the 27 member states of the European Union, it will be easier to achieve a higher representativeness by consciously choosing cases in the sampling than would otherwise be possible when using a randomized sampling procedure (Seawright 2008:295).

Another disadvantage often recognized when using the small case study, is the low potential for generalizability of the findings across diverse populations. George and Bennett (2005:31) identify the trade-off between achieving theoretical parsimony and ascertain explanatory richness while maintaining a manageable number of cases. Generally, a quantitative case study will fulfill the former at the expense of the latter while the opposite relationship is common with a qualitative one. Thus, a small comparative case study can rarely provide a basis for valid generalization or the necessary grounds when disproving an established theory. However, by defining the range to which your results apply, in terms of institutional and geographic settings, cultural and situational contexts and time period, a small case study can and will contribute to theory building and the outlining of general propositions (Hantrais 2009:58). Hence, the scope for generalization for this study will be limited to the chosen cases and to those member states with a similar cultural and political context of those involved in the study. It is therefore unlikely that this study will contribute to any great theoretical generalizations within the field of compliance or national strategic cultures. Nevertheless, a small case study analysis is necessary when looking at concepts such as culture which are multi-dimensional and relatively unique for each case in a small population universe. Through explanatory richness, this study will therefore make a small but not unimportant contribution to theory building in the field of compliance.

3.1.2 Case selection

The population universe in this study is limited to the member states of the European Union, who all share the obligation to institutionalize measures which are decided upon within the organization. As members of the EU they all also

share, to some extent, an identity of purpose as they all work toward common goals by accepting pre-existing conditions when subscribing membership to the organization (Hantrais 2009:51). Consequently, they all share common reference points in the forming of policy while each national government also constitutes a direct link between the EU's counter-terrorism strategy and national security policies.

The other purpose of this research is to introduce the concept of national strategic culture in the field of compliance. Culture is a shifting concept, which is not equivalent to nationality but may very well transcend national borders. A state-centered comparative study may therefore be problematic as there are some difficulties with getting the definition of permeable concepts such as culture to correspond with the non-permeable borders of the state (Hantrais 2009:52). In terms of national strategic cultures, culture is closely linked with the state itself as it manifests through a state's threat perception, situation assessment, strategic objectives and problem-solving (Howorth 2002:89). The use of the concept of culture in this study is therefore limited to its functional connotations connected to the state as main actor and does not focus on culture in the strict sociological or anthropological interpretation of the word (Chrysochoou 2004:XX).

The previous chapter established that national strategic cultures play a significant role in the strategic behavior of states. This means that different national strategic cultures will potentially react differently to the counter-terrorism strategy presented by the EU. Thus, in order to see how national strategic cultures affect member state compliance there is a need to select cases consisting of different national strategic cultures. Jason Seawright (2008:300) terms this case selection strategy as the *diverse case method*, and it enables experimental variance which is useful in exploratory research of this kind.

As I need to keep the number of cases to a manageable but analytically useful level, I have settled on the inclusion of three cases that are all considered as belonging to different national strategic cultures. The chosen cases have been selected on factors grounded in theoretical considerations; history of terrorism; threat perception; internal cultural cohesion; NATO membership; war experiences and past imperial ambitions. This selection process finally resulted in Germany, Sweden and the United Kingdom and these will be further presented in the following chapter.

3.1.3 The data collection process

Up until now, this study's research aim has been presented, questions have been formulated, a research method has been chosen and cases have been selected. It is now time to turn to the next critical step; the collection of data. To study national counter-terrorism policies, there is of course a need for sources that can provide an accurate understanding of states' strategies in dealing with the threat of terrorism. In this respect, official policy documents on counter-terrorism from the European Union, the United Nations and national governments comprise the best options regarding method of analysis and sources of data. Consequently,

official policy documents will constitute the primary source of information in this study, while academic research will be applied as complementary secondary sources.

There are some limitations to using policy documents as a source in research related to counter-terrorism. It is regarded as a sensitive issue within the field of politics with the result that some measures may be kept secret and motivations behind certain strategic moves might not be disclosed in the documents. This may possibly hinder me from acquire a full and deep understanding of the different national policies. Still, the informal character of the policy-making process can perhaps be considered as an inconvenient but real part of the political arena and is a problem which many researchers need to deal with (TTSRL 2008:12). As these issues cannot be easily solved by using other sources of material I will out of necessity regard the national counter-terrorism policies to be what the policy documents say they are. Nonetheless, having outlined these limitations, this is not a study that is specifically concerned with hidden agendas but with the strategic moves of states. Therefore, concentrating on the information provided by policy documents provide the possibility for a more focused and deep analysis than otherwise would be possible. According to Öjvind Jaeger, official security documents may be viewed as “narrative representations of the way security, threat, defense, war, danger and countermeasures are conceived of” and that national security documents are “privileged textual representations of the state’s security policy” (cited in Möller 2006:23). Thus, by looking at national policy documents, one may gain a fuller understanding of a state’s national counter-terrorism policy.

3.1.4 Analytic structure

The study is initiated with a comparative analysis of the European counter-terrorism strategy’s four key pillars – Prevent, Protect, Pursue and Respond – in each state’s national counter-terrorism policy. Using the pillars as a starting point has two advantages. First, they are analytically helpful as they are clearly delineated categories that represent the values and priorities of the European Union concerning counter-terrorism, which serves to simplify the comparison between the cases (Hsieh & Shannon 2005:1281). Second, they allow me to clearly see how the pillars are prioritized among the cases while identifying similarities and differences across national policies. As such the pillars serve as a measurement instrument for the level of compliance as well as an indicator for the effect of national strategic cultures on strategic decisions regarding terrorism.

The methodical process starts with a systematic comparison of the measures contained in each case’s national counter-terrorism policy with each pillar. The complementarity between the pillar and the national strategy are then measured according to the values of high, medium and low depending on the amount of measures under each pillar¹. These results are presented in a matrix, which

¹ High equaled 30 measures or more, Medium equaled 15-29 measures and Low equaled 14 measures or less.

provides the basis for further analysis. Using a measurement scale from low to high as I have done in the tables above is of course problematic in the sense that the application of value to what should be considered as constituting a value becomes subjective. Not everyone may agree with what I consider to be a high or low value in this study. However, it is not the precise measurement of a state's counter-terrorism policy that is of central concern here. Rather, these measurements serve as indications and guidelines for further comparison and analysis of the different national policies in light of the counter-terrorism strategy of the EU. A more detailed review of the research results follows in an in-depth analysis of the different cases where theories of compliance and national strategic cultures are applied to the research results.

4 National Strategic Cultures

As behavior and strategic decisions of political actors are based on experiences, ideas and beliefs, security policies are always embedded in the social and cultural context from which they derive from (Meyer 2005:527). Thus, in order to understand the development of the national counter-terrorism policies of Germany, Sweden and the United Kingdom as well as the relation to their level of compliance with regards to the European Union's counter-terrorism strategy, it is necessary to study how each country's national strategic culture is constructed. It is through these normative structures that identities are formed which ultimately inform the interests of states (Reus-Smit 2005). This chapter will therefore present each case individually, giving a brief overview of three different strategic cultures, which have contributed to the formation of three different counter-terrorism frameworks. Fully aware of the limitations of providing a complete picture of the different strategic cultures, the aspiration here is to provide a contextual orientation necessary in order for the reader to follow the analysis of strategic decisions made by Germany, Sweden and the UK with regard to counter-terrorism.

4.1 Germany – a strong advocator of multilateralism

Germany's modern history of terrorism begins with the wave of left-wing terrorism that started late in the 1960's when an urban guerilla group called the Red Army Faction (RAF) made its first appearance on the political stage. It was set up during the last years of the Vietnam War and had the purpose to fight American imperialism. The RAF saw themselves as defenders of the people of the Third World, who they perceived as exploited and oppressed by American politics. Germany was perceived as a supporter of American imperialism, which therefore served to inspire some of the earlier violence campaign directed at American military bases in West Germany (Groenewold 1993:136f.). In the following years during the 1970's, arsons and bomb attacks targeted warehouse stores, political figures and military targets. The wave of violence reached its culmination in the years of 1975-1977, starting with the occupation of the West German embassy in Stockholm in 1975 that ultimately led to the bombing of the embassy and the deaths of two employees. The result was a steep increase of violence with multiple assassinations and bomb attempts during the German Autumn in 1977 (German History Society 2007:401).

During this period, German authorities responded with aggressive force. In the name of “defending democracy”, basic civil rights were denied to imprisoned RAF-members, people suspected of sympathizing with RAF were subjected to police searches, and armed guards patrolled the streets (German History Society 2007:401). *Rasterfahndung* was also introduced during this time; a controversial computer-based search designed, with the intention of locating suspected terrorists, to match certain pre-determined personal criteria connected with terrorist activities with information from various public and private databases (Zeugman 2009:48). Because of the German authorities forceful approach, fears were raised by international press as well as from by significant portions of the German population that the German government was proving unable to free itself from its authoritarian character it acquired during the Second World War (German History Society 2007:401).

The end of WWII can be characterized as a formative moment for strategic decision-making in Germany. During WWII, Germany conducted extremely aggressive warfare, where disproportionate violence was carried out that sacrificed millions of Germans and foreigners in order to promote a belief system as well as territorial expansion (Meyer 2005:531). At the end of the war, six million people had been killed and most major cities had been reduced to rubble by Allied bombardment. Doubtless, the period after WWII was a turbulent and changing time for the political arena in Germany. The government struggled with how to deal with its totalitarian past while German society was fueled with the fear of letting fascism once again become part of the social structures (Bopp in Varon 2004:248). According to Bopp, movements such as the RAF, founded by the first generation of youths who grew up in the aftermath of WWII, can be viewed as a way for supporters of RAF and similar groups to free themselves from the passiveness that characterized the generation of their parents during the war (Ibid.).

The German defeat ultimately led to a U-turn in national security policing and the strategic culture in contemporary Germany can today conversely be characterized as cautious and skeptic of the utility of military force (Lantis 2003:101). Today, Germany has come to show a strong preference for multilateral cooperation and now wishes to promote itself as a reliable partner in international affairs (Ibid.). It is contended that the use of force only should be used in case of direct attack but even then only with maximal restraint and they are now a strong advocator for military force to be conditioned on the regulations and laws of military alliances and supranational organizations (Meyer 2005:531). This has been part of a further strategy to morally, politically and strategically integrate into the West in order to build German democracy and maintain friendly relations with important key countries (Dalgaard-Nielsen 2005:344). As such, Germany continues to keep a strong profile in the European Union and has been a member of NATO since 1955².

Today, one of the main threats towards German security, as for many other European countries, has been identified as Islamist terrorism (Federal Ministry of

² West Germany became a member of NATO in 1955. Later the *Länders* of the Former Democratic Republic joined the Federal Republic of Germany as a member of NATO in 1990 (NATO 2011).

the Interior 2012). Up until 2011, Germany had been a transit country for Islamist terrorism rather than a direct target but on 2 March 2011 the first such attack was carried out on German soil when two U.S. soldiers were shot and killed and seriously wounded two more on Frankfurt Airport. The largest group in Germany, related to Islamist terrorism, is called the Islamic Community of Millî Görüş³, which sees itself as representing the interests of a large number of Muslims living in Germany with the aim to create a territorial space where their members can live according to their interpretation of the laws of *sharia* – the will of Allah (Federal Minister of the Interior 2010:7). Another related concern is separatist motivated organizations that primarily are supporters of the Kurdistan Worker's Party (PKK) in Turkey, whose illegal activities are mainly targeting Turkish interests in Germany. However, the German social policy system have also been an issue of hostility for these organizations, as Kurdish immigrants today represents the highest percentage of immigrants living in Germany (Federal Minister of the Interior 2010:8). Germany is considered today to be one of the most important immigration countries in the world. However, this development has been involuntary and Germany long resisted its label as a country of immigration (Koopman et al 2005:1). For example, Germany long excluded migrants and their descendants from the right to citizenship as the issue of citizenship in Germany is deeply connected to tradition, culture, history and the nation itself. German policies have therefore tended to keep immigrants politically and culturally apart from German society (Carens 2000:26, 214; Koopmans et al 2005:241). However, Germany has taken steps to improve this situation and is now to a greater extent granting citizenship to immigrants and providing more opportunities for political inclusion (Koopmans et al 2005).

4.2 Sweden – counter-terrorism as a new policy area

At this point in time, a transformation in Sweden's security culture is occurring which is particularly noticeable in the changing structure of the Swedish Armed Forces that is moving away from a traditional territorial defense towards an increasing focus on international crisis management (Försvarsmakten 2011). This is one move in a greater transformation of Swedish security discourse where Swedish commitment to issues of security in multilateral organisations has become more prominent during recent years (Carlsnaes 2005:405). This is a significant change for a country that for almost 100 years called itself neutral in international relations and has refrain from war for twice as long (Eliasson 2004:4).

The principle of neutrality was solidified during the first half of the 20th century with the outbreak of the First World War, when there was unanimous support in parliament for a neutral position (Eliasson 2004:4). During more recent

³ Millî Görüş was reportedly not involved in the attack on Frankfurt Airport, which was carried out by a man, with connections to the Salafist movement (Gordon Smith 20110304).

years, arguments about the neutral position has been connected to the Swedish welfare model as well as the position of solidarity with third world countries, which indicate that the principle of neutrality is by now a well ingrained part of Swedish identity (Ibid.). As a result, Sweden was at first reluctant to join the European Union as such a collaboration was seen as potentially undermining the credibility of the principle of neutrality. Nevertheless, with the end of the Cold War and the following collapse of the bipolar order and with the preference for multilateral cooperation in various issues increasing, the principle of neutrality proved to be difficult to preserve (Carlsnaes 2005:404). Sweden therefore limited the neutrality principle in 1992 to pertain to the surrounding neighboring countries and took on a position of military non-alignment outside of these territories (Utrikesdepartementet 2011). Furthermore, Sweden became a member in the EU in 1995 and has since then increasingly shown willingness to participate in various security collaborations. Now, Sweden is one of the strongest supporters of the development of the European Security and Defense Policy (ESDP) among the member states and has made important contributions to EU battle groups. Additionally, although not a member of NATO, Sweden has formed a close and institutionalized cooperation with the organization through Partnership for Peace and has contributed with personnel and resources in a number of military operations, for example in Kosovo and Libya (Möller & Bjereld 2010:365). However, Sweden still maintains a position of militarily non-alignment and the language of neutrality is still used within the Swedish security discourse (Carlsnaes 2005:404f.), which implies that neutrality still constitutes an important guiding principle with an enduring impact on Swedish security policy.

Counter-terrorism became an important policy area for Sweden only after the attacks on 9/11 and is thus a relatively new issue on the Swedish security agenda. In contrast to Germany and the United Kingdom, Sweden has not been forced to deal with established national or international groups that use methods of terrorism to promote their cause. Only a handful of attacks have occurred on Swedish soil during the last century which could be classified as terrorism. Out of these only a few incidents have been related to international terrorism, such as the earlier mentioned occupation of the West German embassy by RAF-members in 1975. More recently, some people with Swedish citizenship have been connected to terrorism abroad. Usama Kassir was extradited from Chechnya to the United States, where he was found guilty of conspiring to support terrorism and Mirsad Bektašević from Kungälv was convicted for terrorist offences in Sarajevo in 2007 (Fors & Brown 2008). The last major incident took place last year on 11 December, when two bombs exploded in the middle of the rush of Christmas shopping. Luckily no one got seriously hurt but the man responsible for the attack who was killed (Säkerhetspolisen 20110926). The threat level concerning terrorism was raised from low to elevated – level three on a scale of five – a few months before the last attack in Stockholm and still remains at this level today. However, the Swedish Security Police (Säkerhetspolisen) maintains that the threat against Sweden still is low in comparison to some other countries in Europe and that there is no indication of an immediate attack against Sweden (Säkerhetspolisen 20101001). Also, an earlier study by Lennart Sjöberg (2005)

showed that Swedes in general perceive the risk of terrorism as low and that the majority of the Swedish population believes it is possible to protect oneself from its dangers.

There is a worry however, concerning Islam and its supposed connection to violence and terrorism in the Swedish society. This is reflected in Swedish media for example where Islam is often connected to news regarding terrorism which naturally serves to fuel continued associations of this kind (Hvitfeldt 1998:78-81). After the attacks on 9/11, Muslims in Sweden also perceived that attitudes towards Islam had become more negative and had experienced more negative incidents with a discriminatory nature perpetrated against them (Sander 2005). Islam is the second biggest religion in Sweden today and Muslim traditions and culture exist in close connection with Swedish society (Hvitfeldt 1998:72). This is a relatively new development as Sweden has a long history of being a homogenous nation. According to Håkan Hvitfeldt (1998:74), Swedish stereotyping about Islam could therefore be seen as a form of resistance to unknown cultures and unfamiliar behavior.

4.3 The UK – lessons learned from Northern Ireland

The following years after the Second World War proved to be a formative period for strategic thinking in many European countries. For the United Kingdom, having a central role in the Allied coalition, they left the WWII having accomplished victory with the defeat of Hitler and the Third Reich. In contrast to Germany, the war therefore left the UK with a confidence in the effectiveness of military power (Meyer 2005:529). Accordingly, close after the end of WWII, the UK together with ten other states founded the military alliance North Atlantic Treaty Organization (NATO) in 1949, which obliges all members through Article 5 to provide the assistance necessary (including military power) in the event of an attack on another member state. Since 1949 the UK has contributed to a number of NATO operations, including peace keeping and counter-terrorism missions as well as military operations in for example Afghanistan, Libya and Kosovo (NATO (2) 2011). Furthermore, the UK has, since the end of WWII, continued to maintain a close relationship with the United States, a relationship that has had a great influence on the British view of military force, particularly during recent years. For example the support for the war in Iraq in 2003 and the application of the concept pre-emptive warfare are results from the influence of American military discourse that have served to influence the British perception on the use of military force (Miskimmon 2004:274).

Parallel to the UK's military role in international conflicts, the UK has been faced with the internal security threat from terrorism emanating from the protracted conflict of Northern Ireland since 1939, which revolved around the separatist intentions of incorporating Northern Ireland in the Republic of Ireland. For a long period, the Northern Ireland conflict was considered as the primary security threat towards British security. Violence and terrorist acts were

perpetrated on both sides of the conflict by Republicans/Nationalists (Catholics) as well as Loyalists/Unionists (Protestants) in a context where political loyalty and religious affiliation overlapped (Bonner 1993:173).

The main terrorist group during the conflict was the Irish Republican Army (IRA), which was divided into two factions; the political faction the Official IRA and the Provisional IRA (PIRA) that followed a more violent path (Bonner 1993:175). PIRA's campaign manifested in bombings on the mainland where one of the biggest attacks was the Brighton bombing in 1984, orchestrated with the aim to kill the Prime Minister and many people in the Cabinet. By its excesses of violence, PIRA's intention was to create a "war-weariness" in the government, which they hoped would eventually contribute to a withdrawal from Northern Ireland (Ibid.). However, it was primarily Northern Ireland who was hardest beset by the violence, where approximately 3,000 people have been killed in the conflict since 1969.

Today, the peace process is well under way and important political progress has been made with the signing of the Good Friday Agreement in 1998, even though sporadic violence by various groups still continues. The long struggle with tackling the persisting PIRA campaigns provided the UK with a deep knowledge and experience regarding counter-terrorism tactics in areas such as law enforcement, intelligence gathering and military responses (Cuthbertson 2006:106). The result has been rigorous legislation that steadily grew more merciless as the fight against PIRA moved along. Generally, after a particularly devastating attack, new measures of counter-terrorism would be introduced that gave more powers to the government that aimed to put obstacles in the way of the perpetrators and their supporters, with some measures directly infringing on civil rights (Bonner 1993).

However, with the attacks on 9/11 in 2001, the focus on the Northern Ireland conflict shifted towards the threat from international terrorism. Islamist extremism is now perceived by the British government to be the "most significant long-term threat to the UK" (MI5 (1) 2011) and since 2001, there has been several attacks carried out against British interests domestically and abroad. The most significant incident being the attack on London's transport system on 7 July 2005, which took the life of 52 people and injured 700. Since the London attack, the perceived threat level of an attack has oscillated between the highest level "critical" to the more moderate level "substantial"⁴, to which it is set today, meaning that an attack is a strong possibility (MI5 (2) 2011).

For the UK, the threat from international terrorism has not only been external to its nature but has indeed become a significant internal issue. The four perpetrators of the London attack in 2005 were all second generation immigrants, born and raised in the UK with parents of Pakistani origin. As a former colonial power in South Asia occupying the countries of India, Bangladesh, Burma and Pakistan, 50 % of the immigrants in the UK originate from this region (Koopman et al 2005:44). Today, the UK is a multicultural country and was indeed one of the first countries to embrace and promote the multi-cultural agenda, extending

⁴ The UK Threat Level System is composed of a scale from 1. Low, 2. Moderate, 3. Substantial, 4. Severe and 5. Critical (MI5 (3) 2011).

minority rights particularly to immigrants from former colonies (Ibid). However, the promotion of ethnic diversity has resulted in segregated enclaves comprised of separated ethnic groups, where social interactions with the majority have become less common. Additionally, many are poor, inadequately educated and only get access to entry-level employment (Cuthbertson 2006:109). These conditions cause at times feelings of isolation and marginalization, which may serve to make young people vulnerable to manipulation by terrorist recruiters. At the same time, prejudice and distrust toward the Muslim population in the UK has been flourishing among the majority population after the attack in London 2005, with 53 % of the British population concerned with, what is perceived as a negative impact of Islam on British society as a whole (Ibid:110, 113).

5 Counter-terrorism in the EU

In a study of terrorism, a multi-faceted phenomenon which has been subject to a number of different interpretations and is afforded different meaning depending on context, it is necessary to look at how the concept of terrorism is interpreted by the European Union (TTSRL (1) 2008:5). Terrorism is a politically charged concept as its meaning is different depending on contextual factors as well as the world view dominating the dominating discourse. In a world perceived as peaceful, an act of political violence may be considered as terrorism, while the same act of violence can be considered justified by others who perceive the world to be at war (Juergensmeyer 2003:9). Thus, without identifying how the EU attributes meaning to the concept of terrorism, there can be no correct understanding of its counter-terrorism strategy from 2005. Below, an overview of the evolution of counter-terrorism within the European Union is presented, with a deeper look into the nature of Islamist terrorism, a form of international terrorism identified as the most significant threat towards security in European countries.

5.1 The evolution of European counter-terrorism

It was not until 9/11 that the terrorism threat became a central security concern for the countries of Europe. Many countries in Europe had however, been subjected to terrorist attacks for decades before that day. To a large extent, acts of terrorism in Europe have been and are still today being performed by national groups with separatist intentions. Government responses toward these groups, such as the Basque Separatist Organization (ETA) in Spain (and to a lesser extent in France) and the Irish Republican Army (IRA) and its splinter groups in the United Kingdom, have taken various forms (TTSRL (3) 2008:88). However, unilateral counter-terrorism measures did not contribute to the establishment of a common European policy in any significant way, most primarily due to the lack of a comprehensive and precise definition of terrorism that could be implemented across the member states of the European Union (Ibid.).

The conceptually sensitive nature of terrorism made it difficult for member states to come to an agreement, which initially inhibited the effort to develop effective multilateral counter-terrorism measures. The process of establishing a European definition of terrorism was initiated in 1977 with the European convention on the Suppression of Terrorism, where a list of acts was drawn up that could be considered to constitute terrorist offences. A clear-cut definition however, was not established until after 9/11, which served to move terrorism from a peripheral security concern for the EU to the center of attention (Hassan

2010:453). In the Framework Decision on Combating Terrorism that was presented in 2002, a list of offences is presented, which are considered as terrorism when

given their nature or context, may seriously damage a country or an international organisation where committed with the aim of: seriously intimidating a population, or unduly compelling a Government or international organisation to perform or abstain from performing any act, or seriously destabilising or destroying the fundamental political, constitutional, economic or social structures of a country or international organization. (Council of the European Union 2002)

With this definition, possibilities were opened up for harmonizing efforts and ensuring a closer cooperation between countries at the level of the EU as well as abroad. Before this definition only incremental changes had served to progress the EU's attempt to coordinate member state policy on terrorism. With the 1992 Maastricht Treaty a legal base was provided for police cooperation between member states and later in 1998 the European Judicial Network was created in order to facilitate judicial cooperation in criminal matters (Hassan 2010:447f.). These developments signified a growing acceptance towards making a partial abnegation of sovereign rights regarding internal security. This acceptance was further institutionalized with the adoption of the Amsterdam Treaty in 1997, which laid the foundation for developing common strategies and instruments (Ibid.).

The attacks on 9/11 in 2001 however, propelled the EU's coordination efforts and the response from Brussels was swift and policy-altering. Within ten days the member states formulated a common Action Plan which proposed measures that concerned the issuing of a common arrest warrant, joint investigation teams, enhanced police and intelligence cooperation, the improvement of airport security within the EU, emergency preparedness, terrorist financing and diplomatic activity outside the Union (Wright 2007:286). Furthermore, the policy process accelerated pace resulted in two important frameworks which were adopted in June 2002. The first of these were *the EU Framework Decision on the Arrest Warrant and the Surrender Procedures between Member States*, which obliged the member states to introduce legislation that would bring the European Arrest Warrant into force by 1 January 2004. The second framework was *the EU Framework Decision on Combating Terrorism* which required member states to include a common concept of terrorist offences in their legal systems and was supposed to go into force on 31 December 2003. However, several member states did not meet these deadlines (Hassan 2010:454).

Meanwhile, Europe continued to have problems with separatist terrorist groups, as ETA and splinter groups from IRA continued to carry out attacks during the late 1990's and further on in the early 2000's (Wright 2007:283). The attacks of 9/11 caused an upheaval in international relations and constituted a formative moment in the field of security policy. The attacks on World Trade Center have since that day served to influence policy-makers to a degree, which until then had never been achieved before by an act of terrorism (Burgess 2003).

Since 2001, Europe has seen an increase in terrorist groups which adhere to a radical interpretation of Islam. The police and intelligence agencies of Germany, France, the Netherlands, Belgium, Denmark, Italy, the UK and Spain have all uncovered terrorist networks and intercepted planned attacks during the last few years (Bakker 2006). Still, it was the series of bombings on four commuter trains in Madrid on 11 March 2004, which killed 191 and injured 1,430 people, that above all triggered the institutionalization of a counter-terrorism framework within the EU (Wright 2007:284). The EU framed the attack as a threat towards European security, democracy and Western values, which served to shift the perception of the threat from exclusively concerning Spain to be a matter of concern for all member states (Hassan 2010:455). Only a few weeks later on 25 March 2004, the solidarity clause was incorporated in the *Declaration on Combating Terrorism*, which stated that member states will “act jointly...if one of them is the victim of a terrorist attack” and that they should also “mobilise all instruments at their disposal, including military resources” if deemed necessary (European Council 2004). Such a declaration is a highly symbolic act that serves to strengthen the interdependent bond between member states and thereby reinforcing the role of the EU as a collective security actor. The EU sought increasingly to expand on existing policy and argued for greater coordination, regulatory technology and management on multiple levels through the reinforcement of operational cooperation and the exchange of intelligence between states as well as between national authorities and EU bodies such as Europol and Eurojust (Hassan 2010:456).

Not even a year and a half after the bombings in Madrid; on 7 July 2005 terrorist attacks were carried out in London where the target was the public transport system during morning rush hour. 52 people were killed and 700 injured during the attacks, which were executed by four radical Islamists born and raised in the United Kingdom. Once again, the pressure to agree on a strategy that could coordinate information-sharing and operational capacities as well as homogenize counter-terrorism policies across member states was high (Hassan 2010:456). By December 2005, the European Council presented the *EU Counter-Terrorism Strategy*, consisting of four key pillars identified as “Prevent, Protect, Pursue and Respond” (European Council 2005). These pillars cover a wide range of areas and have the purpose of simplifying the plethora of measures that had been issued during the previous years (Hassan 2010:456). Notably, after the London attacks a focus on radicalization, recruitment and home-grown terrorism was introduced into the strategy, where appropriate measures regarding the tackling of these factors have found their home under the pillar *Prevent*. Measures concerning the protection of citizens and infrastructures are found under the second pillar *Protect*, where the focus mainly lies with reducing the vulnerability of borders, transport systems and other critical infrastructures from possible attack. Under the third pillar *Pursue*, measures related to pursuing and investigating terrorists across borders are the main focus, including measures to impede traveling, planning, financing, access to resources and to simplify the prosecution of suspected terrorists. The final pillar *Respond*, is concerned with measures related to preparation and management of emergency responses in order to minimize the

consequences in the event of an attack. This is supposed to be dealt with through operational coordination and by tending to the needs of the victims during and after an attack (European Council 2005). However, the strategy from 2005 is only binding to the extent that the EU binds itself to regularly monitor member states progress in implementing the strategy through the Committee of Permanent Representatives, as well as with follow-ups by the Counter-Terrorism Coordinator and the European Commission (European Council 2005:17).

Today, more than six years after the attacks in London, international terrorism is still considered by many member states in the EU to be *the* most serious threat towards security. More particularly, this concerns the type of terrorism that is defined as “Islamist terrorism” (Europol 2010:6). The evolution of EU counter-terrorism policy shows how the terrorist attacks in New York, Madrid and London have acted as formative moments in the policy-making process and have indeed served to strengthen the EU’s role as a security actor within the Union itself. The attacks in the USA, Spain and the UK emphasized the interdependence between member states with regards to the threat from international terrorism and have consequently resulted in significant policy changes. By shifting focus from victimized countries to the EU as the common denominator, the EU managed to securitize terrorism and advance its own role as a security actor, both within the Union as well as within the international community as a whole.

5.2 Terrorism with roots in radical Islamism

After the attacks on 9/11 in 2001, a great deal of attention was directed towards situations of conflict in the Middle East, where Al Qaeda as a terrorist network and ideology has been the centerpiece of political discussion. Al Qaeda as an organization appeared in 1989 with the purpose to enlighten the Muslim masses in order to lead them into a political-religious war and a just society. Today, Al Qaeda as an organization has crumbled, Osama bin Ladin has been hunted down and killed and the organization is heavily weakened after the past decade’s “War on Terror”. What remains however, is the ideology that continues to inspire others to attack Western targets around the world (Bakker & Boer 2007:8f.). As such, Al Qaida as a label still represents a threat to European security and has become a symbol as well as a source for inspiration for various terrorist groups. As a result, Islamist terrorism has gained a stronger foothold in Europe in recent years. In a study conducted in 2006, Edwin Bakker showed that an overwhelming majority of the persons involved in planning and/or executing a terrorist attack in Europe were residents of a European country and that more than a third of them had been born and raised in these countries. Others had been living in Europe for more than ten years before becoming involved in terrorism (Bakker: 2006:36).

Regrettably, Muslims in many European countries are often faced with various levels of stigmatization because of their affiliation to Islam and are experiencing discrimination regarding housing, employment and education, which poses as serious obstacles for integration. In some instances, young

Muslims who have been born and raised in Europe are confronted with the challenge to unite a Islamic heritage with Western culture where religion is considered a private matter not to be visible to the public eye (TTSRL (2) 2008:18). Notably, a significant part of those who were drawn to terrorist activities in Bakker's study were second- and third generation immigrants with family from countries in the Middle East and North Africa, indicating that issues of integration are of relevance in the fight against terrorism.

Related to this, are the processes of globalization and modernization that have increasingly led to a de-territorialisation of Islam. The forces of globalization and modernization continue to facilitate a growing interaction between cultures and religions around the world. Benjamin Barber (1996) argues that consumerism, modern technologies and Western notions of emancipation are spread throughout the world and Muslims are being confronted with values that originally were disproved by the Quran. According to Lara Deeb (2006), this has led to changes in how Muslims view their relationship with Islam. For example, in her ethnographic study of Lebanese women in a small community in Beirut, she illustrated how the women in this community have adopted a more pious and spiritual lifestyle as a response to what they consider the spiritual emptiness of Western modernization. These processes of globalization are also considered to contribute to extreme responses which have manifested in the establishment of radical fundamentalist movements (TTSRL (2)2008:16).

Through modern technology as the internet, religion is no longer necessarily confined to specific territories or cultures. Religion is now also being re-created in new digital communities that are organized solely around their faith. Here, religion is not based on culture or national identity but on a set of norms that are adaptable to diverse environments. Juergensmeyer calls this phenomenon *email ethnicities* and they serve as "extensions of traditional societies whose adherents and cultures are dispersed throughout the world" (Juergensmeyer 2003:197). Transnational Islam may be particularly attractive to young Muslims in Europe who are feeling marginalized and alienated because of their family's origin. Through the connection of such communities, they are able to find an identity and a place to belong which bind them with other Muslims regardless of nationality (TTSRL 2008 (2):19). Considering such developments within Islam, it is no longer possible to comprehend international terrorism by solely focusing on events and organizations confined to the Middle East-region, as was customary in the immediate aftermath of 9/11. Even though the Western treatment concerning the occupation of Iraq or the Israeli-Palestinian conflict have given rise to protest against the Western world, today's radical Islamists do not always carry out their fight in Iraq or Palestine but do so in Europe and America as well. From Europe, some travel to Pakistan, Jordan or Afghanistan to participate in training and then they return to Spain, the UK or France ready to bring their fight to European ground, both in terms of attacking European targets as well as organizing bases of planning, recruitment, communication and finance (Wright 2007:283). Their activity is connected with multiple countries, which is maintained through the opportunities which globalization has provided in terms of travel, communication and identity, giving this form of terrorism a clear international nature.

6 Patterns of member state compliance

This chapter presents the results of the data collection based on the national counter-terrorism policies of Germany, Sweden and the United Kingdom and their relation to the implementation of the European Union's counter-terrorism strategy. The data collection process resulted in a clear picture of the way the four key pillars – Prevent, Protect, Pursue and Respond – were constituted in each state's policies, how the pillars have been prioritized as well as the level of compliance across the three cases. An overview of the results is presented below.

6.1 The four key pillars

The results of the data collection are presented below in two separate tables. In line with the structure of the four pillars, table 1 shows how the national counter-terrorism policies are constituted in Germany, Sweden and the United Kingdom. Depending on the measure's intended purpose it was sorted and categorized under the pillar to which it belonged. This provides an overview of the priorities in different national policies and accordingly serves as an indicative framework for strategic behavior with regards to counter-terrorism (Möller 2006:23).

	Prevent	Protect	Pursue	Respond
Germany	Low	High	High	Medium
Sweden	Medium	Medium	Medium	Low
The UK	High	Medium	Medium	Medium

Table 1: Distribution of measures in national counter-terrorism policies

The rate of compliance in Germany, Sweden and the UK, regarding the incorporation of measures included in the European Union's counter-terrorism strategy into national policies, is presented in Table 2. Here, the focal point of analysis was the strategy presented by the EU in 2005. Listing the measures given in the EU strategy and comparing them against the national strategies, it was possible to see to what extent Germany, Sweden and the UK had complied with the strategy of the EU. Again the scores "high", "medium" and "low" were used and were attributed according to rate of compliance among the countries⁵.

⁵ High equaled 90 % compliance, Medium equaled 50-89% compliance and Low equaled 49 % compliance or less

	Prevent	Protect	Pursue	Respond
Germany	Low	High	High	High
Sweden	Medium	High	High	Medium
The UK	High	High	Medium	Medium

Table 2: Level of compliance regarding the EU counter-terrorism strategy

Although counter-terrorism policies of Germany, Sweden and the UK differentiate themselves from each other in several significant ways, compliance regarding the EU's counter-terrorism strategy may still be considered to be relatively high among all three countries. The UK has adhered to all pillars in the European counter-terrorism strategy, the pillars Prevent and Protect in particular, while some measures still need to be implemented under the remaining two pillars to ensure 100% compliance in the British strategy. Similarly, Sweden has institutionalized measures under all four pillars in the EU's counter-terrorism strategy but still needs to adopt more measures in the pillars of Prevent and Respond to receive a high level of compliance. Germany is the country in the sample that has the highest compliance level towards the EU's counter-terrorism strategy and scores high in all pillars except Prevent, which interestingly received a low score. A more detailed description of the similarities and differences of the national counter-terrorism policies follow below.

6.1.1 Prevention of terrorism

Prevention measures in the European Union's counter-terrorism strategy are primarily concerned with tackling factors that encourage processes of radicalization and recruitment to terrorist activities, both on a national scale as well as internationally (European Council 2005). Out of the three cases under study here, the United Kingdom is by far the country with the highest amount of measures under this pillar – 37 measures in relation to Sweden's 21 and Germany's relatively low number 15.

Regarding compliance, the UK is the most noticeable that has a compliance level of 100 % under this pillar. The UK government has instituted measures, covering all areas that the EU advocates in its strategy, with a particular focus on tackling issues of radicalization and recruitment at home. A lot of effort has been afforded to the development of programs for the de-radicalization of terrorist offenders. Programs and interventions have been introduced and carried out in prisons and communities during the license phase of a prison sentence in order to support people vulnerable to radicalization. For example, the Multi Agency Public Protection Arrangements (MAPPA) organizes the cooperation between the police, prison and probation services in order to assess and manage the transition of high risk offenders into society (CONTEST 2011:51). The UK is also working closely with universities to tackle issues of extremism on campus and to ensure that students are unable to access unlawful material through the schools and libraries (Ibid:75).

In Sweden, similar measures have been implemented with regard to countering radicalization and recruitment of vulnerable persons, although not in the same extensive manner as the UK. The Swedish Security Police (SÄPO) has introduced a contact program in which SÄPO maintains a presence in sensitive environments such as schools and places of worship where primarily youths are targets of radicalization and recruitment. The intention with the program is to openly inform teachers, parents and religious leaders about the situation and any potential warning signals (Regeringen 2008:16).

Although, Sweden has incorporated the majority of measures presented in the EU counter-terrorism strategy, Sweden has only received a medium rating concerning their level of compliance under the prevention pillar. This is due to a lack of any official measures related to the monitoring of travels to conflict zones and impediment of terrorists' instrumental use of the internet in the Swedish national strategy. The latter policy area is an important focus in the EU-counter-terrorism strategy as the internet may be regarded as a source used for communication and recruitment purposes. The UK is the only country in the sample that has expressively stated the inclusion of applied measures regarding this area in their strategy. These include for example the set-up of the internet referral unit where people are encouraged to report extremist material online to the service provider who will then take action to remove it (Ibid.).

Similar to Sweden, Germany has not included any official measures targeting terrorists' use of the internet. In fact, Germany's counter-terrorism efforts regarding prevention have until now been quite limited and they are balancing between a low and medium value in Table 1. Germany is also the country in the sample with the lowest scores of compliance towards the EU-strategy under the prevention pillar as not even half of the policy issues have been incorporated into their national counter-terrorism policy. The majority of the German measures are primarily clustered around the areas of integration and the work with assistance programs in third world countries. Germany has for example contributed to post-war reconstruction projects both in Iraq and Afghanistan⁶, where the main objective has been to strengthen the rule of law and protect human rights as a way to prevent terrorism and crime in these countries. Similar projects in third world countries also constitute an important part of Sweden's and the UK's prevention measures as they have contributed to programs and operations in for example Afghanistan, Iraq and Kosovo, which are considered as an important part in counter-terrorism efforts abroad.

Notably, only a few measures are presented in the German counter-terrorism strategy regarding the impediment of recruitment of terrorists and no measures at all are provided for tackling radicalization in sensitive environments⁷, which separates the German strategy from the UK and Sweden. Rather than working directly with individuals who run the risk of being recruited into terrorism,

⁶ The EU Integrated Rule of Law Mission EUJUST LEX-Iraq (Federal Ministry of the Interior (2):2011) and the Project Office in Kabul (Federal Ministry of the Interior:2006) and The Project Office in Kabul (Federal Ministry of the Interior:2006)

⁷ Possibly, such measures are presented in relation to other circumstances but they are not mentioned in the documents where Germany's national counter-terrorism strategy is discussed.

Germany exclusively applies a more aggressive approach founded on a strong legal framework, which makes terrorist recruitment punishable and enables the banning of Islamist organizations that support, instigate or threaten to resort to violence (Security Council 2004:7). However, there are some similarities between strategies in Germany, Sweden and the UK concerning integration measures as the importance of dialogue between communities is highlighted in policy documents for all three countries. For Germany, upholding an intensive dialogue with the Muslim population is emphasized in order to “strengthen identification with the foundations of [German] values and society” (Federal Ministry of the Interior (1) 2011). The most important forum for this dialogue has been the German Islam Conference (DIK). Here, efforts are made to improve social integration and dialogue between the state and German Muslims (DIK 2011).

Similar measures have also been applied in the UK and Sweden. The government in the UK has sought to strengthen the dialogue with faith institutions and organizations. Together with faith communities, the UK has aimed to strengthen cooperation with mosques that have taken a stand against terrorism. This has led to the establishment of seven working groups, comprising over 100 Muslim leaders, that focus on the prevention of radicalization at community level (Security Council (1) 2006:5). Working from a broader perspective on prevention, Sweden has been working on advocating values of human rights, democracy and tolerance through organizations such as the Living History Forum, where the Holocaust has been the point of departure for a deeper discussion. The purpose has been to deepen the knowledge about crimes against humanity, both in the past and in the present, as a way to promote equality of all mankind (Security Council (2) 2006:10).

6.1.2 Protection from terrorism

The second pillar is concerned with counter-terrorism measures connected to the protection of citizens and infrastructure. The intention of this pillar is to “reduce the vulnerability to attack, including through improved security of borders, transport and critical infrastructure” (European Council 2005:3). All three countries score high under this pillar but the country that has put most effort into strengthening its critical infrastructure and border security is Germany. The German strategy has scored high both in terms of the distribution of measures in their national strategy as well as in the rate of compliance towards the European Union’s counter-terrorism strategy. Germany has instituted measures that encompass all issues in the European strategy, giving them a compliance rate of 100 % under this pillar. The first part of the protection pillar concerns border security, which has been given a lot of attention in the German counter-terrorism policy. Extensive immigration laws have been introduced that permit deportation of suspected foreigners as well as hinder suspected persons from entering Germany or from getting a residence permit (European Council 2009). Sweden and the UK have also instituted similar immigration laws that aim to hinder suspected terrorists from entering or remaining in the country. Additionally, all

three countries have introduced biometric information in identification and travel documents to make forgery more difficult (Federal Ministry of the Interior (1) 2011; Security Council (2) 2006:7; CONTEST 2011:83). They are all also participants in the FRONTEX-cooperation, which supports the coordination of border authorities in order to improve European border security and is included in the EU counter-terrorism strategy.

Furthermore, the European counter-terrorism strategy includes other technical measures that aim to ensure more efficient border security. These measures include the implementation of the Visa Information System (VIS), which stores information on all visa applications within the Union, as well as the second generation Schengen Information System (SIS II) that concern the sharing of information for border security and law enforcement purposes. Germany is the only country that has adopted both systems (Federal Ministry of the Interior (3) 2011). Sweden has at this time only adopted VIS but is preparing to institutionalize SIS II (Justitedepartementet 2010). Interestingly, as the UK is not part of the Schengen Treaty, the UK is in another position than the other countries in the sample. As a result of this, despite expressing a strong interest in the VIS system, the UK has not been allowed to participate in this cooperation and has refrained from introducing SIS II (Williams 2010). Therefore, despite not having these information systems in place, the UK's compliance score has not been affected and therefore still maintain a high degree of compliance under the Protection pillar.

The second part of the Protection pillar is concerned with protecting critical infrastructure. All three countries have adopted measures to improve aviation and aircraft as well as maritime security. Security checks regarding personnel, passengers and hand luggage on airports according to EU regulation 2320/2002 has been improved in all countries in the sample (Federal Ministry of the Interior (3) 2011; Security Council 2005; CONTEST 2011:81). Additionally, Germany has deployed federal police officers as air marshals on commercial flights and installed bullet proof and entry proof cockpit door on all German planes (Miko & Froehlich 2004:7). In the UK, further powers have been accorded to the police, customs and immigrations officers regarding arrest, the detainment of aircrafts and searches (European Council 2007). Such powers have also been extended to include maritime ports in Sweden and the UK. Through the newly opened multi-agency National Maritime Information Centre that organizes all information regarding the UK's maritime security, a comprehensive picture of potential threats is achieved (CONTEST 2011:85). Likewise, Sweden has introduced measures regarding their maritime security where today's security arrangements are similar to the arrangements found at airports. Security checks are performed on both personnel and passengers, body searches are allowed and luggage is often screened through metal detectors or x-ray units (Security Council 2005:9).

Regarding other forms of critical infrastructure, such as buildings and cyber structures, Sweden has made some limited efforts in enforcing protective measures. A strategic analysis unit within the Secret Service makes continuous evaluations on current or emerging threats and exercises are performed in order to bring inadequate measures to attention (Security Council 2005:4). The UK has

taken a step further in this direction and instituted a National Counter-Terrorism Exercise Program which delivers a mix of exercises each year that take into account various scenarios, including aviation, weapons of mass destruction and hostage-taking, with the intention to test coordination and communication among central authorities (CONTEST 2011:101).

The UK has also worked with protection against electronic attacks, which is an issue presented in the European strategy. The vulnerability of government systems and networks is under assessment and the National Cyber Security Program is being coordinated across the departments in government in order to increase cyber security (CONTEST 2011:76). Similarly, Germany is developing encryption software and the command and control centre for IT security emergencies is working on strengthening the defense against electronic attack (Federal Ministry of the Interior (4) 2011). In the Swedish strategy however, protective measures against electronic attacks are not mentioned, giving them a slightly lower degree of compliance regarding the fulfillment of the European strategy than Germany and the UK.

6.1.3 The pursuit of terrorists

Pursue is the third pillar in the strategy of the European Union and these policy measures are intended to “pursue and investigate terrorists across our borders and globally; to impede planning, travel and communications; to disrupt support networks; to cut off funding and access to attack materials, and bring terrorists to justice” (European Council 2005). Germany has adopted most measures from this pillar of the European counter-terrorism strategy into their national policy and therefore shows a high level of compliance as well as a high score of the number of measures under this pillar. The majority of these measures primarily concern the strengthening of law enforcement capabilities to collect and analyse intelligence and the impediment of terrorist financing. This is also true for the national policies in Sweden and the UK, although these countries have not introduced as many measures as Germany in this area. Sweden, who also has a high rate of compliance under this pillar, has implemented measures such as covert interception and surveillance of telecommunications, recording private conversations and covert camera surveillance, which may be applied by police authorities if it is of “exceptional importance” to an investigation (European Council 2008:2). The UK and Germany also make use of similar instruments in intelligence gathering. Germany however, uses additional instruments that may be considered as more intrusive. The government has for example authorized the surveillance of postal services and airlines and the use of automated comparisons with stored DNA material to check for certain features concerning offenders (Federal Ministry of the Interior (1) 2011; European Council 2009:4).

Hindering money laundering is another area in the EU counter-terrorism strategy which all three countries have been careful to include in their national policies. Financial investigations have become an integral part of terrorism investigations and financial supervision and investigative authorities have become

part of counter-terrorism efforts in Germany and Sweden⁸ (Security Council 2004:3; European Council 2008:7). The UK has even institutionalized a law enforcement agency called National Terrorist Financial Investigation Unit, with the responsibility to investigate terrorist financing (European Council 2007:9). EU regulations, regarding asset freezing and the responsibility of banks to report to law enforcement authorities about suspicious behavior with regards to customers, transactions and accounts, have been adopted in all three countries. Sweden however, has made reservations about an insufficient legal framework for personal security concerning the freezing of assets. Thus, although Sweden has gone through with freezing suspected terrorist accounts, they have not implemented certain EU regulations to their full extent (Regeringen 2008:13).

Another area that receives a lot of attention is the exchange of information and intelligence between member states. All three states are engaged in operational cooperation to some extent, as they all cooperate with Europol and Eurojust, two EU bodies that coordinate police operations and judicial cooperation. All three countries have also implemented the European Arrest Warrant, which requires that a person suspected of a crime is arrested in the member state that received the warrant and is thereafter transferred to the state that issued the warrant. However, it is primarily Sweden and Germany that have given this area a lot of attention in their policies. Sweden is represented in several multinational bodies that consist of countries' security service and law enforcement agencies (Säkerhetspolisen 2011). Primarily though, Sweden is involved in close cooperation with the Baltic countries and contributes to the Task Force on Organised Crime in the region, which has improved the sharing of information and led to joint operations in the area (Security Council 2005:8). Germany also looks positively at cross border cooperation and has therefore institutionalized extensive cooperation regarding investigations, operations and information sharing in law enforcement. Bilateral agreements with all neighboring countries are in force, which provide the possibility for cross border police operations, joint patrols, information sharing and cross border personnel support (Federal Ministry of the Interior (2) 2011). Through the Prüm Treaty from 2005, which includes the sharing of data regarding DNA material, fingerprints and registrations on motor vehicles, Germany has made additional efforts in strengthening cross border cooperation (Ibid.).

The UK does not seem to favor operational cooperation in equal measure as the other two countries in the sample as they do not mention any concrete measure adopted in this regard in their national strategy. However, like Sweden and Germany, the British government has made progress in developing useful approaches to information sharing within the EU. The UK is part of the Joint Situation Centre in Brussels, a forum for sharing sensitive information, in which Sweden and Germany also are involved. Additionally, the British government has also set up a similar centre in the UK, the International Liaison Section (ILS) which is a point of contact for national police forces in the UK, in Europe and for

⁸ Financial Intelligence Unit in Germany and the Swedish Financial Supervision Authority in Sweden.

international police organizations regarding information and intelligence sharing on terrorism matters (European Council 2007:9).

6.1.4 Responding to a terrorist attack

The final pillar Response is the smallest of the four in the European Union's counter-terrorism strategy. The intention with including this pillar is that there is a need to "prepare ourselves, in the spirit of solidarity, to manage and minimise the consequences of a terrorist attack, by improving capabilities to deal with: the aftermath; the co-ordination of the response; and the needs of the victims" (European Council 2005). Once again it is Germany that achieved the highest level of compliance. The German government has developed measures to accommodate every part of the EU strategy under this pillar. Most noticeably in the German strategy is their focus on international cooperation in the event of an attack, something that is clearly lacking in both Sweden and the UK. In Germany, the German Joint Information and Situation Centre is the central point of coordination both nationally and internationally regarding volunteers and material resources in the event of an attack. Germany has also been a driving force in establishing the Civil Protection Mechanism (CPM) that is part of the Response pillar in the European counter-terrorism strategy. The purpose of CPM is to offer assistance on the request of a member state with the management of a serious emergency (Federal Ministry of the Interior (5) 2011). Although Germany is most likely not the only country that adhere to CPM, there is no mentioning of this mechanism in Sweden's or the UK's national policy documents or reports to the EU and the United Nations, which indicates that no strong connection between CPM and counter-terrorism exists in these countries.

However, the UK is cooperating with foreign governments, mainly through the Foreign and Commonwealth Office (FCO), supporting the development and execution of exercises concerning terrorist emergencies (CONTEST 2011:99). Nonetheless, the British government has been more concerned with developing an advanced response system for domestic purposes. For example a lot of effort has been put into developing response teams within the medical field. An Ambulance Service Program has been introduced, which includes Hazardous Area Response Teams where training, equipment and vehicles for ambulance staff are set up in order to facilitate their work in hazardous areas. Furthermore, multi-agency exercises have been performed in order to test communication and coordination of emergency responses. A national Chemical, Biological, Radiological and Nuclear (CBRN) response centre has been set up, which has trained 10,000 police officers to deal CBRN incidents and continues to provide expertise to emergency responders in this area (CONTEST 2011:96, 98).

In contrast to both the UK and Germany, Sweden has not developed an elaborate response system specifically for the consequences of a terrorist attack. This is visible in Table 1 on the distribution of measures in the national policies as Sweden received a low level under the Response pillar. Most response mechanisms that are activated after a terrorist attack are part of the encompassing

response system for natural disasters and radiological and nuclear incidents. These mechanisms first and foremost include restrictive measures regarding radiation exposure, including evacuations, distributions of iodine tablets and remediation of persons and exposed areas (Räddningsverket 2008:9). Preparations between involved authorities regarding research, education, exercises and international collaboration continue to be supported by the CBRN-Council (Faktasamling CBRN 2011).

Although Sweden's lack of versatility regarding terrorist threats in their response system and the amount of measures put in place in response to a terrorist attack is the lowest of the three countries in the sample, Sweden still manages to keep a medium score in their level of compliance towards the EU counter-terrorism strategy. Sweden has developed a risk based approach regarding threat and vulnerability assessment, where action has been taken towards events that would have a devastating impact (MSB 2010:2). Additionally, Sweden also has invested in measures that ensure the compensation of victims in a terrorist attack, which is also part of the European counter-terrorism strategy. Through the Tort Liability Act and the Criminal Injury's Compensation Act, the victims are given the right to compensation primarily through the perpetrator's obligations towards his/her victims and through the responsibility of the state if the perpetrator is not able to meet his obligations (European Council 2008:5). Germany and the UK have similar compensations systems in place to ensure that victims of terrorism are taken care of.

7 A contextual analysis of compliance

The majority of studies on member state compliance within the European Union have primarily been driven by rational-modeled theories focusing on the role of institutions or enforcement processes. However, the development of a common security and defense policy (ESDP) is still in its adolescence in the EU and the realm of security remains primarily as a national concern. As a result, few measures in the EU's counter-terrorism strategy are subjected to enforcement procedures. In this chapter, in addition to traditional compliance theories, the concept of national strategic culture is introduced in order to see to what extent normative structures may have an influence on member state compliance with regards to the European counter-terrorism strategy. The analysis below is therefore structured on two legs, with one leg rooted in institutional-focused theories of compliance, while the other is placed in the framework of the national strategic cultures of Germany, Sweden and the United Kingdom.

7.1 The political system

The first of the theories on member state compliance deals with the effect of a member state's political system on the level of compliance concerning a directive from the European Union. It is argued that in a state where political power is concentrated at the national level, the government needs less support from regional and local political levels in the implementation process of EU-directives. Accordingly, it is supposed to be more difficult for a federal state to comply with such directives as the implementation process often includes the involvement of the autonomous regions of the state in question (Thomson 2007:996). According to this argument, Sweden and the United Kingdom, both having a centralized political system concentrated at the national level, should provide the highest score of compliance in this study, while the federal state of Germany would have more difficulty to comply with the EU's counter-terrorism strategy. However, as Germany is the country with the highest level of compliance in this study, the political system-theory seems to be inadequate. The majority of the counter-terrorism measures presented in the German counter-terrorism policy have been issued under the authority of the Federal Ministry of the Interior, a ministry of the German federal government responsible for domestic security issues. Furthermore, the responsibility to implement the majority of these measures lies with federal authorities that function on a national level as central offices for coordination activities with the individual states of Germany. Two examples are the Federal Criminal Police Office (BKA) (BKA 2011), which has received

greater capacities to gather intelligence and investigate terrorist crimes and the Federal Office for Civil Protection and Disaster Assistance (BBK), which has been tasked with ensuring the protection of critical infrastructure throughout Germany (Federal Ministry of the Interior (5) 2011). Possibly, the involvement of the German federal government and federal authorities in the implementation process of the EU's counter-terrorism strategy in German policy may have resulted in a higher degree of compliance, otherwise unusual in a system of federalism. The systems of federalism and central government and their impact on compliance therefore does not seem to be of central importance in this study as it is rather the power and resources the government - federal or central - use to invest in the implementation of EU-directives on the national level that are of importance here.

7.2 Administrative capacities

A second theory of compliance concerns the administrative capacities of states with regards to the access of resources to grant the ability to implement directives from the European Union (Falkner et al 2005:453). Administrative deficiencies have primarily been a problem for southern member states and for small countries like Luxembourg where the administration has come under heavy pressure to accommodate both national and European regulations (Thomson 2007; Haverland & Romeijn 2007). However, all three countries in this study, have national administrations with the capacity to adapt to agreements within the EU. The United Kingdom is generally recognized as having one of the strongest and effective systems of all member states (Schout & Jordan 2008:967) and Sweden is considered to have developed a high administrative capacity as well (Thomson 2007:998), which may account for the UK's and Sweden's relatively high levels of compliance in this study. Germany is the country in the sample considered to have the lowest capacity in their administration, mainly due to their federal political system where the decision-making process is enacted on multiple levels – national and regional – which create a structurally and procedurally interlocked system not conducive to large changes (Knill 1999:118). According to this theory, Germany should therefore have the lowest level of compliance with regards to the implementation of the EU's counter-terrorism strategy. As Germany in fact has the highest level of compliance in this study it may be concluded that the theory of administrative capacity alone cannot provide an adequate explanation for the results in this study.

7.3 Discretionary power

The theory of discretion is often used to explain compliance patterns across member states in the European Union. Because of the multitude of political actors and diversity of opinions involved in the decision-making process, EU-directives often need to be loosely phrased in order to accommodate as many actors involved as possible. This is termed discretionary power and the argument goes that the higher degree of discretion in a directive, the higher the rate of member state compliance in the forthcoming implementation process (Falkner et al 2005:463).

The EU's counter-terrorism strategy is composed both of measures offering a high degree of flexibility for member states when accommodating these into their national context as well as more concrete measures that need to be equivalent across all member states. For example, on the issue of countering the spread of propaganda about a supposed conflict between the West and Islam, the EU provides a vague formulation on the "need to ensure that voices of mainstream opinion prevail over those of extremism by engaging with civil society and faith groups that reject the ideas put forward by terrorists and extremists that incite violence" (European Council 2005:8). In contrast, the adaptation of specific EU instruments is more clearly phrased, where member states for example are expected to "implement agreed common standards on civil aviation, port and maritime security" (European Council 2005:11). Thus, according to the theory of discretion, compliance is expected to be higher in the implementation of the measures of with a higher degree of discretion in the counter-terrorism strategy.

Interestingly, the pillars showing the highest degree of compliance across the three countries in this study are Protect and Pursue. It is mainly under these pillars that the less flexible measures of counter-terrorism have been gathered; primarily EU-regulations concerning airport- and maritime security, border security, money laundering and the exchange of information. All concrete measures under the Protect-pillar have been implemented by all three countries and the majority of the regulations under Pursue have been adopted as well. Instead, it is the measures with a higher degree of discretion under the Prevent and Respond pillars that show a slightly more unstable compliance pattern across the three countries, with Germany having its only low compliance score with measures associated with the Prevent pillar and Sweden showing their lowest levels under Prevent and Respond. Out of the three countries in the sample it is only the United Kingdom that provides a high compliance rate under the Prevent pillar. It therefore seems as also the theory of discretion has some difficulty of explaining the compliance pattern among the cases in this study.

7.4 Goodness of fit

Last, among the traditional theories of compliance is the theory of goodness of fit, which is commonly used in studies of member state compliance within the European Union. This theory argues that depending on the form of the directive in question and previously existing policies within a member state, different costs will befall member states in the implementation process. In theory, compliance is thus more likely to occur when a directive is easily adaptable to current national policies and few changes are required in the implementation process (Zhelyazkova & Torenvlied 2011). In terms of the implementation of the EU's counter-terrorism strategy, it may be argued that Germany and the United Kingdom would have the highest level of fit between existing national frameworks on counter-terrorism and the new strategy from the EU due to the history of terrorism within their territories. According to this line of reasoning, Sweden should have been faced with making greater changes concerning their national framework when the EU's counter-terrorism strategy was introduced as Sweden did not even have a counter-terrorism policy until 2008.

In contrast to Sweden, the violent terrorist events of the past in Germany and the UK left both countries with a comprehensive counter-terrorism policy framework. However, the threat from international terrorism from recent years has of course brought significant changes to both states' national policies. For example the expanding cooperation between member states with regards to border and transport security and law enforcement collaboration, is a development which both Germany and the UK have been forced to adapt to. However, both countries' history of domestic terrorism has affected today's national counter-terrorism policies toward international terrorism. Today, Germany is still using the heavily criticized computer search system *Rasterfahndung*, which was used to investigate members of RAF in the 1980's and 90's (Miko & Froehlich 2004:9). In the UK counter-terrorism policy, measures including the impediment of financial and material resources, enhanced powers of arrest and detention as well as greater possibilities for security forces to stop, search and question properties and persons originate from government decisions taken during the Northern Ireland conflict (Bonner 1993). It may therefore be argued that a connection exists between counter-terrorism legislation in the past and today's policy development in both Germany and the UK. Accordingly, the costs for implementing the EU's counter-terrorism strategy should not have been too high for either Germany or the UK, which may explain their high levels of compliance.

Compared to many other European countries, Sweden has until recently had relatively little experience with international terrorism, which has been mainly limited to constituting platforms for the financing of terrorist groups. As a result Sweden has, in comparison with Germany and the UK, a national counter-terrorism policy that is quite limited in its scope. Most changes in national policy with developments directly connected to terrorism have been accomplished in the pillars of Protect and Pursue where the Swedish government has taken care of

implementing measures involving the protection of transport systems, border security and other critical infrastructure as well as institutionalized measures related to the impediment of the financing of terrorism and enhancing the capabilities of law enforcement authorities. The Swedish counter-terrorism policy, with regards to the pillars of Prevent and Respond, is more general in nature and a majority of these measures have not been specifically tailored at countering terrorism alone as is the case in the British policy for example. Instead, many measures may be applied during other circumstances as well. For example, Sweden does not have any particular response system designed for handling the aftermath of a terrorist attack but instead leans on existing emergency systems used during other crises as well. Similarly, some measures which target radicalized behavior do not necessarily concern terrorism alone but can be used to counter other forms of radicalization. It is therefore possible to argue that Sweden has, at least to some extent, used previously existing national arrangements to adapt to the European counter-terrorism strategy. The level of fit with the Swedish policy context may therefore have been increased in order to simplify the implementation process, which has resulted in a high level of compliance in this study, despite not having a national counter-terrorism policy until very recently.

7.5 The impact of national strategic cultures

Despite the inclusion of three different national strategic cultures in this study, the level of compliance with regards to the European Union's counter-terrorism strategy is relatively high for all three cases in the sample. An easy conclusion could therefore be that a state's national strategic culture does not have much to do with its ability to follow a directive from the EU. However, the results of this study also show that although compliance is quite high for all three countries, their national counter-terrorism policies are constituted differently in several significant ways. Diverse perceptions on the threat from international terrorism have therefore likely still contributed to the different strategic choices of Germany, Sweden and the United Kingdom concerning the design of their counter-terrorism policies (Meyer 2005). Different factors in a state's national strategic culture may therefore serve to strengthen the will or ability to comply the European counter-terrorism strategy or high compliance may also be an indicator that the EU's counter-terrorism strategy constitutes an important step towards the homogenization of security priorities within the Union (Howorth 2002).

7.5.1 Germany

Keeping Germany's preference for multilateral cooperation in security issues in mind, where military force is heavily tied to regulations within alliances and

supranational organizations, the German government's high level of compliance in this study may be seen as being consistent with the development of Germany's national strategic culture during the years after the Second World War. With the exception of measures under the Prevent pillar, Germany seems to have consistently implemented measures and regulations presented in the European Union's counter-terrorism strategy. As seen in table 1, Germany's counter-terrorism policy had the highest amount of measures concentrated around the pillars Protect and Pursue, while maintaining a medium score in the Respond pillar and a low score in the number of measures under the Prevent pillar. Naturally this brings forth the question why Germany, despite a strong commitment to the other pillars, has chosen to neglect the Prevent pillar in their national policy.

The German counter-terrorism framework mainly focuses on all the features of the EU's counter-terrorism strategy that emphasizes the stages where terrorism already has become a dangerous threat – Protect, Pursue and Respond. In comparison, relatively little stress is put on the softest pillar, Prevent, where the focus is on spreading democratic values, improving integration and obstructing radicalization processes. Additionally, the low level of compliance with regards to the Prevent pillar serves to further underline Germany's emphasis on more forceful measures in their counter-terrorism policy. Germany chose to use a similarly forceful approach to tackle the terrorist threat during the Red Army Faction's (RAF) active period in the late 1960's and up until the 1990's. The RAF was perceived as an enemy of the state by the German government which therefore thought it justified to deprive the members of RAF their civil rights as long as they defended their political convictions (Groenewold 1993:139). Although not as uncompromising as it was during the RAF-period, Germany's counter-terrorism policy with its particular emphasis on measures under the pillars Pursue and Protect, indicates that Germany still views terrorism as a dangerous threat. As terrorism has constituted a more or less significant security threat for Germany for over forty years, it is likely that actions taken to handle this threat have resulted in durable and protective measures with a stronger commitment to security alliances like the EU and NATO, which may express itself with a high degree of compliance (Meyer 2005:533).

Today, mainly the threat from Islamist terrorism has replaced the threat from RAF. Although plans to carry out terrorist attacks have been uncovered, only one terrorist attack have been carried out by an Islamist extremist in Germany during the past ten years. The German government therefore continues to perceive the threat from Islamist terrorism as real and dangerous. As organizations with connections to terrorism of this kind are active in Germany, it worth to consider Germany's tough immigration laws. Today, Germany has a large Muslim population, with people with a Kurdish background constituting the largest share of this group. Although Germany now has taken steps to grant citizenship rights more extensively and seeks to create more opportunities for integration and political inclusion, for long many immigrants were marginalized in German society. However, specific measures to deal with radicalization processes are missing from the German strategy and it is possible that terrorists with a Muslim

background may not be considered to belong to Germany in the same extent and are thus not the responsibility of the government. This could be part of the explanation why Germany has failed to comply with the implementation of the Prevent pillar in their counter-terrorism policy. However, more research is needed on this in order to see if there exists any concrete connection between Germany's immigration policies and their low level of compliance related to preventive measures in their policy framework.

7.5.2 Sweden

Having the least comprehensive counter-terrorism strategy of the three, Sweden never achieves a higher level than medium when it comes to the distribution of their total amount of measures across the four pillars. Looking at Table 1 however, the counter-terrorism measures are quite evenly distributed across the pillars of Prevent, Protect and Pursue, while Sweden receives a low score regarding measures under the Respond pillar. As Sweden mainly has invested in measures that strengthen airport and maritime security and border protection under the Protect pillar and in measures that give greater capacities to law enforcement agencies as well as to the targeting of resources that allow terrorists to carry out their activities under the Pursue pillar, these priorities speak of a mainly proactive strategy, which seeks to stop terrorist activities *before* it reaches the point that it results in a successful attack against targets in Sweden. An elaborate response system may therefore not seem as important in the Swedish view on counter-terrorism. Most likely, this prioritization follows from Sweden's relative lack of experience of terrorism, which may have resulted in a belief that an attack against Sweden is unlikely. This belief is also reflected in Sweden's comparatively low threat perception of Islamist terrorism, which is much higher in both Germany and the United Kingdom (Sjögren 2005).

Even though Sweden has not come much in contact with terrorism and still does not regard it as a particular dangerous threat towards Swedish security, there is a quite high level of compliance regarding the EU's counter-terrorism strategy in Swedish policy. Sweden's previously held position of neutrality has caused Sweden to be cautious about joining military alliances in the past but the last two decades has brought about a change where Sweden has increasingly become involved in multilateral cooperation, where they are actively participating in various security collaborations with other countries. Arguably, Sweden's high level of compliance, particularly under the Protect and Pursue pillar where most measures have little discretionary power, confirms this development towards a further strengthening of multilateral cooperation in security issues. Equally significant is that Sweden's policy, although only comprised by a few measures in this area, still maintains a medium degree of compliance under the Respond pillar. This suggests that Sweden have used the EU's counter-terrorism strategy as a framework for the development of its own national policy, which is important as it demonstrates Sweden commitment to the EU as a security actor. Despite being the least motivated country in the sample to develop a

comprehensive national counter-terrorism policy, Sweden has still managed to attain a relatively high level of compliance in the implementation of the European counter-terrorism strategy. This indicates that Sweden may have changed its own perception on security with regards to the threat from international terrorism in order to better reflect the dominant view within the EU (Meyer 2005:536).

7.5.3 The United Kingdom

The United Kingdom's counter-terrorism policy is the most comprehensive and most evenly distributed across all four pillars in the European Union's counter-terrorism strategy. The Prevent pillar is however particularly favored in British counter-terrorism policy, which suggests that the UK perceive terrorism as a multi-faceted phenomenon that needs to be fought on many levels. The emphasis put on the Prevent pillar also implies that they approach terrorism as a human activity that require direct contact with people, whether they are terrorists or possible terrorist recruits. As such, terrorism is not only perceived as a source for emergency situations or cause of damage.

At the same time, the comprehensiveness of the UK's counter-terrorism policy demonstrates how serious the British government views the threat from international terrorism. The majority of measures in the UK's counter-terrorism framework are at times highly advanced and resource-demanding. Committees, analysis centers and counter-terrorism units have been set up within different governmental departments, police authorities and other official authorities, while programs and exercises have been completed dealing with emergency response processes, interoperability between authorities, reducing access to CBRN material, reducing vulnerability to transport systems, countering radicalization as well as improving counter-insurgency operations in Afghanistan and Iraq. All these measures require a lot of personnel and resources and serves to demonstrate how well integrated and institutionalized the UK's counter-terrorism framework is in their overall national security policy.

Past contact with the IRA and in particular PIRA that resulted in violent attacks on both sides in the Northern Ireland conflict, brought the brutality of terrorism into reality for the UK. Forceful counter-terrorism measures followed from the British government that restricted civil liberties during the years that followed the conflict through forceful legislation targeting the banning of certain organizations, financial and material resources of terrorism and further investigative and coercive powers for the security forces. During this period, terrorism was envisioned as a "battle" by the British government (Bonner 1993:194). Having experienced the devastating consequences of terrorism for a long period of time, the UK have like Germany adapted their normative structures in order to develop a strong, durable and protective shield towards the threat from terrorism (Meyer 2005:533). Although, better care is taken to protect civil liberties in the UK today in the fight against terrorism (some of the earlier measures have been adjusted or replaced by others), their forceful stance is still maintained through their extensive counter-terrorism policy.

However, the British government's strong focus on the softest pillar Prevent, separates the UK from Germany in a profound way. It may even seem surprising that the British government has given this strand so much emphasis in their strategy as the UK historically has shown a preference for military power through their contributions to a number of NATO missions, through their contributions to the war in Iraq in 2003 and through their support of the war on terror. Past dealings with PIRA have also shown an inclination for handling acts of terrorism with forceful measures. However, the attacks on London's transport system on 7 July 2005 by four British young men with a Pakistani background served as a powerful reminder that home-grown terrorism is still a significant security threat for the UK as it has the potential to cause severe societal damage. In contrast to the other two countries in this sample, the UK is the only country that have experienced a large-scale Islamist terror attack that was carried out successfully, which in addition was carried out in the aftermath of the Madrid train bombings in 2004. It is therefore likely that initiatives dealing with issues of immigrant marginalization and rising feelings of prejudice and mistrust toward the Muslim population, issues of integration, de-radicalization and reaching vulnerable youths that may be drawn to terrorist recruiters have be of particular importance in the British policy.

8 Conclusion

The threat from international terrorism that is transcending national borders, have showed that internal and external security challenges are now more interconnected than ever before. Its transnational nature, in terms of organizational, financial and security aspects, has since the attacks on World Trade Center on 11 September 2001 emphasized the need for a common counter-terrorism strategy within the European Union. A framework for counter-terrorism has progressively developed, which in 2005 took the format of four key pillars – Prevent, Protect, Pursue and Respond. These pillars include a wide range of measures and initiatives that the member states are expected to institutionalize in their national counter-terrorism frameworks. However, due to the sensitive nature of security issues as well as competing national strategic cultures within the EU, establishing common strategies and policies has been a complicated process. One of the challenges has been a deficit of member state compliance concerning directives from the EU, which have served to undermine the construction of common foreign and defense policies within the Union.

Previously, studies of compliance have been grounded in the positivistic school of thought, where models of rational theory and the language of variables and hypotheses have dominated the choice of methodology. However, the analysis of the national counter-terrorism policies of Germany, Sweden and the United Kingdom show that traditional compliance theories, with the exception of the goodness of fit-theory, have difficulty explaining the compliance pattern of the EU's counter-terrorism strategy in these three countries. For example both theories concerning political systems and administrative capacities have trouble explaining Germany's top-ranking position with regards to compliance towards the EU's counter-terrorism strategy. Equally, the theory of discretionary power struggles with the clarification of the lower compliance scores regarding measures related to the Prevent and Response pillar that apply for all three countries.

However, the normative aspects of national strategic cultures, crucial to a state's perceptions of security, invite a perspective of social constructionism. National constructs of ideas, beliefs and identities have proved to play an important role in the willingness and abilities of member states to comply with the EU's counter-terrorism strategy. While all three countries have a high level of compliance towards the European counter-terrorism strategy, this study shows that cultural differences have created different perceptions of the terrorism threat which consequently have manifested differently in the strategic policies of Germany, Sweden and the UK.

In conclusion, despite cultural differences, Germany, Sweden and the UK all manage to achieve a relatively high level of compliance with regards to the

implementation of the European counter-terrorism strategy. These results therefore seem to suggest that at least in the field of counter-terrorism, security priorities have started to align within the EU, which in itself constitutes an important step towards the establishment of a common European security culture. Nonetheless, theories on national strategic cultures constitute an important building block in the contextual understanding of strategy formation and compliance with regards to issues of security in the EU. Further research concerning this area would benefit from the study of issues related to compliance and strategic behavior. The future development of a common European Security and Defense policy as part of a continuing focus on an emerging European strategic culture could thus be of particular relevance for coming research.

9 Executive Summary

International terrorism is perceived today as one of the most serious threats against the security of member states in the European Union. The transnational impact of recent years' terrorist activities in Europe in terms of organization, communication and financial aspects of terrorism, as well as in terms of victims and material- and financial damages from executed attacks, have drawn attention to the interdependency of European countries in the fight against international terrorism. Since the attack on World Trade Center on 11 September 2001, a common counter-terrorism framework has been progressively developed within the EU. An official strategy to combat international terrorism was introduced in 2005 and is composed of four key pillars – Prevent, Protect, Pursue and Respond. These pillars include a wide range of measures and instruments that are meant to be implemented in the member states of the EU. However, member state compliance regarding implementation of the common counter-terrorism framework has been problematic in the past as member states sometimes failed or chose not to implement EU directives, particularly in the area of law enforcement cooperation.

The area of security still constitutes a defining feature of a state's foreign policy and is strongly associated with notions of state identity and sovereignty. The idea of the Westphalian state still remains as the frame of reference for international interaction and the protection of one's population so remains at the centre of the state's *raison d'être* with regards to strategy formation. Strategic decisions are informed by perceptions of interests, norms and beliefs that are rooted in a state's relationship with neighbors, experiences of war and peace as well as its internal structures, which all serve to form a state's national strategic culture. Unwillingness to surrender control over their own security policies and conflicting strategic cultures among the member states have therefore afforded the EU few authoritative powers in enforcing the counter-terrorism strategy other than through the incorporation of cooperative instruments and regulations.

This study therefore aims to answer the question of to what extent member states have complied with the EU's counter-terrorism strategy in their national counter-terrorism policies. Its second aim is to investigate how the different national strategic cultures of Germany, Sweden and the United Kingdom have affected these three countries' level of compliance towards implementing the European counter-terrorism strategy. The majority of earlier studies of compliance within the EU have been focused around EU legislation and directives connected to the development of the internal market and have mainly generated positivistic theories revolving around the behavior of rational actors. However, social constructivist notions of ideas, normative structures and the role of identity play an important role in the shaping of strategic decision-making. As this dimension has until now largely been absent from the field of compliance,

this study intends to add this perspective to the research field in order to provide a contextual understanding of the strategic choices made by states in relation to threats to security.

The study of member state compliance regarding the EU's counter-terrorism strategy is done through the small comparative case study method, which allows a deep, systematic comparison of the characteristics of each state's counter-terrorism strategy while incorporating contextual factors into the analysis. Based on the diverse case method, Germany, Sweden and the UK were selected as cases as they all represent three different national strategic cultures with potentially different policy framework that could interfere with their abilities or willingness to comply with regards to the implementation of the European counter-terrorism strategy. Data collected from national and organizational security documents about the national counter-terrorism policies is examined using the framework of four key pillars of the European counter-terrorism strategy as an instrument for analysis. These pillars constitute the values and priorities within the EU with regards to counter-terrorism and consequently serve as an instrument of measurement not only for member state compliance towards the European counter-terrorism strategy but for values and priorities within the member states themselves, which is expressed through their national strategic cultures.

Indeed, the analysis of the study's results showed that national constructs of ideas, beliefs and identities do play an important role in the establishment of pre-existing conditions that have significance for member state compliance. The results showed that compliance toward the EU's counter-terrorism strategy was medium or high for all three cases in all but one instance, where Germany showed a low level of compliance under the pillar Prevent. Besides the lack of preventive measures in the German counter-terrorism policy, Germany has been the most compliant out of the three countries in the implementation of the pillars Protect, Pursue and Respond, while concentrating the majority of measures around 'hard' objectives connected to the protection of infrastructure and the pursuit of terrorists. Germany's high level of compliance is consistent with the German profile in the international community; where after the Second World War, Germany became a strong supporter of multilateral cooperation. Today, Germany is a strong advocator for regulating military force and thus engages actively in the EU and NATO. Also, Germany's forceful approach regarding international terrorism shows similarities with historic confrontations with the Red Army Faction (RAF) late in the 1960's up until the 1990's, where tough measures like the *Rasterfahndung* were introduced, which were criticized for violating civil rights.

Sweden and the UK showed a medium to high level of compliance across all four pillars of the EU's counter-terrorism strategy. Having the least comprehensive counter-terrorism strategy of the three cases, Sweden has mainly invested in protective measures aimed to strengthen transport and border security as well as in measures that serve to strengthen law enforcement capacities. With some investments under the Prevent pillar and a weak prioritization of response measures, Sweden seems to have chosen a proactive approach to counter-terrorism. A lacking experience of terrorism in the past serves to explain the

limited scope in Sweden's counter-terrorism policy, particularly with regards to the relatively thin emergency response system that is activated in the event of a terrorist attack. Sweden's high level of compliance however may still be ensured through the ongoing Swedish defense reforms, where the security discourse has been progressively altered towards the view that security can only be attained through the collaboration with other states. This has led to an increased Swedish presence in international security operations in cooperation with other countries and has increasingly given Sweden a more prominent role in multilateral security collaborations. Today, Sweden is a driving force in the development of ESDP within the EU and actively engages in NATO through the agreement on Partnership for peace.

Meanwhile, in its comprehensiveness, the UK's counter-terrorism policy may be considered to constitute the opposite of Sweden's policy. The UK's policy measures are evenly distributed across all four pillars, where some are particularly resource-demanding, which serve demonstrate the importance of counter-terrorism in the UK's security policy. Having experienced the devastating consequences of terrorism during the protracted Northern Ireland conflict, the UK have, like Germany, adopted normative structures that have developed a strong, durable and protective shield towards the threat from terrorism. Committees, analysis centers and counter-terrorism units are now a part of the British counter-terrorism framework and programs and exercises dealing with emergency response processes, interoperability, risk assessments and issues of radicalization are completed regularly in the UK today. Compliance towards the EU's counter-terrorism strategy is particularly high regarding preventive and protective measures in the British policy, with particularly the cluster of measures under the softest pillar separates the UK significantly from Germany's counter-terrorism policy. The emphasis on prevention also implies that the UK view terrorism as a human activity with the implication that counter-terrorism also needs to be conducted through contact with people. This adds another dimension to British counter-terrorism not present to the same extent in Sweden's and especially not Germany's national policies. The attacks in London on 7 July 2005 by four British citizens, born and raised in the UK likely served as a powerful reminder that home-grown terrorism is still a significant threat to security in the UK. Initiatives dealing with issues of integration, radicalization and prejudice against the Muslim population may therefore be of particular importance in the British counter-terrorism policy.

In conclusion, despite different national strategic cultures and different counter-terrorism priorities, Germany, Sweden and the UK all manage to achieve a relatively high level of compliance with regards to the implementation of the European counter-terrorism strategy. These results therefore seem to suggest that at least in the field of counter-terrorism, security priorities have started to align within the EU, which in itself constitutes an important step towards the establishment of a common European security culture. Furthermore, social constructivist concepts of culture, norms and identity add an important dimension to the theoretical field of compliance, as rationally modeled theories of compliance do not serve as sufficient explanations for strategy formation in

regards to security related issues. Forthcoming research concerning this area would benefit from the study of issues related to compliance and strategic behavior with regards to the development of a common European Security and Defense policy and as part of a continuing focus on an emerging European strategic culture.

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