

Destruction or Protection?

A discursive institutionalist study of the ideas behind the
different responses to the Minimum wage directive in
Sweden and Finland

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Abstract

This study seeks to understand and explain why Sweden and Finland voted differently in the Council of the European Union on the proposal of a minimum wage directive. The two countries share a labor market system, based in collective bargaining and important roles for trade unions and employer organizations, without a legally set minimum wage. At the time, the two countries had ideologically similar governments, with Prime Ministers from the same party. Moreover, they joined the EU together and before that shared a neutral position between the great powers. Materially, their interests should be similar, and from traditional explanations of government preferences they are expected to act similarly. However, they did not. To understand why this is the case I use the theoretical framework of Discursive Institutionalism and through a Qualitative Content Analysis examine how different ideas were expressed by the governments and key interest organization in the two countries. Notably, the two governments make widely different interpretations of the proposal on minimum wages as do the trade unions. Sweden's government and trade unions express the idea that a minimum wage directive would destroy the Swedish labor market model, while their Finnish counterparts welcome the Commission's initiative. The study finds that there are different dominating ideas on European integration in the two countries, and that these ideas take form in different interpretations of the proposal and thus different action in the Council.

Keywords: Sweden, Finland, Minimum wage directive, Discursive institutionalism, ideas, discourse

Innehållsförteckning

Abstract	2
Introduction	4
Aim	6
Research Question	6
Disposition	6
Literature Review: Government preferences and Swedish and Finnish ideas on the European Union	6
Traditional Explanations of Government Preferences in the European Union	6
Collective bargaining in Sweden and Finland	8
Finland and the European Union: ideas, preferences, and action	9
Sweden and the European Union: ideas, preference, and action	11
Theoretical framework: Discursive institutionalism and the study of ideas	13
The interactive side of discourse – Discourse in discursive institutionalism	17
Methodology: Operationalizing Discursive Institutionalism	19
Case Selection	21
Material	23
Results and Analysis	25
Narratives	27
Negative Narratives	27
Fear of the Court of Justice.....	27
The Commission goes beyond the Treaty.....	29
Both Good and Bad: The Ends do not Justify the Means.....	32
A minimum wage is bad for profit	34
Analysis	35
Positive Narratives	38
There is nothing to worry about: The Nordic Model Protected	38
Analysis	40
Discussion	42
Which different ideas are expressed?	42
Conclusion	44
Future Research	47
References	48

Introduction

Scholarly literature dealing with governmental preferences and behavior in the European Union tend to examine correlations between government ideology, geographical location, party ideology, integration preference, voter preference (Aspinwall 2002: 2006; Hooghe et al. 2004; Steenbergen et al 2007; Gabel & Hix 2004). As well, research on coalitions in the Council of the European Union find that they are primarily geographically structured, while disagreeing on how locked-in the coalitions are (Zimmer et al 2004; Elgström et al 2001). According to these findings, we would expect similar countries to take the same positions. This study concerns a case where this does not seem to be the case. In 2022, Sweden and Finland voted differently in the Council regarding the European Commission's proposal on adequate minimum wages (Council of the European Union, 2023). Despite being closely geographically located, sharing a similar party system structure (Leruth 2014 p. 14). At the time, both had social democratic Prime Ministers leading a centrist coalition, with two populations sharing the same level of positivity towards the European Union, among the highest in the entire Union (Eurobarometer 2023).

Other than sharing governments of the same ideology, Sweden and Finland joined the European Union together in 1995. They are two Nordic countries which share similar welfare systems. The party landscape in the two countries also share significant differences. Even though the sizes of parties have varied, both countries have historically shared three large parties, namely social democrats, Conservatives (the Moderates in Sweden and National Coalition in Finland), and an agrarian party called Center Party in both countries (Leruth 2014 p. 14-15). More recently the dynamics have changed somewhat and since their respective last election, a radical right party has established itself as one of the three large parties in both Sweden and Finland (Valmyndigheten 2023; Statistics Finland 2023). Most importantly for this study, however, is that both Finland and Sweden share what is called the Nordic labor market model. This model builds on collective bargaining between trade unions and business organizations to determine wages and other conditions for the work force. Both countries rarely see strikes, and governments tend to be careful when legislating about the labor market (Ahlberg 2017; Kjellberg 2019). Instead, the labor markets are characterized by self-governance through the negotiations of the trade unions and businesses. Thus, the traditional ways of explaining governmental actions in the EU does not explain this case. To study why Sweden and Finland acted differently, I turn to the ideas about European integration in the two countries.

That different ideas are present in Sweden and Finland's interpretation and preference on the EU can be seen by comparing previous research on the two countries' actions within the European cooperation. First, different reasons for becoming members of the EU have been identified by scholars. For Finland, it is argued that the decision to apply for membership stems, among other things, from a will to belong to the Western political community after a long period of balancing their western political system with the influence of the neighboring Soviet Union (Arter 1995 p. 362; Tiilikainen 1998 p. 112). Others, for example Leruth (2014 p. 46), argue that the Swedish decision had a significant effect on Finland's decision to apply. Studies on Sweden, on the other hand, emphasize the economic crisis in the early 1990s as the turning point, with the application for membership being presented in the program for handling the economic crisis (Stegmann McCallion 2017 p. 61). Differences in ideas can also be traced through accounts of different actions in response to EU initiatives.

Ideas can be used as explanatory variables in cases where the material factors cannot (Beland & Cox 2010 p. 5; Schmidt 2008). If the material factors are the same, or similar enough, in both countries it must be the interpretation of these material factors that differ. These interpretations of the material world are the ideas which then shape what an actor can see as possible and through which they evaluate the effects of something. To study ideas is complicated, we cannot insert ourselves into the minds of actors we wish to study. However, we can study the way actors express themselves. When using arguments, actors formulate their ideas in words to shape how other actors interpret the material factors of the world. Thus, through a content analysis of outputs from different actors in Sweden and Finland, I study which ideas about European integration are expressed in reference to the minimum wage directive, which actors formulate which ideas, and which actors share the same ideas. In an attempt to label scholars studying ideas, Vivian Schmidt (2008) has used the term Discursive institutionalism. Discursive institutionalists argue that political actors are thinking agents capable of interpreting the material reality around them, and that these interpretations steer action as well as contribute to re-constituting the material reality.

In this study, I study ideas as an explanatory variable to see how different ideas affected the debate between policy actors in the two countries, which actors subscribed to which ideas, and whether there was a domination of one idea, or whether several ideas were expressed in both countries. The comparison between Finland and Sweden contributes to understanding how interpretations affect actor's preferences, as well as how the role of European institutions is characterized in different countries. By understanding the effect of variations in ideas between otherwise similar

countries we can better understand why countries act in specific ways. As well, this study contributes to the theoretical scholarship on ideas, by providing another empirical example of how ideas are articulated and influencing the politics of the European Union.

Aim

With this thesis, I aim to explain differences between Finland and Sweden when it comes to ideas on European integration, and how these ideas are expressed through arguments used in connection to the minimum wage directive. As well, the aim of the study is to contribute to the scholarship about ideas as explanatory variables, by showing that actors' interpretations of a political proposal can vary despite very similar material realities, and that this interpretation determines how a government acts in the European Union.

Research Question

Based on the above, and to make the aim more concrete, the following research questions guide the rest of the study: *Which different ideas expressed in the debate on the minimum wage directive in Sweden and Finland? How do similar actors in the two countries differ in their argumentation connected to the directive? Is there one dominating idea or a battle between several ideas in the debates in the two countries?*

Disposition

The remainder of this study is structured as follows. First, a review of literature on preference formation takes place, then a review of Finland and Sweden's respective ideas, preferences, and action in the EU is done. From that point, I argue that there is a need to empirically study ideas to find out why they vote differently on the minimum wage directive. I set out a theoretical framework to do this, operationalize it and discuss the selection of actors and material. Then, I report the results from the analysis and connect it back to the literature review. Finally, I discuss the different ideas.

Literature Review: Government preferences and Swedish and Finnish ideas on the European Union

Traditional Explanations of Government Preferences in the European Union

Aspinwall (2002) has researched how governments decide their preferences on European Integration. He finds no evidence for the claim that different preferences are based on nationality. Instead, party ideology and government ideology contribute to the different position

governments take on European Integration (Aspinwall 2002 p. 82). Furthermore, Aspinwall found that the more centrist a government is, the more positive it should be toward integration. Both left-wing and right-wing parties tend to be more critical of integration than centrist parties, countries with consistent centrist governments therefore tend to be the fondest of integration (Aspinwall 2002 p. 84). Hooghe et al (2004) also find that the left-right dimension is an explanation to government action in the Council. Moreover, their study find that the GAL/TAN dimension of politics powerfully structure the responses (Hooghe et al. 2004). In a later study, Aspinwall (2006) finds that besides position on the left-right scale of ideology a country's position as net spender or net receiver of EU funds determines government's positions in the Council of ministers.

What Aspinwall (2002; 2006) shows is that preference formation in the Council is not dependent on one factor. Likewise, Zimmer et al (2004 p. 417) find that the strongest correlation is between northern and southern European countries, especially when the geographical divide corresponds to the division of net-contributors and net-receivers of EU funds. That is, northern member states vote together, and southern member states vote together. However, Zimmer and her colleagues (2004) point out that the coalitions formed in the council are by no means consistent. On the contrary, Elgström et al (2001 p. 123) argue that for Sweden, coalitions seem to follow the north-south logic consistently. Through a questionnaire the authors received responses indicating that Sweden, at the time, cooperated closely with its Nordic neighbors and the UK, and very rarely with France and Spain (Elgström et al 2001).

A study of Finland, Sweden and Norway, and their differentiated approaches to integration, Leruth (2014) examined party and government positions on application for EU membership, participation in the Schengen area, participation in the European Economic Area, full participation in the Economic and Monetary Union, and finally, participation in the European Battle Groups. Leruth's selection of cases together amounts to a picture of the degree of integration for each respective country. After analyzing the different cases, the result was that domestic political situations affected the countries' positions on European integration. Moreover, the results go against the findings by Aspinwall, mentioned earlier, that centrist governments would favor integration, for the Nordic countries this does not seem to be the case (Leruth 2014).

Following studies of government preferences and coalition building, we would expect Sweden and Finland to take the same position. With Aspinwall's (2002; 2006) results in mind, this

should especially be the case when both countries share governments with the same ideological heritage, which was the case during the legislative process of the minimum wage directive. At the time, both countries had coalition governments led by social democratic Prime ministers. In Sweden, it was a social democratic and green party coalition, while Finland was governed by a coalition of social democrats, Centre party, green party, left party, and the Swedish people's party. Although they were not part of the government, Sweden's government was reliant on an agreement with the Centre party and liberal party, meaning that the coalitions in both countries could best be described as centrist. Neither ideology nor coalition patterns can therefore be expected to explain the different positions taken in this case. Something else must be the reason for the specific outcome. In the following section, I turn to scholarship examining another possible variable which can be used to study this type of case, namely, ideas.

Collective bargaining in Sweden and Finland

Both Sweden and Finland have strong corporatist traditions (Ojanen & Raunio 2017 p. 40; Leruth 2014 p. 15-16). Especially in areas concerning labor market policies, where trade unions and employer organizations take responsibility for much of the governance. Both countries rely on collective agreements between the labor market actors. However, there are some slight differences in the two models. Finland uses a model of generally applicable collective agreements (Ahlberg 2017 p. 18), while Sweden does not (Ahlberg 2017 p. 16). This means that following negotiations between trade unions and employers an agreement in Finland is applicable for all workers if it reaches certain conditions (Ahlberg 2017 p. 19). In practice the entire labor market in Finland is organized by such generally applicable agreements. Sweden uses another model, where an agreement between a trade union and employer organization is applicable to all workers in a specific sector, but only organized workers can invoke the rights in the collective agreement through the unions (Kjellberg 2019 p. 590).

Common for the two models is the freedom for the labor market actors, the trade unions and the employer organizations. Unlike other countries with generally applicable agreements the Finnish actors have large freedom to negotiate with each other (Ahlberg 2017 p. 19). When an agreement is reached, a special committee confirms that the agreement is generally applicable, but the committee has no part in the negotiation (Ahlberg 2017 p. 19-20). Neither is the interpretation of the agreement a question for the committee, rather it is the trade unions and employers who interpret the agreement (Ahlberg 2017 p. 24). Likewise, in Sweden, differing interpretations of the meaning of an agreement is settled by negotiations between trade union and employer. If they continue to disagree it can be brought to court (Kjellberg 2019 p. 590).

Thus, despite some differences, the situation for trade unions and employer organizations are similar in Sweden and Finland. They are responsible for negotiating and interpreting collective agreements, in self-regulatory systems with little room for politicians to meddle. With these similarities in mind, it could be expected that the actors on the labor market would interpret a directive on minimum wages in the EU the same way. From the material conditions, it is difficult to see how they can determine different actions. As mentioned in the previous section, it is needed to take ideas into account, and how they shape the different interpretations of the directive's effect the respective labor market.

Finland and the European Union: ideas, preferences, and action

Finland quickly became the model pupil after joining the EU, especially compared to Sweden who entered the cooperation at the same time (Jungar 2002 p. 397, Ojanen & Raupio 2017 p. 38). The Finnish view on the European Union was that supranational solutions could help solve cross-border issues (Jungar 2002 p. 398). In the lead up to the decision to apply for EU membership, Finland suffered from an economic crisis (Arter 1995 p. 362; Aylott et al. 2013 p. 94). For Finland, the early 1990s also meant a new position following the fall of the Soviet Union. After decades of balancing their geographical location bordering the east with a western economic system, Finland's national identity could suddenly be reformulated (Tiilikainen 1998 159-160; Aylott et al. 2013 p. 94). The decision to join the EU, both from the government's perspective and for the people who voted in favor in the referendum, built on a will to belong to the West (Arter 1995 p. 383). However, aspects of identity were not unquestioned in the debate surrounding membership. Military neutrality, economic ties to Russia, and worries that a Finnish membership would isolate Russia were all arguments against a membership (Arter 1995 p. 379-380). At the same time, the economic situation (Ojanen & Raunio 2017 p. 39) together with a Swedish intention to apply for membership played a part in initiating a European debate in Finland (Tiilikainen 1998 p. 159; Leruth 2014 p. 46). In the end, the preference of young people, inhabitants in urban areas as well as people with high education for becoming a part of the EU, tilted the referendum to accept the accession agreement (Arter 1995 p. 380).

In the beginning, the decision to apply for membership was elite driven, with then-president Koivisto speaking in favor of membership in late 1992 (Tiilikainen 1998 p. 159). According to Tiilikainen (1998 p. 164), accession to the European Union not only happened because of a reconstruction of the Finnish identity in foreign policy but has also played a significant part in establishing this new identity as the dominating image of Finland. Before the fall of the Soviet

Union, the EU was viewed as a Western project in Finland, thus making it impossible to participate in the cooperation without abandoning the principle of neutrality between superpowers. As the Soviet Union collapsed, and the EU moved towards Eastern enlargements, it became a viable option for the Finns, without completely derailing the neutrality. Writing in 1998 (p.176), Tiilikainen raises the question of what kind of member Finland will turn out to be, arguing that the country does not have a clear ideological commitment to integration. At the time, the arena for creation of new political ideas was open, and Finland's trajectory within the Union uncertain and open for competition. Returning to the question more than 20 years later, Tiilikainen (2020 p. 6) finds that Finland have adhered to the community model and trusted the European institutions like the Commission, Parliament, and Court of Justice with key roles. This has meant the Finland during its membership in the EU have shown themselves to be prepared to further integrate the European Cooperation (Tiilikainen 2020 p. 6). Which Jungar (2002 p. 398) pointed out early into Finland's membership.

Like many other countries, Finland saw the rise of a radical right/populist nationalist party in the early 2010s, The Finns Party. The party is the most euro-skeptical party in Finland, much like its counterparts around Europe. However, its fellow parties have not had the same influence as the Finns Party (Aylott et al. 2013 p. 100). During the euro-crisis following the financial crisis in 2008, euro-skeptical views grew stronger in Finland (Tiilikainen 2020 p. 11; Aylott et al. 2013 p.117). Of course, the Finn Party was at the forefront of criticism, however, the Social Democrats then in opposition followed suit and criticized the government's support for bailouts. Thus, in the early 2010s the previous consensus on European issues was shattered (Aylott et al. 2013 p. 117; Tiilikainen 2020 p.11). However, in recent years, following the Finns party's position in a government coalition, their Euroscepticism has diminished, and a consensus has returned to Finnish EU-politics (Tiilikainen 2020 p. 11-12). Unlike other European social democratic parties, for example the Swedish, Finland's social democratic party held a rather positive view on European Integration early in the membership process (Raunio 2010 p. 205). In the referendum 75 percent of its voters voted in favor of EU membership, and then-party leader Paavo Lipponen was one of the first Finnish politicians who spoke out in favor of integration in the late 1980s (Raunio 2010 p. 198). Lipponen's personal interest in European cooperation is seen as an important reason for Finland's membership (Raunio 2010 p. 198-199). As well, Arter (1995 p. 362) called the Finnish social democratic party "the most pro-European of all the Nordic social democratic-labor parties". In contrast to Lipponen's genuine interest in integration and positive view on membership. Sweden's social democratic prime minister at the

time, Ingvar Carlsson, is by Arter (1995 p. 382) said to have taken a panic measure when applying for membership in the European Union. Overall, the Finnish social democrats have been significantly more positive towards European integration than their Swedish counterpart (Leruth 2014 p. 181-182). The different attitudes between the two social democratic parties matter for this study, since they were both the leading government party at the time of discussion on the minimum wage directive. From this difference, it can be expected that there is some difference in ideas between corresponding actors in Sweden and Finland.

Finland's history of coalition governments and bloc-less politics have been used as an explanation for the country's positive view on integration and the absence of concrete opposition to the EU (Raunio 2010 p. 190-192). This is supported by Tiilikainen (2020 p. 11-12) who points out the True Finns party, a Eurosceptic right-wing party, toned down their Euroscepticism to take positions in a coalition with already established right wing parties. All parties in parliament have their sights on cabinet seats, meaning that issues such as the EU become issues of administration rather than an ideological battle between the market and the welfare state. At the same time, Finland's leading politicians, especially in the Social Democratic Party have stressed that there is no conflict between a welfare state and European integration. Rather, market regulation, employment, and environment issues are said to be best solved at the international level, together with the other member states, through further integration of such issues (Raunio 2010 p. 200-202). Key interest groups play an important role in Finnish policymaking, especially the corporatist actors, that is, trade unions and employer's organizations (Ojanen & Raunio 2017 p. 40).

Sweden and the European Union: ideas, preference, and action

Sweden's decision to apply for membership in the European Union was framed as a step in the economic recovery plan in the early 1990s (Stegmann McCallion 2017 p. 61; Johansson 2003 p. 369; Aylott 2008 p. 188). Possibly in an attempt to make it less controversial, it was put forward as an economic rather than a political decision (Stegmann McCallion 2017 p. 61). In contrast to Finland's decision to apply for membership, Sweden's application has been deemed a panic move in times of financial crisis (Arter 1995 p. 382). As well, the referendum on accession to the EU was planned to immediately follow a parliamentary election, in order to keep the issue out of the national campaign (Aylott et al. 2013 p. 156). The framing of membership as an economic solution contributes to Swedish reluctance of integration other policy areas. For Sweden, the EU is first and foremost an economic project to stimulate trade

and growth across Europe (Stegmann McCallion 2017 p. 60). Nevertheless, there was a significant debate surrounding the referendum (Twaddle 1997), in which support for membership only won by a small margin. Issues such as economic growth, environmental protection, worker's rights, and social welfare were debated from opposite sides. For those in favor of an EU membership, the argument surrounding the welfare state was that the Swedish model would be an inspiration for other members, and that the economic growth that comes from membership would help sustain an extensive welfare sector (Twaddle 1997 p. 191-195).

As mentioned, the referendum resulted in a small margin in favor of membership. Thus, a high level of Euroscepticism was present in Sweden at the time, even within parties, something that continued even after the accession (Aylott 2008 p. 181-182). The social democrats, the center party, the left, the Christian democrats, and the greens, all had organized forms of Euroscepticism within the parties, contradicting many of their European ideological counterparts. For most of these groups, the idea of European integration would interfere with the domestic popular rule by moving issues to the European arena (Aylott 2008 p. 197). Aylott (2008 p. 190-191) distinguishes between hard and soft Euroscepticism, where hard entails an opposition to membership altogether, while soft Euroscepticism is opposition to specific policy areas in the EU. During the first years of Swedish membership, both types were present as Sweden's population was characterized as Eurosceptic. In fact, at one point, Sweden had the most Eurosceptic population in the European Union (Johansson 2003 p. 370). Today, support for membership of the European Union is at all time high levels among the Swedish public (Weissenbilder & Andersson 2020 p. 6). However, when asked whether for example foreign policy should be coordinated within the EU to a higher degree, and if Sweden should work towards a United States of Europe, public support is significantly lower (Weissenbilder & Andersson 2020 p. 6; Johansson & Von Sydow 2018 p. 396). In the Swedish public, there is support for the membership, but not for further integration and supranational aspects of the EU, for example the single currency (Johansson & Von Sydow p. 396). To use Aylott's (2008) terminology a soft Euroscepticism is still present in Sweden, particularly a skepticism of further integrating more policy areas.

As a way of furthering the European cooperation while appeasing domestic Eurosceptics, Göran Persson (Swedish Prime Minister 1996-2006) argued in favor of a method of cooperation where countries could cooperate but where decision-making power would still lie with the member states (Jungar 2002 p. 414). Persson wanted new policy areas to be integrated as strictly intergovernmental, while also furthering the intergovernmental processes in already existing

policy areas (Jungar 2002 p. 414). On other issues, Persson argued on principles rather than the issue at hand, Jungar (2002 p. 415) uses the example of harmonization of taxes on carbon dioxide, where Persson explained Sweden's resistance as a resistance of deciding taxes through majority-voting rather than unanimity. "It is the principle we are opposing and not the harmonization of environmental taxes. That we can do in unanimity" Persson said at the time (Jungar 2002 p. 415).

This chapter has served to establish what previous research on government preferences would lead us to expect. Then, the respective approaches to the EU in Finland and Sweden have been presented. Through this presentation, we can see that the two countries have had different views on integration since the 1990s. Despite being similar countries, and despite expectations that they would take similar routes when becoming members, this has not happened. It is also clear that there have been different ideas expressed by political elites especially around the issue of supranational integration. The next section maps out how other political scientists have theorized about the study of ideas as empirical objects, and how this can help explain why Sweden and Finland act differently.

Theoretical framework: Discursive institutionalism and the study of ideas

The thesis uses discursive institutionalism to explore the ideas and discursive practices in play in Sweden and Finland. Discursive institutionalism has been called a "fourth new institutionalism" (Schmidt 2008 p. 304), supplementing the other three, rational choice, historical, and sociological institutionalism. Proponents of discursive institutionalism argue that the three old new institutionalisms lack explanatory power in change, as well as ignoring the power of ideas and discourse in maintaining continuity (Schmidt 2008 p.314). In this section, I will discuss the main ideas of discursive institutionalism, its usefulness for this study, as well as contrasting it to rational choice, historical, and sociological institutionalism. The theoretical idea of discursive institutionalism was set out by Vivian A. Schmidt, this section therefore follows Schmidt, and other scholars studying ideas, while also discussing the theory's relevance for this study.

Turning to discursive institutionalism allows us to study change and continuity through the ideas and discourses used by the political actors (Schmidt 2010 p. 5). A common trait among scholars in the discursive institutionalist tradition is to study ideas as constitutive of political

action, and construction of political interests and values (Schmidt 2010 p. 2). One scholar within the discursive institutional tradition, is Mark Blyth (2002 ch.2) who sets out five hypotheses about how ideas are connected to institutions. Working from an economic starting point, Blyth (2002 p. 35), theorizes that it is ideas rather than institutions that reduces uncertainty in times of economic crises. The second hypothesis is that ideas allow for coalition-building and collective action (Blyth 2002 p. 37). Third, ideas are used as weapons in the struggle over how to build institutions (Blyth 2002 p. 39). As the struggle continues, and an existing institution is dismantled, it is ideas that form the blueprint the building of a new institution (Blyth 2002 p. 40). Blyth's (2002 p. 41) final hypothesis states that once a new institution has been built, ideas are the factor that make institutional stability possible. By studying two different cases, Sweden, and the United States, (Blyth 2002 p. 263) show that the two countries have undergone similar institutional change at the same time, despite very different material situations. Ideas, Blyth (2002 p. 275) argues, are important because they can tell actors what future to construct, something that power, money, and self-interest cannot. Moreover, ideas are fundamental for actors when making sense of an uncertainty and the construction of action to combat such uncertainty (Blyth 2002 p. 275).

Many political scientists have been interested in studying ideas as independent variables affecting an outcome. Parsons (2003) argue that the EU as we know it today is the result of a certain idea, which Parsons (2003 p. 1) call "the community model". Through a study of French politics, Parsons find that several ideas were competing as solutions to structural problems, and that the idea of the community model repeatedly won. This idea was then institutionalized in France, preventing even its harshest critics from changing it when they eventually came into power. The details of France European integration are far beyond the scope of this thesis; however, throughout the book, the argument is that ideas are independent variables which shape the outcome, and that looking only for material, historical, cultural factors, does not give sufficient explanations (Parsons 2003). Another example of a study, using ideas as an explanatory factor is Kathleen McNamara's study of the European Monetary Union, in which she argues that interests are not given by the external world, but rather of our interpretation of the external world (McNamara 2006 p. 819-820). Ideas are the result of the interpretation of the world, and shapes how an actor think the world works how they should act within the world (McNamara 2006 p 820). However, like Parsons and Blyth, McNamara does not reject the existence of an outside, or real world. Instead, material conditions are taken to exist, but it is

the interaction between these conditions and policy actors beliefs and social interactions which determines the actors actions (McNamara 2006 p. 820).

Explanation through ideational analysis builds a framework for this thesis. By treating ideas as possible objects of study, the empirical possibility of political science broadens (Beland & Cox 2010 p. 5). It allows us to study how coalitions form between actors with different material interests, why actors act opposed to their material interests (Beland & Cox 2010 p. 5), or as in this study, why actors with, assumingly, the same material interests act differently. Ideational explanations, that is using ideas as a causal mechanism, means that we assume that actors interpret situations through their ideas of the world (Parsons 2007 p. 100). Such interpretations are done through practices, norms, symbols, grammars, models, identities, and beliefs, which are held by people (Parsons 2007 p. 99: 100: 130). To distinguish ideational from institutional thinking, Parsons (2007 p. 99) argue that institutionalist see ambiguities at the start of their arguments, while ideationalists see ambiguities throughout. When using ideas as an explanatory factor, it is an actor's interpretation of a given situation that matters, rather than the external situation in itself. Instead of being restrained by man-made institutions, actors are restrained by their own interpretation, which also affects the available actions to perform. For this study, it means that it is not the organization of the labor market in itself which structure the response to the minimum wage directive, if it were the corresponding actors in Sweden in Finland should hold the same opinion. Rather, it must be each actor's interpretation of the directive that determines their positioning, ultimately explaining the differences in outcome.

As well, in comparing cases in which material factors, historical factors, and cultural factors are similar, or even the same, discursive institutionalism is useful to examine underlying ideas and discourses surrounding the cases (Beland & Cox 2010 p. 5). As mentioned above, this thesis aims to compare two such cases, Sweden and Finland, where the three old new institutionalisms would expect the same outcome, but where in reality the outcome was different. Discursive institutionalism offers another way of conceiving institutions compared to the three other institutionalisms (Schmidt 2008). While all three of rational choice, historical and sociological institutionalism treat institutions as given, with actors following a rule-based logic, albeit different rules dominate the analysis of the theories (Schmidt 2008 p. 314). Discursive institutionalism on the other hand considers institutions to be given as the context in which actors speak, act and think, but at the same time the result of agent's thoughts, words, and actions (Schmidt 2008 p. 314). For Schmidt (2008 p. 314) this leaves the three older

institutionalisms with “unthinking actors” making it difficult to account for actions as a result of an agent rather than the institutional rules.

Contrary to some criticism commonly directed at discourse theorists, discursive institutionalism does not ignore material factors, however it distinguishes the material reality from material interests (Schmidt 2008 p. 318). Within discursive institutionalism material reality is the context which actors conceive their ideas (Schmidt 2008 p. 318). In regard to institutions, they are real as constitutive of interests, and cause for action, while not being physical objects (Schmidt 2008 p. 318). Due to its broad formulation, discursive institutionalism serves as an umbrella term for political scientists who analyses ideas and the interactive way that ideas are exchanged through discourse (Schmidt 2010 p. 4).

As seen above, discursive institutionalism both go against the other institutionalisms, but at the same time can be used in conjunction with them. In the following, discursive institutionalism will be compared to rational choice, historical, and sociological institutionalism, to show the differences which make discursive institutionalism suitable for this study. While there are scholars within the discursive tradition whose work is closely related to rational choice institutionalism, many of the fundamental assumptions differ between the two. Mainly, the rational choice institutionalist framework sees actors as bound by their material interests, and that there is a calculable way to maximize these interests (Hindmoor & Taylor 2018 p. 39-40; Schmidt 2010). These interests are given by the rules of the game, and not subject to any (re)construction from ideas and discourse. Rational choice institutionalists accept that institutions are human creations, but that they serve to structure situations and that actors select strategies to maximize their self-interest within the structure (Lowndes 2018 p. 58). An action leading to the maximization of self-interest is reliant on the interpretation an actor makes of an objective situation (Parsons 2002 p. 51).

Second, historical institutionalism regards institutions as practices which, with time, become rule-like structures of actions and outcomes (Schmidt 2010 p. 10). These practices are created over time and sustained through path-dependencies where previous decisions frame the possibility of future decisions (Hall & Taylor 1996 p. 941; Pollack 2018 p. 111). Change, in historical institutionalism, come at critical junctures (Hall & Taylor 1996 p. 942) where an, often, exogenous shock to the institution opens the possibility to change the existing institutions (Pollack 2018 p. 111). Ideas have played a bigger role in historical institutionalism than its rational choice counterpart. Schmidt (2010 p. 11-12) argues that historical analysis can

contribute as background material for a discursive analysis, where the discursive institutionalism incorporates agency. As well, objective historical factors may very well influence the ideas held by different actors, but that does not make the claim that subjective ideas are currently influencing outcomes invalid (Parsons 2002 p. 51).

The third new institutionalism is sociological institutionalism, which has been concerned with ideas since its creation. Sociological institutionalism works from a logic of appropriateness where systems of meaning serve as boundaries for legitimate actions (Risse 2018 p. 133). That is, institutions form what individuals see as rational and steer individual action (Hall & Taylor 1996 p. 948; Schmidt 2010 p. 13). In sociological institutionalism, the constant reconstruction of institutions is of importance. While institutions shape the way actors interpret appropriate actions, actors in turn maintain the institutions by acting within them (Hall & Taylor 1996 p.). The institution, then, is the norms and cultural factors which guide an actor's view on acceptable, even rational, action. An institution, in sociological institutionalism, is not something external to the actor, as it is in rational choice institutionalism, rather an actor is embedded within the social institutions they act in (Risse 2018 p. 133).

The main difference between discursive and sociological institutionalism is that sociological institutionalism, like its rational choice and historical counterparts, regard institutions as external to actors, as a set of rules which mainly serve as constraints. It is just that sociological institutionalism regards immaterial factors like culture as an example of constraints, rather than historical decisions and rational calculations. Discursive institutionalism on the other hand, sees institutions as internal to thinking agents, serving as constraints of action, and thought, as well as constructs created and changed by the same thinking agents that they constrain (Schmidt 2010 p. 14). In that same way, Schmidt (2010 p. 14) argues that discursive institutionalist scholars go beyond sociological institutionalism by studying ideas as empirical objects in themselves, rather than just studying ideas in their cultural context. This is an important difference for this study, the difference between Finland and Sweden is not taken to be just a different cultural context, but difference in ideas through which the cultural context is interpreted.

The interactive side of discourse – Discourse in discursive institutionalism

Before moving on to an operationalization and methodological way to employ discursive institutionalism, it is useful to expand on what discourse means within the discursive institutionalist framework. As mentioned shortly above, discursive institutionalists do not

ignore the material, or real, world and the role it plays within politics (Schmidt 2008 p. 318). Instead, it takes ideas to be real objects which can be studied empirically. The way that ideas are expressed by different actors are what is termed discourse within the theoretical framework. Schmidt (2008 p. 305) takes discourse to not only be ideas in themselves, but also the context where they are expressed. A discursive institutionalist analysis thus cannot only analyze expressions or texts, but also includes who is expressing an idea, where, when, how and to whom the idea is expressed. This allows for a more holistic analysis of different actors and the way they express their ideas.

To make the term discourse more concrete, Schmidt distinguishes between different forms of discourse, for example, between coordinative and communicative discourse. These types are dependent on who is speaking to whom. In coordinative discourse, ideas are expressed between policy actors, for example between politicians, interest groups, experts and so on, to come to agreement on political issues (Schmidt 2008 p. 310). Communicative discourse, on the other hand, is directed at the public. It occurs when the policy actors engaged in coordinative discourse direct their ideas at the masses rather than at other policy actors. Many actors engage in communicative discourse, of course politicians, party employees, spin doctors, but media, activists, think-tanks, also direct their ideas at the public to create a favorable public opinion. At the same time, the public participates in the communicative discourse through grass-root organization, demonstrations, and of course, voting (Schmidt 2008 p. 310-311). Discourse can move from both top-down and bottom-up, in some cases activists articulate demands that move through the public to the political representatives who create policy in accordance with the demands. In other cases, the political actors create a “master discourse” (Schmidt 2008 p. 311) that incorporates the ideas of where an issue is, where it is going and where it should go.

For the purpose of this study, top-down communicative discourse is assumed to be more relevant than bottom-up. EU issues are not salient among the publics in the two countries studied, meaning that political elites have a lot of room to frame issues proposed on the European level. Considering that media reporting on EU politics is lacking, especially in Sweden, the narrative is often set by interest groups or politicians who have a clear agenda on certain issues. In the following methodology section, I will discuss how the study chooses the actors who are thought to participate in the creation of a dominating discourse surrounding the minimum wage directive.

Methodology: Operationalizing Discursive Institutionalism

This section outlines the methodological approach of the thesis and discusses how the research question will be answered. It follows closely from the theoretical standpoints outlined in the previous section but serves to operationalize the theory. After the methodological approach has been outlined, I discuss the material used in the study, its sources, and the reason for using them.

Unlike other variants of discourse analysis which are both theories and methods (Jørgensen & Philips 2011 p. 4), discursive institutionalism leave room for multiple methodological approaches. One example is process tracing, where discourses and ideas are studied in the context of a specific policy proposal. In the study of ideas, it is common to employ process tracing with an assumption that some variables should be “objective”, while finding that these factors does not satisfactorily explain the result, implicating a need to study the ideas that do explain the outcome (Parsons 2010 p. 135). Besides process-tracing, both quantitative and qualitative methods can be used. One example is a quantitative content analysis, which in turn can be combined with a qualitative historical analysis to ascribe meaning to the quantitative numbers (see for example Miró 2021). As well, qualitative content analysis and frame analysis have been employed as methods for studies within the discursive institutionalist framework (Crespy & Schmidt 2014). The range of different methods used in discursive institutionalist studies show that its benefits lie in the theoretical aspects. While at the same time, despite using different methods, the scholars engaged in discursive institutionalist studies look for the same things, discursive practices, and ideas as explanatory variables. Whether through mixed method approaches (Miró 2021) or fully qualitative approaches (Crespy & Schmidt 2014, Hagelund 2020).

For the analysis in this thesis, qualitative content analysis will be the analytical method. It allows for the interpretation of the discourse within the context it is produced, unlike a quantitative content analysis where discursive practices are counted and grouped together with less regard for the context in which it was produced. Since the aim of the thesis is to compare the different discourses in Sweden and Finland it is essential to examine how the contexts differ between the countries. This is done by connecting the different historical views on the EU, public opinion on the EU, as well as on further integration, party landscape discussed above with the analysis below.

Content analysis has been defined as “a family of research techniques for making systematic, credible, or valid and replicable inferences from texts and other forms of communication” (Drisko & Maschi 2015 p. 8). Drisko and Maschi (2015 p. 1-3) identify three types of content analysis; basic, interpretive, and qualitative, where the basic content analysis employs quantitative methods perform word counts and descriptive statistics. Interpretive content analysis uses summaries and interpretations to analyze content, rather than counting words. It is systematic and aims for transparency, while not assuming to be objective (Drisko & Maschi 2015 p. 3-5). The need for interpretation also stems from the fact that through content analysis we often aim to study underlying or latent messages, and not simply what is clearly expressed by the actors we study (Prior 2020 p. 544). Qualitative content analysis, according to Drisko & Maschi (2015 p. 5-6), seeks to analyze data through specific categories which can be changed and reformulated throughout the process of analysis. It involves both an inductive creation of categories and a deductive application of said categories to existing data.

In this study, I use a combination of what Drisko and Maschi (2015 p. 1-3) calls interpretive and qualitative content analysis. When approaching the data, several categories of content were created to order the data. The categories were different depending on the actor that created the document. For example, a category named “calls for political action” was present in when reading documents from policy actors like trade unions and business organizations, but not for the governments, since it would be unreasonable to expect the government to call for action by themselves. However, during the data analysis, I was open to reconfiguring the coding if needed to best capture the essence of the debate. As the analytical process developed, the coding did as well. When coding the material, I analyzed arguments against the proposal at a first stage. In later stages the arguments were analyzed deeper and grouped into categories depending on the type of criticism it constructed. For example, actors opposed to the directive both argue against the eventual involvement of the Court of Justice, that the Commissions oversteps the treaties, as well as that the directive increase costs for businesses. These different groups are presented as different narratives in the following results section.

At times, I have interpreted the meaning of arguments, and the role of some European actors that have been described in policy documents. One such case is the Court of Justice. As will be seen in the results section the Court of Justice have been at the center of arguments against the directive on minimum wages, and while the threat from the Court may not always be spelled out, I have interpreted, and coded it, as an argument that they threaten the Nordic labor model. Throughout the analysis, Schmidt’s (2008 p.305; 2010 p.15) questions of who, where, how, and

to whom an act of communication is directed are taken into account, to allow for an explanation encompassing the various interests of different actors.

When performing a qualitative content analysis, there are still decisions to make in the analytical methodological approach. Thematic analysis, narrative analysis, and frame analysis are all examples of qualitative content analysis approaches, with many similarities, but also some important differences. A thematic analysis studies the material with the objective of finding different themes expressed by different actors. These themes have to be reoccurring and are identified through a thorough reading of the material (Bryman 2016 p. 703-709). In contrast, a narrative analysis serves to find the common story told about a specific case (Bryman 2016 p. 709). Narratives are usually constructed in a way that can be likened to what Schmidt (2008 p. 311) calls a master discourse. It creates the boundaries of thinking and analyzing a specific case (Bryman 2016 p. 709-714). In politics, a narrative can create a hegemony which informs the public's understanding of what is realistic. In the analysis that follows this section, I group several arguments together which builds narratives.

Each narrative consists of several arguments which together build the narrative. The arguments are building blocks in forming an overarching narrative. Arguments are, in themselves, built on two claims which are connected in a way that forms a conclusion (Phelan & Reynolds 1996 p. 12). Using arguments to create narratives, which serve to establish accepted ways of thinking about a certain matter, is an expression of the ideas which exist in regard to a specific case. The analysis performed in the next chapter therefore serves to analyze the arguments made by actors, what narratives they build together, and what ideas are established through the narratives, and how dominant these ideas are in the respective countries. Phelan and Reynolds (1996) explain several ways of analyzing the strength of different arguments, this has not been included in my analysis. The goal of this study is to uncover the dominating ideas behind European politics in Sweden and Finland, through their responses to the minimum wage directive. Whether these ideas generate strong arguments is of secondary importance to the question of which ideas dominate the discourse used by policy actors in the different countries.

Case Selection

This study is case driven. Sweden and Finland's different votes on the minimum wage directive is the starting point of the thesis. The path leading to that decision is the case of study. Throughout writing the thesis, the case has been hanging over it, rather than serving as an example of a successful theory, the theory has been chosen to explain the case. Thus, the case

selection is what Bryman (2016 p. 498) calls an a-priori selection. Nevertheless, the choice of studying Sweden and Finland is also a most similar case design (George & Bennet 2005 p. 252). As I have argued earlier the study, the two countries are similar in many important aspects that would traditionally be assumed to form their preferences. However, in this case, they have different preferences. It is difficult to eliminate all but one difference, however, as argued in previous sections, the two cases in this study share similarities in all variables but ideas and discourse. It allows us to study a case where actors have acted differently despite being located in similar institutional contexts (Parsons 2010 p. 135). If ideas were not complex things, created separately from institutions, and not simply reflections of rational self-interest, we would expect these two cases to have the same result. Through using this case, the study makes a two-fold contribution to the field of political science, through a theoretical contribution to the field of discursive institutionalism by another case study showing how discourses and ideas affect how actors act. That is, both a theoretical contribution and an empirical contribution on the difference of two similar countries.

Narrowing it further, within each case, the thesis concerns a set of actors that can be assumed to play important roles. These actors are the two governments, and the labor market actors: unions and business organizations. Since the case of minimum wages is a case of labor market politics, unions and business organizations, which in the two countries negotiate wage levels between themselves, are assumed to be the most important interest groups. They should, in their respective role, take part in both the coordinative and communicative discourses. That is, through different acts, try to influence both the government's and the public's opinions. Both unions and business organizations have an interest in influencing the implementation of the directive, since it will impact their members as well as their power as institutions. Sweden and Finland both share a corporatist tradition, where the trade unions and employer organizations play a significant role in policy processes, especially those concerning labor markets (Ojanen & Raunio 2017 p. 40; Leruth 2014 p. 15-16). These interest groups are therefore expected to be central actors in expressing ideas about the minimum wage directive. As well as influencing the outcome. Since discourse in politics seem to go top-down (Schmidt 2008 p. 311), a focus on the policy actors captures how these actors create the way which a proposal is interpreted by the public.

The case selection follows from a qualitative comparative logic, based on the countries' similarities but their different outcomes. Following Ebbinghaus (2005 p. 134) comparing a small number of cases is beneficial for the opportunity to understand and analyze differences

between the cases. A large number of cases, commonly used in quantitative comparative approaches, decreases the depth of the study. As well, Ebbinghaus (2005 p. 135-136) argues that no matter how many cases are selected for a study, it is impossible to perform a perfectly random selection. Every case comes with different contexts, which are nearly impossible to account for in studies with a high number of cases. The logic behind choosing Sweden and Finland follows from a most similar design, where selected cases share similar factors apart from the outcome. Such a study aims to discover how the different outcomes can be explained, that is, finding the differing factor between the cases. Located in a discursive institutionalist framework, this study starts from an assumption that discourse can be the differing variable. Employing a large-N case study would impact the possibility of studying discourses in depth in a negative way.

Material

This thesis focuses on the coordinative discourses in Sweden and Finland surrounding the minimum wage directive. The coordinative discourse, that is the way policy actors talk about how legislation should be formulated (Schmidt 2008 p. 310), is studied through policy documents from the governments in Sweden and Finland. Both governments provide its parliaments with a document discussing new proposals from the Commission and the government's view on said proposal. As well, the preparations in both countries include the governments participation in discussions in parliament. In Sweden it is done in the Committee for European Affairs (EU-nämnden) and in Finland in the Grand Committee (Stora Utskottet). After every meeting in the Swedish Committee for European Affairs a word for word protocol is published on the parliament website. By analyzing these protocols one aspect of the coordinative discourse can be studied. The coordinative discourse also includes the way experts and interest groups engage with the politicians (Schmidt 2008 p. 310). To analyze this, I rely on official statements from trade unions and employer organizations. A further explanation of the documents analyzed here is provided below.

Using documents created by others, called existing data, is beneficial as it decreases the room for researcher's bias, which is a common criticism of qualitative interpretative studies (Drisko & Maschi 2015 p. 13; Prior 2020). The data in this study is not created for research purposes, but for expressing political opinions. They are thus optimal sources to gather the arguments and ideas used to interpret a legitimate response to the directive on minimum wages in both countries.

The material sources gathered for this research consists of multiple documents from actors in both countries. First, the government's analyses of the European Commission's proposal have been analyzed. Then from Swedish actors, two joint analyses from parties on the labor market LO, PTK, and the Confederation of Swedish Enterprise have been analyzed. The first analysis was published in 2020 and the second in 2021. A statement of opinion, signed by the President of LO directed at the Swedish government have also been analyzed. Moreover, an open letter from the three parties to the commission, and a letter sent by them to the members of the European Parliament is part of the analysis. The three actors LO, PTK, and the Confederation of Swedish Enterprise, represent a majority of the employees and employers in the private sector. Since they are umbrella organizations with other organizations as members, they are regarded as representing the opinions of their members. For parliamentary debates, protocols from the Committee of Labor Market Affairs in the Swedish parliament have been collected, as well as word for word protocols from the Committee of European Affairs.

Apart from the government's analysis, the positions of Finnish actors have been gathered from statement of opinions sent to the Committee for Working Life and Equality in the Finnish parliament. These documents are written by trade unions, business organizations, and academics, however, only the trade unions and business organizations have been analyzed. Several actors have provided two opinions, one in response to the initial proposal from the Commission, and a second later in the legislative process when a compromise proposal was presented to the Council of the European Union. In total, statements from ten Finnish actors have been collected, of which six actors have provided two statements. The government's analysis is published in Swedish on the Finnish parliament's website. All other documents were written in Finnish, and have therefore been translated through a translation software, posing a risk that some nuances available in the original document have been lost. However, the meaning and intentions of the documents are still visible.

For both Finland and Sweden, the material thus allows for analyzing any changes in argumentation during the legislative process and whether the argumentation have changed during the development of the proposal. The chosen documents represent the position of different actors, as well as the reasoning behind their position. In them, it is possible to find what meaning they ascribe to the proposed minimum wage directive, its threats and its benefits, and the consequences it may have on the existing labor market models.

In this study, I only analyze what Schmidt (2008p. 310) calls the coordinative discourse, that is, the interaction between policymakers and interest organizations. To study communicative discourse as well would require material which is directed at the public rather than other policymakers. It could include news articles, opinion articles and other expressions through the media to influence the public's opinions on the directive. However, such material has only been possible to collect from Swedish actors. An analysis of the communicative discourse would then only include one of the two countries, and not contribute to the aim of this study. Instead, while the focus is on the coordinative discourse, all materials for the study is publicly available online, and could thus be read by the public. It is, however, addressed to policymakers and not part of what would be termed communicative discourse.

Country	Government	Trade Unions	Employer/business organizations
Sweden	Social democrats & Green Party (supported by Center party, liberal party & left party.	LO (blue collar) PTK (White collar)	Confederation of Swedish Enterprise
Finland	Social democrats, Center party, Green Party, Left party & Swedish People's party.	Akava (Central organization for educated workers) PAM (service industry) STTK (trained professionals) SAK (Finnish trade unions central organization)	Mara (hospitality sector) Suomen Yrittäjät (Small & medium enterprises) Confederation of Finnish Industries

Table 1: Studied actors according to category.

Results and Analysis

In the following chapter, the results of my analysis of the coordinative discourse in Sweden and Finland are presented. There are several narratives which are used to establish what would be a legitimate further action in the policy process. Actors opposed to the directive use a larger number of narratives than those in favor of the proposed directive. While narratives against the directive have much in common, I have chosen to structure them according to different themes. Among the narratives are constructions of the Court of Justice of the European Union as a power-hungry institution, which is simply waiting for an opportunity to demolish the Nordic labor market model. Another narrative is that the Commission is side-stepping the treaties and giving themselves more power, without formally having the competence to legislate on wages.

At the same time, some actors opposed to the directive credit the Commission for its focus on in-work poverty, however very forcefully arguing against the directive at hand. Another, more sparsely, just argument is that the minimum wage directive would increase costs for businesses, and thus contribute to higher levels of unemployment. On the other hand, actors in favor of the directive argue that the Commission's proposal do not interfere with the Nordic labor market model, but rather seeks to make it the European model.

The remainder of this chapter will discuss these aspects in more detail by showing how these narratives have been articulated by different actors. When it comes to actors, it can be said that all Swedish actors have been fiercely against the directive throughout the process. In Finland, there has been a wider variety of opinions, where the government and trade unions have held a positive view on the directive, while business organizations have opposed the directive, sharing many arguments with the Swedish actors. The following sections are structured around different narratives that have been prominent in the debate. These narratives span country borders, and similar arguments have been employed by actors with the same opinion. It is structured as follows, first I shortly introduce the directive. Then, I present the narratives which have been identified during the analysis, first the narratives against the directive are presented, four in total. Two of them have been grouped together as they both revolves around a criticism of further Europeanization. However, they are presented as two separate narratives since their main point is criticism against different actors, the Court of Justice, and the Commission. After the four critical narratives have been analyze, I turn to the narrative built by those in favor of the directive. The actors in favor have, contrary the those opposed, constructed one main narrative, namely that the minimum wage directive does not come with any danger towards the existing Nordic labor model.

The idea of a minimum wage directive was proposed in July 2019 by the then candidate for President of the European Commission Ursula von der Leyen. Von der Leyen promised to have a proposal in place within the first 100 days of her mandate to “to ensure that every worker in our Union has a fair minimum wage” (von der Leyen 2019 p. 9). Immediately following the mentioned quote, von der Leyen (2019 p. 9) states that wages should be determined “according to national traditions, through collective agreements or legal provisions”. The commission president also emphasizes “the value of social dialogues between employers and unions” (von der Leyen 2019 p. 9). Despite the seed of the minimum wage directive taking up less than a page of the Commission's political guidelines, it provides a road map detailing that national

traditions should be respected, and that the directive would not include how the minimum wage in each member state is determined.

Narratives

Negative Narratives

Fear of the Court of Justice

One common narrative employed by the actors against the proposed directive, that is, all Swedish actors, and business organizations in Finland, is a fear of the Court of Justice of the European Union. The narrative, in essence, consists of an idea that the Commission's proposal may well contain aspects of protection for the Nordic labor model, but that such protection is not sufficient. Rather, these actors argue, when the directive is implemented, it will have to be interpreted by the Court of Justice, who are likely to interpret the directive in a way that endangers the Nordic model. This sentiment comes from an experience that the Court often interprets directives in the most integrationist manner, one case mentioned is the Laval case, which Swedish unions reference as evidence that the Court does not hesitate to harm the Swedish mode, an open letter signed by union leaders in Denmark, Sweden, Norway go as far as accusing the court of social dumping, with the Laval case as evidence (Risgaard et al. 2020 p. 2).

Business organizations in Finland, reference a fear of the Court in their opposition to the directive, for example, "the danger is that the Court of Justice deem that member states should ensure that 100 % of employees are protected through one of the two instruments mentioned in the directive" (Miettinen 2020¹ p. 4). Mara, an organization representing Finnish companies in the hospitality sector, argue that while the proposal from a first view does not appear to affect the Finnish model, that may change through a Court interpretation (Nisametdis 2021 p. 4-5). As well, the organization for Finnish small and medium-sized enterprises follow this line. In their statement of opinion to the government, they write that the proposal leaves room for interpretation and that the Court of Justice's interpretation could "substantially change the content of the directive" (Mäkelä 2021a p. 2). They return to this position in a second statement, arguing that the room for interpretation in the proposal create significant risks for what the case law following the directive will turn out to be (Mäkelä 2021b p. 1).

¹ The document referenced is dated 11th of February 2020. However, it is likely to be from 2021 as all other Finnish documents. Due to uncertainty, I refer to the date stated in the document.

Several of the organizations which express fear of an interpretation of the Court of Justice, also emphasize that the directive already breaks with existing case law, where the Court have expressed that the EU should not harmonize wage levels between member states (Nisametdis 2021 p. 2). LO, a central organization consisting of several Swedish labor unions, in a letter to the Swedish government in November 2020, take the same position of the Finnish business organizations. They too, argue that the proposed directive should be seen as an “invite for the Court of Justice to an area where the Court have previously been careful” (Gideonsson & Ståhl 2020 p. 2). This exact formulation is also used in an analysis by LO, PTK, and Svenskt Näringsliv (Ståhl et al. 2020 p. 11), and thus not only the position of LO, but also of unions organizing workers with higher education, as well as Sweden’s most prominent business organization. Throughout the legislation process, these actors have voiced their concerns repeatedly. In a second joint analysis, they write that the proposal is riddled with question marks and legal uncertainties meaning that “the Court of Justice will have to interpret its content and meaning” (Forsselius et al. 2021 p. 14). In 2022, the spokespeople of the three actors said that the proposal brings many “uncertainties” which in the end will be “questions for the Court of Justice to decide” (Linder et al. 2022).

A worry for the Court’s interpretation was also expressed in the Swedish parliament’s committee for the labor market during its meeting on December 8th, 2020. When the social democratic government presented its opinion, the Moderate members of the committee made a statement criticizing the government’s opinion. In their statement, they write, among other things, that the proposal will have to be interpreted by the Court which will fill in the blanks left open by the Commission, constituting a big risk for the Swedish model (Sveriges Riksdag Prot. 2020/21:13). The idea that the Court will interpret the directive in a way that does not serve Sweden’s interests is also expressed in the labor market committee’s subsidiarity evaluation. “In the end, it is the Court of Justice that interprets the directives adopted by the EU” (Sveriges Riksdag, 2020/21:AU6 p. 11-12) which, according to all parties in parliament makes it impossible to know how the directive will be implemented in advance (Sveriges Riksdag, 2020/21:AU6). The existence of this risk was acknowledged by the social democratic minister for European Affairs, Hans Dahlgren as well, in a meeting in the Committee for European Affairs in January 2021. Dahlgren said, “We do not want to risk, as has happened previously, that the Court of Justice corrects a position that we supported earlier and that we have been forced to adhere to” (Sveriges Riksdag 2020/21:23 p. 16).

Moreover, LO argues that definitions in the proposal have not been previously defined in EU law. That in turn, would mean that the Court of Justice would have to define the meaning of collective bargaining, collective agreements, and labor unions, and that these definitions could conflict with Swedish law, and thus “undermine the foundations of Swedish collective labor rights” (Gideonsson & Ståhl 2020 p. 4). Another objection where the Court plays a significant role, is a matter of principle for LO. The eventuality that wages set decided through collective bargaining would be subject to political approval, and even judicial approval is a large infringement in the freedom of unions and employers (Gideonsson & Ståhl 2020 p. 7). Neither is it in line with the Swedish model that an employee who is not a union member would have the right to invoke the rights in a collective agreement (Gideonsson & Ståhl 2020 p. 7).

The fear that the Court would want to ensure the protection of all workers, creates an issue, since there are still some people, in both Sweden and Finland, who are not protected by a collective agreement. If these workers, also must be protected, the agreements have to be either general, or a dual system with both collective agreements and legally binding minimum wages introduced. A dual system would severely damage the negotiation room for the parties since employers could always reference the legal minimum wage as a bottom line. In this narrative, the Court of Justice is portrayed as an institution characterized by activism for integration, the big bad wolf who is awaiting the next opportunity to destroy the collective bargaining model. References to the Laval case must be understood as a point of construction of opposition. Many union members remember the ruling as a hard restriction of what was assumed to be the rights of a union. To avoid the risk that the Court could play this role, actors opposed to the directive encourage politicians to ensure that the directive does not have room for interpretation. That is why actors on the Swedish labor market wanted a full written exception for Sweden and Denmark, and why they emphasized that countries with collective bargaining were at risk (Ståhl et al. 2020).

The Commission goes beyond the Treaty

The idea that the directive will lead to further Europeanization is not entirely tied to the Court of Justice and its potential interpretation. It is also expressed in criticisms that the proposed directive goes beyond the legal basis of the treaties and creates new competences for the Commission to legislate on the labor market. Considerations of the proposal’s legal basis is carried out by all actors analyzed in the study, however, unsurprisingly, those against the

directive are the ones who deem it an issue. Before engaging with this line of argument, it is worth noting that the Commission reference article 153.1 and 153.2 Treaty of the Functioning of the European Union (TFEU) (European Commission, directive 2020/0310). These articles give the EU supporting competence in fields of for example working conditions, social protection of workers (153.1) and the right to adopt directives with minimum requirements as long as they regard “conditions and technical rules obtaining in each of the Member States” (153.2 TFEU). However, article 153.5 states that “The provisions of this Article shall not apply to pay, the right of association, the right to strike or the right to impose lock-outs”. This is the article used by the opposition to the directive, to argue that a directive on minimum wages breaches the Treaty, and in doing so, questions the legitimacy of the treaties in themselves. The Commission’s argument (European Commission 2020/0310) is that access to a minimum wage is to be considered as access to good working conditions, and that since the directive will not propose any wage levels, it is compatible with the Treaty of the functioning of the European Union.

A joint analysis by large parties on the Swedish labor market, LO, PTK and the Confederation of Swedish Enterprise, the writers argue that the Commission is mistaken in arguing that the directive considers working conditions. Since the proposal contains rules on conditions for setting the wage, as well as for how the wages are to be updated, it goes beyond mere working conditions (Ståhl et al. 2020 p. 8). The Swedish labor market actors write that “Since the proposal gives workers right to ‘adequate’ minimum wages the levels of collective agreements can be [legally] tried” (Ståhl et al. 2020 p. 8). Further, according to the Swedish parties, the proposal does not only interfere in setting wage levels, but it also interferes with the right of association, protected by article 153.5 TFEU. This is due to the definitions of collective agreement and collective bargaining. Following the commissions definitions would lead to a decreased right of association compared to the Swedish definitions (Ståhl et al. 2020 8-9). Concretely, the unions and business organization intervene against an article in the proposed directive, which they claim would create a Union-wide labor law, only allowing “collective agreements which give more favorable conditions for workers” (Ståhl et al. 2020 p. 9). This would, according to the parties, have severe implications for the Swedish model where it is essential that improvements in one area can be accompanied by impairments in another (Ståhl et al. 2020 p. 9). They return to this sentiment in a second analysis a year later, writing that in a worst-case scenario the material content of the proposal will go beyond the treaties and cause severe risks for the Swedish model (Forselius et al. 2021 p. 14).

In an open letter to the European Commission, spokespersons for LO, Svenskt Näringsliv, and PTK, reiterate this point by concluding with “the EU is taking a clear step towards increased supranationalism” (Gideonsson et al. 2020 p. 3). In another statement the three actors state that the proposal would mean “far more power ... than the member states have intended through the treaty” (Linder et al. 2022). In its initial assessment on the proposal the Swedish government writes “it should be considered that the EU’s competence on the area is limited” (Regeringskansliet 2020/2021: FPM41 p. 7). As well, they argue that “there is limited space for binding measures on the EU-level for adequate minimum wages.”, and that the Swedish national model must be protected (Regeringskansliet 2020/2021: FPM41 p. 1). However, the government also acknowledges that the Commission’s proposal state that it does not intend to force countries, where wages are set through collective bargaining, to introduce legally set minimum wages (Regeringskansliet 2020/2021: FPM41 p. 5). Yet, they maintain that the directive should be opposed, due to the eventual risk it brings to the Swedish labor market model. The government also argue that the proposal is a threat to the other Nordic countries as well, stating that many Nordic countries does not have minimum wages in their collective agreements, and that the Commission has not evaluated what effects the proposal may have (Regeringskansliet 2020/2021: FPM41 p. 7).

In essence, the argument employed by the parties of the Swedish labor markets, is that the proposed directive contains ambiguous formulations, that, perhaps without the Commission realizing it, would result in “large encroachments in the Swedish right of association” (Ståhl et al. 2020 p. 9). If the Commission were to expand into new policy areas without a treaty revision, their legitimacy would be severely decreased. In their analysis, LO, PTK and Svenskt Näringsliv write that the guarantees that pay, right of association, strike, and lock-out played a significant role in shaping the trade union’s positive view on EU membership in the 1990s (Ståhl et al. 2020 p. 9). This could be read as a signal that the minimum wage directive, which by the parties is deemed to change this fact, would risk changing the trade union’s view on the EU, and possibly leading to a questioning of the Swedish membership. At the very least, it is a clear warning to the Commission that the proposal comes with high risks.

Suomen Yrittäjät, an organization for small and medium enterprises in Finland, follow the Swedish actors in their argumentation. They too, take issue with the Treaty articles chosen by the Commission, and argue that the proposal goes beyond simply working conditions, by concerning itself with specific conditions for determining wages (Mäkelä 2021a p. 2). Suomen Yrittäjät’s report also argues that the Commission has not previously dealt with aspects that

affect pay levels, even if they have proposed directives regarding labor rights before (Mäkelä 2021a p. 2). In essence, they argue that EU competence should not be extended, and that the minimum wage directive would demand such an extension (Mäkelä 2021b p. 1). As well, the confederation for Finnish industries agrees with their small and medium sized colleagues. They argue that the proposed minimum wage directive does not follow the treaties and is not in line with existing case law from the Court of Justice (Miettinen 2020 p. 1). From this argument follows a claim that the directive would not fulfill the principle of subsidiarity, due to its incompatibility with the treaties as well as that adequate wage levels “can only be determined on the national level” (Miettinen 2020 p. 2).

Both the Confederation for Finnish industries and Suomen Yrittäjät argue that there is a trend where the European Union’s competences are extended without a treaty revision. For example, the Confederation of Finnish industries repeat the following formulation in their two statement of opinions “this reinforces the already existing path, where EU-regulation is squeezed into areas which are the core of the national labor market systems” (Miettinen 2020 p. 2; Miettinen 2021 p. 1). Suomen Yrittäjät write in their second statement that the minimum wage directive is an example of how the EU have expanded its competence into areas of social policy and interfere with member states’ possibilities to have an employment and social policy based on their domestic conditions (Mäkelä 2021 p. 3). The third Finnish business organization to issue a statement was the representatives of companies in the hospitality sector, Mara. They too argue that the Commission, through the minimum wage directive, is going beyond the treaties to give itself more power over employment policy (Nisatmedis 2021 p. 4). This would, if it is allowed, mean that the Commission can continue to extend its competence without formal changes to the treaties (Nisatmedis 2021 p. 4). Thus, this argument is that regardless of whether the minimum wage directive would affect Finland, it could open the door for the Commission to get involved in other aspects of employment policy that they until now have not had the competence to propose legislation on.

Both Good and Bad: The Ends do not Justify the Means

The third narrative is, as well, constructed by actors opposed to the directive. Its central point is that there is support for the overall goal of the directive, ending in-work poverty. However, despite the noble objective, the means used by the Commission spark opposition. In this narrative, there are some differences between actors who share a negative opinion on the

directive. While unions in Sweden often reiterates their support for the social pillar, we will see that party representatives of right-wing parties in the Swedish parliament uses the social pillar to blame the government at the time for the existence of a minimum wage directive.

The Confederation of Finnish Industries holds a negative view of the directive, for example subscribing to the risk of the Court's involvement. However, the introduction to their first statement to the Finnish parliament reads "Like the government's standpoint ... the confederation of Finnish Industries holds a positive view of the goals in the Commission's proposal" (Miettinen 2020 p. 1). That is, reducing poverty among working people and increasing the involvement of labor market parties. However, the confederation intervenes that "a binding minimum wage legislation at the EU-level is not the right or necessary thing to do to reach these goals" (Miettinen 2020 p. 1). Following this introduction, is five pages of objections to the directive. In 2021, the confederation provided the Finnish parliament with a second opinion, introduced by the exact same formulations as the first (Miettinen 2021 p. 1). Despite changes to the Commission's proposal, there was no change in opinion neither regarding the aim nor the proposed action. Further, Suomen Yrittäjät, an organization for small and medium enterprises in Finland, subscribe to the view of the larger Confederation of Finnish Industries writing that, "Even if ... agrees with the aim of the proposal for a directive securing adequate minimum wages for employees, the EU directive is not the right way to achieve this aim" (Mäkelä 2021 p. 1). Similarly, Mara, also introduces their statement to the Finnish parliament by stating that the aim of the commission should be fully supported (Nisatmedis 2021 p. 1).

The Finnish business organizations are not alone in using this line of argumentation, they are accompanied by Swedish unions. In their analysis of the proposal, LO end by clearly supporting the Commission's "description of the issues in the EU" (Gideonsson & Ståhl 2020 p. 9), too many countries have poor working conditions, working is not profitable enough, and wages must be increased. They continue by stating that "the promise of a better future must be restored" (Gideonsson & Ståhl 2020 p. 9). However, as shown in the two previous sections, they see the directive as a breach of EU competence, as well as a threat from the Court of Justice's interpretation, it is clear that, in the opinion of LO, the promise of a better future is not restored through a minimum wage directive.

Following these lines, the actors opposed to the directive all argue that the subsidiarity and proportionality principles are infringed through the proposal. At no point do they argue that the

directive is bad in itself but rather in the way it is formulated by the Commission. Instead, the opponents withhold that each member state is better equipped to determine how their minimum wage should be set. An example of this rejection comes from the Confederation of the Finnish Industries, who emphasize differences in social security, taxes, and wage levels between member states, differences which make it impossible to determine a minimum wage on the European level (Miettinen 2020 p. 2). Companies in the Finnish hospitality sector, agree with their colleagues in the industry, arguing the minimum wages are at the “core of every member state’s economic and social system”, and should therefore be regulated nationally (Nisatmedis 2021 p. 3). The parties on the Swedish labor market write that the principle of subsidiarity should be analyzed by asking the question whether Sweden is unable to uphold a basic protection for workers’ wages, and that the answer to this question is no (Ståhl et al 2020 p. 13). As well, in their analysis, Ståhl and his colleagues (2020 p. 13) state that Sweden is clearly able to provide rules promoting collective bargaining, once again showing that the country does not need help from the EU.

It is not only interest organizations who argue along these lines. Sweden’s Prime Minister at the time, Stefan Löfven, said to the Committee for European Affairs before the Porto Summit in May 2021, that “The government wants the EU to have a strong social dimension” (Sveriges Riksdag 2020/21:38 p. 2). Like the trade unions in LO, Löfven argued that the social pillar would help increase and restore people’s faith in the European Cooperation (Sveriges Riksdag 2020/21:38 p. 2). However, due to the differences in social models between the different member states, the social area is better suited for “common exchange of experiences and common goals, rather than supranationalism and common laws” (Sveriges Riksdag 2020/21:38 p. 3).

A minimum wage is bad for profit

There is one narrative in opposition to the directive, which has only been employed by Finnish actors. The argument used is that the directive would increase costs for businesses, lowering the profit margins, while at the same time increasing unemployment. It stems from calculations made by the Commission and was noticed and used by all Finnish business organizations analyzed in this study. The confederation of the Finnish Industries wrote in their first statement of opinion that the proposal would negatively affect the companies’ possibilities to create jobs (Miettinen 2020 p. 5). With reference to the economic situation at the time, the Confederation viewed these economic factors as further reasons to reject the minimum wage proposal. In their

second statement of opinion, the Confederation for Finnish Industries repeat their concern for the economic consequences for companies (Miettinen 2021 p. 4).

Mara, the organization for companies in the Finnish hospitality sector, is not as concerned with the increased costs as the Confederation of Finnish Industries. In their only statement of opinion, Mara concludes by stating that the forecasted decrease in employment is yet another reason to oppose the directive (Nisatmedis 2021 p. 5). They also argue that their members have suffered from bad economic conditions, following the pandemic, and therefore would be more vulnerable to an increase in unemployment (Nisatmedis 2021 p. 5).

The Swedish government also acknowledges the economic effects of the proposal. They write in their analysis of the proposal that if the companies are expected to bear one fourth of the increased costs, profit margins will be negatively impacted (Regeringskansliet FPM 2020/21:FPM41). Such increased costs would in extension pose a threat to the workers bearing minimum wages, who may be fired if companies cannot make enough profit (Regeringskansliet 2020/21:FPM41 p. 7).

Analysis

To analyze the narratives used by opponents to the directive, I return both to the previous research on Sweden and Finland's respective relationship to the EU, as well as to Schmidt's framework about how ideas and discourse shapes action. Through the questions posed by Schmidt (2008 p. 2010 p.) about by who, where, when, how, and to whom communication is expressed, we can further understand the aim of the narratives. As seen above, several actors used these narratives, for example the parties on the Swedish labor market, the Swedish government, and Finnish employer organizations. Despite being opposing parties in negotiation about the conditions on the labor market, they stand united in this case. They are joined by all parties in the Swedish parliament as shown by the united statement by the Committee of Labor Market. In Sweden, the negative narratives are clearly dominating. In the policy sphere, it is near impossible to find actors who publicly support the minimum wage directive. Opposition is the master discourse (Schmidt 2008 p. 311), meaning that there is little room for actors to challenge this view.

For the most part, Sweden's trade unions and business organization have written joint analyzes, however, the central organizations for trade unions LO have also issued their own statements. These statements do not differ in its direction that those written together with organizations

representing employers. This shows that in Sweden, there is no clear ideological differences surrounding the directive, this is as well seen in the analysis from the fact that all parties in parliament have criticized the directive. Instead, the so-called Swedish model of labor market organization serves as an overarching priority across the political spectra. No matter what, the model should be protected, especially from threats from the outside. It also shows that despite trade unions and employer organizations writing together, there has been no watering-down of the criticism, which may have been expected considering their opposite positions.

The narratives which are dominated by Swedish actors, are constructed around a threat from the Court of Justice of the European Union, as well as constructed around the Commission gaining more power than they have been given by the member states. These narratives are both in line with the ideas about Europe which have been present in Sweden for a long time. As Stegmann McCallion (2017) notes, the decision to apply for membership was an economic rather than a political decision. It was even presented in the government program for handling the economic crisis in the early 1990s. Further, Jungar (2002) shows how the Swedish reluctance then remained in its hesitance towards further integration. Instead, Sweden have repeatedly argued for coordination in reaching goals rather than common rules throughout the EU. While the EU enjoys great support from the Swedish public, the content of the European cooperation is still a debated topic in Sweden. When asking the public if they want to see a United States of Europe, the support vanishes. Many favors cooperation on environmental and migration issues, but oppose deep integration, for example through membership of the single currency (Weissenbilder & Andersson 2020; Johansson & Von Sydow 2018). The narratives employed by Swedish actors are in line with the public opinion. There is a dominating view that the EU should have a strict competence, rather than spreading into new policy areas. Swedish actors thus argue in a way that would keep them in the “outer core” of the EU (Leruth 2014), and in way which could be called soft Euroscepticism (Aylott 2008).

When it comes to who expresses what ideas, it is interesting to note the discrepancy between Sweden and Finland. While all Swedish actors hold the same opinion, and express variations of the same ideas, only Finnish employer organization express the same ideas in Finland. This means that there are more ideas expressed in the Finnish debate, than in the Swedish. Despite working together with the Finnish unions, in a way closely related to that in Sweden, Finland’s employer organizations are not convinced of the EU’s attempts to regulate working conditions. They use the same narratives as the Swedish actors, expressing a fear that the Court of Justice’s

interpretation will damage the Finnish labor market model, and that the Commission tries to get more power without formal changes to the treaty.

These expressions are not in line with what was described as the dominant views on European integration in Finland (Tiilikainen 1998; Tiilikainen 2020; Raunio 2010). However, these ideas are not dominating in Finland since the country supported the directive. Instead, the results shows that there is a battle of ideas on European integration in Finland, where employer organizations oppose further integration on working conditions. It is in line with Aylott et al. (2013), who identified a decrease in the consensus that had previously characterized Finnish EU politics. While Tiilikainen (2020) find that the consensus have returned, there is clearly no consensus in this case. A difference from the Swedish employer organizations, on the other hand, is that the Finnish employers argue in favor of the Commission's aim to combat poverty and bad working conditions. Rather, the argument is that this directive is not the right way to achieve that aim. Here, the Finnish employer organizations are joined by the Swedish trade union movement who express similar ideas.

Further, Schmidt (2008 p. 311) notes that it is important to consider to whom expressions of ideas are directed. In the narratives opposed to the directive, we find several receivers. First, and most common, is the governments in Sweden and Finland. The Finnish employer organizations have been asked by the parliament to give an opinion relating to the government's assessment of the proposal. Their opinions are thus directed both at the government but should also be seen as directed to the parliament committee for Working life and equality. Even if the statements are published online, they are not directed at the public, the goal of the communication is to influence policy actors as the government and the parliament not the public. Neither is it aimed at the European Commission.

In Sweden however, the joint analyzes by the actors on the labor market are aimed at the government. Unlike the Finnish actors, it has not officially been a part of the parliamentary handling of the directive. These analyzes are published online on the respective website of the actors and thus available for everyone to read. However, they are several pages long, and quite technical, indicating that the intended audience is other policy actors, primarily Swedish politicians. Swedish actors have also written letters to the European Commission, as well as Members of the European Parliament, showing an attempt to directly influence European policy actors as well, rather than only domestic actors, which is the case for Finland's employer organizations. On the other hand, Finnish and Swedish employer organizations are members of

Business Europe, an organization that have been opposed to the directive throughout, there is thus less reason for them to independently approach the European institutions. Sweden's trade unions have taken the opposite position to the European trade union confederation, and could therefore not rely on their support, forcing them to communicate directly with the Commission and Members of European Parliament.

Positive Narratives

There is nothing to worry about: The Nordic Model Protected

Among the actors who support the proposed directive, one narrative is reoccurring. Perhaps unsurprisingly, the narrative is built around the Commission's guarantees that collective bargaining will serve as an acceptable way to establish adequate minimum wages. Actors using this line of argument is primarily Finnish, both the government and the trade unions have, as we will see, used this narrative.

The Finnish government's initial position was positive, noting that the directive is part of social pillar, and that said pillar is "essential in the creation of a social Europe" (Government of Finland U 69/2020 rd p. 15). Further, they argue that the Commission does not want to impair the "total respect for the labor market parties independence" (Government of Finland U 69/2020 rd p. 15). It is also important for the Finnish government, that the Commission regards Finland as a country with a collective bargaining model, and that member states with such a model will not be forced to implement a legal minimum wage (Government of Finland U 69/2020 rd p. 15). At several points, the Finnish government, argue that the directive will not force Finland to change (Government of Finland U 69/2020 p. 9-10). For example, "the proposal has no direct effects in countries like Finland, where wages are set in collective agreements" (Government of Finland U 69/2020 p. 9), and "According to the Commission, Finland is one of the member states where wages are set through collective bargaining" (Government of Finland U 69/2020 p. 10). For the government, the directive has, since the first proposal, been seen as a way of improving the situation for the workers earning the least in countries with legally set minimum wages. As well as a way of supporting collective bargaining in countries where it can be improved. This would, according to the Finnish government, improve the competitiveness for Finnish businesses since businesses in other member states could not compete through low wages (Government of Finland U 69/2020 p. 12).

Following the government's analysis, interest organizations were invited to give their own statement of opinions. Akava, a trade union representing workers with academic education, welcomes the Commission's proposal by expressing support for its aims (Kannisto 2021 p. 1). As well, they state that the proposal does not affect countries with a collective bargaining model and respects the central role of trade unions and employer organizations (Kannisto 2021 p. 1). Akava maintained the same position throughout the process of preparation in the Finnish parliament, issuing the same statement in the second round of statement of opinions. The trade union organizing workers in the service industry in Finland, PAM, follow Akava, in supporting the proposal for a minimum wage directive. They argue that in-work poverty is an issue that has to be solved at the European level (Rönni-Sällinen 2021 p. 1).

Beside the need for a common solution to the issue, PAM, argue that the directive leaves room for collective bargaining between unions and employers (Rönni-Sällinen 2021 p. 2). One sentence that captures the position well is "The directive does not put Finland's labor market model at risk" (Rönni-Sällinen 2021 p. 2), there is simply nothing to worry about. Another trade union which argues in line with this narrative is STTK, representing professionals and experts. Like their colleagues in other unions, STTK argue that the Commission's proposal favors labor market models like the Finnish one, and that at the center of the proposal is a wish to spread this model to other member states (Häggman 2021 p. 2). Further, STTK, mention that the directive would not affect the process of negotiating salaries in Finland (Häggman 2021 p. 2). This line of argumentation comes back in a second statement of opinion which STTK has written together with another central union organization SAK. In the second statement, the organizations maintain that the directive does not impede the principle of the Finnish model (Hiilesniemi & Häggman 2021).

For the actors in favor of the proposed directive, this line of argument is visible throughout all statements of opinion. A statement from a representative of the Finnish economy and business ministry, states that the Commission's initial proposal does not seem to pose any threats to the Finnish model (Heinonen 2021). At one point, Heinonen (2021 p. 5), refers to the Commission, stating that "Finland is regarded as one of the countries where wages are set through collective bargaining, and where the in-work poverty is the lowest". Thus, if Finland is already regarded as one of the best countries within the EU, they are not the target for the directive, in which case it means no danger for their labor market model.

Analysis

There is only one narrative constructed by those who favor the Commission's proposal for the minimum wage directive. It is constructed around one specific aspect, namely that the proposal does not entail demolition of the Nordic labor market model. So, who are the actors constructing this narrative? First of all, they are all Finnish. As discussed in the analysis of the negative narratives, all Swedish actors oppose the directive. Second, the Finnish actors in favor of the directive are trade unions and the government. Since the coalition government at the time was led by a social democratic Prime Minister, the actors in favor to some degree represent the labor movement. They take a very different approach to the Swedish government, and trade union movement, who oppose the directive, and describe the European institutions in an unflattering way. Instead, both the Finnish government and trade unions' arguments are characterized by a trust in the European Commission and the Court of Justice.

Trust in the supranational actors of the EU is in line with previous research on Finnish EU politics. Tiilikainen (2020) find that Finland's approach to the European Union has followed the Community model, where the supranational actors have much influence. It also follows the description of Finland's reasons for joining the EU in the 1990s. Arter (1995) writes that it was a vote for the West and characterized by a will to become a full member of the Western political community. Such descriptions also point out that the political elites of the time held a genuine interest in European integration (Raunio 2010). The idea of the community model, seem to have kept its domination over Finnish politics, for a long time. However, while it is dominating in the policy sphere, it does not constitute a master discourse (Schmidt 2008 p. 311). As we have seen above, in relation to the minimum wage directive, there is a battle between the trust in European institutions and the will to further integrate, and the idea that this directive would be the end of the Nordic labor model. In the end, Finland voted in favor of the directive, showing that the preference and adherence to the community model continues to be the idea with the strongest hold on Finnish EU politics.

The idea expressed in this narrative is supportive of further European integration which prioritizes social issues. Most prominent is the argument raised in the government's analysis of the proposal, that the social pillar is essential for the creation of a social Europe (Government of Finland U 69/2020 rd p. 15). It is also expressed by some of the trade unions who argue that supranationalism is needed to overcome pan-European difficulties, and that Finland, through the EU, can export their labor market model to benefit other EU member states (Häggman 2021 p. 2).

Narratives	Key arguments	Actors
Fear of the Court of justice	<p>The court will rule against collective bargaining.</p> <p>Court favors market before social issues.</p> <p>Court's interpretation may change the Commissions guarantees</p>	<p>Swedish government</p> <p>LO (trade union)</p> <p>PTK (trade union)</p> <p>Confederation of Swedish Enterprise (employer org.)</p> <p>Confederation of Finnish Industries (employer org.)</p> <p>Suomen Yrittäjät (employer org.)</p> <p>Mara (employer org.)</p>
The Commission oversteps the treaty	<p>No legal basis for minimum wage directive.</p> <p>Commission gets further competence without treaty revision.</p> <p>Against existing case law</p>	<p>Swedish government</p> <p>LO</p> <p>PTK</p> <p>Confederation of Swedish Enterprise</p> <p>Confederation of Finnish Industries</p> <p>Suomen Yrittäjät</p> <p>Mara</p>
Both good and bad	<p>Welcomes focus on social issues.</p> <p>This directive does not achieve goals.</p>	<p>LO</p> <p>Confederation of Finnish Industries</p> <p>Suomen Yrittäjät</p> <p>Mara</p>
Negative economic implications	<p>Businesses will bear the cost.</p>	<p>Swedish government</p> <p>Confederation of Finnish Industries</p>

	Increase in unemployment.	Suomen Yrittäjät Mara
The Nordic model protected	Collective bargaining is protected in the proposal Commission states that Finland achieves the directives goals. Good for competition. Creates collective models in other member states.	Finnish government Akava (trade union) PAM (trade union) STTK (trade union) SAK (trade union)

Table 2: Summary of narratives, arguments, and actors.

Discussion

Which different ideas are expressed?

So, what can we say about the different ideas in play, following the analysis of arguments and opinions used in the two countries? It is not necessarily the case that completely different ideas are expressed in the two countries. Instead, the difference lie in which ideas are dominating, and in the end used and expressed by the governments. This section discusses the premises and cores of the narratives presented above.

Just like other scholars working with ideas as explanatory variables (Schmidt 2008, 2010; Parsons 2002, 2003, 2010; Blyth 2002; McNamara 2006; Beland & Cox 2010), the interpretations of material conditions are significantly different between Finland and Sweden. These interpretations shape what each country see as legitimate action in the specific case. It is not the case that Finland look to abandon their model of organizing the labor market, while Sweden does not. Where they differ is in the effect, they deem the Commission’s proposal to have on this model. In Sweden it is neither necessarily the danger created by the directive in itself, but in the eventual interpretation from the Court of Justice. Thus, these different interpretations of the material conditions constituted by the Directive on adequate minimum wages shapes the two neighboring countries, who share several similarities, actions in the Council of the European Union.

Already in their first reactions to the proposed directive, the governments are found drawing different conclusions, regarding the effect on each respective country. While the Swedish did not completely rule out the proposal, they were skeptical. This skepticism remained throughout the legislative process and strengthened by the firm resistance from the parties on the labor market. Clearly, the actors on the Swedish labor market view an attempt to legislate about wages on the European level as something with a negative impact on the current system. At the bottom of their argument lies distrust with European actors. The large role the Court of Justice plays in their argumentation is the best example of this. For the Swedish actors analyzed here, the Court is constructed as the opponent at first chance will destroy the Swedish model. Behind the fear of the Court lies a distrust with the Commission. Repeatedly, Swedish actors point out inconsistencies in the Commission's proposal, inconsistencies which opens the door for the Court of Justice to interpret the judicial consequence of the directive. Despite the Commission repeating that they have no intention to interfere with the Swedish model of wage setting, trade unions and business organization does not trust them, arguing that an oral guarantee does not protect the Swedish model.

In the second narrative, the Commission is pointed out as an actor trying to increase its own influence in the European system by gaining a large competence than set out in the treaty. Since the Swedish actors do not agree with the chosen legal basis, this creates a precedent where the Commission, through its choices of treaty base, gives themselves a larger room for action. For the Swedish actors, this is a worrying sign that the power which have shifted from the member states to the Commission can increase without the member states formally giving the EU more competences. In the words of high-ranking representatives of the trade unions and business organizations this is "a clear step towards increased supranationalism" (Gideonsson et al. 2020 p. 3). Arguing against supranationalism follows an idea that have been mainstream in Sweden since the country's accession to the European Union. Jungar (2002 p. 414-415) describe that Sweden at times in the early days of membership opposed European initiatives that were deemed to increase supranationalism, regardless of the government's opinion of the proposed content. As well, while support for EU membership have never been higher in Sweden, support for supranationalism and a United States of Europe remain very low (Johansson & von Sydow p. 396). The dominant idea in Sweden is that the European cooperation should be kept at a more intergovernmental level, keeping as much power with the member states as possible.

When it comes to trust in the European institutions, Finland differs from Sweden. First, throughout the statement of opinions analyzed above, there is a trust in the Commission's

guarantees that collective bargaining will be protected. Several actors mention that the Commission already regard Finland as an example of best practice, with large coverage of collective agreement, as well as low levels of in-work poverty. Thus, their conclusion is that the directives effect in Finland will be limited. Instead, they see the directive as useful in improving working conditions in other member states. This improvement is also viewed as beneficial for Finnish companies since the possibility for companies based in other member states to keep prices low through low wages would be limited. Finnish companies would then be more competitive on the single market. This position is however not taken by the business organizations in Finland, but rather by the government and trade unions. Again, looking back to when Finland became a member of the EU, the situation was different from Sweden. Tiilikainen (1998) writes that EU membership was a way for Finland to finally be admitted into the Western community, and to firmly establish their identity as a Western country rather than trying to appease both the West and the East. Moreover, Jungar (2002) shows how Finland and Sweden acted differently as new members. Here, Finland is called the “role model” and “Europhile of the Nordics”, showing less aversion toward supranationalism than Sweden. Instead, the argument that this directive would benefit countries with a less well-functioning labor market model than Finland, is an expression of the idea that supranational initiative can help solve cross-border issues.

Another difference here, is the nature of domination for the different ideas. In Sweden, the skepticism to supranationalism goes beyond ideological differences. No matter if an actor represents workers or businesses, their position is to defend the current labor market model, especially from European interference. There is clearly a master discourse surrounding the issue of European politics. In Finland, however, there is more debate, and a battle of ideas are expressed in the coordination process over this specific proposal. Here, the line is drawn between trade unions and businesses, where business oppose interference while unions are more welcoming.

Conclusion

In this thesis, I have examined the dominating ideas toward European integration of employment policy among policy actors in Sweden and Finland. The policy actors are actors on the labor market, who through the corporatist histories of each country have enjoyed significant roles in policymaking, especially when it comes to labor market policies. Empirically, the European Commission’s proposal for adequate minimum wages have served

to show how different actors argue, and what ideas are expressed through these arguments. That different ideas would be expressed was expected, since the starting point of the thesis was the different outcomes when the Council of the European Union voted on the directive.

In the first part of the thesis, literature on each country's relationship to the European Union was examined and discussed. Through the literature review, I argued that the traditional variables used to predict government preferences on the European level could not be applied to this case, due to the countries' many similarities. However, through the literature on Sweden and Finland's different approaches to the EU since becoming members in 1995, it is clear that their ideas about the European cooperation are different. I then discussed theoretical approaches as to why the study of ideas matter in political science, and how ideas can be studied as causal mechanisms in themselves, regardless of history, rationality from material interests, and cultural context. Then, the arguments employed in response to the minimum wage directive were analyzed and discussed.

The main findings are the following. To answer the first research question posed in the introduction: *Which different ideas expressed in the debate on the minimum wage directive in Sweden and Finland?* Despite their similarities, Finland, and Sweden's ideas about what the European Union should be are different in important aspects. Most significant is Finland's adherence to the community model, and the trust Finnish policy actors have in the European institutions. In their statements to the government, policy actors in favor of the directive, without exception trade unions, refer to the Commission's intentions that models built on collective bargaining will not be impeded. Not only will the Finnish order of negotiation be affected (Rönni-Sälinen 2021 p. 2; Häggman 2021 p. 2) but it will also spread this model to other member states (Häggman 2021 p. 2) in order to achieve similar well-functioning labor markets across the EU. Repeatedly, Finnish trade unions, and the government, argue in favor of an increased role for supranational actors.

On the other hand, business organizations in Finland, share the ideas expressed by Swedish actors, that the EU should proceed with caution to not compromise the Nordic labor market model. Unlike Finland, all Swedish actors analyzed in this study, that is trade unions, business organizations, and the government, argue that the proposed directive constitutes a threat to the organization of the Swedish labor market. Rather than the trust and belief in the community model, Swedish actors are skeptical of the European institutions. Both the Court of Justice and the Commission are constructed as greedy actors who are looking to increase their own power

and influence over employment policy, which have previously been left to the member states. This position taken by a social democratic government, together with allies in the trade unions, go against many other European social democratic parties, some of whom already in the 1990s aimed to have a stronger focus on employment in the Maastricht treaty (Johansson 2003 p. 371). The categorization of Sweden as, awkward (Johansson 2003; Stegmann McCallion 2017) or reluctant (Jungar 2002), in contrast to Finland as a europhile (Jungar 2002), seem to hold true in this case. This is also shown in the Swedish actors somewhat strange approach to the social pillar on one hand, and the directives that stem from the pillar. While arguing against the directive on minimum wages, the trade union LO and Prime Minister Stefan Löfven, complimented the Commission's increased focus on social issues.

A second conclusion, and answer to the second research question: *How do similar actors in the two countries differ in their argumentation connected to the directive?* The difference between similar actors in two countries is between the governments and the trade unions, since employer organizations in both countries position themselves against the directive. Both governments were coalition governments where the Prime Minister was a social democrat and can be characterized as centrist. According to traditional models of government preference formation, they should agree on an EU-positive line. Similarities between the trade unions are self-evident, they represent workers in different sectors, negotiate collective agreements with employers, and are connected to the social democratic parties in their respective countries. However, the ideas they give expression to related to the minimum wage directive are significantly different. From previous research (Arter 1995; Raunio 2010), we see that the Finnish social democratic party has been one of the most integration friendly social democratic parties in Europe. Among other things, its political elite was proactive in its ideas on the EU, before Finland applied for membership. Quite the contrary, Sweden's social democrats have been skeptical towards too much integration. Joining the EU was first and foremost an economic decision for the Swedish labor movement (Stegmann McCallion 2017 p. 61; Johansson 2003 p. 369; Arter 1995 p. 382), something necessary to recover from financial crisis. The ideas that have been present within the social democratic parties thus continue to separate their actions on the European arena.

This finding indicates that ideas on European integration forms along other lines than ideology, since ideological counterparts in Sweden and Finland hold different ideas. It is worth noting that neither Sweden's government nor the trade union movement oppose the EU membership, even if the trade union LO said that the minimum wage directive may lead to a reevaluation of the membership. Where these different ideas come from, and how they change cannot be

answered in this study. However, this finding is contrary to those of other scholars who find that preferences towards integration follow ideological lines, in this case it does not. Instead, I argue that this case shows that Sweden and Finland have interpreted the value of EU membership differently, which continues to guide their EU politics.

The third research question is: *Is one idea dominating in each country or are there several competing ideas?* Through the results of the study, it is clear that there are differences in this aspect as well. Swedish discourse is dominated by the negative approach to the minimum wage directive. All actors analyzed in the study express distrust in the supranational European institutions and are reluctant to give more power to them. There seems to be little room for a policy actor to promote a positive view on supranationalism according to the community model favored in Finland. Rather, the Swedish idea on how to best use the EU is through intergovernmental cooperation, with little legally binding directives, especially in areas concerning the labor market and the welfare state. The Finnish debate is not as dominated by a single alternative. Employer organizations are worried about what they, like the Swedes, see as an extension of EU competence. However, they are supportive of more integration on social policy, just not in the form of a minimum wage directive. This idea is related to the dominating idea in Finland, where further integration is not necessarily a bad thing.

To conclude, this study has shown that there are different ideas expressed in Sweden and Finland in response to the minimum wage directive. These ideas, and their expressions, ultimately influence the way each government voted in the Council of the European Union. As well, the ideas construct the supranational European institutions in significantly different ways, marking differences in the general approach to European integration in a wider remark. I also find that policy actors, especially the trade unions, do not conform based on ideology. As expected, when studying ideas, the different ideas in the two countries make the actors interpret the same material situation differently, and thus as well interpret what is legitimate action differently. To study member states' actions in the EU, I argue that ideas need to be given a bigger role, and the national discourses expressing these ideas further studied, to understand how seemingly similar member states end up with different approaches in the European Union.

Future Research

Further research on this area could take several directions. First, it would be interesting to compare the coordinative discourse which I analyzed, with the communicative discourse where

the policy actors communicate with the public. In this study, that could have been done for Swedish actors, but there was limited material available from Finnish media. However, such research could show whether the actors emphasize different aspects when communicating with the public as opposed to other policy actors.

Another alternative for further research is to compare Sweden and Finland's responses other proposals, both on issues of social policy as well as on other policy areas. Such research could show whether the two countries' different ideas on European integration differ are expressed in other areas as well, and further examine the role of ideas in shaping governmental preferences on European issues.

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