



LUND
UNIVERSITY

EUHR18

Spring 2024

30 ECTS

Does sub-national autonomy matter in the EU?

A case study about multi-level representation in the European Parliament

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Abstract

This thesis examines the representation of sub-national autonomous parliaments within the European Parliament (EP), focusing on the Åland Islands (Finland) and Greenland (Denmark). Both territories possess legislative autonomy and home rule, yet their representation at the EU level diverges significantly, prompting an analysis of the political ideas that shape national election laws affecting EP representation. Through a comparative qualitative study, this research investigates how regional and national political debates and dialogues influence autonomy representation in the EP, using the theoretical frameworks of multilevel governance and autonomy regimes. The findings reveal how different political, historical, and legal settings impact the ability of autonomous regions to secure representation in supranational institutions. The study contributes to the broader understanding of minority rights and regional autonomy within the EU, highlighting the complexities of integrating autonomous regions into a cohesive European democracy.

Keywords: autonomy, self-governance, sub-national government, multi-level governance, regional representation, autonomy regimes, home rule law, political partnership.

Acknowledgements

Thanks to the Olof M Jansson foundation for economical support, and Göran Lindholm for valuable guidance. Through his connections I'm grateful of having the chance to share perspectives on the topic with prof. Gudmundur Alfredsson and prof. Bárður Larsen. Hans-Erik Ramström at the Åland parliamentary library also deserves a special thank you for guiding me through the collection. Lastly this endeavor would not have been possible without the support of Otto, Anton, Tobias, Marit, Elsa and Emma – for helping me reconsider principles, to maintain intellectual agility and keeping a good tone.

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1. Introduction

Since the founding of the European Coal and Steel Community 1951, the democratic principle of the community, and later the union, has been evolving constantly. Today's European Union gathers 27 countries, but it also consists of over 240 regions.¹ During the fall of 2023, I worked at a regional office in Brussels, the Åland Islands government representative's office: a part of Finland's permanent representation to the EU. During my time at the office, a national debate arose in Finland, after the Council decided that Finland would get an additional seat in the European Parliament election 2024.² Åland, an autonomous part of Finland, then proposed a change to the Finnish election law. This change would allow Åland to become a separate electoral district which in practice would lead to a reserved mandate for the autonomous Åland in the EP. This idea is not new. Since Åland decided to join the EU together with Finland, the Islands has demanded parliamentary representation on European level. This demand has never been met, and therefore the debate arose again in 2023. The Åland Parliament followed and sent in a corresponding proposal to the Finnish Parliament. Both proposals were turned down by the Finnish Parliament, without any actual discussion on national level. The proposals were simply dismissed and the debate about the proposed change never made it outside the Åland Islands.

The concept of autonomy in Europe is evolving as a part of an ongoing debate on minority protection within political science. I aim to explore this dynamic between autonomies, national states and the EU, using two cases with theoretical similarities but differing in European representation – to analyze the field through a multidisciplinary and multilevel approach. A lot of research has been conducted on the area by, among others, Maria Ackrén, Markku Suski and Lauri Hannikainen. My goal is to use their conclusions to bring even more nuance to the academic discussion of autonomies.

Different EU-countries have different methods to ensure that the whole of the country gets representation in the European Parliament – usually by creating election constituencies.

¹ Eurostat, "Regions in Europe – Statistics Visualised," ec.europa.eu, 2022, <https://ec.europa.eu/eurostat/cache/digpub/regions/>.

² European Parliament, "2024 European Elections: 15 Additional Seats Divided between 12 Countries," [www.europarl.europa.eu](https://www.europarl.europa.eu/news/en/press-room/20230911IPR04910/2024-european-elections-15-additional-seats-divided-between-12-countries), September 13, 2023, <https://www.europarl.europa.eu/news/en/press-room/20230911IPR04910/2024-european-elections-15-additional-seats-divided-between-12-countries>.

This creates the possibility to give territories with special minority or language protection status a seat at the table, something that have been done for example with the Italian islands of Sardinia and Sicily as well as the German Speaking Community in Belgium.³ Through national election laws that give them reserved mandates, their interests are safeguarded.

This episode aroused my curiosity – how does this method of autonomous and/or special regional representation at EU-level work in other member states? I wanted to look at the autonomy representation in EP, especially connected to autonomies with their own legislative powers and parliaments. The legislative power dimension was important for me, since an accession to the EU for an autonomy inevitably would include giving away some of this, often hard-fought for, power.

The aim of this thesis is therefore to dive into the autonomy aspect of European democracy by comparing two national discussions on autonomous representation in the European Parliament. This study will not only be explanatory, even if that is the primary aim. As there is a lack of collected descriptive information about the EU-representation of sub-national parliaments this essay will passively also be descriptive and add to the general knowledge on the phenomena. It will describe power divisions and historical discussions in Finland and Denmark which today do not exist in easily accessible text. This is indeed relevant considering the fact that representation regularly is a point at legislative agendas in different EU countries or regions – as the Åland case shows.

In this qualitative study I will explore how regional and national political debates affect the autonomy representation in the European Parliament through a comparative study of two legislative territories. I will also examine how the national states argue in favor of or against power shifts through special national electoral districts for those territories.

The first territory is the autonomous Åland Island, which is a part of Finland and the European Union. Åland does not have any official representation in the European parliament. Åland is not a part of the EU as a tax union, which is a unique solution in

³ RTBF Belgium, “German-Speaking Community of Belgium Is One of the Best Represented at the European Parliament – EURANET PLUS,” Euranet Plus, February 13, 2014, <https://euranetplus-inside.eu/german-speaking-community-of-belgium-is-one-of-the-best-represented-at-the-european-parliament/>.

today's Union. The second territory is Greenland, an autonomous island that nationally belongs to the Kingdom of Denmark. Greenland was a part of the European Union until 1981 and while it was a part of the Union it had a reserved mandate in the European parliament, granted by the Danish Parliament through the Greenlandic election law for the EP.

As I will discuss in further detail in the chapter that reviews previous research, this thesis will explore issues of minority rights and autonomy, within the scope of European studies and political science – and this will be done through the lens of multilevel governance (MLG) and the concept of autonomy regimes.

The aim of this study is to examine autonomy (and through that minority) representation at supranational level, and what the political arguments for or against it are.

The research question addressed is simply: which political ideas behind national election laws affect an autonomy's potential EP-representation?

1.2 Disposition

In the next chapter I will describe the background to this study and the chosen definitions that I will work with. I will then provide an oversight of the previous research and position the study within the research fields.

Chapter 3 will provide the theoretical framework for the analysis: what kind of autonomy regimes there are and how these could function and affect the research questions from a multilevel governance perspective. The chapter ends with an operationalization of the theory into a questionnaire, that will be the foundation of the research design. Chapter 4 will address the method choices and chapter 5 will give a brief description of the gathered data. In chapter 6 the analysis will be conducted in accordance with the questionnaire, and the conclusion, and suggestions for future research, will be summarized in chapter 7.

2. Background & definitions

Initially it is important to pinpoint the concept that also will function as one of the two theoretical perspectives this study will rely on: autonomy regimes, and more specifically territorial autonomies with legislative powers. This means sub-national territories with its own parliament that has the right to, within certain limits, prepare laws and legislate for their own population.

There are different definitions of **autonomy**. The author Bjarne Lindström claims that it is a region that “significantly different in political and legal terms from other parts of the territory of the respective State”⁴. A second take on the matter is Markku Suski that defines it as: ”self-governing territories which, by virtue of some characteristic, have acquired a special status in relation to a unitary state”⁵.

Maria Ackrén agrees with Lindström and Suski, but also claims that it is a multifaceted and controversial concept – and creates the framework for autonomy regimes and territorial autonomy as a concept.⁶ Further on the legal and self-governing aspect will be my choice of definition, since I argue that creates solid entities that are possible to compare.

Considering the multifaceted definition of autonomy, one could raise the question of why the focus is on territorial rather than sub-national or regional. The regional perspective is way too broad and unspecific: it could be used to describe the whole territory in the case study, it could also refer to a specific region within e.g. Greenland. The political reality for European regions differs incredibly and it would be impossible to operationalize in connection with the research questions, which leads to this limitation of the phenomena.

2.1 Basic principles

The principle of subsidiarity is an important concept on a European level when discussing regional influence. The principle is claimed to be the backbone of regional

⁴ Lindström, Bjarne. “The Political and Legal Prerequisites for Autonomies in Europe.” Coopieters Foundation, 2023. Quote translated by the author.

⁵ Suski, Markku. “Aspects of Autonomy.” In *Minorities and Conflicts*. Åland Island’s Peace Institute, 1996, p. 93. Quote translated by the author.

⁶ Ackrén, Maria. *Territoriella Autonomier i Världen*. Mariehamn: Ålands fredsinstitut, 2005, p. 163.

influence on legislation, as a way of keeping the processes closer to the citizens.⁷ The principle implies that all decisions should be taken on the level that is the closest to and most suitable for the citizens. Every legislation that passes the EU-level should therefore be examined with the following questions: is the EU-level the most suitable level, or could this be better done at a national or even a regional level?

Another fundamental EU-principle is the **principle of proportionality**. The goal of the principle is to ensure that the actions of EU institutions do not exceed what is necessary to achieve the objectives of the Treaties.⁸ In this thesis I will also face another way of using the **concept of proportionality**. As I will develop in the analysis and data-section the Finnish and Danish protocols or debates have one recurring argument: “is it proportional?”. This understanding is a more straightforward one than the EU-principle: it is simply a question of if it is a reasonable ratio between actions/representation/or likewise.

When looking at the composition of the division of MEP mandates in the EP between member states the EU instead uses the term **degressive proportionality**. The term has its roots in the concept of proportionality but is a way of taking in to account the different sizes of the member states in the union.⁹ If using a non-modified definition of proportionality smaller member states would have little to no representation in the EP, while more densely populated countries would completely dominate the scene. To showcase what practical difference the use of degressive proportionality does, the following table shows how many spots different member states would have if divided by proportionality versus degressive proportionality. The number of mandates in the column for simple proportionality is calculated on the percent that the national population represents compared to the total EU population, from Eurostat 2021.^{10 11}

⁷ Eeva Pavy, “The Principle of Subsidiarity | Fact Sheets on the European Union | European Parliament,” Europa.eu, November 2019, <https://www.europarl.europa.eu/factsheets/en/sheet/7/the-principle-of-subsidiarity>.

⁸ EUR-Lex. “Principle of Proportionality.” eur-lex.europa.eu, n.d. <https://eur-lex.europa.eu/EN/legal-content/glossary/principle-of-proportionality.html>.

⁹ Delgado-Márquez, Blanca L, Michael Kaeding, and Antonio Palomares. “A More Balanced Composition of the European Parliament with Degressive Proportionality.” *European Union Politics* 14, no. 3 (June 3, 2013): 458–71. <https://doi.org/10.1177/1465116513485470>.

¹⁰ Source: European Parliament, “Home | 2024 European Election Results | European Parliament,” <https://results-elections.secvoting.com/>, June 14, 2024, <https://results.elections.europa.eu/en/>.

¹¹ Eurostat, “Population on 1 January,” Europa.eu, 2021, <https://ec.europa.eu/eurostat/databrowser/view/tps00001/default/table?lang=en>.

2024 election	Denmark	Finland	Germany	Malta
Mandates if simple proportionality was used	9,36	8,64	135,36	0,72
The actual mandates in EP	15	15	96	6

2.2 Previous research

My research question could be categorized as a contribution to the field of European Studies, to political science and the field of regional development or an addition to the field of linguistical, cultural and minority rights. More specifically the study is a contribution to the field of autonomy research. Related research often explores the keywords regional/sub-national parliaments and territorial representation. Regarding the overview of previous research, I've limited my overview to the European scene, since my focus will solely be connected to autonomy representation towards the EU-institutions.

Within the research about regions in the European Union in general there is a great collection of existing and on-going research. Through the CoR and other regional cooperation networks a lot of research is funded. One especially well researched aspect is the region's role seen in connection to the development of EU cohesion policy and resilience development. In this research different types of regions are not separated, and the units that are compared or analyzed can often differ drastically in how they function. In Germany and Spain, a lot of research has been done on how the regional parliaments function in the EU-system: prof. Hoffmann and Anna-Lena Högenauer being two influential researchers.

When it comes to my specific field of research, autonomies with extensive legislative power, the research is more often produced from universities, NGOs or the public sector close to the autonomy rather than by external actors.

One exception from this is the American professor Michael Tkacik. He published an influential article on types of autonomies in 2008, *Characteristics of Forms of Autonomy*, which sets the foundation for much of the future academic discussion on autonomy forms.

In his article he argues for a change in the traditional view of autonomy, opening for a more fluid and flexible definition and categorization.¹²

If one narrows the perspective to the Nordic context, one of the main researchers within the field of autonomy research is Maria Ackrén, Head of the Department of Social Sciences at the University of Greenland. Ackrén has conducted several studies on the concept of autonomy and her book *Conditions for different autonomy regimes* from 2009 will set the foundation for this study. Ackrén concludes with the idea that it would “be interesting to investigate the similarities and differences between countries possessing territorial autonomies”.¹³ Ackrén’s research perspective is mainly focused on definitions, creating categories and making autonomies operationalizable. Her methods are characterized by trying to combine qualitative and quantitative data to systematize the autonomies, with a focus on the political dimension and the (legal) documents that create and develop this dimension. Much of her research is conducted in a Nordic context, even if the categorization attempts are global.

Maria Ackrén has created an index over autonomies in the world according to the method of fuzzy-set. Ackrén uses the method to operationalize the conditions behind autonomy by giving quantitative values to qualitative variables such as geographical remoteness, potential disputes over natural resources, size according to population, historical context of the autonomy and so on.¹⁴ Through this method she creates an autonomy index where all the variables that create and develop an autonomy are measured binarily. When the index combines the different aspects, it makes it possible to compare different territorial autonomies by their so-called fuzzy score: both in connection to specific dimensions and conditions as well as the total score.¹⁵

In her application of fuzzy-set Ackrén reasons that you actively can chose the dependent variable and from there discover the other variables that could be explanation to a specific autonomy situation.¹⁶

¹² Tkacik, Michael. "Characteristics of Forms of Autonomy." *International Journal on Minority & Group Rights* 15, no. 2/3 (June 2008): 369-401.

¹³ Ackrén Maria, *Conditions for Different Autonomy Regimes in the World: A Fuzzy-Set Application* (Åbo: Åbo Akademi University Press, 2009), p. 162.

¹⁴ Ackrén, *Conditions for Different Autonomy Regimes in the World*, p. 39-101.

¹⁵ Ackrén, *Conditions for Different Autonomy Regimes in the World*, p. 109-111.

¹⁶ Ackrén, *Conditions for Different Autonomy Regimes in the World*, p. 24.

As mentioned in relation to definitions, Bjarne Lindström's reports and research provide an important base for further research within a Nordic context. Lindström is an expert in regional planning and policy and has together with other scholars examined especially the legal prerequisites for the Åland autonomy. In 2023 he wrote the report *The political and legal prerequisites for autonomies in Europe*, which is a case study of the autonomy development and situation in the Faroe Islands, South Tyrol, The Basque Country, Isle of Man, Gibraltar and Flanders. Together with Ackrén's work Lindström's analysis structure will create the foundation for this thesis. In Lindström's 2023 report he pinpoints several aspects that alone are not sufficient as an explanation for the differences in autonomy development shown in his case studies¹⁷: something that I'll argue that also is the case when it comes to the autonomies' multilevel representation.

Another scholar that has contributed a lot to the field of research is Markku Suski. Suski functions as a professor in law at Åbo akademi and in his article *Aspects of autonomy* he presents an attempt to systematize the legal status of autonomies by looking at two linear aspects: the type of law regulating autonomy and the type of power the law in question gives to the autonomy. In this study the relevant autonomies align regarding the type of power, but they differ in what kind of law that gives the autonomy the power in question.

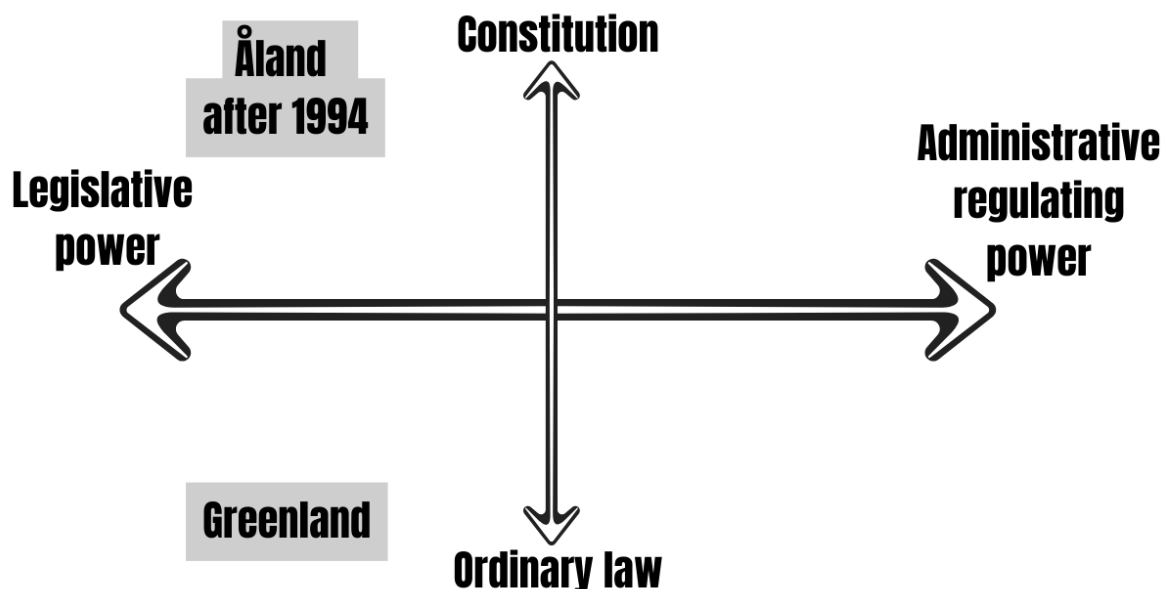


Figure 1: Markku Suski's legal basis for an autonomy.

¹⁷ Lindström, Bjarne. "The Political and Legal Prerequisites for Autonomies in Europe." Coopieters Foundation, 2023, p. 8.

Suski's research is naturally more focused on the legal aspects of autonomy, and his primary sources are legal texts. He also covers areas within digitalization of governance, fundamental rights as well as linguistics and minority rights.

A further author that has been important for the perspective of territorial autonomies is Professor Lauri Hannikainen from the Faculty of Law at Helsinki University. Hannikainen has during his career as researcher focused on, among other things, the legal status of minorities and minority rights. In the article *Legal status of Minorities, Indigenous Peoples and Immigrant and Refugee Groups in the Nordic Countries* Hannikainen summarizes that the Nordics in general have good policies towards minorities: "Certain Nordic Policies towards different minority groups serve as positive examples internationally. These are in particular 1) The self-governments of three island territories, the Åland Islands, Greenland and the Faroe Islands"¹⁸. Hannikainen shares the judicial perspective on autonomies together with Suski. Key perspectives in his research are self-determination, international law and, as earlier mentioned, minority rights with legal sources and discussions as the base.

Gudmundur Alfredsson and Göran Lindholm are two scholars that in various ways have contributed to the field of research. In a coming volume they have gathered many highly respected scholars' and experts' articles about autonomy challenges from a Nordic perspective.¹⁹ This book is not yet released, but some of the articles will, to a limited extent, be used as sources in this thesis. I personally got the possibility to edit the manuscript and through that got to preview the content.

2.3 Relevant horizontal organization

In the international context there are several networks and organizations that with their stakeholders or members conduct research and gather data on autonomous territories. In the European institutional system, the Committee of Regions (CoR) is the EU institution with the aim of representing local and regional authorities. CoR has an advisory position in the EU legislative process and was created through the Treaty of Maastricht in 1993. When

¹⁸ Hannikainen, Lauri. "Legal status of Minorities, Indigenous Peoples and Immigrant and Refugee Groups" In *Minorities and Conflicts*. Åland Island's Peace Institute, 1996, p. 71.

¹⁹ This book is not yet released.

reading earlier mentioned scholars' work on autonomies in the EU one thing stands out in relation to the CoR: the committee is seldom or never mentioned. CoR did not exist when Greenland left the union. Åland is one of the total 329 members in CoR, and according to MP Mats Löfström this was what the national-local negotiations resulted in when Åland and Finland entered the EU – instead of the desired spot in the European parliament.²⁰ With this background the CoR will be disregarded in this report.

Another relevant network is RLEG. RLEG gathers 17 regional governments with different levels of own legislative powers in the categories: land, autonomous region, autonomous community and region. One of the network's primary objectives is to "joining efforts in advancing effective multilevel governance and recognition to the unique role of the regions with legislative powers in EU's policy cycle".²¹ A similar network to RLEG is CALRE. CALRE gathers 72 sub-national parliaments, represented by the assemblies' presidents, with legislative powers.²² Both networks offer contributions, declarations and working group results that can help to understand the broader scope of autonomy studies in a European context.

2.4 The research gap

With the previous background in mind, I found a research gap where I think that my study will fit perfectly. The autonomy puzzle in Europe is very much a work in progress, with pieces that per se are living and dynamic. Autonomy as a concept within political science is also relatively new, and a part of a vivid and ongoing minority protection debate. This makes the topic hard to catch from solely a legal perspective, in part due to the inevitable fact that legislation often is a slow process. I want to explore the multidisciplinary and multilevel dynamic of autonomies versus national state versus the EU – through two cases that have theoretical similarities but differ in the representational aspect at the European level.

The autonomy puzzle is evolving on multiple levels: it is affected by local, national and international politics, discussions and agreements. Ackrén's contributions to the area with a

²⁰ See chapter 5.

²¹ RLEG. "Members." Rleg.eu. Accessed August 10, 2024. <https://rleg.eu/members>.

²² CALRE. "Conference of European Regional Legislative Assemblies," March 7, 2024. <https://www.calrenet.eu/>.

political science perspective and a comparative approach create a solid ground for continuing the research – and with my research question I found the perfect setting to try her conclusions in two specific cases.

Through the two case studies I will connect the previous research on autonomy representation with the ongoing political development of the two autonomies in question. Within the current challenges that the EU overall faces the regional aspect is sometimes being highlighted as a way forward for finding suitable and effective solutions²³. With this comparative analysis I hope to create an updated picture on if autonomy development is something that could alter the way regions can influence the legislative process, as a continuation of the earlier academic description of the dynamic.

2.5 Case selection

After the proposal of changing the Finnish election law, my first case of the study was obvious: the Åland Island represents a solid legislative autonomy with several international connections and the recent discussion about regional representation in the European parliament. It is a perfect example of well-developed autonomy, with lots of new accessible data. When choosing the other case(s) I explored several different options. After making a scheme of all autonomies in the world, according to Ackrén's different works, and dividing them into categories based on local legislative opportunities, membership within the EU and territorial character, I concluded that a reasonable selection should consist of two similar autonomies or more than five autonomies that express different characteristics. I was therefore looking at increasing the case studies to five or six regions but reasoned, with regard to the scope of the thesis, that the time frame would not allow the collection and analysis of that amount of data.

In Ackrén's index the Italian and the Spanish autonomies join the Nordic ones with a very high score.²⁴ There is a lot of research, especially focusing on the Spanish regions, since they are very strong regions and, in some cases, do explicit regional efforts with the goal to gain independence from the Spanish state. The amount of existing research on the South of

²³ Joint Research Centre. "Cohesion Policy Benefits EU's Economy and Regions - European Commission." European Commission, July 22, 2024. https://joint-research-centre.ec.europa.eu/jrc-news-and-updates/cohesion-policy-benefits-eus-economy-and-regions-2024-04-11_en.

²⁴ Ackrén, *Conditions for Different Autonomy Regimes in the World*, p. 109-111.

Europe motivated my decision to exclude these regions, and the final set became the Nordic autonomies that are, or have been, a part of the European Union. This variable rule out the Faroese Islands, which otherwise would have been a natural part of the selection. In Lindström's, Alfredsson's and Lindholm's research the Faroe Islands, as well as South Tyrol, UK autonomies and Flanders have recently been examined. Greenland therefore was even more of the logical option.

The selection of the Åland Islands and Greenland was also based on the fact that the two territories have many similarities in parliamentary organization, size and autonomy development. Both autonomies are islands and both islands also have had, or are currently having, a discussion with their national Parliament regarding political representation in EP. This set a great empirical foundation for my research, with the access to comparable data. As Lindström states in his report, the theoretical facts and bases for an autonomy seldom reflect reality²⁵. Unintentionally this claim will also be tested in this thesis, in connection to the objective similarities of the two cases.

It could have been possible to include other regions as well, with regard to the fact that it is most likely that there is a wish for more (EU) representation on a regional level.²⁶ This would have put way to high demands on the method of collecting data in regard to the scope of a master thesis, and I reason that these two similar cases create the opportunity to do a more thorough analysis. To be able to collect that empirical data, in a foreign language, would have demanded a great collection of qualitative interviews both from regional and national point of view. One advantage with the chosen selection and the methods to collect data is that the empirical information I am aiming to gather is static: the discussions are in the past, and I have physical documents that guides us through the arguments – with the exception of one complementary interview.

2.5.1 The case of Åland

The World War has raged for three years. In Europe everything is chaotic. The Åland Island and Finland still are a part of the enormous Russian empire, but it is an empire that is shaken

²⁵ Lindström, *Prerequisites for Autonomies in Europe*, p. 50.

²⁶ Donas, Tom, and Jan Beyers. "How Regions Assemble in Brussels: The Organizational Form of Territorial Representation in the European Union." *Publius: The Journal of Federalism* 43, no. 4 (September 21, 2012): 527–50. <https://doi.org/10.1093/publius/pjs042>, p. 544.

to its core by war and revolution and stands before a civil war: the empire is soon to fall apart.²⁷

In a comic book from the 1990s these are the first words used to describe the history of the Åland Islands. The Åland Islands are a group of islands in the middle of the Baltic Sea, between Stockholm and Helsinki. The inhabitants have traditionally always spoken Swedish, and the islands have been considered as an important geopolitical territory because of its proximity to Saint Petersburg, Stockholm and Helsinki. For hundreds of years Finland and the Åland Islands was the eastern part of the Kingdom of Sweden. In 1881 Finland and Åland were conquered by the Russian Empire. The Åland Islands continued being a part of the Swedish cultural sphere and has always been a military strategic bonus for the countries controlling the territory. When Finland became independent in 1917, the inhabitants of Åland started a resistance movement promoting reunification with Sweden.

To avoid a war between the new state Finland and Sweden over the Åland Islands the question (*Ålandsfrågan*) was settled by the League of Nations in 1921. The solution was to grant the people of the Åland islands autonomy and to protect the Ålanders right to their own culture and the Swedish language in the Finnish constitution.²⁸

This led to an autonomous status and the creation of Åland's own legislative parliament, the *lagting*, and its own government, *Ålands landskapsregering*. The legal basis of the autonomy is the "self-government law" (In Swedish: *Självstyrelselagen*), further on called the Åland home rule act". The law can only be changed through both the Finnish parliament's and the Åland parliament's approval.²⁹ The law divides the legislative powers between the Åland parliament and the Finnish parliament. Examples of legislative powers that Finland has exclusive competence in are foreign politics, defense politics, international relations and taxation.

When Finland decided to join the EU the Ålanders had the choice to join with Finland or to stay outside the union. The decision was made through two referendums and in 1993 the

²⁷ Skogsjö, Håkan. *Skotten i Tornvillan*. Ålands landskapsstyrelse, 1997.

²⁸ Öljans, Jerker. *Ålandsfrågan mina herrar*. PQR-Kultur, 2020.

²⁹ Finland, Justitiedepartementet. Ålands självstyrelselag. 16.8.1991/1144. Adopted 01.01.1993. <https://finlex.fi/sv/laki/ajantasa/1991/19911144>

Ålanders decided to join the EU, on the condition that some of the autonomy aspects were respected. This meant that some of the legislative powers that Åland then had exclusive rights to legislate about was moved from the local level in Mariehamn to Brussels. One of the questions was to ensure that Åland still could influence these legislative areas through granted representation in the EP. This question was not solved when Åland entered the union, which is the basis for the soon 30-year long discussion between Åland and Finland about the EP-promise.³⁰

Regarding political autonomy representation Åland today has one reserved spot in the national parliament. In connection to the EU institutions Åland has one minister counsellor placed at the Finland's permanent representation to the EU in Brussels, a part of the Finnish ministry for Foreign Affairs.

A coalition of parties in the Åland parliament (*samarbetspartierna*) has for several years had a political agreement with joint representation in the EP together with the national party for safeguarding the Swedish language in Finland, Svenska Folkpartiet (SFP). The agreement states that if SFP manages to get a seat in the EP they have to hire one person to cover Åland's interests. If a candidate from the Åland islands get a seat in the EP representing SFP they in return need to hire one person from SFP.

In numbers Åland has approximately 30.000 inhabitants and an area of 1.500 square kilometers. The local government consists of 30 full-time politicians and the island is divided into 16 different municipalities. When Finland joined the EU the Åland exemptions were stated in protocol 4 in the accession treaty.

During Åland's time in the EU, the following MP:s has represented Åland in Helsinki and the Finnish parliament:

- 1983–2003: Gunnar Jansson (Liberalerna)
- 2003–2007: Roger Jansson (Moderaterna på Åland)
- 2007–2015: Elisabeth Naucélér (Obunden)
- 2015-now; Mats Löfström (Åländsk center)

³⁰ Löfström, Mats. About Åland and the European Parliament. Interview by Alexandra Gäddnäs, April 17, 2024.

In reference to the data collection these are potential interview subjects and important key words when searching in parliamentary achieves and news achieves.

2.5.2 The case of Greenland

Greenland is the biggest island in the world and is located in the Arctics. The claims of “owning” the Greenlandic territory dates back to 1397 and the Kalmar Union between Norway and Denmark³¹. When the union dissolved 1523 the Danish Kingdom got control over Iceland, The Faroe Islands and Greenland. From 1815 onwards Denmark conducted what Malloy calls “traditional colonial politics” connected to the three islands. After the turn of the century the Greenlandic elite came with demands on better treatment, but the decolonization process first got started after the Second World War.

During the Second World War Denmark lost direct control over Greenland when under German occupation. Greenland was during that time de facto controlled from the United States, by Danish representatives.³² After the war Denmark faced an image problem, being categorized as a colonial power by the United Nation. Denmark did not want this status, but neither did they want to let go of the control over Greenland. Greenland served, and still serves, as a reason for Denmark to be viewed as big player in international politics.³³

According to Malloy one of the main reasons of granting the Greenlandic people autonomy was a foreign policy-related one – rather than a humanitarian. In 1978 The Danish *Folketing* adopted the Home Rule Act for Greenland, a law inspired by the Faroese Home Rule Law from 1948. This gave the Greenlanders the possibility to withdraw from the EU, something that they did a couple of years after the home rule act entered in force 1979. Ackrén argues that the development of the Greenlandic autonomy has been incredibly fast: “Greenland's political development has progressed rapidly from colony, autonomy and now extended autonomy”.³⁴

³¹ Malloy, *Danmarks rolle i Grønlands emancipering: Formynder eller fredsaktør?* 108.

³² Maria Ackrén, “Grönlands Politiska Utveckling Efter Andra Världskriget till Våra Dagar” in *Självstyrelser i Norden i ett fredsperspektiv: Färöarna, Grönland Och Åland*, Ålands fredsinstitut, 2015.

³³ Malloy, *Danmarks rolle i Grønlands emancipering: Formynder eller fredsaktør?* 130.

³⁴ Ackrén. *Grönlands politiska utveckling efter andra världskriget till våra dagar*, 103.

Malloy reasons that this was a result of a generational change in Greenlandic politics. The new generation fought for a Greenlandic representation in the Danish accession negotiations in Brussel, a request that was respected only in the end of the negotiations process. By then public opinion in Greenland had already changed. The Greenlanders arranged a referendum on the matter, which was ruled unconstitutional by Danish lawyers. The referendum results were against joining the EU. The main concerns for the Greenlanders in the decision was the handling of fishing quotas and the oil industry.³⁵ Malloy claims that the Greenlandic and Danish relation first started to normalize after the end of the Cold War. In practice the normalization then occurs after Denmark joined the EU, and after Greenland already got its home rule and left the EU.³⁶

In numbers, Greenland has approximately 56.000 inhabitants and an area of 2 million square kilometers. The local government consists of 31 politicians and the island is divided into 5 different municipalities. When Denmark joined the EU the Greenland exemptions were stated in protocol 2 in the Danish accession treaty.

During the time Greenland entered and exited the European Union the island always had two seats in the Danish Parliament. Below is a scheme of the Greenlandic MP in *Folketinget* during the years my data will cover:

- 1977: Otto Steenholdt (Atasuut) and Lars-Emil Johansen (Siumut).
- 1979: Otto Steenholdt (Atasuut) and Preben Lange (Siumut)
- 1981: Otto Steenholdt (Atasuut) and Preben Lange (Siumut)
- 1984: Otto Steenholdt (Atasuut) and Preben Lange (Siumut)

Regarding the data collection these are potential interview persons and important key words when searching in parliamentary achieves and news achieves.

³⁵ Ackrén. *Grönlands politiska utveckling efter andra världskriget till våra dagar*, 90.

³⁶ Malloy, *Danmarks rolle i Grönlands emanciperings: Formynder eller fredsaktør?* 130.

3. Theoretical framework

To conduct the analysis, I will apply a combined theoretical framework: the concept of autonomy regimes and the approach of multilevel governance. In this chapter I will first briefly explain the core of both approaches, then argue why they need to be combined in order to tackle my research questions. Lastly, I will operationalize the framework so that it can be used to carry out the coming idea analysis.

3.1 Autonomy regimes

As discussed in the previous research section, Maria Ackrén has done a thorough categorization and indexation of autonomies in the world and through this created concepts of autonomies that can be compared with each other, and regimes that can be further studied.

This will serve as the first theoretical element in this study: the concept of autonomy regimes and more specifically territorial autonomy with legislative powers. In *Condition for different autonomy regimes* (2009) Ackrén's aim is to explain how a territorial autonomy can be created in the first place. One absolute condition is democracy: "a prerequisite for discussing autonomies at all is to operate in a national sphere where democracy prevails – it is a necessary condition, which sure is fulfilled in these cases."³⁷

Ackrén illustrates that the political development in democracies in the late 1990s is characterized by a decentralization movement, and that 95% per cent of democratic countries in the end on 1900s century had some kind of system with sub-national authorities or governments³⁸. She continues to discuss two words: "autonomy" and "self-government" with the conclusion that they are used synonymously³⁹.

When I discuss the two different legal frameworks for autonomy in Greenland and Åland, this should be remembered. The legal framework on the Åland Islands is called

³⁷ Ackrén, *Conditions for different autonomy regimes*, 54.

³⁸ Ackrén, *Conditions for different autonomy regimes*, 5.

³⁹ Ackrén, *Conditions for different autonomy regimes*, 11.

“*självstyrelselag*” and the legal framework of Greenland is called “*hjemmestyrelselag*”. Further on the laws will be translated as “home rule acts”.

Ackrén claims that what an autonomy regime actually represents is a division of power⁴⁰ – a claim that makes it interesting to combine with MLG-approach. The concept of (territorial) autonomy is according to Ackrén a “living and not static phenomenon”⁴¹.

Another influential researcher within the field of autonomy research is Stephan (2009) who talks about three types of autonomies: coming-together, holding-together or putting-together⁴². The independent variable here is based on the hierarchical approach. Is it a top-down model or a bottom-up model? In the two cases the top-down approach is dominating, even if that dynamic in some cases is challenged in the Greenlandic case. The top-down approach is the core in the research question. It is the national attitude that dictates the autonomy development in this scenario.

With the fuzzy-set method that Ackrén used in some of the previous research she combines qualitative and quantitative method and creates an index of autonomy, which is based in the dependent variable of her research: the degree of autonomy⁴³. The independent variables that are examined and combined to create the degree of autonomy are⁴⁴:

- 1) Democracy
- 2) Historical strategic importance
- 3) Geographical distance
- 4) Potential disputes over natural resources
- 5) Existence of regional movements/parties and/or separatist groups
- 6) Ethnic distinctiveness
- 7) Size according to population
- 8) Economic viability

These independent variables will be the foundation of the questionnaire, through which I will do my analysis.

⁴⁰ Ackrén, *Conditions for different autonomy regimes*, 15.

⁴¹ Ackrén, *Conditions for different autonomy regimes*, 22.

⁴² Ackrén, *Conditions for different autonomy regimes*, 47.

⁴³ Ackrén, *Conditions for different autonomy regimes*, 110.

⁴⁴ Ackrén, *Conditions for different autonomy regimes*, 111.

3.2 Multilevel governance

The multi-level governance (MLG) paradigm. Like Lynggard and others claim, to successfully conduct a study in European Studies too much of just one way of thinking will hold us back.⁴⁵ While the MLG framework alone does not fully equip us with answer to the research question, it highlights how various actors leverage interlevel connections to negotiate and shape the development of representation. The MLG perspective is, however, essential for understanding the complexity of this process.

I will disregard the past (and present) discussion of how MLG positions itself among other traditional theories in European studies. I will use the paradigm as a way of sorting and comparing the two islands, and from that also point out where the paradigm works as an explanatory model and where it fails to explain the variations between the two autonomies. As an example of where MLG alone has a hard time explaining the variation: the regional (or autonomous) level is not static. It cannot be treated as a set concept, the level itself is floating and constantly evolving – and not necessarily in the same directions as the other levels. To be able to tackle this MLG must be complemented with perspectives that can explain the internal development of variables on autonomy level.

Hooghe and Marks are two of the most cited scholars in the field of MLG. Through several articles and books their research has set the foundation for the development of the framework. Thomas Christiansen describes MLG as a not yet “fully fledged theory”. Tanja A. Börzel talks about it as an “approach” and “analytical concept”. The scholars have different opinions on how the theory relates to other, earlier dominating, theories within European studies but both agree that the baseline is a shifted focus in politics: from a two level (supranational state and national state) to a three level (European) perspective.⁴⁶ This will in the study be the identifier for multilevel ideas, arguments or aspects: it requires an expansion of the levels involved from two to three.

Christansen describes the approach as freestanding relations between the supranational body and the lower levels. This results in the national state losing its exclusive control over

⁴⁵ Lynggaard, Kennet & Manners, Ian & Löfgren, Karl. “Crossroads in European Union Studies”, p. 7.

⁴⁶ Christiansen, Thomas. “Governance in the European Union.” In *European Union Politics*, edited by Cini, Michelle; Pérez-Solórzano-Borragán, Nieves. Oxford: Oxford University Press, 2019, p. 103.

representing territorial interests in European institutions, and regional actors gaining autonomy as independent participants.⁴⁷ This is a claim that in many ways can interact with the development of representation in the two cases that this study examines.

Something obvious when talking about autonomy development is that one sometimes looks at national states losing control over specific territories within their official borders: but do they have the possibility to become independent participants as a territorial region or autonomies? Is representation in the EP a way of achieving that?

Gustav Blomberg has in the text *Ålands representation i Bryssel* explored how the Åland minister counselor (the Åland government's representative in Brussels) represents Åland's interests – and how its position and work is affected by the autonomy aspect. The minister counselor is officially a part of the Finnish representation to the EU but is recruited by the Åland government. It is a position that intersects the different legislative competences and to some extent could be seen as challenging the status quo of exclusive legislative competences and Finland's authority over handling international relations. Blomberg attributes the physical presence of regional interests in Brussels to what he terms "the multi-level governance concept."⁴⁸ Blomberg's reasoning showcases the need for looking at different political levels and how they interact to be able to understand the nature of different autonomies, and the national state's relationship to the autonomy in question.

3.3 The combination of approaches

When analyzing different arguments and conditions that affect the possibility of regional representation in the EP, I will apply two theoretical concepts. As mentioned, MLG alone cannot explain the variation between the autonomies. It is an important tool to be able to scientifically connect and examine the different levels, but I will need to be able to take into account how an autonomy functions in the political systems – and in what aspects they differ.

Without combining the approaches, I would be left with a static picture that does not take into account the ever-changing aspect of the (1) multilevel changing political landscape

⁴⁷ Christiansen, Thomas. "Governance in the European Union." In *European Union Politics*, edited by Cini, Michelle; Pérez-Solórzano-Borragán, Nieves. Oxford: Oxford University Press, 2019, p. 103.

⁴⁸ Blomberg, Gustav. "Ålands Representation i Bryssel." Ålands fredsinstitut, 2022, pp. 9–10.

and the (2) multifaceted aspects of autonomy condition. Therefore, I see it as essential to use an overlapping framework to be able to answer the research questions.

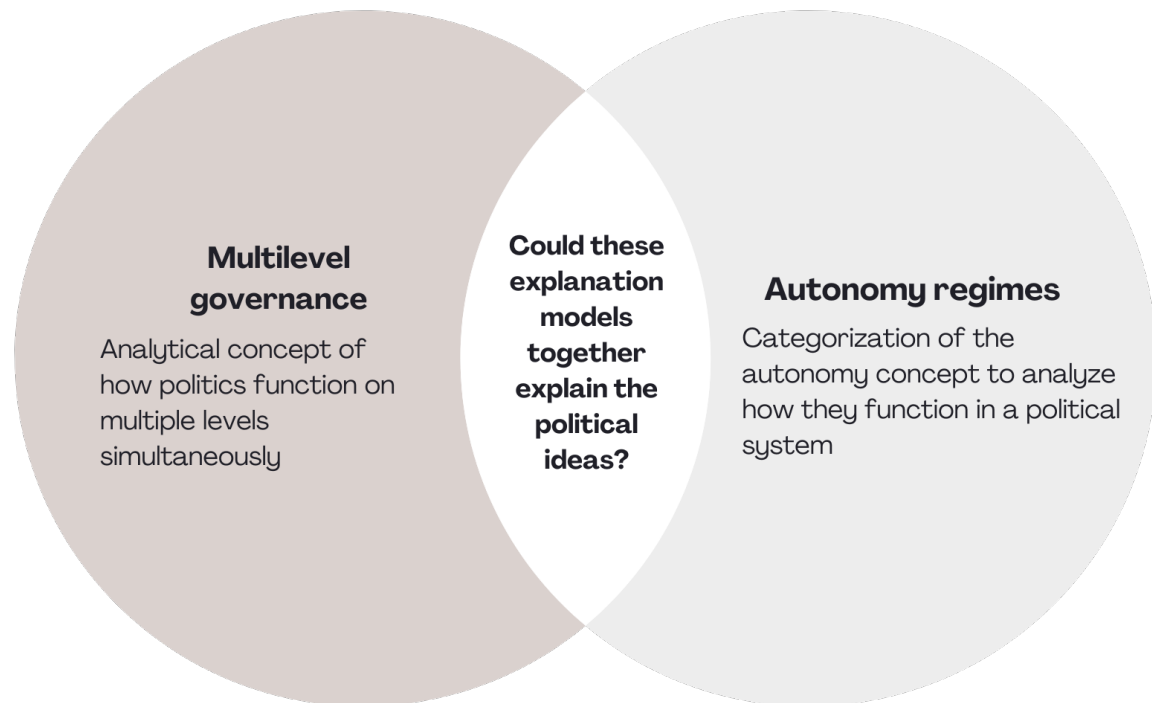


Figure 2: The combination of autonomy regimes and multilevel governance.

For my theoretical framework I have created a theoretical hierarchy of which concept will be prioritized, and which approach will work as a supportive perspective, completing the analysis and explaining the complexity.

- a) Autonomy regimes:
 - i) the autonomies view at the matter
 - ii) the national view at the matter
- b) MLG: how does the relation between the levels, divided in four perspectives, function?

The concept of autonomy and its characteristics will guide the analysis forward. When discussing the concept, I will always examine the question from four perspectives, to be able to search for patterns in the comparison. The analysis of these four perspectives will then be further explained through the lens of MLG, which will showcase how the dynamic relations between political levels affect autonomy development.

Ackrén's independent variables that create the degree of autonomy function as a solid ground to concretize the autonomy regime aspects. In combination with Lindström's chosen perspectives in his comparative report from 2023 I chose to focus on the following four cluster elements for structuring the data and conducting the analysis:

1. Historical setting
2. Political position
3. Legal setting
4. Geopolitical aspect

3.4 The operationalization of the framework

I have operationalized the framework through a questionnaire, that takes the theoretical hierarchy and the qualitative aspects into account. Through this questionnaire the data from the two cases will be processed when conduction and idea analysis – which will be the basis for the discussion and conclusion.

The questionnaire:

- a) Through the lens of autonomy regimes, answer the questions:
 - (1) How does the historical setting affect the two cases?
 - (2) How does the political position of the autonomy affect the relation to the national state?
 - (3) How does the legal setting affect the relation to the national state?
 - (4) How does the geopolitical aspect affect the two cases?
- b) Multilevel governance: how do the four aspects relate to different levels?
 - (1) Historical setting
How does the autonomy correspond with different levels historically?
 - (2) Political position
How does the autonomy correspond with different levels politically?
 - (3) Legal setting
How does the autonomy correspond with different levels legally?

(4) Geopolitical aspect

How does the autonomy correspond with different levels geopolitically?

4. Method

In examining national attitudes towards autonomy representation on a supranational level I will look at the specific arguments presented by the national governments in a comparative way. When it comes to the collection of the data from my primary sources it will be structured by the method of idea analysis, that will help me find an answer to what I actually need in the terms of tools to tackle the questions in the questionnaire. The second part of my method framework is the use of informant interviews, to help me fill the potential gaps in the data.

The choice of using idea analysis is based on the fact that the method sets the rules to gather and process the fragmented data my to cases offers in a smooth way. As will be discussed further on, the method's goal of explaining origins and consequences of political messages does exactly align with the goal of the research question. It is also an excellent method for extracting the core messages from the oral and written sources – and could easily be used in other cases to study the phenomena even further.

Further on I will develop the sources further, but at this stage I can conclude that the Danish case offers extensive written material and primary sources in form of plenary protocols. The Finnish case will be examined through legal proposals, committee reports and a complimentary interview, with regard to the lack of extensive plenary discussion protocols.

4.1 Qualitative idea analysis

Describing a text inevitably means that we think we can say something about its meaning that is hopefully not self-evident and thus contradicts how at least someone else claims the text is to be understood. (Beckman, 2007, p. 50⁴⁹)

To be able to concentrate on the core arguments and aspects of the different views on supranational representation I've chosen to use the method of qualitative idea analysis. I argue that this analytical technique will allow me to extract the core differences in a smooth manner. Ludvig Beckman is a political scientist who set the foundation for the

⁴⁹ Beckman, Ludvig. *Grundbok i idéanalys: det kritiska studiet av politiska texter och idéer*. Johanneshov: Mtm, 2019. Quote translated by the author.

method of idea analysis often used by other Swedish political scientists. The method is a development on traditional ways for analyzing messages and texts, for example Björn Badersten's work on normative and value-based text analysis or Göran Bergström & Kristina Boréus work on the power of language use, *Textens mening och makt* (2005, 2012).⁵⁰

Beckman claims that idea analysis is a sub-category method related to similar methodologies such as ideology, content and argument analysis. According to Beckman the analytical technique sets the rules on how you should collect your data and how you should process it – while the methodology on a broader scale connects the theory with the relationship between the researcher and the material. When combining these two approaches Beckman argues it allows for a richer and more nuanced analysis.⁵¹ He argues that even if you choose a specific specialization, that does not mean you need to exclude the others.

For Beckman idea analysis simply is the scientific study of political messages. He divides the method into two main types: substantial and functional analyses.⁵² Substantial analysis views political messages as a collection of arguments aimed at testing their validity and sustainability, a practice known as idea criticism and often used by Herbert Tingsten. Functional analysis, on the other hand, sees arguments as variables in a sequence of events, focusing on their origins, dissemination, and consequences.⁵³

In this thesis I'll use the functional approach, which will meet one of the three primary purposes that Beckman highlights:

1. describing and interpreting the meaning of political messages
2. assessing their sustainability
3. explaining their origins or consequences⁵⁴

With the functional idea analysis, I aim to explain the arguments origins and consequences for the autonomy development and autonomy representation at supra national level.

⁵⁰ Vedung, Evert. "Fyra Typer Av Statsvetenskaplig Idéanalys." *Statsvetenskaplig Tidskrift* 120: 2018, no. 2 (2018).

⁵¹ Beckman, *Grundbok i idéanalys*, 10.

⁵² Beckman, *Grundbok i idéanalys*, 11.

⁵³ Beckman, *Grundbok i idéanalys*, 12-13.

⁵⁴ Beckman, *Grundbok i idéanalys*, 14.

One methodological question that divides the scholars according to Beckman is to what extent you need to understand the context in which the political messages are presented. Beckman emphasizes that political messages are contributions to contemporary debates, and their significance may be lost without considering their historical context.⁵⁵ He presents two academic ways of tackling the questions: either the “Cambridge School” that highlights the intellectual and linguistic debates of the time or the economic and social conditions. In the end he concludes that the research questions should guide the choice. An idea-centered study focuses on the concept itself, while an actor-centered study considers who presents the idea and why.⁵⁶

This will be the perquisite for this analysis: this study looks at multilevel arguments, and will therefore be an actor-centered study which needs to consider the concrete conditions surrounding the arguments – who, when and why? Beckman emphasizes that you early on need to sort out which or whose arguments or claims you aim to study and to connect this methodological choice to your theoretical framework, and theoretically motivate your choice of analytical concept.⁵⁷ In this thesis the arguments in focus are the national parliamentary arguments regarding the wishes of the autonomies (expressed by the legislative parliaments) and this choice and the method is connected to the theory through the earlier presented questionnaire.

Beckman continues and identifies three main textual analytical approaches: concept analysis, argumentation analysis, and content analysis. The approach that is the base of the questionnaire and the analysis is concept analysis. Concept analysis examines how a concept is presented in debates, differentiating between words and concepts, and addressing the ambiguity that may arise from this distinction.⁵⁸

This study will not only be explanatory, even if that is the primary aim. As there is a lack of collected descriptive information about sub-national parliaments EU-representation this study will passively be descriptive and add to the general knowledge on the phenomena. It

⁵⁵ Beckman, *Grundbok i idéanalys*, 15.

⁵⁶ Beckman, *Grundbok i idéanalys*, 16-17.

⁵⁷ Beckman, *Grundbok i idéanalys*, 21.

⁵⁸ Beckman, xx *Grundbok i idéanalys*, 31-37.

will describe power divisions and historical discussions which today do not exist in easily accessible text. This becomes a problem in connection with the earlier mentioned fact that this regularly is a point at legislative agendas in different EU countries or regions.

Beckman claims that for such descriptions to have scientific value, they must offer new insights and enable the researcher to draw conclusions.⁵⁹ On this matter prof. em. Evert Verdung agrees:

Beckman thus strongly rejects the view that description is something untheoretical and trivial; and I myself agree, as just stated, wholeheartedly and enthusiastically. Good descriptions have an intrinsic value.⁶⁰

Beckman means that the interpreting of the message must show things that are not self-evident and contrast with at least some other interpretations.⁶¹ This could be done through comparing earlier interpretations or to compare how the same questions are tackled by other actors, the latter is exactly what this study will do. The explanatory analysis will use two comparative cases and methodologically seeks to answer why something happened by using political statements, documents, and other texts as indicators.⁶² It is important to remember in these cases that ideas themselves cannot cause consequences, it is the actions that are based on the arguments that create the consequences.

4.2 Informant interview

The protocols from Danish plenary debates are extensive and gives the study hundreds of pages of data, while there are no comparable protocols of an actual debate from the Finnish parliament. The written sources from Finland consist of proposals and committee reports. Much of the material I've found originates from the Åland Parliament and is included in the list of potential data for the sake of future research, but it will not be addressed as more than reference sources in this thesis. To balance the data between Finland and Denmark I have complemented the Finnish data with an interview with the Åland MP in the Finnish parliament that proposed changes to the election law in 2023, Mats Löfström. The interview will give us the perspective that the Finnish sources otherwise lack. The interview will be conducted in a qualitative and semi structural way.

⁵⁹ Beckman, *Grundbok i idéanalys*, 49.

⁶⁰ Vedung. "Fyra Typer Av Statsvetenskaplig Idéanalys". Quote translated by the author.

⁶¹ Beckman, *Grundbok i idéanalys*, 51.

⁶² Beckman, *Grundbok i idéanalys*. 81.

With Kvale & Brinkmann's terminology this one-on-one interview is an elite one: "with a leader or expert in a society and that often has a position of power".⁶³ This will affect the ethical considerations below. Kvale & Brinkmann addresses the ethical aspect of conducting and using interviews as data and highlight four areas that needs to be considered to ensure the ethical validity of an interview study: informed consent, confidentiality, consequences and the role of the researcher.⁶⁴

Regarding the informed consent I gave written information about the study by email. According to Kvale & Brinkmann, there could be methodological conflicts between confidentiality and scientific principles for intersubjective control, but this is not the case in this study.⁶⁵ In this case the aspect of confidentiality is generally not applicable. The interview person answers the questions in the public role as a member of parliament, and as Kvale & Brinkmann states there is also a value of publicly recognizing the data contribution the interview person helps with.⁶⁶ The interview did not follow a set interview guide, and this meant that the interviewee only got the themes for the interview beforehand, not the specific questions. Therefore, the summarized interview will be sent to the interview person and the content will need to be approved before conducting the analysis.

4.3 Methodological reflections

I have considered expanding the data through more interviews. Since the Danish data in quantitative matters are much more extensive and offers a thorough walkthrough in the different political parties' views on the Greenlandic representation the Finnish MP-interview was needed to balance the data. More interviews would have offered an even more vivid and detailed picture, but under the scope of a master thesis the balancing argument was valued most suitable.

There were several other methods that could have been suitable to use in this study: idea analysis is closely related to argumentation analysis, rhetorical analysis, discourse analysis

⁶³ Kvale, Steinar, and Svend Brinkmann. *Den kvalitative forskningsinterviewen*. 3rd ed. Studentlitteratur AB, 2014, p. 187.

⁶⁴ Kvale & Brinkmann, *Den kvalitative forskningsinterviewen*, p. 106.

⁶⁵ Kvale & Brinkmann, *Den kvalitative forskningsinterviewen*, p. 109.

⁶⁶ Kvale & Brinkmann, *Den kvalitative forskningsinterviewen*, p. 110/323.

and content analysis for example.⁶⁷ The decision to use solely a qualitative idea analysis was made based on the fact that the method successfully captures the complexity in the theoretical framework and the fact that I look at a concept (autonomy) that changes depending on which actor or level you look at, or what aspect you value the most (see the qualitative aspects in the questionnaire).

To be able to fully explore the dynamic more interviews would have been needed, and further methodological work regarding the historical aspect of changes in power dynamics and institutional importance would be required. Since the previous research, that qualitatively combines political, historical and juridical factors through a comparative lens, is limited I reasoned that this methodical combination was enough to collect the required data and set the foundation for future research that better can consider the historical scope for example.

When it comes to using interviews as a method the answers the interviewee gives can in many ways be political and have political consequences on both a regional and national level. This is another reason that the interviewee will get the possibility to adjust the summarized interview. In theory the interviewee could formulate answers that affect broad political debates, since the question recently has been an active political discussion with a lot of different stakeholders. This creates a challenge when balancing the Danish and the Finnish data. The Danish data is official transcripts that are connected to specific member of parliament and parties. In the Finnish complementary interview, I will have a subjective view from one member of parliament's— without other MP's or parties' perspectives. To balance this inequality, and to tackle the risk that the interviewee's own political position would color the data I have chosen to disregard the discussions we had on specific details that I ruled was unnecessary for the big picture.

One last reflection about the interview's validity is the risk of "going native" as Kvale & Brinkmann discusses. Since I have previously worked with the question, from the same political perspective as the MP, there could be a risk that I uncritically would accept the answers given. I mean that it is a non-applicable risk in this study since the goal is to compare the arguments, not to assess the truthiness in them.

⁶⁷ Beckman, *Grundbok i idéanalys*, 10.

4.5 Limitations

In this thesis the EP will be treated solely as a concrete channel to influence the legislative process in the European Union. The EP's role, process and connection to other institutions in the legislative process will not be addressed.

One could argue that with treaty changes that increase the importance and the role of the EP, the national parliaments would be more eager to keep the mandates on a national level. During Greenland's time in the EP the Parliament had more limited opportunities for influence and actually legislate, while since Greenland left this situation has changed. The EP has developed its role and increased its importance in decision-making through both the Maastricht Treaty (1992) and the Lisbon Treaty (2007).

How these treaty changes affected Åland and Greenland's opportunities in the EP does not affect the approach to the research question: the focus is on the national ideas and attitudes towards the role of the autonomous territories vis-à-vis the EU. One can of course imagine that the national positions may have hardened due to the treaty changes but that is not something the analysis takes into account. This is a weakness of the study, and an aspect that should be more thoroughly addressed in future research.

5. Sources: the gathered empirical data

My sources are mainly primary sources, and the material will consist of written documents, protocols and proposals from the national or regional parliaments. In the Åland case the documents will be complemented by informant interviews to be able to fill the gaps. Secondary sources will be used to a limited extent to identify knowledge gaps and to complete the background information. An overview of all the data gathered and the search instructions for the same data can be found in the appendixes.

5.1 The Åland sources

As for the primary sources of data on the Åland Islands I have firstly conducted a digital archive scan of the Finnish parliament's data base and the Åland parliament's database. The Finnish parliament has digitalized material from 1907 and onwards. Before 1975 the digital archive is a bit trickier to use, but that does not affect my research since I only search as far back as 1991 (when the latest Åland home rule act was adopted).

One problem during the research process is the fact that reports from the Finnish parliament can be solely in Finnish, which requires translation and the risk of meanings getting lost. It is also a risk that the used key words in Swedish do not match the description of the documents, and that one thereby misses relevant pieces of data.

The Åland Parliament archive is available for digital searches from 1922 and onwards. The material from this archive is mainly used as background references since the official proposals is found in the Finnish archives. With the help of the archivists at the Åland government archive and the librarian from the Åland parliament I have searched for additional material that might have been missed when doing digital searches.

Even through all these efforts of researching the archives there are still some blind spots in the timeline. One indirect aim for this thesis is to gather all the relevant documents connected to the Åland discussion about a reserved EP-mandate, this also helps even out the unbalance between the national documentation compared with Denmark. To tackle the blind spots, I have complemented the primary source material by conducting a smaller informant interview according to earlier mentioned semi-structured qualitative method.

The actual political decision if a mandate should be given to the Åland Island is conducted in the Finnish parliament, and the Åland MP is therefore the natural link between any proposals from the Åland parliament (*Ö-förslag*) and the Finnish parliament. The Åland MPs themselves have also historically been proposing law changes.

From the archives I have found one proposal from Roger Jansson and two proposals from Mats Löfström. There are no references in the data that the matter would have been discussed to any bigger extent during Elisabeth Naucmér's time in office.

The discussion about a reserved mandate in the European Parliament started as early as when Åland, after a referendum, decided to join the EU in 1994. The last time the discussion arose was in 2023 when Mats Löfström proposed a change in the Finnish election law which would make Åland a separate election district in the European elections.

To be able to follow the discussion between Åland parliament and the Finnish parliament I have gathered the parliamentary motions, proposals, committee reports and transcripts on the topic during the time period of 1994 to 2023.

5.2 The Greenlandic sources

In the Greenlandic case the sources consist of the legal initiative of creating a Greenlandic election law to the European Parliament, and the transcripts from the national discussions in *Folketing* about the law in question. Regarding the Danish transcripts one should note that I, as the author, am not fluent in Danish and have used AI to help me with the translations. The possibility of messages lost in translation is therefore a potential weakness to the study, there is also a weakness in the data collection in connection to the risk that I have missed relevant keywords in Danish and Greenlandic. Seen to language knowledge I have also only searched Danish archive, which means that there could be relevant documents in Greenlandic that I have missed. In this legislative matter the initiative came from the Danish government, not the autonomy as in the Åland case. This means that the Danish archives should be sufficient in this particular situation.

The Danish parliamentary (*Folketinget*) archive goes back to 1850. The relevant time period for me has been 1977 through 1985. In 1977 *Folketinget* started processing the Danish and Greenlandic EU-election law. In 1985 Greenland left the EU after the island got its Home Rule Law in 1979, which made it possible to be a local decision.

As a consequence of Greenlandic process of getting a reserved seat in the EP being quicker and more straightforward compared to the Åland case, the Greenlandic data was easier to find. The data consists of the proposed election law, transcripts from the national discussions about the election law and committee reports connected to the treatment of the law. Potential data from the Greenlandic process of leaving the EU is not relevant for this study.

The discussion about a reserved mandate in the EP for Greenland was held in relation to the establishment of the Danish and the Greenlandic election law for the EP. The discussion about the two laws were mostly combined. In the Greenlandic case there was only one discussion about the topic.

6. Analysis

The analysis of the collected data will be done in connection to my methodological framework and the questionnaire that operationalizes the two theoretical concepts.

Firstly, I will comment on the two cases in general terms before narrowing down the perspective. I will systematically analyze how the four aspects influence the political message, the idea, in connection to autonomy as a concept. This will be further developed with the continuation of analyzing the same aspects but add on the MLG-perspective, to be able to reach the full complexity of the aspects and the political idea.

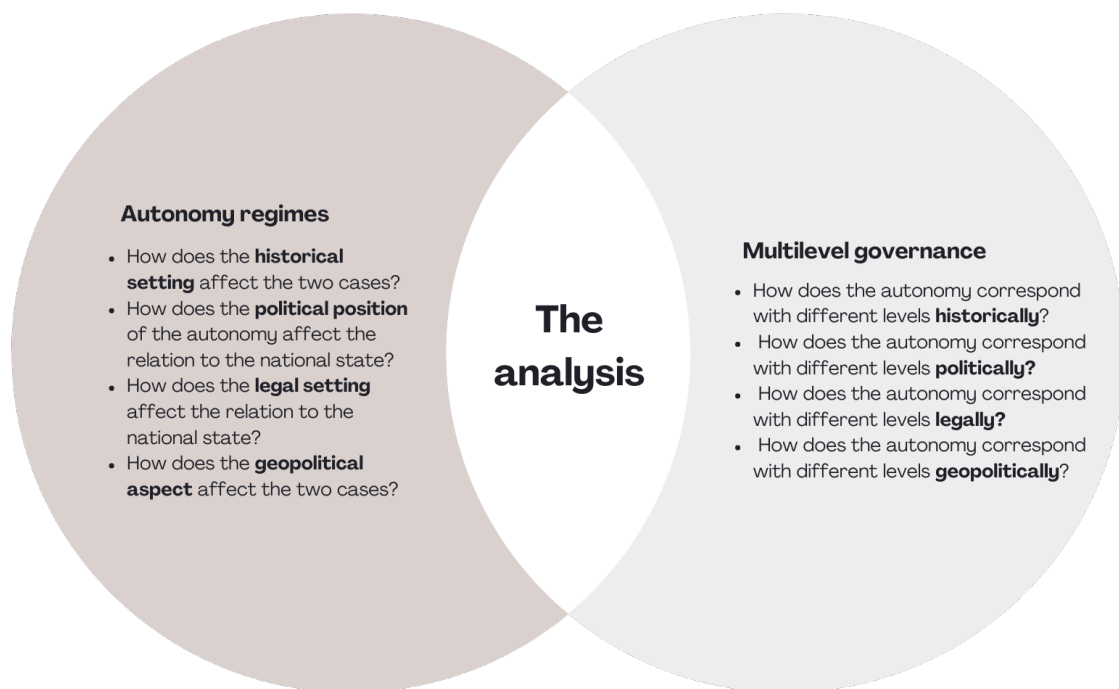


Figure 3: The questionnaire of the combined theoretical analysis.

When discussing the Greenlandic role in the European Parliament the Danish government already had a majority when they presented the proposal of Greenlandic election law. The main argument was that Greenland **needs** to be its own electoral district, even if the number of voters is low, to safeguard the special status of the island.

The committee report summarizes the different parties' viewpoints on the matter. Two parties and one Greenlandic MP were against the proposal. Fremskridtspartiet (FP) stands out with its position against the proposed election law through the whole process. They claim that the proposed law means that a Greenlandic vote would weight more than a Danish vote. Their MP Ib Nordlund argues that the real intention from the Danish government is to control Greenland and sabotage the process of the upcoming home rule law for Greenland, an interpretation the government strongly opposes.

We think it is wrong to give a mandate to Greenland in advance, as we know that there are only 27,5000 eligible voters in Greenland. We do not find it objectively well-founded.⁶⁸

The Greenlandic MP Lars Emil Johansen (Siumut) is also against the proposed law. He explains his view by addressing that he feels like Denmark ignored the Greenlandic perspective through the whole process of deciding to join the EU and that this law is to force the Greenlandic people to choose a representative for an organization they did not want to be a part of in the first place.

The objections are overall disregarded, and the majority values the main argument: that Greenland needs to be its own electoral district even if it is not proportionate. This to be able to safeguard the special status of Greenland.⁶⁹ The Home Secretary Egon Jensen (Social democrat) claims that there is “no chance on earth” to safeguard Greenlandic representation in the EU without this law and that Lars Emil Johansen's claims that it would be a defamation is not true – Jensen describes it as a courtesy from Danish side towards the Greenlanders.⁷⁰

The Finnish proposal about a change in the election law in 2023 never made it to plenary discussion. It instead became a committee report that re-uses arguments from the committee reports in 2006 and 2017, when the same change was proposed.

⁶⁸ Denmark, Statsministeriet. Lov for Grønland om valg til Europa-Parlamentet, 2 behandling. Lovforslag nr. L 16. Fremsat 6/10 77. Tang Sørensen, p. 2714.

⁶⁹ Denmark, Statsministeriet. Lov for Grønland om valg til Europa-Parlamentet, 1 behandling. Lovforslag nr. L 16. Fremsat 6/10 77. Jørgen Peder Hansen, p. 141.

⁷⁰ Denmark, Statsministeriet. Lov for Grønland om valg til Europa-Parlamentet, 1 behandling. Lovforslag nr. L 16. Fremsat 6/10 77, p. 769.

The committee in question, the constitutional committee (in Swedish: *grundlagsutskottet*), has representatives from every party in the Finnish parliament. The only representant in the committee from the SFP is the Åland MP Mats Löfström (that officially is not a part of the SFP, but still represents them in different roles). Löfström objects to the committee report and the proposal to dismiss a change in the election law.

The main argument that the committee presents is earlier praxis (from 2006 and 2017). The report states that the committee understands that Åland wants this change to be made seen the special status of Åland but: “in the view of the Constitutional Committee, the proposal is inconsistent with the requirement of a proportional electoral system and the principle of equal voting rights”⁷¹ – in other words the same argument that the Danish Fremskridtspartiet presented in the debate 1977. The Constitutional Committee concludes that this is, in the end, a political question. In the absence of discussion, the only further political perspective one can get of the question in the written protocols is the voting numbers when the law was dismissed: 8 votes in favor for the change, all from the SFP and the Åland MP, and 166 votes against.⁷²

This means that the arguments presented by a minority in the Danish parliament in 1977 represent the praxis for the majority argument in Finland during the years 2006 to 2023. The core political messages can be concluded as: “proportionality matters/degressive proportionality matters” and the “autonomy status requires/the autonomy status does not require”. These ideas will further be analyzed in the theoretical framework’s set perspective.

6.1 Historical setting for autonomy

Regarding the historical aspect Greenland’s and Denmark’s history goes back to 1523, while Åland’s and Finland’s history could in a way be viewed as more modern: Åland officially became Finnish when Finland gained independence in 1917. Åland has before that been Swedish during hundreds of years, and Russian for around a century. In 1920

⁷¹ GrUB 2/2023.

⁷² Bredenberg, Felicia. “Förslaget om åländsk EU-Parlamentsplats röstades ner med stor majoritet.” Ålands Radio & Tv Ab, December 15, 2023. <https://alandsradio.ax/nyheter/forslaget-om-alandsk-eu-parlamentsplats-rostades-ner-stor-majoritet>.

Åland got the status as an autonomy, and is one of the oldest ones existing today, while Greenland first got the status in 1979.

As the data shows Greenland and Åland have the similarity of being strategically important during times of war, this will be discussed further under the subchapter “geopolitical aspect”.

The biggest difference between the two autonomies is the international view of the relation to the national state. In the Danish case Denmark was considered a “colonial power” by the UN after the Second World War.⁷³ In the Finnish case the predecessor of the UN, League of Nations, instead ruled that Finnish governance over the Islands was reasonable in 1921, when the Åland dispute was solved.

This affects the power dynamic: the colonial power attribute is nothing that Denmark wants to be associated with, and from their side the work to please and seek forgiveness from the Greenlanders starts. This could be seen as a possibility for Greenland to increase and really use and develop their autonomy, when Denmark is open for change – the history behind the Home Rule Act has created a law where nothing legally needs to be done for Greenland to claim every legislative area there is: which in practice would mean independence.⁷⁴

In the Finnish case the powers dynamics are the opposite. Instead of an opening for discussion of power division and authority, the League of Nation conclusions represent kind of an end. It marks the ending of a vivid discussion about a reunion with Sweden or independence and marks the beginning of Åland being an integrated part of Finland instead. Finland also accepted an autonomy that was far more detailed than the national will.⁷⁵ It is a fact that indeed vivid discussions about the matter have been held between

⁷³ Malloy, Danmarks rolle i Grønlands emancipering: Formynder eller fredsaktør? 130.

⁷⁴ Suski Markku, “Konstitutionella likheter och skillnader mellan de självstyrda områdena i Norden” in *Självstyrelser i Norden i ett fredsperspektiv: Färöarna, Grönland och Åland*. Ålands fredsinstitut, 2015, p. 17.

⁷⁵ Lindholm, Göran, and Bjarne Lindström. “The Future Conditions for the Åland Autonomy.” Olof M Janssons Stiftelse, 2021, p. 24.

Finland and Åland during the recent century, but they are not open-ended as the Danish-Greenlandic ones⁷⁶: in the case of Denmark-Greenland, independence is still a possibility.

The concept of autonomy can therefore be seen as evolving in the Greenlandic case: the concept has no clear boundaries and could in the long run rather be seen as a process for independence, rather than a concept. In the Åland case autonomy is static and the future development is within set frames, depending on a strengthened political partnership between autonomy and national state. Lindholm and Lindström's describes "a supportive state partnership" as a prerequisite for autonomy development at all in the Åland case.⁷⁷ They mean that the situation today is asymmetric and that Åland is forced to be reactive instead of proactive. It is to be determined if the political partnership can deepen beyond the historical stagnation, to offer development possibilities for the autonomy.

6.2 Political autonomy position(ing)

One of the main political discussions in connection with the law proposals is if the territory should be considered special, in the meaning of deserving special solutions and treatment, or not.

In the Danish political discussion about the Greenlandic election law the two main arguments were discussed during the first and the third hearing. During the second hearing no new discussions or argument about Greenland specific were raised.

The first main argument is presented by Tang Sørensen (FP) during the first hearing:

In one of the proposals put forward by the government points out that Denmark should occupy 15 seats and Greenland should have 1 seat. I this issue we do not agree. Greenland should have equal rights in this matter with the rest of Denmark, so that a Greenlandic vote does not weigh more heavily than a Danish vote. We do not find it

⁷⁶ Suski Markku, "Konstitutionella likheter och skillnader mellan de självstyrda områdena i Norden" in *Självstyrelser i Norden i ett fredsperspektiv: Färöarna, Grönland Och Åland*. Ålands fredsinstitut, 2015, p. 23.

⁷⁷ Lindholm, Göran, and Bjarne Lindström. "The Future Conditions for the Åland Autonomy." Olof M Janssons Stiftelse, 2021, p. 78.

unfortunate that a majority of among 27,500 voters can only elect one representative when a representative from the southern part of Denmark has to choose.⁷⁸

Lars Emil Johansen, one of two Greenlandic MPs, joins Sørensen's stance of being against the law, but out of a different reason – main argument number two:

Awarding 1 mandate to Greenland - yes, it may sound noble, but it reminds me of the poison apple that was handed to Snow White back in the day: the intention is quite obviously to hold Greenland back from using the right to withdraw from the EC, which has been promised in connection with home rule.⁷⁹

Tang Sørensen develops his resistance in the third and final hearing, stresses the importance of his political view that Greenland does not have a special status:

The Progress Party proposed amendments to this bill at the second reading, as we do not want the Greenlandic territory to occupy a special position within the Danish realm.⁸⁰

Internally the proposed law divided the two Greenlandic representatives in *Folketinget*. Lars Emil Johansen opposes the proposal in reference to the weak support for EU membership in Greenland and sees the proposal as a way of tying Greenland closer to a supranational organization that they want to distance themselves from. In the third discussion about the law the second Greenlandic representative enters the debate, Otto Steenholdt, who had been absent during previous ones. He supports the law and questions Johansen's earlier statements:

It is not the opinion of the Greenland Council that the government with this bill is luring Greenland to stay in the EC even after the introduction of home rule, as Mr. Lars Emil Johansen believes. I would strongly reject Mr. Lars Emil Johansen's statement that the majority of the National Council has made its decision to let Greenland be represented in the European Parliament on a deficient and directly misleading and misleading basis. Mr. Lars

⁷⁸ Denmark, Statsministeriet. Lov for Grønland om valg til Europa-Parlamentet, 1 behandling. Lovforslag nr. L 16. Fremsat 6/10 77. Tang Sørensen.

⁷⁹ Denmark, Statsministeriet. Lov for Grønland om valg til Europa-Parlamentet, 1 behandling. Lovforslag nr. L 16. Fremsat 6/10 77. Ib Nordlund, p. 747.

⁸⁰ Denmark, Statsministeriet. Lov for Grønland om valg til Europa-Parlamentet, 1 behandling. Lovforslag nr. L 16. Fremsat 6/10 77. Tang Sørensen.

Emil Johansen has followed the National Council's discussion of the matter closely, as he himself put it. But I have been in the discussion as a full member of the the National Council. I regret that Mr. Lars Emil Johansen can characterize the highest elected assembly in Greenland, the National Council, so demeaningly. It is a downright misleading statement from this rostrum, possibly stemming from his preconceived opinions. I believe that the majority of the National Council would agree if I were to say on their behalf that we receive the handout with pleasure.⁸¹

In the Danish case the majority in *Folketinget* already supports the idea, and the law is proposed by the Danish government. The law passes without any changes from the original proposal.

When looking at the Finnish data there are no discussions that can be followed or analyzed during the years the proposal has been raised regularly. Seen to the phenomena of regularly raising the questions (with the same result) MP Löfström says: “You need something that really changes the situation, to be able to send a proposal like that. Otherwise you risk devaluing the value of Åland proposals in general”.⁸²

One thing that stands out in the two most recent proposals of changing the election law is the lack of political plenary discussion. In both the 2018 and 2023 case the constitutional committee proposes a dismissal of the proposal, and the parliament has done so, without a single MP other than the Åland MP commenting on the matter.

Löfström thinks that this is a way of “burying your head in the sand” and an active tactic to avoid hurting the relationship between Åland and Finland. In other words, that none of the other MPs has something positive to say, and also resists saying something negative to maintain good relations with the autonomy. The constitutional committee has every time specified that they understand the proposal from the Ålandic perspective, and that they acknowledge Åland’s special status. What it bases its proposal for dismissal on is every time the principle of proportionality. In 2006 it was formulated as following:

⁸¹ Denmark, Statsministeriet. Lov for Grønland om valg til Europa-Parlamentet, 3 behandling. Lovforslag nr. L 16. Fremsat 6/10 77. Otto Steenholdt.

⁸² Löfström, Mats. About Åland and the European Parliament. Interview by Alexandra Gäddnäs, April 17, 2024.

The initiative is fully understandable given the special status of Åland. However, under the proposed legislation, Åland's representation in the European Parliament would be 1 member per 27 000 inhabitants, compared to 1 member per 408 000 inhabitants in the rest of the country

[...]

If we also take into account that, with the accession of Bulgaria and Romania, the number of MEPs from Finland will decrease by one to 13 on the basis of the Treaty of Nice, the Constitutional Committee proposes that the bill be rejected.⁸³

In 2023 the same argument was used, with the two earlier statements as praxis:

The Committee considers that, although there is reason to take into account that Åland partly has its own legal system, the proposal is, in the Constitutional Committee's view, inconsistent with the proportional electoral system and the principle of equal voting rights (GrUB 13/2006 rd, p. 2/II, GrUU 10/2018 rd, p. 2, GrUU 10/2023 rd) and the constitutional aspects thus do not support in this respect a division of Finland into two electoral districts in the European Parliament elections.⁸⁴

As Lindström argues in his case study, the autonomy development overall is highly dependent on **political partnership** between autonomy and national level. A strong constitutional ground does not alone guarantee any development at all if the political process between the levels is weak.⁸⁵

How Löfström addresses the lack of discussion in Finnish parliament connected to the proposed change to the election law as a way for Finnish politicians to uphold a constructive political partnership with the Åland Islands. They know that it could be sensitive for the Finland-Åland relationship to develop their stances against the proposal, and therefore refrain from saying anything and simply let the constitutional committee report speak for them.⁸⁶ The report proposes a dismissal but concludes that this is ultimately a political decision. The politicians are, in the absence of discussion, avoiding formulating a more precise political message, leaving the constitutional committee

⁸³ Finland, Grundlagsutskottet. GrUB 13/2006 rd. 07.02.2007.

⁸⁴ Finland, Grundlagsutskottet. GrUB 2/2023 rd. 12.12.2023.

⁸⁵ Lindström, 2023, p. 50.

⁸⁶ Löfström, Mats. About Åland and the European Parliament. Interview by Alexandra Gäddnäs, April 17, 2024.

conclusion represent the whole political spectra – even if the committee itself explicitly states that it is a matter of politics rather than law. This strengthens the argument that the interpretation of the political message and idea from the majority of Finnish parliament only can be to uphold status quo. This indirectly translates to an idea of non-development of the autonomy while maintaining (neither developing nor weakening) the political partnership at the same level, that differs from the Danish idea.

As earlier mentioned, the possibility of independence is still open for Greenland. A majority of the parties in the local parliament are in favor of it as the long-term goal⁸⁷ – and from the Danish side no one has stopped Greenland from taking legal steps towards future independence. Gad describes the Greenlandic development as slowly “photo-shopping” Denmark out of the picture, also in the autonomy’s international relations.⁸⁸ In the case of Åland the data shows no signs of seeing independence as a plausible solution, and there are right now no parties, either on local or national level, that have stated that it could be a real future scenario.

The existence of independence movement(s) could be seen as a challenge in the political partnership between autonomy and national state. Here Åland and Greenland differ: Åland previously has had a local party with a clear idea of independence, but today there are no actual debates about it. If you then look at autonomy development one could see two quite different maneuvering spaces: the Greenlandic space is big and the status quo is somewhat undefined, or at least tactically seldom discussed. The Åland maneuvering space is instead more limited, the development has set frames, and the process is slow and often described as a bureaucratic and inflexible power play between Åland and Finland.

An example of maneuvering space could be the way the proportionality argument is used in political debates. When the Finnish Parliament and the Danish *Folketinget* discusses autonomy representation in the EP both use the argument, but with different results.

At first glance one could argue that the existence of a strong independence movement within an autonomy would weaken the political partnership between levels – since it’s an obvious threat to the national state’s control. The two cases showcase the opposite:

⁸⁷ Utrikespolitiska Institutet. “Grönländarna vill lämna Danmark – men oklart när.” ui.se, 2018. <https://www.ui.se/utrikesmagasinet/analyser/2018/maj/gronland-for-full-sjalvstandighet-i-en-oviss-framtid/>.

⁸⁸ Gad, 2013. Greenland: A post-Danish sovereign nation state in the making

Greenland is granted more political freedom of action even if the option of independence is still open and active. This could of course also be viewed as a way for Denmark to keep Greenland happy and refrain them from claiming independence from the Danish kingdom. On Åland, when the discussion about independence or reunification with Sweden faded out, no obvious political maneuver room was added except for the required minimum from the League of Nations.

6.3 Legal settings for autonomy

The legal conditions for Greenland and Åland differ both in the history of home rule and in the position toward the EU. First of all, the Åland home rule act has a strong constitutional protection, is older and is affected by several international agreements with other national states as signatories. The Greenland home rule act is not constitutionally protected on a national level and is relatively modern, it did not even exist when the Greenlandic election law was discussed.⁸⁹ Disregarding these differences, both legal situations are considered strong in Ackrén's categorization.⁹⁰ As discussed about political positioning there is also little to no connection between the theoretical legal status and the real political maneuver space for the autonomy.

In the discussions during the creation of the Danish and Greenlandic EU-election law 1972 the Danish majority was in favor of giving Greenland its own connection points through a reserved seat in the European Parliament. It is clear that this seat would give the Greenlanders the possibility of pushing their own political agenda, no matter what the Danish MEPs would think about the matters. In the discussions the Greenlandic MPs are against a reserved seat, but with the reasoning that they do not want to be a part of the EU in the first place and that this was a political game from the Danish side of shifting focus from that fact. The Danish main argument was that a reserved spot was a perfect way of safeguarding the independent representation of Greenland in the EU, something that Greenland explicitly claimed was wrong.

⁸⁹ Suski, Markku. "Aspects of Autonomy." In *Minorities and Conflicts*. Åland Island's Peace Institute, 1996, p. 97.

⁹⁰ Ackrén, Maria. *Conditions for Different Autonomy Regimes in the World: A Fuzzy-Set Application*. Åbo: Åbo Akademi University Press, 2009, p. 39.

As seen in previous quotes from the data the existence of a special status is mentioned in both cases. In practice Greenland does not formally have a special status or a home rule act at the time of the discussion. In the case of Åland the special status has been internationally rooted since 1921. In the Finnish constitutional committee reports this is pointed out: “Åland has exceptional status under international law”⁹¹ and that this special status is grounded in constitutional law. In the Danish debate the government treated Greenland’s special status as self-evident, it was only the nationalistic Fremskridtspartiet that claimed that a special status was unreasonable. An interesting situation emerges in this example, which goes in line with Lindström’s reason about political partnership being the most crucial perquisite: the legal special status does not seem to matter in the political result. This could further be seen as confirmed by the Finnish constitutional committee that also, in all three statements, returns to the fact that is solely a political decision if the autonomy should be granted their own representation in the EP.

The view on how to construct the law is another of the main differences between Denmark and Finland. Denmark wants to give Greenland the possibility of being an independent actor and the state is the actor that proposes the law (without confirming or denying the political game-perspective the Greenlandic MPs highlights) while Finland in official documents do not express the same wish, and the actor that proposes the law is the autonomy.

6.4 Geopolitical aspect on autonomy

The geopolitical aspect is naturally intertwined with some of the earlier analyzed aspects, for example the war time history. Ulrik P Gad describes the situation after WW2, when Greenland and Denmark got formally closer again after Greenland had been ruled in practice from the US as: “Essentially, then, Denmark maintained formal sovereignty over Greenland by emptying the concept of any content, at least when it comes to military affairs”⁹². The US got the right to use Greenland for defense purposes which is still being done today, which also highlights the military superpowers’ view of Greenland as an important geopolitical territory. In addition to the military and defense part of the geopolitical aspect, Greenland also has a lot of natural resources: many of those minerals

⁹¹ Finland, Grundlagsutskottet. GrUB 13/2006 rd. 07.02.2007.

⁹² Gad, “Greenland: A Post-Danish Sovereign Nation State in the Making.”, p. 103.

that the EU identifies as critical raw materials for the European manufacturing industry. Greenland and the EU signed a strategic partnership in the fall of 2023, to “develop sustainable raw materials value chains”.⁹³

In the case of Åland the geopolitical aspect plays out differently. One could argue that the geopolitical importance indeed also is established by external actors, especially after the Crimean War and the demilitarization of the Islands in the Paris Peace Treaty in 1856. The convention on the demilitarization was signed by Russia, The United Kingdom and France, and in addition to the demilitarization the content was further specified through the convention relating to the non-fortification and neutralization of the Åland Islands in 1921⁹⁴. In combination with other international agreements the Åland Islands geopolitical importance has been debated for over a hundred years, with the principle of no military activities in peace time as a result. This aspect was also an important topic during Finland’s negotiations to join NATO – could Finland join while still respecting the demilitarization? The questions then became a vividly discussed matter in national Finnish politics and was closely linked the Russian war against Ukraine. The president Sauli Niinistö ordered a report on how the Åland demilitarization should and could look in different scenarios.⁹⁵ Therefore, Greenland is an example of an active place for military and defense activities, and Åland represents the complete opposite. In the Åland case one could also argue that the geographical proximity to Helsinki, Stockholm and Saint Petersburg has lost its importance due to modern warfare and defense planning, with long distance weapons that do not require the physical presence of the enemy in the local area.

6.5 Multilevel governance: how does the four aspects relate to different levels of governance through the parliaments

To fully explore the previously discussed aspects I will now analyze them through the lens on MLG. The analysis will include looking at political relationships and connections

⁹³ European Commission. “Press Release EU and Greenland Sign Strategic Partnership on Sustainable Raw Materials Value Chains,” November 30, 2023.

https://ec.europa.eu/commission/presscorner/api/files/document/print/en/ip_23_6166/IP_23_6166_EN.pdf.

⁹⁴ Ålands Fredsinstitut. “The Demilitarisation of Åland in a Nutshell,” February 28, 2022.

<https://peace.ax/en/the-demilitarisation-of-aland-in-a-nutshell/>.

⁹⁵ Ulkomministeriö, Utrikesministeriet. “Folkrättslig utredning om Ålands internationella särställning och rättsliga frågor som gäller Rysslands konsulat i Mariehamn,” 2023.

broadener than only between the autonomy and the state. In those cases where freestanding relationships exist between autonomy and supranational level a research gap exists.

This broadening of analytic scope is something both Brözel’s and Christiansen’s highlights, the development from a two level analysis to a three or more level analysis is valid in these cases.⁹⁶ In the case of Åland and Greenland I’m looking at a three, or potentially four level, analysis: the supranational level represented by EU institutions and network, the national level represented by Denmark and Finland, the regional level represented by the autonomous parliaments and autonomy public management and lastly the local level represented by the municipalities within the autonomies. In this study I will disregard the local level since potential connections with other levels do not explicitly affect the research question.

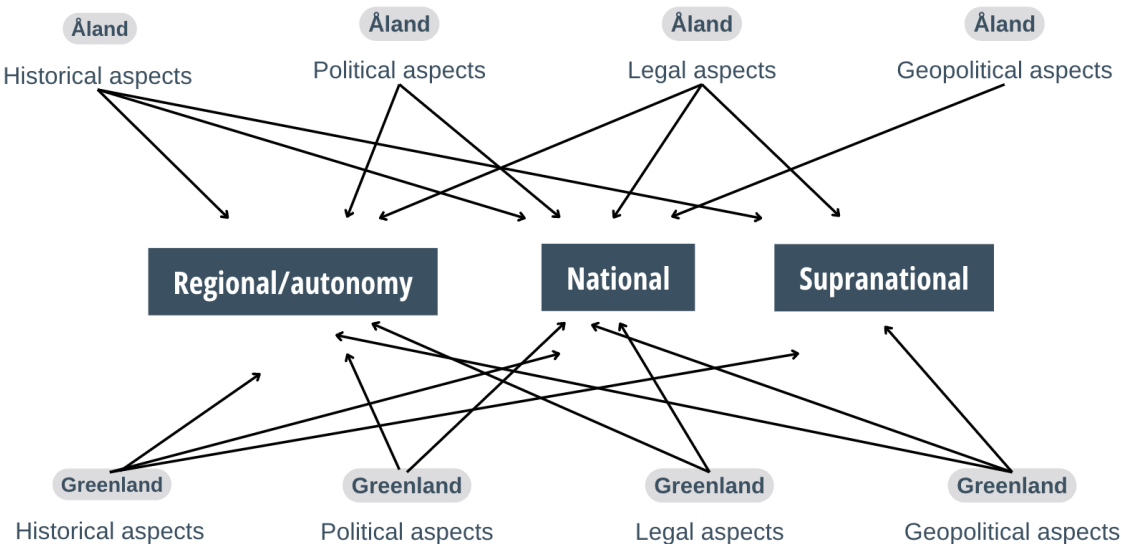


Figure 4: Scheme of multilevel connections between the research aspects.

6.5.1 Historically

If autonomy can be seen as a concept or a process was discussed in the section focusing on autonomy regimes. If one links the historical aspect of development of autonomy and special statuses to the multilevel framework, both Greenland and Åland have had political

⁹⁶ Christiansen, Thomas. “Governance in the European Union.” In *European Union Politics*, edited by Cini, Michelle; Pérez-Solórzano-Borragán, Nieves. Oxford: Oxford University Press, 2019, p. 103.

developments on all three levels within the aspect. From Åland's side there was a local movement working for reunification with Sweden, there was a Finnish resistance against the plan and there was an international solution. The supranational level was also relevant in connection with the Islands neutralization and demilitarization. From Greenlandic perspective the same dynamic can be traced, but with the independence-idea rather than a reunification. The differences emerge in relation to the reactions and actions of the national state: in the Åland case Finland actively tried to stop the efforts and in the Greenlandic case Denmark passively has accepted the way autonomy is becoming a process rather than a concept.

In today's political landscape there have been no traces of supranational relations with Åland on autonomy development matters – in the Greenlandic case that discussion will be covered under the headline “geopolitically”.

As for the idea of proportionality and degressive proportionality neither Finland nor Denmark has ever denied any EU proposal of getting more seats in the EP. Both countries' number of mandates have shifted during the years, both increasing and decreasing the number of seats. In Denmark the proportional argument never became a problem or the foundation for a real discussion with regards to the Greenlandic election law. In Finland the proportionality is the core of the argument against a change in the election law in favor of Åland representation. In 2018 the constitutional committee commented specifically on the matter of degressive proportionality vs proportionality:

In 2007, the Constitutional Committee discussed the Government's report on the distribution of seats in the European Parliament. At that time, the Committee noted that the Government's view of its ambition to influence the European Parliament in order to obtain one of the extra seats is entirely in line with the opinion of the Constitutional Law Committee in its report 13/2006 rd insofar as the argument is the special status of the Åland Islands. The aim was to be able to take up an extra seat because of the special status of Åland. Finland would then have one more seat than other Member States of the same size. In the committee's view, this would help to overcome the obstacles posed by the proportional representation requirement and the principle of equal voting rights to the Åland Islands becoming a separate constituency in the election of MEPs. On the other hand, the Constitutional Committee noted that the government also used the principle of degressive proportionality as an argument for an additional seat. However, in the Committee's view, this is a separate argument from the special status of Åland, which, if applied consistently, also applies to Member States that can

be considered to be of the same size as Finland and suggests that the number of seats should also be increased for them in the same way. In that case, any additional seats for Åland must, as far as the Committee can see, be assessed on the same basis as in the Committee's report GrUB 13/2006 rd.⁹⁷

In practice Finland has gotten an additional seat in the EP two times since 2007, and in that decision no argument of solidarity against other member states of the same size, not getting additional seats were raised. Among the countries of similar population size as Finland for example Ireland lost two seats before the election in 2014, while Finland (and Denmark) gained one seat each.

The use of proportionality terms clearly differs depending on which level one focuses on.

6.5.2 Politically

The political aspects of the ideas I examine do not in fact reach the supranational level. There are of course exceptions from this, for example Blomberg argues that physical representation in Brussels and towards the EU of autonomous parliaments is a way of creating a freestanding dialogue and proactively engage with the supranational level, independent from the national level.⁹⁸ Indeed, it opens up to more direct communication with the EU institutions, but it is hard to draw any generalized conclusions from this study's two cases. In the Greenland case there recently was a tightening of cooperation between the autonomy and the European Commission, an institution that Blomberg points out as crucial for influencing policy formation at supranational level.⁹⁹ In the Åland case the representational office is still tightly connected to the Finnish foreign ministry, and I have not found any data pointing out that this could open for actual interaction that circumvent the national level of policy influence. The tools Åland has for independent policy influencing are few and could rather actualize an authority debate between the autonomy and national state levels than creating free standing relations with the supranational level, seen to the broader scope of political partnership between Finland and Åland. Disregarding the potential disputes embedded in this, the Åland minister counsellor

⁹⁷ Finland, Grundlagsutskottet. GrUU 10/2018 rd. 27.04.2018, p. 2.

⁹⁸ Blomberg, Gustav. "Ålands Representation I Bryssel." Ålands fredsinstitut, 2022, pp. 9–10

⁹⁹ Blomberg, Gustav. "Ålands Representation I Bryssel." Ålands fredsinstitut, 2022, p. 10.

does represent a MLG development of the political aspect and a positive development in the political partnership between autonomy and national state.

Christansen also focuses on the freestanding relation between supranational levels and lower levels. One keyword in his reasoning is the “control” over representing territorial interests. He means that regional actors can change the traditional hierarchy by gaining a seat at the table, creating relations where they could be seen as independent participants.¹⁰⁰ This in a good way describes the case of Greenland, and the development there. In the Greenlandic case we have the “open ended” autonomy development as clear example of this shift in control. On several areas Greenland has, without any louder protests from Copenhagen, claimed an independent role in the relation to the EU. The newly opened Commission office in Nuuk being the most recent concrete example of that. There we have an independent connection point between the autonomy level and the supranational level.

In the figure none of the thesis cases are directly connected to the supranational level. The reason for that is that the connections in regard to the research question are secondary. When it comes to the political idea of autonomy representation in the EP, no connections to the supranational level can be traced from the broader discussions in the parliaments.

6.5.3 Legally

The legal aspect has, not surprisingly, been a very important factor in this analysis, but it is also clear that the legal nature of the legislation process and autonomy development does not necessarily reflect the development in reality. In the Greenlandic case the home rule act is a result of autonomy – national state relations, while in the Åland case the legal foundation also includes the supranational level with the League of Nations’ playing a role in the development of a home rule act.

If one continues to specify the supranational level to an EU-level the legal situation for the two cases in an MLG-perspective are very different. Greenland actively stands outside the European Union, before Brexit in 2016 being the only territory that has left the union after joining it. Greenlandic referendums have showed that the islands inhabitants with a weak

¹⁰⁰ Christiansen, Thomas. “Governance in the European Union.” In *European Union Politics*, edited by Cini, Michelle; Pérez-Solórzano-Borragán, Nieves. Oxford: Oxford University Press, 2019, p. 104.

majority was against an EU-membership. Åland on the other hand had the opposite situation, a weak majority in favor of membership. Åland is a part of the Union but stands outside the customs union. Both autonomies got exceptions when entering the union, these exceptions were in both cases a part of the national accession treaty. The solutions with exceptions when entering the EU focus on different things.

The Åland Protocol (nr. 2) from 1995, an annex to the Finnish accession treaty, consists of three articles. The first article covers the right of domicile and special rules applying for people with “regional citizenship” regarding owning property or starting businesses.

The second article is in this context the most relevant, it is a wording that legally places Åland outside the custom union, while still a part of the EU:

(a) The territory of the Aaland islands - being considered as a third territory, as defined in Article 3 (1) third indent of Council Directive 77/388/EEC as amended, and as a national territory falling outside the field of application of the excise harmonization directives as defined in Article 2 of Council Directive 92/12/EEC - shall be excluded from the territorial application of the EC provisions in the fields of harmonization of the laws of the Member States on turnover taxes and on excise duties and other forms of indirect taxation. This exemption shall not have any effect on the Community's own resources.

This paragraph shall not apply to the provisions of Council Directive 69/335/EEC, as amended, relating to capital duty.

(b) This derogation is aimed at maintaining a viable local economy in the islands and shall not have any negative effects on the interests of the Union nor on its common policies. If the Commission considers that the provisions in paragraph (a) are no longer justified, particularly in terms of fair competition or own resources, it shall submit appropriate proposals to the Council, which shall act in accordance with the pertinent articles of the EC Treaty.¹⁰¹

The third article states that it is the national state of Finland that is responsible to ensure that “the same treatment applies to all natural and legal persons of the Member States”.

¹⁰¹ Treaty of Accession of Austria, Finland and Sweden [1994] OJ 1 241/01.

The Greenland Protocol (nr. 4) from 1972 gives the island certain special rights in two articles. The first article is similar, but less extensive, than the Åland regional citizenship – but only addresses commercial activities: “Denmark may retain its national provisions whereby a six-month period of residence in Greenland is required to obtain a license for engaging in certain commercial activities in that territory”. The articles then give the Council the right to liberalize the Greenlandic system, a shift of power that also can be found in the Åland protocol, where the Commission has the possibility to propose to the Council to demolish the Åland tax exemption.

The second article in the Greenland protocol covers the market for fishery products:” The institutions of the Community will seek, within the framework of the common organization of the market in fishery products, adequate solutions to the specific problems of Greenland”.¹⁰² Other territories that in the Danish, Irish and British accession treaty is granted their own protocols are The Faroes Islands, the Channel Islands, the Isle of Man and Svalbard.

In the accession phase there are a set of areas that logically should have been the most important questions for the islands, at the time of the negotiations. The common one being a way of protecting commercial interests, with provisions that create special conditions for people that lived on the islands for a certain amount of time.

That the three topics (protecting commercial interests, tax exemption in the case of Åland and the market for fishery products in the case of Greenland) logically should have been the result of political prioritizing is based on the process of negotiating accession. For neither of the islands the accession to the EU was obvious and both were preceded by several referendums. These provisions are the results of three different levels negotiating and compromising heavily.

The EU in general does not like exceptions.¹⁰³ This means that Åland and Greenland (or Finland and Denmark) would have been the driving forces for the mentioned exceptions – and therefore also decided that these exceptions were of utmost importance, compared to

¹⁰² Treaty of Accession of Denmark, Ireland and the United Kingdom [1972] OJ 2 73/01.

¹⁰³ Phinnemore, David. “The European Union: Establishment and Development.” In *European Union Politics*. Oxford: Oxford University Press, 2019, p. 23.

other aspects. One example of the process of regional or national prioritizing is that Åland wanted a guarantee for a reserved spot in the EP already at this stage. As Löfström discussed, one could now see that Åland should have prioritized that fact back then to safeguard the actual influence. The matter of a reserved spot was postponed to the future, and in reality, pushed to a different political level – from an EU-negotiation to a national-regional discussion.

For Åland the case specific provision, that logically should have been one of the highest political priorities, since it actually made it to the protocol, is the tax exemption.

For Greenland the case specific provision, that also should have been one of the most important political priorities, is the market for fishery products. In the accession treaty as a whole, the Greenlandic fisheries are mentioned several times outside the Greenland protocol. This is not the fact when it comes to the Åland tax exemption.

The matter of a reserved spot was postponed to the future, and in reality, pushed to a different political level – from an EU-negotiation to a national-regional discussion. In general, the sender of the initiative differs: the push for Greenlandic representation comes from the Danish side while the push for Ålandic representation comes from the Åland side towards the Finnish government.

There is no official action from the supranational level towards Åland, while Greenland is, as an example, being courted by the Commission. One potential explanation for this is the active geopolitical situation in Greenland, together with the shift in general EU politics with a new focus on safety, self-sufficiency and the new Critical Raw Material Act. Since Åland lacks any similar possibilities, the autonomy simply is not interesting for the supranational level.

Regarding the legal aspect Greenland in practice has a newer autonomy law, and the law is not protected by the Danish constitution. Denmark does not stop the Greenlandic progress of, as Gad phrased it, “photo-shopping” Denmark out of the picture, creating a path towards independence and independent relations to the supranational level. Åland has a bit stronger position: the autonomy is older; it is based on constitutional law rather than

ordinary law¹⁰⁴ and is partly confirmed by international agreements. Finland has a hesitant view of autonomy development and Åland has few independent interactions with the supranational level. This could be used as an argument that the legal status of the autonomy does not matter. Greenland and Åland are judicially quite similar in their autonomy on paper, but the reality differs quite a lot.

Prof. Hannikainen highlights the Nordic autonomies as positive examples of minority protection internationally.¹⁰⁵ This is a perfect example of how the focus on just one aspect and level can give an insufficient picture of reality. From a solely legal and national legislative perspective Greenland and Åland has a similar status as excellent minority solutions, which this analysis has shown does not reflect reality.

6.5.4 Geopolitically

Geopolitically speaking the Åland case through the data only corresponds with national level. The autonomy itself is an actor in the discussion, but overall the power distribution through the Åland home rule act places the control at the national state level. The only recent discussion about the topic on supranational level was how the demilitarization would be handled when Finland and Åland joined NATO, but that is a discussion that falls outside the scope of this essay.

In the Greenlandic case the autonomy itself has control over some of the legislation regarding geopolitical matters¹⁰⁶ (for example extraction of critical raw materials), while some still (theoretically) are governed from Denmark. There is clear that this division does not necessarily intervene with the process of building freestanding relationships within the geopolitical area between autonomy and supranational state. As earlier mentioned, the newly opened Commission's office in Nuuk is a perfect example of that.

¹⁰⁴ Ackrén, Maria. *Territoriella Autonomier i Världen*. Mariehamn: Ålands fredsinstitut, 2005, p. 71.

¹⁰⁵ Hannikainen, Lauri. "Legal status of Minorities, Indigenous Peoples and Immigrant and Refugee Groups" In *Minorities and Conflicts*. Åland Island's Peace Institute, 1996, p. 71.

¹⁰⁶ Hannikainen, Lauri. "Legal status of Minorities, Indigenous Peoples and Immigrant and Refugee Groups" In *Minorities and Conflicts*. Åland Island's Peace Institute, 1996, p. 69.

7. Conclusion

The question of **which political ideas behind national election laws affects an autonomy's potential EP-representation** can be summarized in two themes: it is the question of the political idea and motivation to develop the autonomy and it is the political idea of how proportionality should work in special cases.

In simple terms, the answer lies in the fact that varying legal, historical, and political factors at multiple levels create unique situations that shape each national states idea of autonomy, and what the autonomy is worth and how special the solution is. Depending on the idea the potential for political maneuvering for the autonomy varies. In the two cases discussed, the divergent outcomes are primarily driven by the prevailing political attitudes towards the autonomy of the national state. In the Danish case, the relationship is marked by a post-colonial desire to maintain and develop friendly relations, wherein Denmark grants significant maneuvering space and the idea of autonomy is positive. Conversely, in the Finnish case, autonomy was not happily granted but imposed through international mediation, resulting in a relationship that lacks the conciliatory attitude Denmark exhibits towards Greenland. In Finnish national politics, there is little effort to advance autonomy, with an idea of maintaining the status quo rather than pursuing further development.

From the perspective of the autonomies, the historical context in both cases supports their claims for representation, but political developments alter the impact of this historical dimension on present realities. Legally, the autonomies rest on different constitutional foundations, but this does not seem to significantly affect the outcomes in practice and the national ideas formed towards them. The geopolitical context, however, appears to bolster Greenland's position in political negotiations both with Denmark and at the EU level, particularly given agreements with Denmark that confer some authority over relevant legal areas. If Åland had comparable geopolitical importance or leverage, it would likely have greater potential to strengthen its position vis-à-vis Finland, even if the current legal framework continues to place ultimate authority over for example international relations in Finnish hands. While Greenlandic autonomy has progressed since Denmark's entry into the EU, the same cannot be said for Åland's autonomy. The revision of the Åland Home Rule Act has been a continuous national and regional project since Finland joined the EU, with only limited tangible progress.

The arguments examined are united by involving all levels in the European multilevel governance system. The MLG-framework does not by itself give us the tools to answer the questions, but you can see how different actors use interlevel connections to negotiate and create room for development of representation, which affects the room for political maneuvers that set the boundaries for acting on the ideas. The MLG-perspective is crucial to address the complexity in the process.

At the European level, solutions for regional representation vary significantly depending on the institution. The only EU institution where representation is directly regulated by the EU itself is the Committee of the Regions. In contrast, representation in the European Parliament and the Council is strictly governed by national politics.

The geopolitical context of Greenland's autonomy and its impact on EU representation was underscored in 2024 when the European Commission opened a diplomatic office in Nuuk. This action conferred and legitimized the autonomy's status, independent of the Danish-Greenlandic relationship.

Regarding the title question of whether autonomy matters within the EU, the answer in these cases is no, it does not. Autonomy, when combined with other factors and a strong political partnership with the national state, may be respected, but not due to the status of autonomy alone.

7.1 Future research possibilities

This topic gives plenty of options for future research: both on how to use MLG-frameworks in regional analysis and on the concept of autonomy itself. Many of the aspects could be developed further and many interlevel relations could be examined deeper to give insights on how to develop regional influence on the international sphere.

One could also further explore how the development of the representation possibilities at European level affects national attitudes on representational roles. In today's EU the union itself does not give any general possibilities for representation outside the advisory CoR. Would stronger pushes for minority protection from EU to the national states be possible – or even at all desirable?

One could also increase the case study by including more of the regions that Ackrén identifies as in some aspects are legislative autonomies – or creating a different selection based on the networks that exists like RLEG and CALRE. This would give the foundation to draw broader conclusions.

One aspect that is missing in this thesis is the development analysis of the European Parliament as a political body. When Greenland exited the EU the EP had limited power, which has changed drastically since the Treaty of Lisbon. Would Denmark really be as eager to let Greenland represent itself in the EP in today's system? To create reserved EP mandates on the national level today would mean giving away legislative powers to a much greater extent than in the 1970s.

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